

**Company Name** Broadcom  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score** 13.3 out of 100

Theme Score	Out of	For Theme
1.9	10	A. Governance and Policies
2.3	25	B. Embedding Respect and Human Rights Due Diligence
3.5	20	C. Remedies and Grievance Mechanisms
3.0	25	D. Performance: Company Human Rights Practices
2.7	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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Code of Ethics and Business Conduct states that 'We are committed to respecting human rights and avoiding complicity in any human rights abuse throughout our company, operations, supply chain and communities'. [Code of Ethics and Business Conduct, 03/2021: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Commitment to the UNGPs: The Company's Human Rights Principles state that 'Broadcom strives to align its approach and actions with the UN Guiding Principles on Business and Human Rights'. However, 'strives to align' is not considered a formal statement of commitment to the initiative according to CHRB wording criteria. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company has a commitment to the ILO Core: See below Company's explicit commitment to each ILO core area of the ILO Declaration [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>Met: Company has a explicit commitment to All four ILO Core: The Company's Human Rights Principles state that 'Broadcom's employment and supply chain practices and policies support the fundamental human rights principles of freely chosen employment, non-discrimination, the elimination of forced and underage labor, and the rights of workers to engage in peaceful assembly, organize, freely associate and bargain collectively, as articulated in the International Labour</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Organization Conventions'. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to commit to ILO Core: See below. Although the Company is committed to each ILO core area, freedom of association and collective bargaining commitments are made 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Company explicitly list All four ILO for suppliers: The Supplier Code indicates the following: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. [...] Child labor is not to be used in any stage of manufacturing. [...] Suppliers should be committed to a workplace free of harassment and unlawful discrimination'. In relation to respect the rights of freedom of association and collective bargaining, the code states: 'In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.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 Health and Safety Policy states that 'We believe that maintaining a safe and health work environment is important for the well-being and productivity of our employees. Our employees are required to support implementation of the following policy actions in accordance with their roles and responsibilities [...]'. [Occupational Health and Safety Policy, 04/2021: <a href="https://docs.broadcom.com">docs.broadcom.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 Company's Supplier Code include requirement with respect Health and Safety, and set out standards in the following topics: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing and Health and Safety Communication. [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: With respect Working hours, the Supplier Code indicates: 'Working hours are not to exceed the maximum set by local law. Further, a work week should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.' However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	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: Responsible mineral sourcing: The Company states that 'is commitment to corporate social responsibility, it is the Company's goal to use Conflict Minerals [...] that do not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or adjoining countries (together, the "DRC") while continuing to support responsible mineral sourcing in the region'. [Conflicts Mineral Policy, 11/2019: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Met: Based on OECD Guidance: See above. The Company states OECD was a starting point for their due diligence for Conflict Minerals. 'The Company has initiated and is in the process of refining its due diligence program for Conflict Minerals consistent with the framework promulgated by the Organization for Economic Cooperation and Development ("OECD") and its "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Areas" and evaluating its internal controls for Control Minerals, and encourages its suppliers to do the same with their respective suppliers'. The Company's SD Form states that 'Broadcom's due diligence framework with regards to conflict minerals, which is summarized below, conforms to the Organization for Economic Co-operation and Development ("OECD") Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High Risk Areas, and the Supplements on Tin, Tantalum and Tungsten and on Gold'. This SEC Filing is considered a proxy for policy statements. [Conflicts Mineral Policy, 11/2019: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [Conflict Minerals Report 2020, 2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Requires suppliers to commit to responsible mineral sourcing: The supplier code states that 'Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commits to follow OECD Guidance for all minerals: The Company does not include all minerals in its conflict minerals policy. "'Conflict Minerals" are defined as cassiterite, columbite-tantalite, gold, wolframite, or their derivatives, tin, tantalum and tungsten. Conflict Minerals are widely used in manufacturing semiconductor and electronic devices like the Company's products'. No evidence found beyond these 3TG, covering all minerals. [Conflicts Mineral Policy, 11/2019: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Suppliers expected to make similar requirements of their suppliers: The supplier code states that 'Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. However, no evidence found of supplier requirements going beyond 3TG, covering all minerals. [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.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: The Human Rights Principles states that 'Broadcom personnel are expected to treat co-workers, customers and suppliers with respect, dignity and integrity. Respecting human rights, particularly the rights of people in vulnerable communities (women, children and migrant workers) is a shared responsibility'. However, no direct commitment from the Company was found to respect rights of women, children or migrant workers [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Children's rights: As above [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Migrant worker's rights: As above [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Met: Expects suppliers to respect at least one of these rights: The Company states in its Supplier Code: 'Broadcom is committed to upholding the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker'. [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.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 states that 'Broadcom has a formal grievance and remedy process where anyone (including employees, contractors, suppliers or any third party) can report potential human rights concerns via a compliance hotline'. However, this subindicator looks for a formal statement of commitment to remedy adverse impacts that it has caused or</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>contributed to. Current evidence refers to the existence of a mechanism for reporting concerns. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <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</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</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 that 'Our Board, through its Nominating, Environmental, Social and Governance Committee (NESG Committee), oversees our ESG matters, including our corporate social responsibility and sustainability program and initiatives'. The company states that ESG stands for 'environment, climate, diversity and inclusion, human rights and governance'. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.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: Although the CEO letter in the ESG report states that 'we remain committed to conducting our business with integrity, strong corporate governance, respecting human rights and responsibly sourcing materials throughout our global supply chain [...]', this subindicator looks for a specific, comprehensive, communication on human rights, discussing why human rights matter to the business or any challenges to respecting human rights encountered by the business. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>
A.2.2	Board responsibility	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/Committee review HRs strategy: The Company states that 'NESG Committee receives quarterly updates from our executives on ESG matters and updates the Board at least quarterly. The feedback we receive from our stakeholders on ESG matters is also regularly communicated to the NESG Committee and the Board. Our Board is engaged in the preparation of and reviews our ESG Report'. As indicated in A.2.1, for the Company, ESG explicitly includes human rights. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period</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: Although the Company indicates that 'the feedback we receive from our stakeholders on ESG matters is also regularly communicated to the NESG Committee and the Board', no further details found, including how experiences affected of stakeholders or external human rights experts informed Board's discussions. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</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</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	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: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Senior responsibility for HR implementation and decision making: The Company indicates that 'Broadcom's ESG Steering Committee (led by the President of semiconductor Solutions Group) has a cross-functional Human Rights/Supply Chain Working Group, which executes the human rights program, champions initiatives across Broadcom and engages with internal and external stakeholders'. The ESG Steering Committee meets quarterly and provides status updates to the NESG Committee and engages with ESG working groups. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How it assigns Day-to-day responsibility: Although there's a cross functional Human Rights/Supply chain working group, no further details were found. There are three working groups, being this one of them. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops: Although there's a cross functional Human Rights/Supply chain working group, no further details were found. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Resources and expertise allocation in the supply chain: Although there's a cross functional Human Rights/Supply chain working group, no further details were found. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</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</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</li> <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: The Company indicates in its ESG Report that 'our Audit Committee of the Board has oversight responsible for enterprise risk management at Broadcom, and enterprise risks are updated and discussed with the Audit Committee on an annual basis with updates provided for select risks throughout the year.' No further information was found in relation to how human rights risks are integrated into the system. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations: The Company states in its Statement Against Modern Slavery and Human Trafficking that 'We provide mandatory training to all of our employees on Broadcom's Code of Ethics and Business Conduct, which includes our commitment to respecting human rights, avoiding complicity in any human rights abuse in the company, our operations, our supply chain and our communities, and complying with all applicable labor laws, including wage and hour laws'. Training for all employees is a proxy for communicating policy in local languages. [Statement Against Modern Slavery and Human Trafficking, 03/2021: <a href="https://docs.broadcom.com">docs.broadcom.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 that 'Broadcom regularly communicates its human rights commitments to its workers, suppliers and stakeholders, including via its Code of Ethics and Business Conduct and Broadcom Supplier Environmental and Social Responsibility Code of Conduct. To educate and raise awareness of forced labor and human trafficking issues, Broadcom requires human rights awareness and forced labor prevention training for relevant personnel in Global Operations, Human Resources, Legal,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Procurement and supply chain functions who have a direct responsibility for supply chain management'. However, no details found on how it actually communicates policy commitments to external stakeholders (excluding suppliers, which are assessed in indicator B.1.4.b) [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</p> <ul style="list-style-type: none"> <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	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: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain: The Company states that 'Broadcom regularly communicates its human rights commitments to its workers, suppliers and stakeholders, including via its Code of Ethics and Business Conduct and Broadcom Supplier Environmental and Social Responsibility Code of Conduct. To educate and raise awareness of forced labor and human trafficking issues, Broadcom requires human rights awareness and forced labor prevention training for relevant personnel in Global Operations, Human Resources, Legal, Procurement and supply chain functions who have a direct responsibility for supply chain management'. It is not clear, however, how it specifically communicates policy requirements to suppliers and subsuppliers. The Company has provided additional source to CHRB, however, no material evidence to this indicator was found. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [Supplier Responsibility - web, N/A: <a href="https://broadcom.com">broadcom.com</a>]</li> <li>• Not Met: Requires suppliers to communicate policy requirements: As above.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The Company indicates that 'in addition to our supplier code, our conflict minerals policy, supplier onboarding procedures and contract and purchase order terms establish standards and expectations for our suppliers regarding human rights and other ESG-related issues'. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on 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: 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: The Company states in its Statement Against Modern Slavery and Human Trafficking that 'We provide mandatory training to all of our employees on Broadcom's Code of Ethics and Business Conduct, which includes our commitment to respecting human rights, avoiding complicity in any human rights abuse in the company, our operations, our supply chain and our communities, and complying with all applicable labor laws, including wage and hour laws.' [Statement Against Modern Slavery and Human Trafficking, 03/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement: The Company states that 'To educate and raise awareness of forced labor and human trafficking issues, Broadcom requires human rights awareness and forced labor prevention training for relevant personnel in Global Operations, Human Resources, Legal, Procurement and supply chain functions who have a direct responsibility for supply chain management'. However, no description was found on how it actually conducts training with procurement and supply chains functions. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [Statement Against Modern Slavery and Human Trafficking, 03/2021: <a href="https://docs.broadcom.com">docs.broadcom.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>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment: The Company states that 'To educate and raise awareness of forced labor and human trafficking issues, Broadcom requires human rights awareness and forced labor prevention training for relevant personnel in Global Operations, Human Resources, Legal, Procurement and supply chain functions who have a direct responsibility for supply chain management'. No details found, however, on how it specifically trains suppliers in human rights policy requirements. The Statement against modern slavery indicates that the Company intends to make human rights training available to suppliers. However, it is not clear if it is doing so, as it seems a future action. The Company indicates in its ESG report that it offers suppliers access to training in relation to supplier code. However, no further details found on actual training conducted by the Company. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Disclose % trained: The Company states in its Statement Against Modern Slavery and Human Trafficking that "[...] achieved a 100% completion rate</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			for this training in FY 2020'. However, this subindicator looks for evidence of the percentage of suppliers trained in Company's human rights requirements. [Statement Against Modern Slavery and Human Trafficking, 03/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a> ]
B.1.6	Monitoring and corrective actions	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: 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 indicates that it conducts an annual 'human rights survey of significant global supply chain suppliers'. 'In addition to the supplier human rights survey, or Global Operations and Internal audit teams regularly audit our suppliers to evaluate their operations and compliance with various Broadcom and human rights-related requirements, including compliance with wage and hour labor laws, safe and respectful working conditions, written employment agreements and prohibitions on charging workers recruitment fees'. In addition, the Human Rights Principles state that 'Broadcom regularly monitors, assesses and reports relevant human rights risks, practices and impacts'. In addition, the 'we measure our employees' engagement by our voluntary attrition rate and our employee ethical culture survey. Our voluntary attrition rate and responses to our Employee Ethical Culture survey help us to continue to improve and create an environment that is supportive of our employees and where our employees feel their contributions are valued'. It also states that 'as part of our commitment to human rights, we conduct annual internal human rights assessment and have found no human rights concerns'. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Met: Proportion of supply chain monitored: The Company indicates that 'in 2021 we conducted our second annual survey of our significant suppliers for human rights-related issues. We achieved a 100% survey response rate [...] we identified and surveyed our largest suppliers globally (based on 2020 supplier spend data) that were not part of our 2020 supplier human rights survey. These suppliers, collectively with the suppliers surveyed in 2020, represent over 90% of our supply chain (based on our 2020 suppliers spend). [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Met: Describe how workers are involved in monitoring: As indicated above, the Company has s Internal Audit teams that 'regularly audits our suppliers to evaluate their operations and compliance with various Broadcom and human rights related-requirements [...]'. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.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>• Not Met: Describes corrective action process: Although the Company describes all findings (see below), no description found on the protocols to implement corrective action processes. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Met: Disclose findings and number of corrective action: The Company states that following the monitoring actions described above 'we found no instances of forced labor, child labor, slavery or human trafficking among Broadcom's suppliers. However, we identified one supplier, who is located in Europe, who may use fines as a method of discipline for workers. While this practice is legal in the jurisdiction and the supplier has a well-defined written escalating disciplinary process supported by the local trade union, we have actively engaged with this supplier and requested that it discontinues this practice'. The Company further adds that 'remediating human rights concerns raised in our 2020 supplier human rights survey - specifically four suppliers who used fines to discipline workers and one supplier who did not permit collective bargaining no longer engage in these prohibited practices'. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	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: HR affects selection of suppliers: The Company states in its ESG report that it has updated the supplier onboarding process 'to increase screening for human rights related-matters'. It also adds that in addition to supplier code and conflict minerals policy, supplier onboarding procedures 'establish the standards and expectations for our suppliers regarding human rights and other ESG-related issues'. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: HR affects on-going supplier relationships</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>• Not Met: Working with suppliers to meet HR requirements: Although the Company describes how it monitors its supply chain, how human rights considerations are included in onboarding processes, and offers training, no</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			evidence found of how it actively works with suppliers to improve their performance in relation to human rights. This subindicator looks for a description of the actual work performed by the Company to actively help suppliers improve (not including corrective action processes following non-compliances) [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a> ]
B.1.8	Approach to engagement with affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <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</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> Score 2 <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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations</li> <li>• Not Met: Identifying risks through relevant business relationships</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts</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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues</li> <li>• Not Met: How process applies to supply chain: The Company indicates in its Broadcom Supplier Environmental and Social Responsibility Code of Conduct that risk assessment 'A process to identify the legal compliance, environmental, health and safety and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.' However, no information found in regards to a due diligence process. [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Public disclosure of the results of HR assessment</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks</li> <li>• Not Met: Description of how global system applies to supply chain: Although the Company describes that it monitors suppliers through a supplier survey, no evidence found of a system to proactively take action to prevent or mitigate risks and impacts considered to be salient in the supply chain. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues: The Company reports cases of policy non-compliances found through surveys and actions taken to remedy (use of fines to discipline workers and a case where no collective bargaining was permitted). However, this subindicator looks for an example of proactive actions taken to prevent or mitigate a salient human rights issue determined through an active due diligence process. Current evidence seems to refer to response to non-compliances found (evaluated in indicator B.1.6) [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul> Score 2 <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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: System for tracking or monitor if actions taken are effective: The Company has provided feedback to CHRB regarding this indicator. However, evidence was not material, as it refers to supplier requirements, compliance monitoring for suppliers, and corrective actions due to non compliance (evaluated in B.1.6 and B.1.7)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	risks and impacts		<ul style="list-style-type: none"> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2 <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	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company states in its Open Door Policy that 'The Broadcom Compliance Hotline, hosted by Navex EthicsPoint, a third-party vendor retained by Broadcom to provide secure and independent reporting capability 24 hours a day, enables you to file a report in two ways: a. Online via the web page hosted on EthicsPoint's secure server or File a Report.' [Open Door Policy, 05/2021: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages and workers aware: The Company indicates in the Human Rights Principles that 'the compliance hotline is available in all appropriate languages'. It also indicates that all workers receive mandatory training in code of conduct, which contains instructions to use the hotline. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [Code of Ethics and Business Conduct, 03/2021: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> <li>• Met: Describe how workers in the supply chain have access to grievance mechanism: The Company indicates in its Broadcom Supplier Environmental and Social Responsibility Code of Conduct that 'Suppliers should raise questions and concerns and report suspected violations of the Code promptly. Suppliers may use our Compliance Hotline, which is available 24 hours a day and in multiple languages. All inquiries and concerns may be submitted anonymously, where permitted by law. Suppliers may use either of the following methods to file a report on the Compliance Hotline' [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Expect Suppliers to convey expectation to their own suppliers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Human Rights Principles (and the code of conduct) state that 'Broadcom has a formal grievance and remedy process where anyone (including employees, contractors, suppliers or any third-party) can report potential human rights concerns via a Compliance Hotline. The Compliance Hotline is available in all appropriate languages and is hosted by a third-party external firm. Concerns may be reported anonymously, where permitted by law. Broadcom prohibits retaliation for reporting concerns in good faith'. [Code of Ethics and Business Conduct, 03/2021: <a href="https://investors.broadcom.com">investors.broadcom.com</a>] &amp; [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describes accessibility and local languages and stakeholder awareness: Although the Company indicates that 'the compliance hotline is available in all appropriate languages' and it can be accessed online, no details were found on whether and how grievance mechanism availability is actively communicated to affected external stakeholders.</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)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Engages users to create or assess system</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Response timescales and how complainants will be informed: The Company indicates in its Open Door Policy that 'You will be informed of the anticipated amount of time needed to review your report (generally 5-6 business days). 'If you submit via the EthicsPoint website or phone, you will be provide a unique report key, which you can use to request updates on your report or to provide additional information'. [Open Door Policy, 05/2021: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> <li>• Not Met: Describe support (technical, financial,etc) available for equal access by complainants: The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material. This subindicator looks for evidence of how the company provides assistance to complainants to support equal access to the mechanism. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</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: The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material. This subindicator looks for evidence of how, through the use of the grievance mechanism, the Company explains which are the outcomes to the complainant. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Escalation to senior/independent level: The Company indicates that 'we address them promptly, investigate to the extent necessary and take disciplinary actions as appropriate (which may include senior management discussions, [...]). The Audit Committee receives information on every allegation submitted via our external hotline, as well as reports and updates on investigations that are in progress or completed'. However, no details were found in relation to whether the Complainant can escalated the complaint to more senior levels or independent third parties to challenge the process or the outcome of the investigation. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</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: The Company states that 'Broadcom has a formal grievance and remedy process where anyone (including employees, contractors, suppliers or any third-party) can report potential human rights concerns via a Compliance Hotline. The Compliance Hotline is available in all appropriate languages and is hosted by a third-party external firm. Concerns may be reported anonymously, where permitted by law. Broadcom prohibits retaliation for reporting concerns in good faith'. [Open Door Policy, 05/2021: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> <li>• Not Met: Practical measures to prevent retaliation: As indicated above, anonymity is not generally granted. No alternative measure found to prevent retaliation.</li> </ul> <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</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	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: Describes how remedy has been provided</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</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)	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</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	and incorporating lessons learned		<ul style="list-style-type: none"> <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.a	Living wage (in own production or manufacturing operations)	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: Pays living wage or sets target date: Although the Company indicates: 'We comply with applicable labor laws, including wage and hour laws, and we expect our business partners to do the same', no evidence found related to paying living wage. [Code of Ethics and Business Conduct, 03/2021: <a href="https://investors.broadcom.com">investors.broadcom.com</a>]</li> <li>• Not Met: Describes how living wage determined</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Paying living wage</li> <li>• Not Met: Definition of living wage reviewed with unions</li> </ul>
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses living wage requirements in supplier code or contracts</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <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	<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: 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> <p>Score 2</p> <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	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: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields)</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	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: Does not use child labour: The Human Rights principles document states that 'Broadcom forbids the use of [...] child labor'. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Age verification of workers recruited: The Company has provided comments to CHRB regarding this subindicator. However, no evidence found of that content in publicly available sources.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remediation if children identified</li> </ul>
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (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: Child Labour rules in codes or contracts: The Company states in its Broadcom Supplier Environmental and Social Responsibility Code of Conduct that 'Child labor is not to be used in any stage of manufacturing.' and also that 'Suppliers shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported.' [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</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: The Company has provided comments to CHRB regarding this subindicator. However, evidence was not material.</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Job seekers and workers do not pay recruitment fee: The Human Rights Principles document states that 'Broadcom prohibits and will not tolerate the use of forced labor. Broadcom forbids the use of recruitment fees'. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>Not Met: Commits to fully reimbursing if they have paid</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: How practices are implemented and monitored for agencies, labour brokers or recruiters: The Company indicates in its ESG report 2020 that it took several initiatives in its human rights program, including 'updating all of our recruiter agreements, globally, to include provisions related to preventing forced labor, such as prohibiting recruiting fees, deceptive and misleading recruitment practices and destroying, concealing or denying access to employees' identification documents'. [ESG Report 2020, 2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Debt and fees rules in codes or contracts: The supplier code states that 'Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, [...] workers shall not be require to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker'. [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>Not Met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Pays workers in full and on time: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.</li> <li>Not Met: Payslips show any legitimate deductions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: How these practices are monitored for agencies, labour brokers or recruiters: The Company states that it took actions in 2020, including 'updating all of our recruiter agreements, globally, to include provisions related to preventing forced labor, such as prohibiting recruiting fees, deceptive and misleading recruitment practices and destroying, concealing or denying access to employees' identification documents'. However, no details found in relation to full and timely wage payments. [ESG Report 2020, 2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The supplier code requires that 'For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law'. [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> Score 2 <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>
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Does not retain documents or restrict movement: The Human Rights principles document states that 'Broadcom prohibits and will not tolerate the use of forced labor. Broadcom forbids the use of recruitment fees, restriction of workers' freedom of employment movement and child labor'. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.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: How these practices are monitored for agencies, labour brokers or recruiters: The Company reports actions taken in FY2020 in relation to human rights in own operations, including 'updating all of our recruiter agreements, globally, to include provisions related to preventing forced labor, such as prohibiting recruiting fees, deceptive and misleading recruitment practices and destroying, concealing or denying access to employees' identification documents'. [ESG Report 2020, 2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>
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: The supplier code states that 'Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents'. [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.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.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company's Human Rights principles document states that 'Broadcom's employment and supply chain practices and policies support [...] the rights of workers to engage in peaceful assembly, organize, freely associate and bargain collectively, as articulated in the International Labour Organization Conventions'. It's prohibition of harassment policy also includes 'against workers seeking to exercise the right to unionize'. No evidence found, however, of measures in place to prohibit intimidation or retaliation against workers seeking to exercise these rights. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>Not Met: Discloses % total direct operations covered by collective CB agreements</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Meets both requirements under score 1</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (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: FoA &amp; CB rules in codes or contracts: The Company explicitly states in its Supplier Code of Conduct that 'Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.' [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>Not Met: How working with suppliers on FoA and CB: Although the Company reports identification of cases of non-compliance and responded to it, no evidence found of proactive work conducted with supplier to improve their performance. This subindicator looks for proactive actions rather than applying corrective actions following non-compliances found.</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</li> </ul>
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not Met: Describes process to identify H&amp;S risks and impacts: The ESG report states that 'In 2021, we implemented processes for reporting occupational injuries and illnesses so global rates could be more consistently managed and tracked. Once reported, we conduct an incident investigation and root cause analysis, as needed, to determine appropriate corrective and preventive actions'. This, however, seems to focus in incident tracking and improvement. No evidence found in relation to a process to identify which are the potential health and safety risks and impacts. [Occupational Health and Safety Policy, 04/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company states that 'In 2021, our global total injury and illness case rate was 0.11 cases per 100 employees, and our lost workday case rate was 0.05 cases per 100 employees' [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Met: Discloses Fatalities for last reporting period: The Company states that 'there were no work-related fatalities globally in 2021'. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Occupational disease rate for last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance</li> <li>• Not Met: Met targets or explain why not or what is doing to improve management systems</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: The supplier code of conduct includes health and safety section with specific requirements in occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing, and health and safety communication [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.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 last reporting period</li> <li>• Not Met: Occupational disease rates for the last reporting period</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</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.a	Women's rights (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Process to stop harassment and violence against women: The Human Rights principles document includes a prohibition of harassment policy. The 2020 ESG report also states that it employs 'people of many different nationalities, ethnicities, cultures, faiths and beliefs around the world. We are firmly committed to providing equal opportunity to all persons without regard to race, color, sex, gender, gender identity, gender expression, sexual orientation [...] or other bases protected by applicable federal, state, or local law. This applies to all of our employment decisions including, but not limited to, recruiting, hiring, training, promotions, pay practices, benefits, disciplinary actions and terminations, and prohibits harassment of applicants and employees'. It is not clear, however, if there's a specific process in place to prohibit and address harassment and violence against women. Evidence found seems to refer to policy statements rather to specific actions conducted. [Human Rights Principles, 07/2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2020, 2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Working conditions take account of gender</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>
D.4.8.b	Women's rights (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts: The supplier code includes some requirements. In relation to safety, it states that 'reasonable steps must also be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers'. Although the code also includes requirements regarding discrimination and harassment, no evidence found of specific requirements in relation to equal pay for equal work and measures to ensure equal opportunities throughout all levels of employment. [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.9.a	Working hours (in own production or manufacturing operations)	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: Respects max hours, min breaks and rest periods in its own operations</li> <li>• Not Met: Assesses ability to comply with its commitments when allocating work/targets</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 it implements and checks this in its operations</li> </ul>
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: The Company states in its Broadcom Supplier Environmental and Social Responsibility Code of Conduct that 'Studies of business practices clearly link worker strain to reduced productivity, increased turnover, and increased injury and illness. Working hours are not to exceed the maximum set by local law. Further, a work week should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days.' However, no indication of following international standards in regards to working hours. [Supplier Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: How working with suppliers on working hours</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>• Not Met: Provide analysis of trends in progress made</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 code requires that 'Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. The ESG report states that 'In addition to our Supplier Code, our Conflict Minerals Policy, supplier onboarding procedures and contract and purchase order terms establish the standards and expectations for our suppliers regarding human rights and other ESG-related issues'. [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Works with smelters/refiners and suppliers to build capacity: Although the Company reports the due diligence activities it conducts and that 'we strongly support our industry's efforts to expand the smelter certification program and the audit process', no evidence found of proactive work conducted with suppliers and SORs to build their capacity. The Company has provided additional sources to CHR Building. [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [2021 Conflict Minerals Report, 31/12/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Contractual requirement to disclosure smelter/refiner information [Supplier Environmental and Social Responsibility Code of Conduct, 09/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Not Met: Contractual requirement covers all minerals</li> </ul>
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Risk identification and disclosure in line with OECD Guidance: The Company indicates that it surveyed suppliers using the Conflict Minerals Reporting Template to identify SORs and country of origin, and compared the SORs list against the list of facilities maintained by RMI's RMAP to identified those SORs certified as conformant (conflict-free) or active. The Company indicates that it achieved a response rate of 100%. No further information found, including risks identified. [2021 Conflict Minerals Report, 31/12/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>• Met: Identification of smelter/refiners and OECD Guidance: See above, the Company surveyed suppliers to identify smelters and refiners and country of origin, and then compared it to the RMI's RMAP list to determine which have carried out due diligence processes in accordance to OECD Guidance. [2021 Conflict Minerals Report, 31/12/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>] &amp; [ESG Report 2021, 2022: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses the full list of Smelters and refiners including which are part of the 'conformant' list, and which are not. [2021 Conflict Minerals Report, 31/12/2021: <a href="https://docs.broadcom.com">docs.broadcom.com</a>]</li> <li>Not Met: Risk identification and disclosure covers all minerals</li> </ul>
D.4.10.c	Reporting on responsible sourcing of minerals	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Describes mineral risk management plan for supply chain: The Company indicates that risk mitigation efforts include encouraging suppliers to purchase materials from SORs validated as conflict free, contacting SORs who are not RMAP conformant or active to participate in an independent third-party audit program, and informing senior management. The Company indicates that will continue to refine the program to improve due diligence measures, work with suppliers to update their templates and verify SORs with the most current list, and extend Reasonable country of origin inquiry and due diligence measures to Companies' acquisitions. [2021 Conflict Minerals Report, 31/12/2021: <a href="https://docs.broadcom.com">docs.broadcom.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> Score 2 <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		No allegations meeting the CHRB severity threshold were found, and so the score of 10.67 out of 80 points scored in themes A-D has been applied to produce a score of 2.67 out of 20 points for theme E.

### 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.

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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.

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