

**Company Name** Apple  
**Industry** ICT (Supply Chain only)  
**Overall Score** 31.6 out of 100

Theme Score	Out of	For Theme
2.8	10	A. Governance and Policies
5.3	25	B. Embedding Respect and Human Rights Due Diligence
9.5	20	C. Remedies and Grievance Mechanisms
8.7	25	D. Performance: Company Human Rights Practices
5.2	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: International Bill of Human Rights: The Company states in its Human Rights Policy: 'We're deeply committed to respecting internationally recognized human rights in our business operations, as set out in the United Nations International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.' [Human Rights Policy, 08/2020: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Commitment to the UNGPs: In addition, in its Human Rights Policy, it indicates: 'Our approach is based on the UN Guiding Principles on Business and Human Rights.' However, to be 'based on' is not considered a formal statement of commitment according to CHRB wording criteria. This subindicator looks for a formal commitment to follow the UNGPs or respect human rights as set out in this document, acting in accordance to these principles. [Human Rights Policy, 08/2020: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="https://apple.com">apple.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Company has a commitment to the ILO Core: The Company states in its Human Rights Policy: 'We're deeply committed to respecting internationally recognized human rights in our business operations, as set out in the United Nations International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work'. [Human Rights Policy, 08/2020: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<ul style="list-style-type: none"> <li>• Not Met: Company has a explicit commitment to All four ILO Core: The Company indicates in its Human Rights Policy: 'At Apple and throughout our supply chain, we prohibit harassment, discrimination, violence, and retaliation of any kind'. Although, the Company commits to respect recognized human rights as set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, no explicit statement committing, by name, to each of the areas covered by the Fundamental Conventions: Forced Labour, child labour, discrimination, freedom of association and collective bargaining. [Human Rights Policy, 08/2020: <a href="https://www.apple.com/humanrights/">s2.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company expect suppliers to commit to ILO Core: In its Supplier Code of Conduct, the Company indicates that 'Apple suppliers shall uphold the highest standards of human rights.', and include provisions for each of discrimination, forced labour, child labour, freedom of association and collective bargaining. In relation with these last two, it requires that 'Supplier shall freely allow Workers' lawful rights to associate with others, form and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.' [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://www.apple.com/suppliercodeofconduct/">apple.com</a>]</li> <li>• Met: Company explicitly list All four ILO for suppliers: In its Supplier Code of Conduct, the Company indicates that 'Apple suppliers shall uphold the highest standards of human rights.', and include provisions for each of discrimination, forced labour, child labour, freedom of association and collective bargaining. In relation with these last two, it requires that 'Supplier shall freely allow Workers' lawful rights to associate with others, form and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.' In its Supplier Responsible Standards, they also indicate that 'Where Applicable Laws and Regulations substantially restrict freedom of association, Supplier shall allow alternative means for Workers to individually and collectively engage with Supplier, including processes for Workers to express their Grievances and protect their rights regarding working conditions and terms of employment'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://www.apple.com/suppliercodeofconduct/">apple.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Business Conduct Policy states that 'Apple is committed to protecting the environment, health, and safety of our employees, customers, and the global communities where we operate'. [Business Conduct Policy, 10/2020: <a href="https://www.apple.com/businessconduct/">apple.com</a>] &amp; [Environmental Health and Safety Policy Statement, 03/2013: <a href="https://www.apple.com/ehs/">images.apple.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The Supplier Code of Conduct indicates: 'Supplier shall provide and maintain a safe work environment and integrate sound health and safety management practices into its business. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://www.apple.com/suppliercodeofconduct/">apple.com</a>]</li> <li>• Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Supplier Code includes the following: 'A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least one day off every seven days except in emergencies or unusual situations. Regular workweeks shall not exceed 48 hours. Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary'. It also indicates that 'supplier shall compensate workers for overtime hours at the legal premium rate'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://www.apple.com/suppliercodeofconduct/">apple.com</a>]</li> </ul>
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Responsible mineral sourcing: In its Conflict Minerals Report 2021, the Company states: 'Apple does not directly purchase or procure primary sourced minerals from mine sites. We are, however, committed to both meeting and exceeding internationally-accepted due diligence standards for primary minerals and recycled materials supply chains.. [...] Conducting human rights due diligence in alignment with the Organisation for Economic Co-operation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016) and related Supplements (the "OECD Due Diligence Guidance") and the United Nations Guiding Principles on Business</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and Human Rights (“UN Guiding Principles”) is the foundation of Apple’s responsible sourcing program for primary sourced minerals, and informs Apple’s due diligence program for recycled minerals’. This SD report is considered a proxy for policy statements under CHRB revised approach. [Conflict Minerals Report 2021, 2022: <a href="https://apple.com">apple.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Based on OECD Guidance: As indicated above, 'We are, however, committed to both meeting and exceeding internationally-accepted due diligence standards for primary minerals and recycled materials supply chains.. [...] Conducting human rights due diligence in alignment with the Organisation for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (2016) and related Supplements (the “OECD Due Diligence Guidance”)’. This SD report is considered a proxy for policy statements under CHRB revised approach. [Conflict Minerals Report 2021, 2022: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Met: Requires suppliers to commit to responsible mineral sourcing: In its Supplier Responsibility Standards, the Company indicates: 'Suppliers shall develop an appropriate management system to conduct due diligence in accordance with the standards set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”) and other applicable international standards [...]'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Commits to follow OECD Guidance for all minerals: The Conflict Minerals Report states that 'Apple does not directly purchase or procure virgin raw minerals from mine sites, but is committed to both meeting and exceeding internationally-accepted due diligence standards for minerals supply chains. [...] Conducting human rights due diligence in alignment with the Organisation for Economic Co-operation and Development (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas (2016) and related Supplements (the “OECD Due Diligence Guidance”) is the foundation of Apple’s responsible sourcing program for primary sourced minerals, and informs Apple’s due diligence program for recycled minerals' [Conflict Minerals Report 2021, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Met: Suppliers expected to make similar requirements of their suppliers: The Supplier Code states that 'Suppliers shall exercise due diligence on Relevant Minerals and Relevant Materials in their Supply Chain. [...] Due diligence shall be conducted to the material processing level in order to determine whether relevant materials originate from regions with High Risks, which include areas associated with conflict, worst forms of child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts'. By Relevant Materials, the Company means: Including, but not limited to: Cassiterite (Tin); Cobalt; Columbite-tantalite (Coltan); (Tantalum); Gold; Wolframite (Tungsten); Mica; Any additional minerals notified to Suppliers by Apple'; and by Relevant Materials: 'Recycled plastics; Bio-based material; Any additional materials notified to Suppliers by Apple.' In addition its SR Report 2022 reads: 'Our Responsible Sourcing of Materials Standard, part of our [Supplier] Code and Standards, covers all primary and recycled materials, including advanced and biobased materials'. In its 'Combat Human Trafficking' Statement 2019, the Company indicates: 'Suppliers are also required to apply our requirements to their sub-contractors, next-tier suppliers and third party recruitment agencies, through all levels of the supply chain'. In addition, in the Modern slavery statement, the Company states: 'Smelters and refiners deeper in our supply chain are held to similar standards and if they exhibit a lack of commitment to meet our Supplier Code and Standards, they risk losing Apple’s business'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul>
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (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"> <li>• Not Met: Women's rights [Human Rights Policy, 08/2020: <a href="https://s2.g4cdn.com">s2.g4cdn.com</a>]</li> <li>• Not Met: Children's rights: The Company indicates in its Modern slavery statement that 'We are dedicated to protecting children wherever our products are made or used. Apple’s Global Security Investigations and Child Safety team supports implementation of our robust policies focused on child protection at all levels of our software platforms and services, and throughout our supply chain'. However, no evidence found of a statement where the Company commits to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>respect children's rights in a suitable source for policy statement. [Human Rights Policy, 08/2020: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Migrant worker's rights: It also indicates in its 2019 Modern slavery statement: 'We continuously strengthen our efforts to uphold the rights of foreign-contract workers in our supply chain. When labor supply is limited in one country but plentiful in another, some suppliers rely on third-party recruiters to secure foreign-contract workers from countries such as the Philippines, Nepal, Thailand, Indonesia, and Vietnam. A foreign contract worker is a person who seeks employment in a country other than the one of which he or she is a citizen. Of the millions of people who work at Apple supplier facilities every year, a small percentage are foreign contract workers. These individuals can be particularly vulnerable to debt-bonded labor, a form of modern slavery. Debt-bonded labor occurs when a person is forced to work in exchange for the repayment of a debt or other obligation—sometimes levied as a fee for receiving a job in the first place.' However, 'continuously strengthen our efforts to uphold the rights' is not considered a commitment statement according to CHRB wording criteria. In addition, this document is no longer considered a suitable source for policy statements according to CHRB's revised approach. No further evidence found. [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://apple.com">apple.com</a>]</li> <li>• Met: Expects suppliers to respect at least one of these rights: The Supplier code includes provisions related to women's rights, such as: 'Supplier shall have a system to discipline supervisors, managers, or Workers who engage in any Physical Abuse, Sexual Harassment or sexual abuse, Psychological Harassment, or Verbal Harassment or Verbal Abuse, through measures such as compulsory counselling, warnings, demotions, and terminations or any combination thereof, regardless of whether such action was intended as a means to maintain labor discipline. [...] Security Practices. All security practices shall be gender appropriate and nonintrusive. [...] Pregnancy and Nursing Mothers Anti-Discrimination. Supplier shall comply with all Applicable Laws and Regulations regarding pregnancy and postnatal employment protections, benefits, and pay. Supplier shall make reasonable accommodations for nursing mothers unless prohibited by Applicable Laws and Regulations. Supplier shall not (i) refuse to hire an applicant for a non-Hazardous position or (ii) terminate a Worker's employment solely based on the Worker's pregnancy or nursing status. Supplier shall not prohibit female Workers from becoming pregnant nor threaten female Workers with adverse employment consequences, including dismissal, loss of seniority, or deduction of wages, in order to discourage them from becoming pregnant. [...] Pregnancy and Medical Testing. Supplier shall not require pregnancy tests or Medical Tests, including but not limited to Hepatitis B or HIV, either as a condition for employment or as a requirement for continued employment. [...]' [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: The Company commits to remedy: The Company indicates in its Human Rights Policy: ' We seek to remedy adverse impacts, track and measure our progress, and report our findings.' However, to 'seek' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, 08/2020: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>• Not Met: Company expect suppliers to make this commitment: The Company includes in its Supplier Code some requirements related to remedy the adverse impacts on individuals and workers, such as: 'If any Active Underage Worker, Historical Underage Worker, or Terminated Underage Worker is found either through an external audit or self-review, Supplier shall notify Apple immediately and shall implement a remediation program as directed by Apple. [...] In the event that the Supplier finds that a FCW has paid Fees and Expenses related to their employment, Supplier shall reimburse such Fees and Expenses to that FCW within 30 days of the later of (i) the start of the FCW's employment with Supplier or (ii) the date Supplier discovers the fee payment(s)'. However, no requirement to commit to remedy of any adverse impacts on individuals and workers and communities that it has caused or contributed to was found. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact: The Company's 'Supplier Responsibility Standards' document includes requirements to remedy specific cases such of non-compliances. In addition, it states that 'If a Supplier or Apple discovers alleged or actual risks associated with its Supply Chain, Supplier shall work with Apple to respond to the applicable risks by (to the extent not prohibited by applicable law): [...] Utilizing grievance channels of recognized Third-Party organizations to report risks and request that appropriate action be taken to address identified High Risks'. In addition, in its Modern Slavery Statement 2019, the Company gives some examples of 'Recognized Third-Party Programs with Grievance Channels: 'Several, but not all, Third-Party verification or audit programs have developed grievance channels, including first or second-party channels to address alleged or confirmed High Risks with Suppliers, traders, or mines or due diligence or whistleblowing platforms (as available) established to report on and address identified risks. Examples include: ITRI's Tin Supply Chain initiative: [...]; The Responsible Jewellery Council'. In its 2018 Statement on combat human trafficking, the Company reports that it has been working in different Remediation Guidelines, such us the 'Remediation Guidelines for Victims of Exploitation in Extended Minerals Supply Chain' which states who is responsible for actions to be taken and give a step-by-step process to remedy the issue, or the 'Bonded Labor remediation program'. Its SR Report 2022, also discloses information about examples of how it works with supplier to provide remedy: 'Responding to supplier employee concerns and providing remedy: Worker feedback is essential to cultivating greater transparency and protecting workers' rights. It is also an indication that workers are aware of their rights, and have enough confidence in the feedback channels to speak freely without fear of retaliation. It also gives our suppliers the opportunity to address and remedy issues, and for us to find better ways to help suppliers improve their performance...'. However, these reports are no longer considered suitable sources for policy statements according CHRB's revised approach. No statement committing to work and collaborate with suppliers to remedy adverse impacts which are directly linked to the company's operations, products or services was found in a suitable source for policy. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>] &amp; [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: <a href="https://apple.com">apple.com</a>]</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs): In its Modern slavery statement the Company indicates: 'Apple believes that empowering independent voices in the supply chain is critical to identifying, assessing, and remediating risks related to human trafficking and involuntary labor. [...] Since 2017, we partnered with the Fund for Global Human Rights, a leading human rights organization, to support their work with grassroots human rights defenders in the Democratic Republic of the Congo ("DRC").' A similar statement was included in its CMR 2019. However, no evidence found of a statement where the Company commits to not tolerating attacks against human rights defenders, including in a suitable source for policy statement according to CHRB's revised approach. [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Work with HRD to create safe and enabling environment: The Company indicates in its SR Report 2022: 'Empowering local, independent voices is critical to identifying and assessing risks and opportunities deeper in our supply chain. In 2021, we supported more than 60 organizations, including human rights and environmental defenders working around the world on issues including social and economic rights in mining communities, the prevention of modern slavery, and media freedom. We've supported many of these organizations through our continuing partnership with the Fund for Global Human Rights — a public foundation that works with local human rights organizations in more than 25 countries around the globe — to equip activists, mobilize movements, and improve lives by supporting groups and individuals working to create lasting change. We've provided financial support to the Fund's frontline activists and human rights defenders working on a range of issues, including economic and social rights of mining communities, inclusive economic growth, judicial advocacy, environmental justice, the rule of law, health and safety, and fair compensation for mining communities.' [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul>



## 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Company indicates in its ESG Report 2021: 'Our Board of Directors adopted the [Human Rights] policy and is responsible for overseeing and periodically reviewing it. Apple's Senior Vice President and General Counsel is responsible for its implementation, and reports to the Board and its committees on our progress and significant issues.[...] The Board and its committees review and discuss with management progress relating to Apple's values. Further, the Board and its committees also review and discuss Apple's commitments and progress on inclusion and diversity, employee engagement, compensation and benefits, and compliance'. [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>• Not Met: Describe HR expertise of Board member</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board responsibility	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board/Committee review HRs strategy: The Company indicates in its ESG Report 2021: 'The Board and its committees review and discuss with management progress relating to Apple's values. Further, the Board and its committees also review and discuss Apple's commitments and progress on inclusion and diversity, employee engagement, compensation and benefits, and compliance. ' However, no information describing the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes at board level or a board committee was found. [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>• Met: Examples/trends re HR discussion in the last reporting period: In addition, the Company reports: 'During 2020, the Board and its committees engaged with management on the impact of COVID-19 on Apple's employees, supply chain, and business. The Board reviewed strategies and initiatives to respond to, and mitigate, adverse impacts, including enhanced health and safety measures for Apple employees as well as workers in our supply chain'. [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>
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"> <li>• Not Met: Incentives for at least one board member: The Company indicates in its ESG Report 2021: 'Our executive compensation program is built on sound compensation policies and practices and clear guiding principles that align executive compensation with our shareholders' interests. We manage Apple for the long term. Consistent with this approach, beginning in 2021, an ESG modifier based on Apple's values and other key community initiatives has been incorporated into our annual cash incentive program. This change is intended to further motivate Apple's executive team to meet exceptionally high standards of values-driven leadership in addition to delivering strong financial results.' However, it is not clear whether Supervisory Board members receive these incentives or whether human rights related indicators or factors are considered in this mechanism. [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy</li> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

## 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"> <li>• Not Met: Score of 1 on A.1.2.a: See indicators A.1.2.a</li> <li>• Met: Senior responsibility for HR implementation and decision making: The Company discloses information about its senior management positions, including the ones related to human rights issues: 'Sabih Khan is Apple's senior vice president of Operations reporting to COO Jeff Williams. Sabih is in charge of Apple's global supply chain, ensuring product quality and overseeing planning, procurement, manufacturing, logistics and product fulfilment functions, as well as Apple's supplier responsibility programs that protect and educate workers at production facilities around the world.'; 'Deirdre O'Brien is Apple's senior vice president of Retail + People, reporting to CEO Tim Cook. [...] In her role leading the People team, Deirdre works to help Apple connect, develop and care for its employees [...]. Her teams oversee a broad range of functions including talent development and Apple University, recruiting, employee relations and experience, business partnership, benefits, compensation, and inclusion and diversity'. Therefore, the Company is reporting senior role for own operations and for supply chain. [Leadership and Governance, N/A: <a href="https://investor.apple.com">investor.apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How it assigns Day-to-day responsibility: The Company indicates that: 'A number of cross-functional teams are responsible for carrying out related efforts with respect to Apple's anti-human trafficking policies, including, but not limited to, our Global Security, Business Conduct, and Supplier Responsibility ("SR") teams. The Global Security team sits within Apple's Legal and Global Security organization and seeks to identify risks across Apple and our supply chain, and mitigate them with efficient and effective security solutions. The Business Conduct team also sits within Apple's Legal and Global Security organization and sets policies and provides guidance to ensure that Apple conducts business ethically, honestly, and in full compliance with applicable laws and regulations. The SR team sits in Apple's World Wide Operations organization and coordinates activities related to our Code and our strategy to eradicate modern slavery. It works across a number of Apple business groups, teams and functions, including, but not limited to Apple's Global Security Investigations and Child Safety team, Business Conduct, Legal, Finance, Product Design, Procurement, Manufacturing Operations, and Retail.' [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
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"> <li>• Not Met: Senior manager incentives for human rights: The Company indicates in its ESG Report 2021: 'Our executive compensation program is built on sound compensation policies and practices and clear guiding principles that align executive compensation with our shareholders' interests. We manage Apple for the long term. Consistent with this approach, beginning in 2021, an ESG modifier based on Apple's values and other key community initiatives has been incorporated into our annual cash incentive program. This change is intended to further motivate Apple's executive team to meet exceptionally high standards of values-driven leadership in addition to delivering strong financial results.' However, it is not clear whether and how human rights related indicators or factors are considered in this mechanism. [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system: The Company indicates in its ESG Report 2021: 'Apple also has internal systems and procedures for managing environmental, social, and governance (ESG) topics, including with external stakeholders to learn about their priorities and get their feedback and to coordinate relevant projects and initiatives. Work on environmental and social initiatives is embedded across different lines of business, with broad collaboration</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>to drive forward initiatives that are important to Apple'. However, no further information describing how human rights are integrated in its Enterprise Risk Management (ERM) or enterprise risk system was found. [ESG Report 2021, 2021: <a href="https://www.apple.com/emea/pressroom/docs/20210929-Apple-ESG-Report-2021.pdf">s2.q4cdn.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Provides an example</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Communicates its policy to all workers in own operations: In its 'Combat Human Trafficking' Statement, the Company indicates: 'The Human Rights Policy is referenced in Apple's Business Conduct Policy, and included in the annual Business Conduct training required of all employees'. [Statement on Efforts to Combat Human Trafficking and Slavery in Supply Chain 2021, 2022: <a href="https://www.apple.com/emea/pressroom/docs/20220303-Apple-Statement-on-Efforts-to-Combat-Human-Trafficking-and-Slavery-in-Our-Business-and-Supply-Chains-03-03-2022.pdf">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder: The Company indicates in its ESG Report 2021: 'Apple also has internal systems and procedures for managing environmental, social, and governance (ESG) topics, including with external stakeholders to learn about their priorities and get their feedback and to coordinate relevant projects and initiatives. Work on environmental and social initiatives is embedded across different lines of business, with broad collaboration to drive forward initiatives that are important to Apple.' However, no further information describing how it actively communicates its policy commitments to affected stakeholders, including local communities, was found. [ESG Report 2021, 2021: <a href="https://www.apple.com/emea/pressroom/docs/20210929-Apple-ESG-Report-2021.pdf">s2.q4cdn.com</a>]</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Requires suppliers to communicate policy requirements: In its 'Combat Human Trafficking' Statement 2019, the Company indicates: 'To do business with Apple, suppliers must agree to operate in full compliance with all applicable laws and regulations, and adhere to our Supplier Code and Standards. Our Supplier Code and Standards go beyond compliance with existing law. [...] Suppliers are also required to apply our requirements to their sub-contractors, next-tier suppliers and third party recruitment agencies, through all levels of the supply chain. [...] The Supplier Code is published in 15 languages and is publicly available on apple.com.' In addition, in the Modern slavery statement, the Company states: 'Smelters and refiners deeper in our supply chain are held to similar standards and if they exhibit a lack of commitment to meet our Supplier Code and Standards, they risk losing Apple's business'. [2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 02/2019: <a href="https://www.apple.com/emea/pressroom/docs/20190202-Apple-Statement-on-Efforts-to-Combat-Human-Trafficking-and-Slavery-in-Our-Business-and-Supply-Chains-02-2019.pdf">apple.com</a>] &amp; [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://www.apple.com/emea/pressroom/docs/20200303-Apple-Statement-on-Efforts-to-Combat-Human-Trafficking-and-Slavery-in-Our-Business-and-Supply-Chains-03-03-2020.pdf">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: As indicated above: 'Suppliers are also required to apply our requirements to their sub-contractors, next-tier suppliers and third party recruitment agencies, through all levels of the supply chain.' [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://www.apple.com/emea/pressroom/docs/20200303-Apple-Statement-on-Efforts-to-Combat-Human-Trafficking-and-Slavery-in-Our-Business-and-Supply-Chains-03-03-2020.pdf">apple.com</a>]</li> <li>• Met: Company requires suppliers to cascade down to their suppliers: As indicated above, Suppliers are also required to apply commitments to their suppliers, and so forth, through all levels of the supply chain. Requirements for suppliers include 'suppliers are required to adhere to the supplier code and standards, including any subsequent amendments or updates'. It also adds that 'Smelters and refiners deeper in our supply chain are held to similar standards and if they exhibit a lack of commitment to meet our Supplier Code and Standards, they risk losing Apple's business'. In addition, suppliers shall perform periodic evaluations of facilities and operations of its subcontractors and next-tier suppliers to ensure compliance with the Code (and permit Apple and any third party designated to do the same). The Supplier Code reads: 'This Code applies to Apple suppliers and their subsidiaries and affiliates, as well as any subcontractors and sub-tier suppliers (each a "Supplier") providing goods or services to Apple or for use in or with Apple products'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://www.apple.com/emea/pressroom/docs/20220101-Apple-Supplier-Code-of-Conduct-and-Standards-01-2022.pdf">apple.com</a>] &amp; [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://www.apple.com/emea/pressroom/docs/20200303-Apple-Statement-on-Efforts-to-Combat-Human-Trafficking-and-Slavery-in-Our-Business-and-Supply-Chains-03-03-2020.pdf">apple.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: How workers are trained on HR policy commitments: In its 'Combat Human Trafficking' Statement, the Company indicates: 'All Apple employees and interns are required to complete mandatory, annual Business Conduct training that includes education on key points in Apple's Anti-Human Trafficking Policy'. This policy has not been found in the public domain. In addition, the Company also indicates: 'All Apple corporate employees are provided annually with information on key points in the Code as well as Apple's SR issue reporting process and are instructed to report anything that might be considered a violation, including forced labor, trafficking, or ethical violations'. In the document's latest version, the Company indicates: 'The Human Rights Policy is referenced in Apple's Business Conduct Policy, and included in the annual Business Conduct training required of all employees'. [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://apple.com">apple.com</a>] &amp; [Statement on Efforts to Combat Human Trafficking and Slavery in Supply Chain 2021, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment</li> <li>• Not Met: Disclose % trained</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company describes its MSA 2022: '[...] we conduct internal and third-party independent assessments of our compliance programs to determine effectiveness, and make changes to our policies and our training to reflect emerging trends. With respect supply chain monitoring process, the Company indicates in its SR 2022: 'In addition to having teams from Apple in our suppliers' facilities regularly, we work with independent, third-party auditors to perform rigorous assessments of our suppliers' performance in upholding our strict standards'. 'Activities included in our Code of Conduct assessments: Management interviews, Extensive document review, Employee interviews, Site walk-throughs'. [Statement on Efforts to Combat Human Trafficking and Slavery in Supply Chain 2021, 2022: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Proportion of supply chain monitored: The Company indicates: 'In reporting year 2021, 1,117 independent, third party assessments were conducted in 52 countries, including 886 Code of Conduct assessments and 291 smelter and refiner assessments.* Since 2007, Apple-managed assessments have covered 94 percent of Apple's direct manufacturing spend.' However, it is not clear what % of its supply chain does this percentage represent. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Describe how workers are involved in monitoring [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Describes corrective action process: The Company indicates in its SR 2022: 'If we uncover non-compliance, we take prompt action to ensure suppliers not only correct the issue, but make meaningful, long-term changes. We do this through a Corrective Action Plan (CAP), during which 30-, 60-, and 90-day check-ins with Apple are required. We then conduct our Corrective Action Verification (CAV) process to verify that all corrective actions have been successfully implemented, and necessary steps have been taken to prevent a reoccurrence'. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Disclose findings and number of corrective action: The Company reports: 'In FY2021, 11 Core Violations were found, including two debt-bonded labor violations, and nine instances of working hours or labor data falsification.* The two debt-bonded labor Core Violations occurred at two separate facilities owned by the same supplier in Taiwan. Auditors found that Foreign Contract Workers had paid recruitment fees, a practice that is strictly prohibited by Apple everywhere we operate, and even if local laws allow it. Any time we find Foreign Contract Workers have paid any recruitment fee we require the supplier to immediately repay the employees in full and we verify this repayment through a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>third-party auditor. As always, we also worked with the supplier to enhance their management systems and practices to prevent a reoccurrence. In the nine instances of working hours or labor data falsification, suppliers were found to have provided falsified records to Apple that showed full compliance with our working hours requirements — which includes limiting working hours to no more than 60 hours per week, and 6 consecutive workdays — in order to hide excessive overtime and/or lack of weekly rest days. There were also two instances in which suppliers falsified records in order to hide non-compliance with our working requirements for students and interns. For each instance, the supplier involved was placed on immediate probation and their CEO was notified. The supplier’s ethics policy and management systems underwent a thorough review to identify the root causes of the issues, and the supplier was required to undergo additional assessments to ensure that policy changes are implemented to prevent future violations. The suppliers were also required to revise all records to reflect an accurate accounting of hours worked'. However, evidence seems to focus only in "core violations", it is not clear the number of corrective actions processes as a result of the monitoring. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</p>
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: In its 'Combat Human Trafficking' Statement, the Company indicates: 'Through our responsible procurement program, we assess new suppliers before they enter our supply chain and before business is awarded. A dedicated team in Apple’s Product Operations group uses a supplier selection framework that includes comprehensive questions on human rights and risks of human trafficking, including on debt-bonded labor.' [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://apple.com">apple.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: The Company indicates in its Supplier Code of Conduct that it 'will assess its suppliers’ compliance with this Code, and any violations of this Code may jeopardize the supplier’s business relationship with Apple, up to and including termination'. The Company also indicates in its MSA Statement: 'When a Core Violation is identified, Apple issues a Notice of Probation directly to the president or CEO of the supplier, and the supplier is commercially penalized. Our Code requires that Core Violations be addressed immediately, and when appropriate, we also report these violations to local authorities. Any supplier with a documented Core Violation is placed on probation until the satisfactory completion of their next audit. During probation, the issue that caused the Core Violation is monitored closely by Apple, and if the supplier does not demonstrate necessary progress toward corrective action, they risk removal from our supply chain. To date, 22 manufacturing supplier facilities have been removed from our supply chain.' [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>] &amp; [2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains, 03/03/2020: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Met: Working with suppliers to meet HR requirements: According to its Supplier Responsibility 2020 Progress Report: 'Consulting closely with stakeholders and the IOM, we created the Responsible Recruitment Due Diligence Toolkit (“the Toolkit”). The Toolkit offers suppliers and labor agents a comprehensive “how-to” guide with practical tools covering six core areas: embedding responsible recruitment into policies and management systems; identifying and assessing risks; preventing and mitigating risks; tracking implementation and results; communicating how risks are addressed; and providing access to remediation. [...] We began holding training sessions on the Toolkit in those countries where the most prevalent migration corridors in our supply chain exist, including Malaysia, Singapore, and the Philippines.' In addition, in its 'Supplier Responsibility 2019 Progress Report', the Company indicates: 'Following an assessment, we partner with a supplier to develop a corrective action plan to make improvements where needed. Ongoing engagements with our suppliers can include months on the ground working with suppliers, providing training, tools, and support to help them meet our standards. To support capability building, Apple’s SupplierCare platform provides information to increase understanding of the Supplier Code of Conduct and educate suppliers on best practices. Tutorials range in topics from safe storage of chemicals to responsibly sourcing minerals. In 2018, SupplierCare expanded to provide online trainings to 219 active supplier facilities.' [Supplier Responsibility 2019 Progress Report, 2019: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="https://apple.com">apple.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with affected stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company indicates in its SR 2022: 'As part of our comprehensive approach to identifying and preventing risks, we engage with civil society organizations, governments, NGOs, UN agencies, and other expert stakeholders throughout the year in both structured and informal roundtables and dialogues to help us understand what we are doing well, where we could do more, and to identify emerging areas of risk and opportunity. The feedback we receive directly influences our strategy and programs, and has enabled us to make faster progress in our supply chain. We share the learnings from this process with other companies through industry associations and at relevant conferences to accelerate progress across the industry.' In addition, its ESG Report 2021 reads: 'Apple engages with stakeholders as part of our commitment to advance meaningful change and find novel solutions to pressing challenges. Every day, at all levels of the business, we interact with a variety of stakeholders to listen and learn from others' perspective and experiences, share our progress, and promote best practices. Throughout the year, we proactively engage with shareholders and other stakeholders. These engagements help us understand their perspectives on significant issues, from company performance, strategy, and corporate governance to executive compensation and other ESG topics. We take feedback and insights from our engagement with all stakeholders into consideration as we review and enhance our operations and disclosures, sharing them with our Board as appropriate.' However, no information found describing the process by which the Company identifies affected stakeholders with whom to engage in relation to human rights impacts, including workers or local communities, including supply chain. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>] &amp; [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Met: Provides two examples of engagement with stakeholders: Example 1: the Company reports in its SR 2022: 'Supplier employee interviews are an important part of every assessment conducted. Each year, we interview tens of thousands of supplier employees in their local language and without their managers present, to determine whether or not their experience on the job aligns with auditors' observations during assessments'. Example 2: In addition to interviews and grievance channels, which are requirements under our Code and Standards, we also engage with supplier employees in order to understand their overall workplace satisfaction. In 2021, we anonymously surveyed 264,963 supplier employees in 191 facilities across Greater China, India, Ireland, Malaysia, Philippines, Singapore, UK, U.S., and Vietnam about their workplace experiences — nearly double the number of supplier employees surveyed last fiscal year. In order to better identify the issues that matter most to supplier employees, we asked participants to provide feedback on different aspects of their workplaces, including working and living conditions, food, and management. We then worked with suppliers to analyze the results, and develop action plans to address their employees' needs and concerns.' [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company indicates in its ESG Report 2021: 'Identifying human rights risks is the first step to addressing those risks through improvements to our policies and management systems. We work to align our efforts with the business and human rights due diligence process set forth in the UNGPs to identify, mitigate, prevent, and remedy human rights risks. We identify salient human rights risks through internal risk assessments and external industry-level third-party audits, as well as through the channels we maintain with rights holders and other stakeholders, including investors, human rights and labor experts, governments, and international bodies such as the UN. In addition to our own internal monitoring, we consider reports identifying potential risks from external sources, including international organizations, policymakers, shareholders, civil society organizations, news outlets, customers, individuals in the supply chain or supply chain communities, whistleblower mechanisms, and third-party hotlines. They also come through the reporting mechanisms we make available directly to all supplier employees, Apple employees, and the general public. These reports can come to us in any language and can be anonymous'. [ESG Report 2021, 2021: <a href="https://www.apple.com/sg4cdn.com">s2.q4cdn.com</a>]</li> <li>• Met: Identifying risks through relevant business relationships: The Company indicates in its SR 2022: 'Identifying risks in our global supply chain is the first step to eliminating those risks through improvements to our policies and strategies, and through collaborative capability-building with our suppliers. Our efforts to identify, mitigate, prevent, and remedy human rights risks align with the Business and Human Rights Due Diligence process set forth in the UNGPs. First, we identify salient human rights risks through our robust assessment processes, as well as by participating in industry-level, third-party audits. Apple selects suppliers for assessment based on a number of factors, including previous audit performance, manufacturing process risks, and planned spending. We also identify salient human rights risks through our own risk analysis and through the channels we maintain with key rights-holders, stakeholders, and partners. These include supplier employee interviews and surveys, consultations with human rights, labor, and environmental experts, expert groups we convene on specialized or emerging human rights topics, UN and government labor and human rights reporting and consultations, media reports, the results of our supplier assessments, discussions with supplier management teams, and reports received through our partners around the world.' [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://www.apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: See above, the company reports consulting through channels with 'key rights-holders, stakeholders, and partners'. Including supplier employee interview and surveys. This is an ongoing process. The company also indicates that consults with experts. However, no details found in relation to experts. Also, this process refers to supply chain only. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://www.apple.com">apple.com</a>]</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates in its ESG Report 2021: 'We work to align our efforts with the business and human rights due diligence process set forth in the UNGPs to identify, mitigate, prevent, and remedy human rights risks. We identify salient human rights risks through internal risk assessments and external industry-level third-party audits, as well as through the channels we maintain with rights holders and other stakeholders, including investors, human rights and labor experts, governments, and international bodies such as the UN. In addition to our own internal monitoring, we consider reports identifying potential risks from external sources, including international organizations, policymakers, shareholders, civil society organizations, news outlets, customers, individuals in the supply chain or supply chain communities, whistleblower mechanisms, and third-party hotlines. They also come through the reporting mechanisms we make available directly to all supplier employees, Apple employees, and the general public.' However, no further information describing the assessment process was found, including how relevant factors are taken into account when , such as geographical, economic, social and other factors. [ESG Report 2021, 2021: <a href="https://www.apple.com/sg4cdn.com">s2.q4cdn.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: How process applies to supply chain: The Company indicates in its SR 2022: 'First, we identify salient human rights risks through our robust assessment processes, as well as by participating in industry-level, third-party audits. Apple selects suppliers for assessment based on a number of factors, including previous audit performance, manufacturing process risks, and planned spending. We also identify salient human rights risks through our own risk analysis and through the channels we maintain with key rights-holders, stakeholders, and partners. These include supplier employee interviews and surveys, consultations with human rights, labor, and environmental experts, expert groups we convene on specialized or emerging human rights topics, UN and government labor and human rights reporting and consultations, media reports, the results of our supplier assessments, discussions with supplier management teams, and reports received through our partners around the world.' However, no information found describing the process to assess these risks and impacts, including how it takes social, geographical, economic or other factors into account beyond the context of conflict minerals. No new relevant evidence found in latest review. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Public disclosure of the results of HR assessment: The Company reports in its SR 2022: 'The following are examples of "salient human rights risks" in our supply chain that relate to the ILO Core Conventions, which are based on supplier assessments, due diligence deeper in our supply chain, work within our industry, and public reporting. Each of these is addressed in our Code and Standards: Discrimination, Freedom of Association and Collective Bargaining, Involuntary Labor and Human Trafficking, Underage Labor' However, no complete information with respect its salient human rights risks was found. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material for this indicator.</li> <li>• Not Met: Description of how global system applies to supply chain: The Company discloses some information in a section named 'Assessing impacts, integrating findings, and taking action' of its SR 2022: ' Supplier performance is assessed against our Code and Standards to drive improvements in the areas of labor and human rights, health and safety, environment, ethics, and management systems. Assessments are a comprehensive process that can require multiple days at a supplier in order to conduct site inspections, review documents, and complete worker and management interviews. [...] If non-compliances are identified during an assessment, we create a Corrective Action Plan for the supplier, requiring 30-, 60-, and 90-day check-ins.' However, this process seems to be related to supply chain monitoring process evaluated in B.1.6 indicator. This indicator looks for evidence of proactive action taken against salient risks and impacts that have been determined relevant for the Company. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues: The Company discloses information about its strategy for safer materials: 'A great deal of care and research go into choosing materials for Apple products to ensure manufacturing workers, customers, and recyclers can use and handle Apple products safely. Consideration of the toxicological profile of materials is a key component of Apple's material selection process during new product development. [...] Apple believes that reducing the use of hazardous substances in materials is essential to ensure the safety of workers who manufacture its products, customers who use its products, and recyclers who handle its products at the end of the products' useful life. This commitment to the safety of workers, customers and recyclers has driven Apple to lead the electronics industry in phasing out hazardous substances from its products.' The Company has been working in this strategy during the last years with the aim of identify hazardous materials, evaluate the hazardous potential along the life of products (production, use, recycling, elimination), eliminate the use of the most dangerous materials and develop safety protocols to safe manipulation of specific materials. Part of this work are the following documents: Material Impact Profile; A Protocol for Prioritizing Chemicals of Concern in the Electronics Industry. However, part of this evidence comes from a source dated 2016. No more recent evidence found of specific proactive action taken to tackle a salient human rights</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>risk or impact. [Integrating Toxicological Assessments in Material Selection, 09/2016] &amp; [Material Impact Profiles, 2019: <a href="https://apple.com">apple.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking 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"> <li>• Not Met: System for tracking or monitor if actions taken are effective: The Company indicates in its ESG Report 2021: 'We're committed to continually assessing our progress and incorporating what we learn into our work. We track and measure our performance across a range of areas, and apply the lessons we learn to continually improve.' However, no further information was found describing its system(s) for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [ESG Report 2021, 2021: <a href="https://s2.g4cdn.com">s2.g4cdn.com</a>]</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and Grievance Mechanisms (20% 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: Company's Business Conduct Policy reads: 'Apple's external helpline (<a href="https://apple.ethicspoint.com">apple.ethicspoint.com</a>) also allows employees and external parties to report concerns with the option of remaining anonymous, where permissible under applicable laws. The external helpline provides local, toll-free phone numbers that connect employees and external parties to a multilingual reporting service'. [Business Conduct Policy, 10/2020: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages and workers aware: As indicated above, 'The external helpline provides local, toll-free phone numbers that connect employees and external parties to a multilingual reporting service'. In addition, the Company indicates in its SR 2022: 'All Apple employees and interns are required to complete mandatory annual Business Conduct training, [...] We offer additional resources for employees to address questions and concerns, including the Business Conduct Helpline and the Business Conduct website, which allow employees to report concerns anonymously'. [Business Conduct Policy, 10/2020: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Met: Describe how workers in the supply chain have access to grievance mechanism: In its Supplier Code of Conduct, the Company indicates: 'Supplier shall ensure that Workers have an effective mechanism to report Grievances and that facilitates open communication between management and Workers.' [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Met: Expect Suppliers to convey expectation to their own suppliers: The Code applies to 'Apple suppliers and their subsidiaries, affiliates, and subcontractors (each a "Supplier") providing goods or services to Apple, or for use in or with Apple products'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company's Business Conduct Policy reads: 'Apple's external helpline (<a href="https://apple.ethicspoint.com">apple.ethicspoint.com</a>) also allows employees and external parties to report concerns with the option of remaining anonymous, where permissible under applicable laws. The external helpline provides local, toll-free phone numbers that connect employees and external parties to a multilingual reporting service'. The FAQ document included on its Ethics Point website indicates: 'EthicsPoint is a comprehensive and confidential reporting service created by NAVEX Global to assist employees who wish to anonymously report misconduct or policy violations.' In addition, it indicates in its</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>ESG Report 2021: 'Apple's external helpline is available to employees and external parties to report concerns, and also provides the option of anonymous reporting, where permissible'. [Business Conduct Policy, 10/2020: <a href="https://apple.com">apple.com</a>] &amp; [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes accessibility and local languages and stakeholder awareness: Its ESG Report 2021 reads: 'The external helpline is available 24/7, and provides a multilingual reporting service with local, toll-free numbers'. However, no further information describing how it ensures that all affected external stakeholders at its own operations are aware of the grievance mechanism (e.g., specific communication(s)). [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>• Not Met: Communities access mechanism direct or through suppliers</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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"> <li>• Met: Engages users to create or assess system: In its Supplier Responsibility 2019 Progress Report, the Company indicates: 'Direct feedback from supplier employees helps us to better understand their experience so we can work with suppliers to identify opportunities for improvement. In 2019, we partnered with workplace rights experts to deploy mobile surveys that measure supplier employees' general satisfaction at work; the extent to which they felt their workplace rights were respected; management's responsiveness to grievances; and their rating of workplace amenities such as food service, facilities, and living conditions.' In addition, it states in its 2019 Progress Report: 'In order to verify the effectiveness of channels, we interview numerous supplier employees during annual assessments in their local language without their managers present. These interviews seek to ensure that supplier employees have received training and are aware of proper channels to voice concerns'. [Supplier Responsibility 2019 Progress Report, 2019: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Engages with potential or actual users on the improvement of the mechanism: As indicated above, the Company engaged workers in the supply chain including questions about operation of grievance mechanisms. [Supplier Responsibility 2019 Progress Report, 2019: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed</li> <li>• Not Met: Describe support (technical, financial, etc) available for equal access by complainants</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Escalation to senior/independent level</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: In its Business Conduct Policy, the Company states: 'Apple will not retaliate—and will not tolerate retaliation—against any individual for reporting a good-faith concern or complaint to a manager, People, Legal, Business Assurance and Audit, Finance, or Business Conduct, or for participating in the investigation of a concern or complaint. We do not tolerate knowingly false reporting.' In addition, it indicates in its ESG Report 2021: 'Apple's external helpline is available to employees and external parties to report concerns, and also provides the option of anonymous reporting, where permissible'. [Business Conduct Policy, 10/2020: <a href="https://apple.com">apple.com</a>] &amp; [ESG Report 2021, 2021: <a href="https://s2.q4cdn.com">s2.q4cdn.com</a>]</li> <li>• Not Met: Practical measures to prevent retaliation: The Company indicates in its Ethics Point FAQ document: 'Unless you identify yourself, all reports received through EthicsPoint are anonymous. NAVEX values your right to privacy and will not disclose any information that would identify you without your express permission or unless legally required to do so. In most European countries, anonymous allegations can only be used for accounting and internal controls issues, including fraud, inaccurate records, auditing and other financial matters.' However, no further evidence describing additional measures to prevent retaliation was found. [Ethics Point FAQ, N/A: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: In its Supplier Code of Conduct, the Company indicates: 'Supplier shall protect whistleblower confidentiality and prohibit retaliation.' However, the grievance channel is not open to other stakeholders beyond workers. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="http://apple.com">apple.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive rights</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	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"> <li>• Met: Describes how remedy has been provided: In its Supplier Responsibility 2020 Progress Report, the Company indicates: 'If debt-bonded labor is found, we require remediation through the immediate return of personal identity documents and direct remedy, meaning suppliers repay the employees for any fees paid. We then verify that repayments were made in full and on time through an independent auditor.[...] \$32.3M Recruitment fees repaid by suppliers to 36,599 supplier employees since 2008. [...] \$1.3M Recruitment fees repaid to 462 supplier employees in 2019'. [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="http://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes to systems, processes and practices to stop similar impact: The Company discloses information about the changes to prevent debt-bonded labor: 'In 2019 [...] we continued mapping the higher-risk migration corridors for foreign contract workers in our supply chain using our own data and information from the ILO and the U.S. State Department in order to more deeply understand challenges at the source of labor recruitment. We also convened an expert group of leading government policymakers, non-governmental organizations, and researchers to further strengthen our efforts. We also spoke directly to migrant workers and labor agents in our supply chain to better understand their experiences. [...] we strengthened our partnership with the International Organization for Migration (IOM) [...] and began to integrate labor agent audits into our responsible labor recruitment program. Consulting closely with stakeholders and the IOM, we created the Responsible Recruitment Due Diligence Toolkit ("the Toolkit").' In addition, in its 2019 Progress Report, it indicates: 'In 2018, we went further to prevent debt-bonded labor in our supply chain, and steps were taken to limit the amount of subcontracting for custodial staff in our retail stores. We also mapped the primary geographic corridors where foreign contract workers enter our supply chain and where they work. As a result, programs were put in place to strengthen debt-bonded labor prevention in high-risk regions. In 2018, we also worked closely with suppliers that hire foreign contract workers to implement stricter standards to assess the labor brokers who provide personnel to their facility. These efforts included implementing enhanced training on topics required by our Code, such as conducting worker interviews and self-assessments. This capability building effort enables suppliers to conduct more comprehensive due diligence in their labor supply chain, and to ensure no recruitment fees are charged.' [Supplier Responsibility 2019 Progress Report, 2019: <a href="http://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="http://apple.com">apple.com</a>]</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company reports in its SR 2022: 'In 2021, the reports we received from supplier employees via hotlines included issues related to wages and benefits, employee relations, amenities at supplier facilities, workforce stability, and health and safety. After further investigation of the reports we received, approximately 40 percent of them uncovered violations of our Code. In each case, we investigated and worked directly with the suppliers to drive improvement and correct any compliance issues found.' However, no further information with respect the total number of human rights grievances received, addressed or resolved from internal</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and external stakeholders was found. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

## D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Not Met: Discloses living wage requirements in supplier code or contracts: The Company indicates in its Supplier Code of Conduct: 'Supplier shall pay at least the minimum wage and provide any benefits required by law and/or contract. Supplier shall compensate workers for overtime hours at the legal premium rate.' However, no reference found to living wage, covering basic needs of employees and families or dependants, and some discretionary income. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Improving living wage practices of suppliers</li> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
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"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.4.3	Mapping and disclosing the supply chain	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates in its 'Combat Human Trafficking' Statement 2020: 'In 2010, we were one of the first companies to map minerals in our supply chain from supplier manufacturing sites back to the smelter and refiner level for tin, tantalum, tungsten, and gold ("3TG"). In 2014, we started mapping our cobalt supply chain.' See below how the Company discloses a list including materials, manufacturing and assembly sites. [Statement on Efforts to Combat Human Trafficking and Slavery in Supply Chain 2020, 03/2021: <a href="https://apple.com">apple.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Discloses names and locations of significant parts of SP and why: The Company discloses its Supplier List: 'The Apple Supplier List represents 98 percent of our direct spend for materials, manufacturing, and assembly of our products worldwide for fiscal year 2020.' The list includes suppliers' names and location. [Supplier List FY 2020, 2021: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Child Labour rules in codes or contracts: The supplier code indicates: Supplier shall employ only Workers who are at least 15 years of age, or the applicable minimum legal age for employment, or the applicable age for completion of compulsory education, whichever is highest. [...] Supplier shall establish and implement appropriate age documentation and verification management systems to ensure that Underage Workers are not working on site. The systems shall cover Supplier's operations, Third Party Employment Agencies, and Qualified Educational Programs.[...] If any Active Underage Worker, Historical Underage Worker, or Terminated Underage Worker is found either through an external audit or self-review, Supplier shall notify Apple immediately and shall implement a remediation program as directed by Apple'. The document includes details of the different steps for remediation. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: How working with suppliers on child labour: The Company indicates: 'We also continued to partner with Pact, an international development organization, to deliver rights awareness training to miners, youth, and community officials in artisanal and small-scale mining (ASM) communities in the DRC. In 2021, Pact organized 72 neighborhood committee meetings reaching over 31,987 community members — including more than 15,000 children — on a range of human rights issues, with a heavy focus on raising awareness about child labor'. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Met: Analysis of trends in progress made: Each year the Company discloses information about the number of child labour cases found in its Supplier Responsibility Reports. For instance in its Supplier Responsibility 2020 Progress Report, the Company indicates that it uncovered one case of Underage Labor. It also states: 'Based on the reduction in age-related violations over the last seven years, our efforts to educate suppliers and to work closely with them on Code requirements have driven significant progress in this area'. Despite not presenting year-on-year figures, the Company explains analyses the trend over the last ones. [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="https://apple.com">apple.com</a>]</li> </ul>
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	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"> <li>• Met: Debt and fees rules in codes or contracts: In its Supplier Responsibility Standard, the Company indicates: 'Workers shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employment. If such fees are found to have been paid by Workers, such fees shall be repaid to the worker. [...] Deposits from Workers are prohibited unless required by Applicable Laws and Regulations. [...] Personal loans to Workers or job seekers under circumstances where repayment terms could be construed as debt bondage or forced labor are prohibited'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> </ul> <ul style="list-style-type: none"> <li>• Met: How working with suppliers on debt &amp; fees: The Company indicates: 'Consulting closely with stakeholders and the IOM, we created the Responsible Recruitment Due Diligence Toolkit ("the Toolkit"). The Toolkit offers suppliers and labor agents a comprehensive "how-to" guide with practical tools covering six core areas: embedding responsible recruitment into policies and management systems; identifying and assessing risks; preventing and mitigating risks; tracking implementation and results; communicating how risks are addressed; and providing access to remediation. [...] We began holding training sessions on the Toolkit in those countries where the most prevalent migration corridors in our supply chain exist, including Malaysia, Singapore, and the Philippines. [...] We also strengthened our pre-departure orientation (PDO) training for labor agencies and civil society organizations that are certified by the government to carry out PDO sessions across all industries'. [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Assessment of the number affected by payment of recruitment fees: The Company discloses in its SR Report 2022: '\$33.2M in recruitment fees paid back by suppliers to 37,322 of their employees since 2008' [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.d	Prohibition of forced labour: Wage practices (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"> <li>• Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: In its Supplier Responsible Standards, the Company indicates: 'Workers shall retain possession or control of all identity documents, such as passports, identity papers, travel documents, and other personal legal documents. Supplier shall not require surrender of Workers' original identity documents, withhold Workers' original identity documents, or restrict Workers' access to original identity documents for any reason. [...] All Workers shall have the right to freely enter into and to terminate their employment. [...] Supplier shall not confine or restrict Worker's freedom of movement inside the place of production or Supplier-provided facilities [...] Suppliers shall not have direct control of, or access to, Worker bank accounts other than to make direct deposits of compensation'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="http://apple.com">apple.com</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: FoA &amp; CB rules in codes or contracts: In its Supplier Responsible Standards, the Company indicates: 'Supplier shall freely allow Workers' lawful rights to associate with others, form, and join (or refrain from joining) organizations of their choice, and bargain collectively, without interference, discrimination, retaliation, or harassment.' They also indicate that 'Where Applicable Laws and Regulations substantially restrict freedom of association, Supplier shall allow alternative means for Workers to individually and collectively engage with Supplier, including processes for Workers to express their Grievances and protect their rights regarding working conditions and terms of employment'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="http://apple.com">apple.com</a>]</li> <li>• Met: How working with suppliers on FoA and CB: The Company reports in its SR 2022: 'In 2021, we continued our partnership with the ILO, including in Vietnam where we worked to help educate and raise awareness among our suppliers about new worker protections and labor reforms being implemented across the country, including requirements related to freedom of association and collective bargaining'. [Supplier Responsibility 2022 Progress Report, 2022: <a href="http://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress: Each year the Company discloses some information about freedom association and collective bargaining non-compliances found during audits. For example, in SR 2019, the Company indicates that 'A lower percentage of assessment violations were found relating to anti-harassment, prevention of underage labor, and freedom of association and collective bargaining.' However, no evidence found of trends/analysis demonstrating evolution over time. No new relevant evidence found in latest review. [Supplier Responsibility 2019 Progress Report, 2019: <a href="http://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2022 Progress Report, 2022: <a href="http://apple.com">apple.com</a>]</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The Company indicates: 'Supplier shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment'. The Company sets out Health and Safety requirements in its Supplier Responsibility Standards, including the following topics: Regulatory Permits; Occupational Health and Safety Risk Assessment; Machine Guarding; Electrical Safety; Lockout/Tagout; High Risk Tasks; Chemical Management; Industrial Hygiene; Medical Surveillance; Personal Protective Equipment (PPE); Ergonomics; Combustible Dust; Training and Communication; and Documentation. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="http://apple.com">apple.com</a>]</li> <li>• Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period</li> <li>• Not Met: Fatalities disclosures for lasting reporting period</li> <li>• Not Met: Occupational disease rates for the last reporting period</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>Met: How working with suppliers on H&amp;S: The Company indicates in its SR 2020: 'If we identify non-compliance with our Standards during an assessment, we hold our suppliers accountable and work collaboratively through tailor-made Corrective Action Plans, online training materials, and on-site coaching. Through this direct engagement, we provide solutions for technical problems, close gaps in management systems, and help to develop a sustainable culture of safety. In 2013, we launched the Apple Environmental Health and Safety Academy ("EHS Academy"). Over a four-year period, EHS managers from over 270 supplier sites in China took courses and implemented projects to improve their site's performance across a number of critical areas, including chemical management, emergency preparedness, and safety equipment. [...] In 2019, we launched the Environmental Health and Safety Leadership Workshop ("the Workshop"), which provides training to supplier management teams on how to act as role models for best practices in creating safe, healthy workplaces as well as ways to better engage and communicate with their employees on safety-related topics. The Workshop has received positive feedback from supplier management teams and is continuing to scale to new facilities.' In addition, in its SR 2022: 'In addition to audits and ongoing capability-building, we consistently look for opportunities to engage earlier and prevent issues before they materialize. In 2020, we set out to proactively improve safety by mapping risks related to machine safety across our supply chain, and identifying those high-priority suppliers that required additional support. In 2021, 212 supplier sites received customized support in order to improve capabilities related to assessing the safety of machinery during their procurement processes, conducting safety reviews before machine sign-off, and instruction on how to safely operate machines during production and maintenance.' [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="http://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2022 Progress Report, 2022: <a href="http://apple.com">apple.com</a>]</li> <li>Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.8.b	Women's rights (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Women's rights in codes or contracts: The Supplier Responsibility Standards include some provisions related to women's rights, such as: 'Supplier shall not Discriminate against any Worker based on race, color, age, gender, [...], gender identity [...] in hiring and employment practices. [...] Supplier shall have a system to discipline supervisors, managers, or Workers who engage in any Physical Abuse, Sexual Harassment or sexual abuse, Psychological Harassment, or Verbal Harassment or Verbal Abuse, through measures such as compulsory counselling, warnings, demotions, and terminations or any combination thereof, regardless of whether such action was intended as a means to maintain labor discipline. [...] Security Practices. All security practices shall be gender appropriate and nonintrusive. [...] Pregnancy and Nursing Mothers Anti-Discrimination. Supplier shall comply with all Applicable Laws and Regulations regarding pregnancy and postnatal employment protections, benefits, and pay. Supplier shall make reasonable accommodations for nursing mothers unless prohibited by Applicable Laws and Regulations. Supplier shall not (i) refuse to hire an applicant for a non-Hazardous position or (ii) terminate a Worker's employment solely based on the Worker's pregnancy or nursing status. Supplier shall not prohibit female Workers from becoming pregnant nor threaten female Workers with adverse employment consequences, including dismissal, loss of seniority, or deduction of wages, in order to discourage them from becoming pregnant. [...] Pregnancy and Medical Testing Supplier shall not require pregnancy tests or Medical Tests, including but not limited to Hepatitis B or HIV, either as a condition for employment or as a requirement for continued employment. [...]' [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="http://apple.com">apple.com</a>]</li> <li>Not Met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>Not Met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.b	Working hours (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Working hours in codes or contracts: Its Supplier Code of Conduct includes a provision with respect Working hours: 'A workweek shall be restricted to 60 hours, including overtime, and workers shall have at least one day off every seven days except in emergencies or unusual situations. Regular workweeks shall not exceed 48 hours. Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: How working with suppliers on working hours: The Company indicates in its SR 2022 Progress Report: 'One example of how we've driven improvements in supplier capability and performance is in compliance with our working hours standard. We review working hours as part of our assessments and implement Corrective Action Plans as needed. In addition, for nearly 10 years, we have monitored the working hours of more than 1.5 million workers on a weekly basis, and validated the reporting of working hours through focused audits. In FY2021, our suppliers achieved 95 percent compliance with our working hours requirements, a 2 percent increase from the previous year.' However, this subindicator looks for evidence of working with manufacturing suppliers to proactively improve their performance. Current evidence seems to focus in monitoring compliance and application of corrective measures where non-compliances are found. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by excessive working hours</li> <li>• Met: Provide analysis of trends in progress made: See above. In FY2021, 'suppliers achieved 95 percent compliance with our working hours requirements, a 2 percent increase from the previous year'. [Supplier Responsibility 2022 Progress Report, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul>
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"> <li>• Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Supplier Responsibility Standards that 'Suppliers shall develop an appropriate management system to conduct due diligence in accordance with the standards set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance") and other applicable international standards [...]'. In addition, the Company indicates in its SR 2021: 'Suppliers are required to adhere to our Code and Standards'. [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2021 Progress Report, 2021: <a href="https://apple.com">apple.com</a>]</li> <li>• Not Met: Works with smelters/refiners and suppliers to build capacity: The Company indicates in its Conflict Minerals Report 2021: 'We provide annual 3TG due diligence training webinars to suppliers that have reported 3TG to Apple. In addition, our SupplierCare portal provides suppliers with access to online training materials (in multiple languages) that focus on Apple's due diligence expectations and requirements for 3TG reporting. [...] In addition to conducting our own supply chain due diligence, we work closely with third party audit programs — in particular, the RMI and the London Bullion Market Association ("LBMA")—to identify risks at the smelter, refiner, and mining levels and to help strengthen industry auditing and certification bodies. The Risk Readiness Assessment ("RRA") — developed by Apple in 2016 and widely adopted by industry via the RMI in 2018 — continued to be utilized by downstream companies and upstream refiners and mining companies, with 366 RRAs completed as of December 31, 2021, compared with 341 completed as of 2020. The Copper Mark, an assurance framework for responsible copper production, also applied the RRA as part of its criteria to assess copper producers at 31 sites, an increase from 16 in 2020. Apple continues to use the RRA on a targeted basis through these industry platforms to assess risks in our global supply chain, with a particular focus on new smelters and refiners that enter our supply chain and on additional minerals beyond 3TG.' It is not clear, however, how it works with smelters/refiners in capacity building activities. [Conflict Minerals Report 2021, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Contractual requirement to disclosure smelter/refiner information: See above about adherence requirement. In its Supplier Responsible Standards document, the Company includes some provision related to the Reporting of the Due Diligence Process: 'Suppliers shall provide evidence of their Supply Chain mapping and verification or audit of identified Material Processors according to specific risks and Relevant Materials: Conflict issues pertaining to tin, tantalum, tungsten, and gold shall be reported to Apple twice annually [...]; Cobalt and other Relevant Mineral Supply Chain mapping shall be reported annually [...]' [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Met: Contractual requirement covers all minerals: See above. Requirement refers to 3TG, cobalt and other relevant mineral. In addition, in its SR 2020 Progress Report, the Company states: ' In 2018, we expanded the scope of our Responsible Sourcing Standard to include all materials. [...] We also map and conduct due diligence on other materials such as mica, titanium, and lithium.' [Supplier Code of Conduct &amp; Standards, 01/2022: <a href="https://apple.com">apple.com</a>] &amp; [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="https://apple.com">apple.com</a>]</li> </ul>
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	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"> <li>• Met: Risk identification and disclosure in line with OECD Guidance: One activity to identify risks consists in requiring suppliers utilizing 3TG to submit an industry-wide standard Conflict Minerals Reporting template. Suppliers are also required 'to inform Apple immediately if they identify certain high risks included in Annex II of the OECD Due Diligence Guidance, such as conflict or human rights risks associated with 3TG.' It also indicates: '[...] we work closely with third party audit programs—in particular, the RMI and the London Bullion Market Association (“LBMA”)—to identify risks at the smelter, refiner, and mining levels and to help strengthen industry auditing and certification bodies. The Risk Readiness Assessment (“RRA”)— developed by Apple in 2016 and widely adopted by industry via the RMI in 2018—continued to be utilized by downstream companies and upstream refiners and mining companies, with 366 RRAs completed as of December 31, 2021, compared with 341 completed as of 2020'. Previous conflict mineral report also indicated that RRA includes assessment categories related to how smelters and refiners treat artisanal and small-scale mining formalization. It also indicates that (RRA) helps assessing risks in its supply chain beyond those associated with conflict, such as social, environmental and human rights risks. [Conflict Minerals Report 2021, 2022: <a href="https://apple.com">apple.com</a>]</li> <li>• Met: Identification of smelter/refiners and OECD Guidance: In addition, it indicates that it collects and processes 'data provided by suppliers through their completion of the CMRT to map our supply chain to the smelter and refiner level and, to the extent available, to the mining level. [...] Apple believes third party audits remain foundational to robust due diligence systems. In particular, third party audits play a significant role in providing assurance that smelters and refiners have appropriate due diligence systems in place, while helping to ensure that operations and sourcing practices are aligned with the OECD Due Diligence Guidance, and do not support conflict, including in the DRC or adjoining countries. Since 2015, we have continued to reach a 100 percent rate of participation in third party audit programs by identified smelters and refiners in our supply chain'. [Conflict Minerals Report 2021, 2022: <a href="https://apple.com">apple.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses its Smelters and refiners reported in Apple’s supply chain List in its Conflict Mineral Report 2021. In addition, it indicates: 'As of December 31, 2021, based on our due diligence efforts, including the information provided by our suppliers, Apple believes that the smelters and refiners listed in Annex I were used to process 3TG in our products at some point during 2021. Through our smelter and refiner identification and validation process, we have identified a total of 265 smelters and refiners that processed 3TG in our supply chain during 2021. Of these 265 smelters and refiners: 12 were removed including those that: previously participated in but subsequently stopped participating in a third party audit program; were not willing to participate in or complete a third party audit within given timelines; exceeded third party audit corrective action plan timelines; or failed to meet Apple’s Supplier Code, Responsible Sourcing Standard, or 3TG mineral requirements; 253 remained in Apple’s 3TG supply chain as of December 31, 2021. [...] Of all 253 smelters and refiners of 3TG determined to be in our supply chain as of December 31, 2021, Apple found no reasonable basis for concluding that any such smelter or refiner sourced 3TG that directly or indirectly financed or benefited armed groups in the DRC or an adjoining country. Of these 253 smelters and refiners, 30 are known to be directly sourcing from the DRC or an adjoining country, of which 100 percent continued to participate in a third party audit as of December 31, 2021 which involves a review of the traceability of the smelter’s or the refiner’s 3TG, as well as a validation of its due diligence systems and country of origin information. The foregoing does not include smelters and refiners indirectly sourcing from the DRC or adjoining countries by acquiring 3TG from these 30 smelters and refiners.' As indicated above, Apple continued to achieve a 100 percent rate of participation in third party audits since 2015. [Conflict Minerals Report 2021, 2022: <a href="https://www.apple.com">apple.com</a>]</li> <li>• Not Met: Risk identification and disclosure covers all minerals: The Company’s Conflict Mineral Report 2021 is focused only in 3TG minerals (see Annex I: Smelter and Refiner Lists) [Conflict Minerals Report 2021, 2022: <a href="https://www.apple.com">apple.com</a>]</li> </ul>
D.4.10.c	Reporting on 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"> <li>• Met: Describes mineral risk management plan for supply chain: The Company describes the following as Strategy to Respond to Identified Risks: 'we implement our due diligence program and conduct supply chain analysis by leveraging information gained from independent research, engaging with civil society groups and rightsholders, analyzing third party audits, and working directly with smelters and refiners to respond to risks identified in our supply chain. We closely monitor completion of third party audits and corrective action plans by the smelters and refiners in our supply chain.. [...] we analyze incident data provided by ITSCI and RCS Global Group’s Better Mining program (“Better Mining”), two upstream traceability and due diligence programs that monitor tin, tantalum, and tungsten mines in the DRC and across the African Great Lakes region. We work with these programs to help develop their incident review processes, and review and monitor incidents generated through their respective reporting systems, including reviewing corrective actions and confirming incidents are closed in accordance with the programs’ criteria. [...] Innovating Responsible Gold Sourcing: Apple is pioneering industry-leading traceability mechanisms for recycled materials to build a supply chain of exclusively recycled gold. In 2021, for the first time, we used 100 percent certified recycled gold in an Apple product: the plating of the main logic board and the wire in the front and rear cameras for iPhone 13.[...] In 2021, we continued to fund and scale the Salmon Gold project with Tiffany &amp; Co., led by RESOLVE, a sustainability non-profit. The Salmon Gold project works with small-scale miners and Indigenous Peoples in remote regions of the Yukon, Alaska, and British Columbia to support a mining practice that helps restore rivers and streams so that salmon and other fish can thrive. Since RESOLVE first introduced the Salmon Gold project in 2017, the organization has connected local placer miners, environmentalists, and government agencies to mitigate the damage done by historic mining activities. The gold mined from this project is then traced from its origin to a refiner in Apple’s supply chain using blockchain technology.'. [Conflict Minerals Report 2021, 2022: <a href="https://www.apple.com">apple.com</a>]</li> <li>• Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time</li> <li>• Not Met: Disclose better risk prevention/mitigation over time</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Suppliers and stakeholders engaged in risk management strategy</li> <li>• Not Met: Risk management and response processes cover all minerals</li> </ul>



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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Working Hours; forced labour</li> <li>• Headline: Wistron iPhone plant accused of labour laws violations</li> <li>• Story: On December 12, 2020, workers of Wistron, an Apple’s iPhone assembly contractor, rioted in a plant near the Indian city of Bengaluru over unpaid wages. Local media report that around 2,000 staff protested at not having been properly paid for months, and that iPhones may have been looted and the factory damaged. The factory opened in August 2020 and was thought to assemble the iPhone SE and iPhone 12. Apple outsourced Indian iPhone assembly to the Taiwanese company Wistron, which in turn outsourced recruitment and payroll to Indian companies. The India companies were accused of not paying staff promptly or properly for several months. Videos made by employees inside the factory showed men breaking security cameras, windows and other equipment with rods and sticks. Police allegedly arrested 149 people over the violence.</li> </ul> <p>On December 21, 2020, press sources reported that an enquiry following the uprising initiated by the state government of Karnataka in southern India found violations of labour laws by Wistron Corporation. Workers alleged management declined their request of payment of back wages, which have accumulated for three months or more for some even as they are forced to work 12-hour shifts. The investigation by the state Department of Factories, Boilers, Industrial Safety &amp; Health found that the Company had illegally increased working hours from 8 hours to 12 hours a day and did not pay the stipulated overtime wages. Furthermore, the Company was allegedly guilty of non-payment of wages on time according to Karnataka laws. The report also alleged that the Company's attendance monitoring system undercounted the number of hours worked by employees.</p> <p>[Deccan Herald, 14/12/2020, "Apple probing possible supplier rules violations by Wistron Corp's Bengaluru facility: Report": <a href="https://www.deccanherald.com">deccanherald.com</a>] [Reuters News, 13/12/2020, "Apple probes supplier after workers at Wistron plant in India rampage": <a href="https://www.reuters.com">reuters.com</a>] [The Register, 14/12/2020, "iPhone factory workers riot over unpaid wages in India": <a href="https://www.theregister.com">theregister.com</a>] [business-standard, 22/12/2020, "Top cop to oversee probe into violence at Wistron's manufacturing facility": <a href="https://www.business-standard.com">business-standard.com</a>]</p>
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: In response to the allegation, the Company stated in an email that: "We have teams on the ground and have immediately launched a detailed investigation at Wistron's Narasapura facility". Adding, it was dedicated to ensuring everyone in its supply chain was treated with dignity and respect. [Reuters News, 13/12/2020: <a href="https://www.reuters.com">reuters.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The Company stated that Wistron had failed to implement proper working hour management processes, which "led to payment delays for some workers in October and November". However, the company did not respond to the allegation on the illegal increase of working hours from 8 hours to 12 hours a day. Thereby, the company did not address all aspects of the allegation in detail. [Reuters News, 19/12/2020,: <a href="https://www.reuters.com">reuters.com</a>]</li> </ul>
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: The Company stated: "We have teams on the ground and have immediately launched a detailed investigation at Wistron's Narasapura facility. [...] Our main objective is to make sure all the workers are treated with dignity and respect, and fully compensated promptly". However, there is no indication that the company or the supplier engaged with the affected stakeholders as part of the investigation. [Reuters News, 19/12/2020: <a href="https://www.reuters.com">reuters.com</a>]</li> <li>• Not Met: Identified cause: The Company stated that Wistron had failed to implement proper working hour management processes, which "led to payment delays for some workers in October and November". However, the company did not present investigative results on the causes underlying the illegal increase of working hours from 8 hours to 12 hours a day. [Reuters News, 19/12/2020: <a href="https://www.reuters.com">reuters.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: Wistron said it is restructuring its teams and setting up 24-hour hotlines for employees to make</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>anonymous complaints. "Apple has sent a strong message to its suppliers, telling them unequivocally that they need to adhere to its standards". However, Apple has no own improvements and what Winstron has done does not qualify for Apple. [Reuters News, 19/12/2020: <a href="https://www.reuters.com">reuters.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Provided remedy: Wistron said it was working hard to raise standards and fix issues at the factory. It said it had paid all workers and introduced new hiring and payroll systems. [Reuters News, 19/12/2020: <a href="https://www.reuters.com">reuters.com</a>]</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Remedy satisfactory to stakeholders: The CHRB did not find information suggesting the affected stakeholders were dissatisfied with the remedy.</li> <li>• Met: Remedy delivered: Winstron said it had paid all workers and introduced new hiring and payroll systems.</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Area: Forced labour</li> <li>• Headline: Apple among companies accused of using suppliers linked to forced labour in China</li> <li>• Story: On March 1st, 2020, the Australian Strategic Policy Institute (ASPI) released a report called "Uyghurs for sale" that named Apple among 83 companies benefiting from the use of potentially abusive labour transfer programmes. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are working in forced labour conditions across the country. The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. In addition, the think tank said that the workers were allegedly transferred out of Xinjiang between 2017 and 2019 and claimed that people are being effectively "bought" and "sold" by local governments and commercial brokers. The ASPI used open-source public documents, satellite imagery, and media reports, allowing to identify 27 factories in nine Chinese provinces that have used labourers. The research found up to 560 Xinjiang workers were transferred to work several factories including to Foxconn Technology, that supplies brands such as Amazon, Apple, Dell, Google, Huawei and Microsoft. Other factory implicated is O-Film Technology which supplies Apple, Huawei, Lenovo and Samsung with camera and touchscreen components. ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". The report calls on companies mentioned to "conduct immediate and thorough human rights due diligence on its factory labour in China, including robust and independent social audits and inspections."</li> </ul> <p>On July 20, 2020, O-Film subsidiary Nanchang, an Apple supplier, was one of the eleven companies blacklisted by the U.S. Department of Commerce's Bureau of Industry and Security over alleged human rights abuses involving Uighur Muslims in China. According to the U.S. Department of Commerce, the O-Film subsidiary was named on the list "in connection with the forced labour of Uighurs and other Muslim minority groups in western China". Companies on the list must apply for special licenses to access U.S. technologies.</p> <p>On August 10, 2020, press reported that Apple imported clothes, probably uniforms for staff in stores, from Changji Esquel Textile, a company that was facing US sanctions over forced labour at a subsidiary firm in China's Xinjiang region. The US government in July 2020 imposed sanctions on Changji Esquel Textile, a unit of textile Esquel group, along with 10 other Chinese companies for alleged human rights violations in the Xinjiang region, including forced labour. The sanctions bar the companies from buying US technology and other goods.</p> <p>According to the press, a month before the sanctions were announced, Esquel had sent a shipment of women's cotton and elastane knit shirts to "Apple Retail stores" in California, as the database run by the global shipping information provider Panjiva showed. In 2018, a presentation at an industry conference by Esquel's chief executive highlighted Apple as a "major customer" of the firm's</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Vietnam arm, providing pictures of blue and red staff uniforms produced in its factories. Those units were not on the sanctions list, but the shirts they produced likely included cotton grown in Xinjiang, the region where Chinese authorities' persecution of mostly Muslim minorities has included forced labour. Further notes listed five locations where the firm operated inside Xinjiang. One was Changji, the location of the sanctioned subsidiary.</p> <p>On December 29, 2020, press sources reported that an investigation by the Washington Post and the Tech Transparency Project, revealed that Companies including Apple, Amazon and Tesla are sourcing parts from a Chinese supplier that allegedly uses forces Muslim labour. The Tech Transparency Project found documents detailing how Lens Technology, Apple's supplier, uses "thousands of Uyghur workers from the predominantly Muslim region of Xinjiang" in its factories. Lens Technology is one of at least five companies connected to Apple's supply chain that have now been linked to alleged forced labour from the Xinjiang region. In the beginning 2020, Congress introduced a bill that would keep goods made with forced labour in the Uyghur region of China from entering the US and that companies would be held responsible for such human rights violations. The bill passed in the House back in September 2020. The Washington Post alleged Apple paid to lobby Congress to essentially water down the bill.</p> <p>On May 10, 2021, press sources and two human rights groups reported that seven companies that supplied products or services to Apple are linked to alleged forced labour involving Uyghurs and other oppressed minorities in China. The investigation reportedly found that at least five of those companies received thousands of Uyghur and other minority workers at specific factory sites or subsidiaries that supplied for Apple. The revelation stands in contrast to Apple's assertions in 2020 that it has not found evidence of forced labour in its supply chain. According to press sources, among the seven Apple suppliers linked to suspected forced labour, only one operated in Xinjiang. The others reportedly operated elsewhere in China and received thousands of Uyghurs and other ethnic Muslim minorities as workers through state-run poverty alleviation programs. Human rights groups and Uyghur refugees said that these programs are coercive; if the workers refuse to go along, they are sent to jail.</p> <p>On September 27, 2021, the Campaign for Accountability (CfA), a non-profit group, has reportedly filed a formal complaint with US Customs and Border protection over Apple's alleged use of forced labor in China. The CfA's Tech Transparency Project (TTP) cites the Tariff Act of 1930 in its complaint against Apple, which "prohibits the importation of merchandise mined, produced or manufactured, wholly or in part, in any foreign country by forced or indentured labor – including forced child labor. Such merchandise is subject to the exclusion and/or seizure, and may lead to a criminal investigation of the importer(s)." "This research is based on hard evidence: Chinese-language media reports, government announcements, and even videos posted online," said the CfA in a statement. "Yet in the face of such detailed allegations raised by TTP and others, Apple has consistently refused to acknowledge the problem, repeatedly issuing the same blanket denial about its suppliers' use of minority Uyghur laborers." The CfA seeks a Withhold Release Order "that prevents the importation of Apple products linked to forced labor." It says Apple is in contravention of the Tariff Act of 1930, which prohibits importing merchandise made under these conditions.  [The Guardian, 01/03/2020, "China transferred detained Uighurs to factories used by global brands – report": <a href="https://www.theguardian.com">theguardian.com</a>] [Business and Human Rights Resource Centre, 10/03/2021, "China: Apple suppliers accused of using alleged "forced labour from Xinjiang"; Apple claims it has not found supporting evidence": <a href="https://www.business-humanrights.org">business-humanrights.org</a>] [The Guardian, 10/08/2020, "Apple imported clothes from Xinjiang firm facing US forced labour sanctions": <a href="https://www.theguardian.com">theguardian.com</a>]  [Engadget, 29/12/2020, "Apple, Amazon and Tesla supplier accused of using forced labor": <a href="https://www.engadget.com">engadget.com</a>]</p>
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:  Score 1</p> <ul style="list-style-type: none"> <li>Met: Public response: After the release of ASPI's report, an Apple spokesman, Josh Rosenstock, told the Washington Post: "Apple is dedicated to ensuring that everyone in our supply chain is treated with the dignity and respect they deserve. We have not seen this report but we work closely with all our suppliers to ensure our high standards are upheld."</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>In testimony to Congress in July 2020, Apple CEO Tim Cook said the company "wouldn't tolerate forced labor" and "would terminate a supplier relationship if it were found."</p> <p>In a statement to The Information's article, Apple said that "looking for the presence of forced labor is part of every assessment we conduct in every country where we do business." It added that "despite the restrictions of Covid-19, we undertook further investigations and found no evidence of forced labor anywhere we operate. We will continue doing all we can to protect workers and ensure they are treated with dignity and respect." [The Guardian, 01/03/2020: <a href="https://www.theguardian.com">theguardian.com</a>] [The Washington Post, 20/11/2020, "Apple lobbies against Uighur forced labor bill": <a href="https://www.washingtonpost.com">washingtonpost.com</a>] [Business and Human Rights Resource Centre, 10/03/2021, "China: Apple suppliers accused of using alleged "forced labour from Xinjiang"; Apple claims it has not found supporting evidence": <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: After the revelation that Apple imports clothes from Changji Esquel Textile, the Company said in a statement: "Esquel is not a direct supplier to Apple but our suppliers do use cotton from their facilities in Guangzhou and Vietnam. We have confirmed no Apple supplier sources cotton from Xinjiang and there are no plans for future sourcing of cotton from the region." However, the spokesman declined to say where those factories source their raw cotton. An Apple spokesperson told that the company confirmed Lens Technology "has not received any labor transfers of Uyghur workers from Xinjiang." The company's supplier progress report states that Apple conducted 1,142 "assessments" across its entire supply chain in 49 different countries in 2019 to enforce its Supplier Code of Conduct and the Supplier Responsibility Standards. In November, Apple spokesperson Josh Rosenstock told the Post that the company "conducted a detailed investigation with our suppliers in China and found no evidence of forced labor on Apple production lines." However, the Company declined to tell whether Lens and O-Film were among the companies it audited. In general, Apple has never publicly acknowledged its ties to the suppliers accused of forced labor and has not publicly listed the suppliers that it works with. There is not evidence that Apple has publicly commented the filing of the complaint by Campaign for Accountability (CfA) with U.S. Customs and Border Protection over Apple's continued use of forced labor in products it ships to and sells in the United States. In addition, Apple has not responded to the letter sent by the UN Working Group on Business and Human Rights on March 12, 2021 on the allegation of Uyghur forced labour in Apple's supply chain. Overall, the company responded in very general terms and did not address the allegation in detail. [The Washington Post, 20/11/2020, "Apple lobbies against Uighur forced labor bill": <a href="https://www.washingtonpost.com">washingtonpost.com</a>] [Campaign for Accountability, 27/09/2021, "Campaign for Accountability Files Customs and Border Protection Complaint over Apple's Use of Forced Labor": <a href="https://www.campaignforaccountability.org">campaignforaccountability.org</a>] [Letter of the Working Group on Business and Human Rights (OTH 58/2021), 12/03/2021: <a href="https://www.spcommreports.ohchr.org">spcommreports.ohchr.org</a>] [Supplier Responsibility 2020 Progress Report, 05/2020: <a href="https://www.apple.com">apple.com</a>]</li> </ul>
E(2).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: Apple spokesperson Josh Rosenstock told the Post that the company "conducted a detailed investigation with our suppliers in China and found no evidence of forced labor on Apple production lines." However, there is no evidence suggesting that the company engaged with the affected stakeholders. The CHRB is aware of difficulties companies may face in attempts to engage directly with Uyghur workers affected by forced labour, however, there is no evidence that the company attempted to engage with other possible sources such as exile Uyghur organisations. [The Washington Post, 20/11/2020, "Apple lobbies against Uighur forced labor bill": <a href="https://www.washingtonpost.com">washingtonpost.com</a>]</li> <li>• Not Met: Identified cause: Apple said that "looking for the presence of forced labor is part of every assessment we conduct in every country where we do business." It added that "despite the restrictions of Covid-19, we undertook further investigations and found no evidence of forced labor anywhere we operate." However, the company does not present investigative results on the underlying causes of the events concerned. [Apple Insider, 10/05/2021, "Seven Apple suppliers linked to Chinese forced labor programs": <a href="https://www.appleinsider.com">appleinsider.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: Bloomberg reported that Apple is thought to have terminated its contracts with O-Film over the concerns a few months ago. However, the company has never publicly acknowledged this move. In addition, both The Information and The Washington Post revealed that</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Apple paid to lobby Congress to water down the bill approved by the US Congress to keep goods made with forced labor in the Uyghur region of China from entering the US. The company did not publicly acknowledge this allegation. In general, there is no publicly available evidence that the company made changes to its management systems, policies and supply chain following the events and their human rights impacts. [BNN Bloomberg, 17/03/2021, "Apple is said to cut off Chinese supplier over Xinjiang labour": <a href="#">bnnbloomberg.ca</a>] [The Information, "Apple Lobbied U.S. Congress on Uighur Slave Labor Bills": <a href="#">theinformation.com</a>] [The Washington Post, 20/11/2020, "Apple is lobbying against a bill aimed at stopping forced labor in China": <a href="#">washingtonpost.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link: The Company stated: "we undertook further investigations and found no evidence of forced labor anywhere we operate." However, Apple did not provide sufficient evidence to prove the company is not linked to the impact. [The Washington Post, 20/11/2020, "Apple is lobbying against a bill aimed at stopping forced labor in China": <a href="#">washingtonpost.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Area: Child labour</li> <li>• Headline: Apple accused of being complicit in child labour in the DRC</li> <li>• Story: On December 15th, 2019, a legal complaint was filed in the U.S. District Court of Washington D.C. by human rights NPO International Rights Advocates, on behalf of 14 families from the Democratic Republic of Congo (DRC), against Tesla, Microsoft, Alphabet, Dell and Apple. The lawsuit accuses the companies of aiding and abetting in the death and serious injury of children who were reportedly working in cobalt mines operated by Kamoto Copper Company, owned by Glencore.</li> </ul> <p>The complaint alleges that the defendants have known for a "significant period of time" that Congo's mining sector "is dependent upon children". The claim further alleged that cobalt from the Glencore-owned mines was then sold to Umicore, which in turn sells battery-grade cobalt to Apple, Google, Tesla, Microsoft and Dell. These companies, according to the complaint, should have the ability to overhaul their cobalt supply chains to ensure safer working conditions.</p> <p>The lawsuit alleges that the children, some as young as 6 years old, were forced by their families' extreme poverty to leave school and work in cobalt mines owned by Glencore. According to the complaint, six of the fourteen children were killed in tunnel collapses, while others suffered life-altering injuries, including paralysis. Some children were working six days a week and allegedly paid as little as USD 1.50 per day.</p> <p>The defendants replied with a motion to dismiss, arguing they did not violate the TVPRA as the child labour occurred only in their supply chain which is not the same as a venture. Furthermore, they argued that the children affected by the mine collapse were not forced into work by direct threats of force or harm by the employer. According to their argument the TVPRA does not include economic pressure in its definition of forced labour. In a third argument, the defendants deny a sufficient degree of knowledge of the issue. The court dismissed the case in November 2021. In the ruling the judge found that the harm claimed by the plaintiffs was not traceable to any of the defendants. Furthermore, the judge did not find a violation of the law cited and voiced doubts regarding the extraterritoriality of the TVPRA. The plaintiffs appealed this decision, therefore, the search for remedy continues.</p> <p>[CBS News, 17/12/2019, "Apple, Google, Microsoft, Tesla and Dell sued over child-mined cobalt from Africa": <a href="#">cbsnews.com</a>] [Reuters, 16/12/2019, "Tesla, Apple among firms accused of aiding child labor in Congo": <a href="#">reuters.com</a>] [Clifford Chance, 07/12/2021, "Testing the US Trafficking Victims Protection Act: Doe v. Apple": <a href="#">cliffordchance.com</a>] [Sky News, 17/12/2019, "Tesla and Apple among tech giants accused of aiding child labour in DRC": <a href="#">news.sky.com</a>]</p>



Indicator Code	Indicator name	Score (out of 2)	Explanation
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: Apple told CBS News the company has "led the industry by establishing the strictest standards for our suppliers and are constantly working to raise the bar for ourselves, and the industry." The company added that since 2016, it has published a full list of cobalt refiners every year, all of which participate in third-party audits. "If a refiner is unable or unwilling to meet our standards, they will be removed from our supply chain," Apple said, adding that it removed six cobalt refiners in 2019. [CBS News, 17/12/2019: <a href="https://www.cbsnews.com">cbsnews.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The company does not address the individual cases of the lawsuit in question. It also does not engage with the alleged conditions of the children, the dangers of child labour in mining, or expressly recognises the issue of child labour as such.</li> </ul>
E(3).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: Although the company indicates it has removed refiners for being unable to meet its standards, it is unclear which standards they are and whether the refiners in question have been removed for child labour related violations. There is no further evidence of a review of management systems following the allegation. [CBS News, 17/12/2019: <a href="https://www.cbsnews.com">cbsnews.com</a>]</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(3).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> <li>• Area: Right to security of persons</li> <li>• Headline: Apple and others named as supplier North Mara Gold Mine faces allegations of pollution and violence in Tanzania</li> <li>• Story: On June 18th, 2019, news outlets in several countries simultaneously released the results of investigations by a consortium of journalists, Forbidden Stories, into human rights and environmental abuses at Barrick Gold's North Mara gold mine in Tanzania, confirming six years of investigations, reported on yearly by MiningWatch Canada, into assaults on men, women and children by the mines private security and by police contracted by the mine. There have been injury cases including loss of limbs, broken bones, and internal injuries. Additionally, the consortium highlighted attacks on journalists who have tried to report on human rights abuses at the mine. At least a dozen local and foreign reporters were censored or threatened, and this is why Forbidden Stories has decided to investigate Acacia Mining's activity in the mine. The consortium also exposed how the gold from this mine is refined in India and Switzerland before being sold to, among others, international electronic companies. In June 2019, at the annual shareholders meeting, human rights campaigners called for independent and transparent assessment of grievance claims and an end to the memorandum of understanding with police. [The Guardian, 18/06/2019, "Murder, rape and claims of contamination at a Tanzanian goldmine": <a href="https://www.theguardian.com">theguardian.com</a>] [Ghana Business News, 19/06/2019, "Green Blood: A Tanzanian gold mine that silences journalists": <a href="https://www.ghanabusinessnews.com">ghanabusinessnews.com</a>] [The Guardian, 18/06/2019, "Tech firms to check suppliers after mining revelations in Tanzania": <a href="https://www.theguardian.com">theguardian.com</a>]</li> </ul>
E(4).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public response: The company responded stating it was "deeply committed to the responsible sourcing of materials that go into its products". The company added that "if a refiner is unable or unwilling to meet our standards, they will be removed from our supply chain." It said it had stopped working with 60 refiners and would continue investigating and holding supply chains to the highest standards. However, no acknowledgement of the allegation could be found as it is</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>unclear whether the 60 refiners were in any way connected to the allegation. [The Guardian, 18/06/2019: <a href="http://theguardian.com">theguardian.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: No acknowledgement of the allegation could be found as it is unclear whether the 60 refiners were in any way connected to the allegation.</li> </ul>
E(4).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: Following the publication of the allegation, Apple, Nokia and Canon said they would ask MMTC-PAMP to look into the claims, and the refinery announced it would assess its gold supply chain from Tanzania and arrange for a site visit by an independent expert, Synergy Global Consulting Ltd.</li> </ul> <p>The visit took place on 19-21 November 2019, however, the visitors were allowed to talk only to local residents vetted by the mine. Furthermore, "the mine said there was a security issue offsite so we suggested some victims go to mine office and speak to the assessor there. Then they said there was not enough time in the schedule. So the assessor spoke to none of the human rights victims, [or] lawyers of victims"</p> <p>According to the auditor, they had "spoken to a variety of stakeholders, including local community representatives. Following the trip [...] there was also an interview with an international NGO." In a response to Raid the auditor admitted that there had been no engagement with affected stakeholders.</p> <p>Barrick Gold, the company operating the mine, claims it has been conducting stakeholder and community engagement since taking over the operations. However, this claim does not expressly include the engagement with affected stakeholders. [The Guardian, 13/07/2020, "Gold trade body urged to suspend refinery over alleged abuses in Tanzania": <a href="http://theguardian.com">theguardian.com</a>] [Synergy, 10/07/2020, "Response to RAID article "LBMA Should Suspend Gold Refiner MMTC-PAMP"": <a href="http://media.business-humanrights.org">media.business-humanrights.org</a>] [Barrick, 10/08/2020, "Solid Operating Performance Maintains Production Within Guidance": <a href="http://barrick.com">barrick.com</a>] [Barrick, N/A, "Human Rights Report": <a href="http://s25.g4cdn.com">s25.g4cdn.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Identified cause: The executive summary of the auditor's report included no evaluation of historical claims. Instead the summary said the focus of the assessment was to look forwards rather than backwards because a new management team had been put in place at the mine. Therefore, the summary does not identify the underlying causes of the impacts. Even though the auditor told The Guardian that the full report "would include a review of historical allegations against the mine based largely on third-party information, such as newspaper articles and evidence collected by civil society groups and lawyers" the CHRB could not access the full report to verify these claims.</li> </ul> <p>Barrick Gold also states that the violations took place under the management of the previous operator and does not present an analysis of underlying causes. [The Guardian 13/07/2020: <a href="http://theguardian.com">theguardian.com</a>] [Synergy, 05/2020, "MMTC-PAMP North Mara Gold Mine Assessment - Executive Summary": <a href="http://mmtcpamp.com">mmtcpamp.com</a>] [Barrick, 10/08/2020: <a href="http://barrick.com">barrick.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: There is no information available that indicates Apple has made changes to its management systems after the allegations or after the publication of the report by Synergy Global Consulting Ltd.</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(4).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy [Raid, 07/2020, "Analysis of synergy assessment north mara gold mine update": <a href="http://raid-uk.org">raid-uk.org</a>] [Raid, 16/12/2021; "Will Barrick Gold's CEO go beyond rhetoric to deliver justice for victims of police killings at Tanzania mine?": <a href="http://raid-uk.org">raid-uk.org</a>] [Responsible Mining Fpundation, 14/08/2020, "More Tnaznian human rights victims join UK legal action against Barrick!": <a href="http://responsibleminingfoundation.org">responsibleminingfoundation.org</a>]</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> <li>• Area: Working hours</li> <li>• Headline: Apple's supplier accused of relying on students working illegal overtime to build iPhone X in China</li> <li>• Story: On November 21, 2017, press sources reported that Apple relies on students working illegal overtime to build its iPhone X, through its contractor Foxconn, which is the sole assembler and manufacturer of this iPhone model in China.</li> </ul> <p>According to press reports, a group of 3,000 students worked at the factory as part of a three-month period called "work experience", which was a pre-requisite for them to graduate. Students routinely worked 11-hour days assembling Apple's flagship smartphone, which constitutes illegal overtime for student interns under Chinese law. The students earned between CNY 3,000 (USD 453) to CNY 4,000 per month. This includes overtime pay; most of them agree to put in the extra hours the report said.</p> <p>Chinese labour law forbids student interns from working more than 40 hours per week, which means Companies are not allowed to ask them to work overtime.</p> <p>On September 8, 2019, China Labour Watch (CLW) published a report accusing Apple and its partner Foxconn of breaching numerous Chinese labour laws at the Zhengzhou Foxconn factory. The report is based on a CLW undercover investigation.</p> <p>On December 9, 2020, press reported that Apple ignored breaches of China's temporary worker law in its supply chain for years because it was concerned about increased costs and product launch delays. Foxconn, Pegatron, and Quanta Computer, three of Apple's major assembly partners, faced difficulties complying with the law between 2013 and 2018. The rule stated that only 10% of a workforce could be temporary. According to the press, in 2014, more than half of a surveyed 362 suppliers broke the temporary worker law, and in March 2015, 81 of 184 Apple suppliers reportedly topped the 10% threshold. That continued in parts of 2016, 2017 and 2018. In 2014, Apple gave suppliers two years to mitigate the issues, but by 2016 little progress had been made.</p> <p>Apple executives reportedly knew that its production strategy increased demand for temporary staff, known as dispatch workers. After Apple commissioned a two-year study with Pegatron, Apple researchers recommended raising salaries, building better dorms, reducing the use of dispatch workers and not hiring workers younger than 23 years old. However, Apple executives were allegedly reluctant to push Pegatron to make changes as they wanted to let supply and demand determine China's labor market conditions.</p> <p>[The Guardian, 21/11/2017, "Apple under fire over reports students worked illegal overtime to build iPhone X": <a href="http://theguardian.com">theguardian.com</a>] [CNET, 09/09/2019, "Apple, Foxconn acknowledge relying on temporary workers in China too much": <a href="http://cnet.com">cnet.com</a>] [iMore, 09/12/2020, "Apple accused of ignoring supplier labor law breaches in China": <a href="http://imore.com">imore.com</a>] [China Labor Watch, 08/09/2019, "iPhone 11 Illegally Produced in China: Apple Allows Supplier Factory Foxconn to Violate Labor Laws": <a href="http://chinalaborwatch.org">chinalaborwatch.org</a>]</p>
E(5).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: In response to the allegation, the company stated: "During the course of a recent audit, we discovered instances of student interns working overtime at a supplier facility in China. We've confirmed the students worked voluntarily, were compensated and provided benefits, but they should not have been allowed to work overtime". [The Guardian, 21/11/2017: <a href="http://theguardian.com">theguardian.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Detailed response: In response to the allegation, the company stated: "During the course of a recent audit, we discovered instances of student interns working overtime at a supplier facility in China. We've confirmed the students worked voluntarily, were compensated and provided benefits, but they should not have been allowed to work overtime". [The Guardian, 21/11/2017: <a href="http://theguardian.com">theguardian.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(5).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engaged with stakeholders: The company stated: "To make sure our high standards are being adhered to, we have robust management systems in place beginning with training on workplace rights, on-site worker interviews, anonymous grievance channels and ongoing audits". [CNBC, 29/09/2019, "Apple denies claims it broke Chinese labor laws in iPhone factory": <a href="https://www.cnbc.com">cnbc.com</a>]</li> <li>• Not Met: Identified cause: The company stated: "When we find issues, we work with our suppliers to take immediate corrective action. We looked into the claims by China Labor Watch and most of the allegations are false". However, while the company did admit to the working hour violations, it does not present investigative results of the causes underlying this issue. [CNBC, 29/09/2019: <a href="https://www.cnbc.com">cnbc.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Identified and implemented improvements: The company stated: "A team of specialists are on site at the facility working with the management on systems to ensure the appropriate standards are adhered to". [The Guardian, 21/11/2017: <a href="https://www.theguardian.com">theguardian.com</a>]</li> <li>• Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected stakeholders were taken into account in the improvement of the company policies.</li> </ul>
E(5).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Provided remedy: The company stated: "We have confirmed all workers are being compensated appropriately, including any overtime wages and bonuses, all overtime work was voluntary and there was no evidence of forced labor. We did find during our investigation that the percentage of dispatch workers exceeded our standards and we are working closely with Foxconn to resolve this issue".</li> </ul> <p>With regard to the child labourers working illegal overtime the company said "When we found that some students were allowed to work overtime, we took prompt action." [CNBC, 29/09/2019: <a href="https://www.cnbc.com">cnbc.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: The company stated "We did find during our investigation that the percentage of dispatch workers exceeded our standards and we are working closely with Foxconn to resolve this issue", indicating that there is a group of affected stakeholders that has not been provided remedy.</li> <li>• Met: Remedy delivered: There is no information available suggesting that the remedies the company has agreed to provide have not been delivered as agreed.</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> <li>• Area: Health &amp; safety</li> <li>• Headline: Apple among leading electronics firms fall short in protecting female workforce from exposure to hazardous chemicals in the Philippines</li> <li>• Story: On 25 January, 2021, Swedewatch published a follow-up report to its report of 23 June, 2020, that presented Swedewatch's research on exposure of female workers to toxic chemicals in factories in the Philippines.</li> </ul> <p>The manufacturing of ICT products in the Philippines takes place in Special Economic Zones (SEZs) where working conditions are often poor and the social and legal protections for workers insufficient. Women interviewed for this report work in poorly ventilated rooms where they are exposed to chemicals with well-known hazardous effects. The laws in place to protect them are not sufficiently implemented and the women state that they work without appropriate protective equipment and safety instructions. The workers describe severe effects on their health and the health of their unborn children; effects that to a large degree corresponds with the known effects of the chemicals used in the processes. In fact, for the women interviewed in this study, cancer and miscarriages are so common that they have become the norm. Swedewatch's research thus indicates that the human rights of the workers are severely impacted. Companies sourcing ICT components and products from the Philippines are linked to these impacts through their business relationships.</p> <p>The follow-up report takes into account company responses to the issues raised.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			[Business and Human Rights Resource Centre, 25/01/2021, "Philippines: Leading electronics firms fall short in protecting female workforce from exposure to hazardous chemicals; incl. co. Comments": <a href="https://www.business-humanrights.org">business-humanrights.org</a> ] [Briefing, 25/01/2021, "Hazardous chemicals in ICT manufacturing and the impacts on female workers in the Philippines": <a href="https://www.swedwatch.org">swedwatch.org</a> ]
E(6).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Public response: The CHRB was not able to access the response provided to Swedewatch as the link provided on the Swedewatch website is not working. However, the report stated that: "Apple expressed an intention to take part in the survey, yet at the time of reply the briefing paper had already been finalized. But according to its supplier list, which is available online, the company has suppliers in the Philippines. The Apple Environmental Report 2020 outlines the work Apple is doing with regards to chemicals. In it, the company states that it works closely with suppliers to minimise workers' harmful exposure to chemicals. However, Swedewatch could not find any detailed information about the company's HRDD in the Philippines or the three substances identified in Toxic Tech. The Apple Environmental Report 2020 names 'Smarter Chemistry' as one of three focus areas and includes a commitment to minimise exposure to harmful chemicals, integrate smarter chemistry innovation in the manufacture and design of products, and to 'drive 100 percent transparency of chemical use in our supply chain and products'. Apple is a member of CEPN and the RBA". [Briefing, 25/01/2021: <a href="https://www.swedwatch.org">swedwatch.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Detailed response: The CHRB was not able to access the response provided to Swedewatch as the link provided on the Swedewatch website is not working. Information found elsewhere was not detailed enough to be considered adequate for this datapoint.</li> </ul>
E(6).2	The Company has appropriate policies in place	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders</li> <li>• Not Met: Identified cause</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(6).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provided remedy</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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

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

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



unless otherwise expressly noted.

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

As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

#### COPYRIGHT

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