

Company Name Intel
Industry ICT (Own operations and Supply Chain)
Overall Score 22.2 out of 100

Theme Score	Out of	For Theme
2.3	10	A. Governance and Policies
7.1	25	B. Embedding Respect and Human Rights Due Diligence
8.0	20	C. Remedies and Grievance Mechanisms
4.8	25	D. Performance: Company Human Rights Practices
0.0	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"> Met: General HRs commitment: Its Global Human Rights Principles 'formalizes Intel's commitment to respect human rights and embodies common principles reflected in the United Nations (UN) Global Compact, the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, core International Labour Organization Conventions, the Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises, and the laws of the countries in which we operate' [Global Human Rights Principles, 11/2019: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: See above. However, the statement is not considered a formal commitment to the UNGP according to CHRB wording criteria, as it indicates that human rights principles embody principles 'reflected' in the UNGPs. [Global Human Rights Principles, 11/2019: intel.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: See above. However, the statement is not considered a formal commitment to the OECD Guidelines for MNEs according to CHRB wording criteria, as it indicates that human rights principles embody principles 'reflected' in the UNGPs. [Global Human Rights Principles, 11/2019: intel.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Company has a commitment to the ILO Core: The Company includes in its Global Human Rights Principles provisions in relation to discrimination, child labour, and forced labour. In relation to freedom of association and collective bargaining, the document states the following: 'Intel recognizes that in many of the

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Fundamental Principles and Rights at Work		<p>locations where we operate, employees have the right to freely associate or no associate with third-party organizations such as labor organizations, along with the right to bargain or not bargain collectively in accordance with local laws. Intel respect those rights and its further committed to treating our employees with dignity and respect [...]. However, no evidence found of a commitment to respect these rights in all contexts and locations, as it is not clear if the Company respects freedom of association and collective bargaining in those locations where they are restricted under local law. [Global Human Rights Principles, 11/2019: intel.com]</p> <ul style="list-style-type: none"> • Not Met: Company has a explicit commitment to All four ILO Core: As indicated above, it is not clear if the Company is committed to provide alternative or parallel mechanisms where rights to freedom of association and collective bargaining are restricted under local law. [Global Human Rights Principles, 11/2019: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same. 'On the other hand, the RBA Code of Conduct reads: '[...] the provisions in this Code are derived from and respect internationally recognized standards including the ILO Declaration on Fundamental Principles and Rights at Work[...]'. However, it is not clear whether the provisions cover the rights of freedom of association and collective bargaining in all contexts. See explanation below. • Not Met: Company explicitly list All four ILO for suppliers: The Company indicates in its Global Human Rights Principles that it 'expects [its] suppliers to maintain progressive employment, environmental, health and safety, and ethics practices that meet or exceed all applicable laws and relevant external codes such as the Responsible Business Alliance (RBA) Code of Conduct, Intel's Code of Conduct, and these Human Rights Principles.' In addition, the Company used RBA Code of Conduct to set out the expectation to its suppliers. The RBA Code of Conduct includes provisions in relation to forced labour, child labour and discrimination. In relation to freedom of association and collective bargaining, it states the following: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' However, it is not clear whether the Company 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. [Global Human Rights Principles, 11/2019: intel.com] & [RBA Code of Conduct (Version 6.0), 2018: responsiblebusiness.org]
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"> • Met: Commitment to respect H&S of workers: According to its Global Human Rights Principles, the Company 'is committed to providing a safe and healthful workplace for our employees, contractors, and communities'. [Global Human Rights Principles, 11/2019: intel.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company indicates in its Global Human Rights Principles document: 'Working hours are not to exceed the maximum set by local law or no more than 60 hours per week, whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off'. The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same. [...] The RBA Code indicates that 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days. [...] In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates'. 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. [Global Human Rights Principles, 11/2019: intel.com] & [RBA Code commitment letter, 2020: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same.' In addition, the RBA Code of Conduct sets out health and safety standards for suppliers. This Code used OHSAS 18001 and ILO Guidelines on Occupational Safety and Health as reference to set the standards. [RBA Code commitment letter, 2020: intel.com] & [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org]</p> <ul style="list-style-type: none"> • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same'. In the RBA Code of Conduct, used by the Company in its Supply Chain, it is indicated: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days. [...] In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by requiring a maximum of 48 hours regular working week, and consensual overtime paid at a premium rate. [Global Human Rights Principles, 11/2019: intel.com] & [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org]
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"> • Met: Responsible mineral sourcing: The Responsible Minerals Sourcing Policy indicates that it 'is committed to the responsible sourcing of minerals-sourcing done in ethical and sustainable manner that safeguards the human rights of everyone in our global supply chain'. [Responsible Minerals Sourcing Policy, 05/2022: intel.com] • Met: Based on OECD Guidance: The Responsible Minerals Sourcing Policy indicates: 'Intel has evolved its responsible minerals program and related due diligence practices to address minerals originating from Conflict-Affected and High-Risk Areas (CAHRAs). Intel's program framework is in alignment with the [...] OECD Guidance'. [Responsible Minerals Sourcing Policy, 05/2022: intel.com] • Met: Requires suppliers to commit to responsible mineral sourcing: The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same.' With respect Responsible sourcing, the RBA Code indicates: 'Participants 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 Company has provided an additional source to this indicator, however key information was already in use. [RBA Code commitment letter, 2020: intel.com] & [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals: The Company has provided additional comment to CHRB regarding this indicator, however, its evidence could not evidence found in any public document. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (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"> • Met: Migrant worker's rights: The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same. On the other hand, the RBA Code indicates: 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker'. The Company has provided an additional source to this indicator, however key information was already in use. [RBA Code commitment letter, 2020: intel.com] & [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Expects suppliers to respect at least one of these rights: The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same. On the other hand, the RBA Code indicates: 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.' The Company has provided an additional source to this indicator, however key information was already in use. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: The Company commits to remedy: In its Human Rights Principles document, the Company states: 'We have put in place formal grievance and remedy processes to enable anyone, including employees, employees of Intel's suppliers, and other external stakeholders, to report human rights concerns through our third-party-operated ethics reporting portal. We will promptly investigate allegations and pursue action to mitigate any adverse human rights impacts.' In addition, the Company indicates in its Code of Conduct: 'We are committed to respecting and promoting human rights in our operations, supply chain, and business relationships, [...]. This includes remediating any known issues'. However, the commitment to remedy is not clear in terms of remediating any adverse impacts that it has caused or contributed to, as it seems to focus on reports made through the grievance mechanisms to initiate a process. [Global Human Rights Principles, 11/2019: intel.com] & [Code of Conduct, 2022: intel.com] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact: The 2021-22 Corporate Responsibility Report indicates: 'In some instances, we have faced challenges in gaining cooperation from suppliers in repaying workers quickly; we work closely with suppliers to determine acceptable remedies and put systems in place to prevent such issues in the future'. It also indicates: 'We have established several programs to advance our supplier leadership and accountability, as well as ensure the latest information is made available through education and collaboration'. Additionally, 'For more than a decade, we have worked to help less mature and evolving suppliers build critical sustainability and corporate responsibility acumen, including a focus on compliance with the RBA and our Code of Conduct expectations and requirements. We have delivered a broad range of no-cost support options for suppliers, including online resources, interactive training sessions, and connection to external resources such as the RBA and other NGO training and conferences'. However, although it indicates it works with suppliers, this datapoint looks for an explicit commitment from the Company to work (collaborate) with suppliers to remedy adverse impacts linked to the Company's operations, products or services. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. No further evidence found in the 2021 Annual Supplier Letter. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] & [2021 Annual Supplier Letter, 12/2021: intel.com]
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"> • Not Met: Zero tolerance attacks on HRs Defenders (HRDs) • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

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"> • Met: Board level responsibility for HRs: In its CSR 2019-2020, the Company indicates: 'The Board's Corporate Governance and Nominating (CGN) Committee has primary responsibility for oversight of ESG issues at Intel, with additional topics also reviewed by other committees (e.g., the Compensation Committee is responsible for oversight of human capital issues, and the Audit Committee is responsible for oversight of our ethics and compliance program). Management provides formal updates to the CGN Committee at least twice each year and at least annually to the full Board on the company's corporate responsibility performance and disclosure. In 2019, this included review of the annual Corporate Responsibility Report and updates on issues including environmental sustainability, climate change, human capital, human rights'. The CSR 2018 includes specific sections about human rights issues, as the following: 'Respecting Human Rights', 'Combating Forced and Bonded Labor' or 'Responsible Minerals Sourcing'. [2019-2020 CSR Report, 2020: csrrreportbuilder.intel.com] • Not Met: Describe HR expertise of Board member: The Company discloses, in its Board Matrix found in the 2022 Proxy Statement. Three of the members of Board's Corporate Governance and Nominating (CGN) Committee have Human Capital expertise. However, no further description found of the human rights expertise of the board member or board committee tasked with that governance oversight. [2022 Proxy Statement, 2022: d1io3yog0oux5.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO: The CEO, Pat Gelsinger, writes in a tweet: 'D&I is a journey for all. @Intel will be aggressively diverse! (But I won't be perfect.) Hear from Intel employees about what #PrideMonth means to them & perspectives on how to be a better ally every day, not just in June'. Moreover, in a foreword for the 2021-22 Corporate Responsibility Report, the CEO indicates: 'This Corporate Responsibility Report outlines our progress on the 2030 goals we laid out two years ago. I am proud of our accomplishments, including: [...] Evolving our Pandemic Response Technology Initiative (PRTI). This has now become our Intel RISE Technology Initiative (IRTI), which funds projects related to healthcare, education, and the economy, with dedicated work streams for social equity and human rights, accessibility, and climate action. The IRTI is a purpose-driven platform for action backed by a \$20 million commitment'. Also, 'As we look ahead, we will build on this momentum to drive progress and take us to even greater heights in 2022 and in the years ahead, including: [...] Driving positive impact in supply chain responsibility. Through our efforts to help protect human rights, our suppliers have returned \$25 million in fees to their workers since 2014. In 2021, our progress also included expansion of our work in responsible minerals sourcing, and the achievement of \$1.4 billion in annual spending with diverse-owned suppliers'. The CEO is a Board member. Moreover, Omar Ishrak, Chair of the Board notes in his Letter From Your Board Chair found in the 2022 Proxy Statement: 'Also in 2021, via Intel's RISE Technology Initiative (IRTI), we worked with over 50 customers, partners, governments, academic bodies, and NGOs on 62 enabled global projects related to health care, education, and the economy with dedicated new work streams for social equity, human rights, accessibility, and climate action'. However, CHRB is looking for specific speeches or presentations where the Board member discusses why human rights matter to the business or challenges that the Company has faced in respecting them. Human rights are expected to be at the center of the communication. No further evidence found. [Tweet CEO, N/A: twitter.com] & [2021-22 Corporate Responsibility Report, 2022: csrrreportbuilder.intel.com]
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"> • Met: Board/Committee review HRs strategy: In its 2019 Proxy Statement, the Company indicates: 'During the past year, the Corporate Governance and Nominating Committee's oversight focused on, among other things, [...], Intel's Corporate Responsibility Report and trends (including climate change, human capital and workplace, and human rights issues), [...]'. In addition, it indicates in its CR Report 2019-2020 that 'Intel has established an integrated approach to managing human rights across our business, including board-level oversight and the involvement of senior level Management Review Committees.' Briefs including corporate responsibility performance take place twice a year (including, as mentioned in indicator A.2.1, human rights). As indicated in its charter, the committee meets at least four times each year, or more frequently. [2020 Proxy

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Statement, 2020: s21.q4cdn.com] & [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com]</p> <ul style="list-style-type: none"> • Not Met: Examples/trends re HR discussion in the last reporting period: The Company states in its Anti-Slavery and Human Trafficking Statement: 'The Intel Board of Directors' Corporate Governance and Nominating (CGN) Committee has primary responsibility for oversight of corporate responsibility issues at Intel. Management provides formal updates to the CGN Committee at least twice each year and at least annually to the full Board on the company's corporate responsibility performance and disclosure, including human rights issues. The annual Intel Modern Slavery and Human Trafficking Statement is reviewed and approved by the CGN Committee and the full board.' No details found, however, of examples of issues or trends discussed in committee meetings. No further information in latest revision. [Statement on Combating Modern Slavery 2019, 05/2020: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
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"> • Not Met: Board process to review business model and strategy: The 2022 Proxy Statement indicates: 'Management provides formal updates to the CGN Committee [Corporate Governance and Nominating Committee] at least twice each year and at least annually to the full Board on the company's ESG performance and disclosure. In 2021, this included a review of the annual Corporate Responsibility Report and updates on issues including environmental sustainability, climate risk, human capital, human rights, political accountability, and investor outreach and feedback'. Also, the Corporate Governance and Nominating Committee has among other focus areas: 'Intel's Corporate Responsibility Report and trends (including environmental sustainability, climate risk, human capital, human rights issues, and political accountability)'. However, no description found of process it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a Board committee. [2022 Proxy Statement, 2022: d1io3yog0oux5.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe frequency and triggers for reviewing • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: In its CSR 2019-2020, the Company indicates: 'We have established cross-functional Management Review Committees (MRCs) consisting of senior executives who manage corporate responsibility and sustainability activities across the organization. Our global Corporate Responsibility Office acts as an internal adviser to the business groups and MRCs to drive strategic alignment and incorporate external stakeholder input into decision processes'. Sustainability and corporate responsibility include human rights. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: In addition, the Company indicates that 'responsibility is also embedded across the company through a cross-Intel Human Rights Steering Committee and close partnerships with global teams that develop and implement policies and actions related to our human rights risks'. Moreover, the Company discloses further information in its Salient Human Rights Risk Mapping Report, where it shows how each of its salient human rights risks is integrated into its value chain and is overseen by the most relevant business unit. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] & [CR 2018 - Salient Human Rights Risk Mapping: intel.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights: In its 2019-2020 CSR Report, the Company states: 'Since 2008, we have linked a portion of our executive and employee compensation to corporate responsibility factors in our Annual Performance Bonus (APB). The formula for determining APB pay-outs is based on both absolute and relative financial performance and the achievement of certain operational goals. In 2019, we achieved the operational goals, which were related to our diversity and inclusion objectives, including advancing women in senior leadership and building our inclusive culture.' In addition, according to its Proxy Statement the operational performance component represents 50% of the annual incentive cash pay-out formula and is based on specific operational goals that the committee approves for each business unit'. However, diversity, inclusion, and women leadership goals are not sufficiently reflecting the whole of the companies' human rights performance. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] & [2020 Proxy Statement, 2020: s21.q4cdn.com] • Met: At least one key HR risk, beyond employee H&S: In 2019 Proxy statement they Company indicated that The target depends on the average of 10 business units' scores, subject to any adjustment for performance against corporate-level diversity and inclusion goal, which was: 'to achieve full representation of women and underrepresented minorities in our U.S. workforce in 2018. Women's rights is one of the key industry risks for the Benchmark. No further details found in latest proxy statement, where goals referred to 'Promoting parity in representation of women in leadership - Driving an inclusive culture'. [2019 Proxy Statement, 2019: s21.q4cdn.com] & [2020 Proxy Statement, 2020: s21.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria made public: See above. [2020 Proxy Statement, 2020: s21.q4cdn.com] & [2019 Proxy Statement, 2019: s21.q4cdn.com] • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: The Company indicates: 'One of the Board's functions is the oversight of risk management, which includes ESG-related risks. The Board receives periodic briefing and informational sessions by management on the types of risks the company faces and enterprise risk management. Management is responsible for identifying risk and risk controls related to significant business activities; mapping the risks to company strategy; and developing programs and recommendations to determine the sufficiency of risk identification, the balance of potential risk to potential reward, and appropriate ways to control risk'. The annual report identifies risks: 'our operations and our financial results, [...] may be adversely affected by a number of global and regional factors outside of our control. [...] including: [...]; differing employment practices and labor issues'. 'We face supply chain risks. [...] increased regulation or stakeholder expectations regarding responsible sourcing practices could cause our compliance costs to increase or result in publicity that negatively affects our reputation. Moreover, given that we use many materials in the manufacturing of our products and rely on many suppliers to provide these materials, but do not directly control the procurement or employment practices of such suppliers, we could be subject to similar financial or reputational risks as a result of our suppliers' conduct. [...] The manufacturing and assembly and test of our products require the use of hazardous materials that are subject to a broad array of environmental, health, and safety laws and regulations'. [CSR 20-21, 2021: csrreportbuilder.intel.com] & [2019 Annual Report, 2020: d1io3yog0oux5.cloudfront.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Provides an example: See above. The Company describes how human rights risks and impacts (included in general risk management) can have an impact on the Company's reputation and financial position. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment: The 2022 Proxy Statement indicates the Board's Role in Risk Oversight: 'An important function of the Board is oversight of risk management at Intel. Risk is inherent in business, and the Board's oversight, assessment, and decisions regarding risks occur in the context of and in conjunction with the other activities of the Board and its committees. [...] The full Board has primary responsibility for risk oversight. The Board executes its oversight duties through: Assigning specific oversight duties to the Board committees; Periodic briefing and informational sessions by management on: The types of risks the company faces; Enterprise risk management: risk identification, mitigation, and control. For most enterprise risk management issues, such as cybersecurity risks, the Board receives regular and detailed reports from management or the appropriate Board committee regarding its review of the issues. In some cases, such as risks regarding new technology and product acceptance, risk oversight is addressed as part of the full Board's regular oversight of strategic planning'. As for the Audit & Finance Committee role: 'Oversees issues related to financial reporting, internal controls, audit functions, and major financial, product security, and cybersecurity risk exposures, and management's annual enterprise risk management assessment. Oversees issues related to financial risk management, including the company's risk tolerance in cash-management investments'. However, although the Company elaborates on the role of the Board and of the Audit Committee on its risk management, it is not clear how it assesses the adequacy of the enterprise risk management system in managing human rights during the company's last reporting year. The assessment was either overseen by the Board Audit Committee or conducted by an independent third party.
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"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: In its CR 2021 the Company indicates: 'Each year, our CEO communicates with all employees and managers about the importance of ethics and legal compliance, including regular reminders on our strong commitment to always act with integrity. This "tone from the top"—reiterated by our senior leadership and proliferated in our corporate required annual ethics and compliance training, regular communications throughout the year, company-wide ethics culture surveys, awareness trainings, annual ethics and compliance summits, and educational resources—helps to create and maintain an ethical and legally compliant culture. [...] All employees are expected to complete annual Code of Conduct training, through which they also certify adherence to the Code.' The Global Human Rights Principles 'is referenced in the Intel Code of Conduct and is included in the corresponding annual employee training materials. [Global Human Rights Principles, 11/2019: intel.com] & [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: In its CSR 2019-2020, the Company indicates: 'We expect our suppliers and their suppliers to comply with the Intel Code of Conduct and the Responsible Business Alliance Code of Conduct (RBA Code). [...] We communicate our expectations in our supplier contracts and request-for-proposal documents, on our supplier website, at meetings and training events, and in annual letters to suppliers.' The Company indicates in its Annual Supplier Letter: 'We expect our suppliers to hold their own suppliers accountable to the RBA Code of Conduct as well, with communications, assessments and audits'. [Annual Supplier Letter 2021, 2021: intel.com] & [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: See above [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How workers are trained on HR policy commitments: In its CR 2021 the Company indicates: 'Each year, our CEO communicates with all employees and managers about the importance of ethics and legal compliance, including regular reminders on our strong commitment to always act with integrity. This “tone from the top”—reiterated by our senior leadership and proliferated in our corporate required annual ethics and compliance training, regular communications throughout the year, company-wide ethics culture surveys, awareness trainings, annual ethics and compliance summits, and educational resources—helps to create and maintain an ethical and legally compliant culture. [...] All employees are expected to complete annual Code of Conduct training, through which they also certify adherence to the Code.' The Global Human Rights Principles 'is referenced in the Intel Code of Conduct and is included in the corresponding annual employee training materials. [Global Human Rights Principles, 11/2019: intel.com] & [CSR 20-21, 2021: csrreportbuilder.intel.com] • Not Met: Trains relevant managers including procurement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: In its 2019-2020 CSR Report the Company indicates that 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols. Every year we complete the RBA Self-Assessment Questionnaire (SAQ) and publish the results on our corporate website. We follow the RBA Validated Assessment Program to conduct audits of our finished goods factories. In 2020, we will conduct an RBA Validated Assessment Process (VAP) audit of our facilities in Chengdu, China. [...] Supplier assessments and audits cover more than 300 environmental, safety, and human rights factors, and help us determine a supplier's risk profile. The audits, conducted by a mix of third parties and Intel personnel, follow the RBA VAP and help us identify where immediate action is needed and where longer-term, corrective “targeted action plans” should be put in place. [...] CSR criteria are also incorporated into Intel Quality Assessment audits to achieve broader reach'. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] • Met: Proportion of supply chain monitored: The Company discloses information about the number of suppliers monitored (RBA VAP Audits, Intel RBA-Based Target Audits, Intel Quality Audits with Sustainability Element, Total of 126 audits) and it reports to have more than 9.000 Tier 1 suppliers. [CSR 20-21, 2021: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe how workers are involved in monitoring • Not Met: Score of 2 on A.1.2.a: See A.1.2.a • Met: Describes corrective action process: In addition, the Company indicates: 'When a supplier does not make sufficient progress in addressing audit findings or has particularly egregious issues, we work with them to quickly develop and implement a strong corrective action plan to address the issues and concerns. Supplier progress is reviewed quarterly until we have verified that all key issues have been closed, and that processes have been put in place to prevent recurrence. If satisfactory progress is not made, we may take additional action, such as not awarding new business (“conditional use” status) until issues are resolved or—when necessary—ending the supplier relationship. While complete closure of certain issues can take several years, we work to close egregious issues within 30 days'. [CSR 20-21, 2021: csrreportbuilder.intel.com] • Not Met: Disclose findings and number of corrective action: The Company indicates in its CSR 2021 that it 'worked with 46 suppliers to close 159 occupational health and safety audit findings and improve worker conditions in their factories. [...]'. However, no further information about the total number of audits finding was found. Although it indicates that 'For priority and major findings by category and sub-category, visit the Report Builder', this information was only found for Environmental and Health and Safety Violations. Previous assessment was based on CSR 2017, dated 2018, which is now out of the three-year timeframe that the methodology requires. [CSR 20-21, 2021: csrreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not Met: HR affects selection of suppliers: The 2021-22 Corporate Responsibility Report indicates: 'When a supplier does not make sufficient progress in addressing audit findings or has particularly egregious issues, we work with the supplier to quickly develop and implement a strong corrective action plan. Supplier progress is reviewed quarterly until we have verified that all key issues have been closed, and that processes have been put in place to prevent recurrence. If satisfactory progress is not made, we may take additional action, such as not awarding new business ("conditional use" status) until issues are resolved or—when necessary—ending the supplier relationship'. Also, according to the 2020-21 Corporate Responsibility Report it conducts assessment for new suppliers: 'A short survey is sent to new suppliers to determine whether a facility is of potential high risk. We work with suppliers during the on-boarding process to remedy any issues identified'. However, the Company is expected to describe how human rights performance is considered when choosing their suppliers, not after the decision was made and then suppliers have to agree to comply with different expectations. This datapoint focuses on the selection process. [CSR 20-21, 2021: csrreportbuilder.intel.com] & [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] • Met: HR affects on-going supplier relationships: In addition, it adds: 'When suppliers do not make sufficient progress in addressing audit findings or have particularly egregious issues, we require that they develop and obtain Intel's approval on "get-well action plans". Suppliers' progress is reviewed quarterly until we have verified that all significant issues have been closed, and that processes have been put in place to prevent recurrence. If satisfactory progress is not made, we are prepared to take additional action, such as not awarding new business ("conditional use" status) until issues are resolved, or—when necessary—ending the supplier relationship'. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights: The Company indicates in its CSR 2021 the following: 'We provide regular feedback to suppliers on their overall progress and achievements, and integrate corporate responsibility considerations into our Supplier Continuous Quality Improvement (SCQI) Program. This program grants SCQI, Preferred Quality Supplier (PQS), and/or Supplier Achievement awards to suppliers that have demonstrated outstanding performance'. However, it is not clear whether the awards have consequences in the Company's purchasing practices to encourage its suppliers to respect human rights. [CSR 20-21, 2021: csrreportbuilder.intel.com] • Met: Working with suppliers to meet HR requirements: The Company discloses the following: 'we have delivered a broad range of no-cost support options for suppliers: an online learning environment where we offer webinars annually in multiple languages; face-to-face training on critical topics; safety programs; multi-stakeholder development summits and round tables; and Intel-funded third-party consulting for suppliers that struggle to close findings from audits. In 2019, we augmented our program by proactively sponsoring in-factory consulting for three suppliers new to Intel's supply chain and RBA expectations. Based on risk assessment data, we worked with these suppliers to address potential issues prior to an audit, rather than responding to close gaps reactively post-audit. As a result, these suppliers have been able to put the right management systems in place to develop improvement plans and more quickly meet code requirements'. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com]
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"> • Met: Discloses stakeholders that HRs may be affected: The Company discloses information about the Rights holders and relevant potential impacts of its salient human rights risks in its CSR 2020/21. For example, it identifies that Supply chain workers are exposed to risks related to: Freedom from Slavery and of Movement, Non-discrimination, Right to a Clean, Healthy, and Sustainable Environment, Right to Decent Work, Rest, and Leisure, Right to Humanitarian and Treatment in Armed Conflict and Right to Peaceful Assembly and Association. [CSR 20-21, 2021: csrreportbuilder.intel.com] • Not Met: Provides two examples of engagement with stakeholders: The 2021-22 Corporate Responsibility Report indicates: 'We use a variety of channels to facilitate open and direct communication, including online forums, open forums with executives, employee experience surveys, and engagement through more than 35 different employee resource groups. The semi-annual Employee Experience Survey

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>invites our entire employee population to provide feedback on Intel culture, management, career opportunities, compensation, and benefits. We also have an Employee Inclusion Survey to help us understand how different employee populations experience inclusion at Intel. [...] In 2021, 90% of employees reported, "I am treated with dignity and respect at work" and "Intel makes it easy for people from diverse backgrounds to fit in and be accepted," an increase in favorable responses year over year'. Additionally, 'we have an ongoing program to dedicate resources and partner with expert civil society organizations to identify and remedy the challenges of the mining communities that source our products. A few examples of projects supported by Intel in 2021 are: Congo Power, an alliance providing mining areas with clean power, specifically funding the power needs for community training in addition to the educational programming at the Dr. Mukwege School; PACT-RMI Youth Vocational Training Program, aimed at providing mining alternatives to Congolese youths; and the development of the world's first Congo-focused North American collection and repository for Congolese-written documents on the Democratic Republic of the Congo (DRC), at the University of British Columbia library. [...] Intel also recognizes the local socio-economic importance of the artisanal and small-scale mining (ASM) sector in CAHRAs and seeks to assist ASM sites in meeting downstream compliance requirements through the Better Mining ASM Mine Monitoring Program in partnership with Responsible Minerals Initiative (RMI) and RCS Global. Intel also supported a digital suite designed specifically for the ASM sector, which will create new pathways to track, access, and share data about practices in mining communities'. However, .regarding the work done in mining communities, although the Company indicates various projects it is involved with, no example of actual engagement found in dialogue with affected stakeholders was found. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] & [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues: The Company discloses information about the process to elaborate its Corporate Responsibility Materiality Matrix: 'We use a range of methods and inputs to identify priority topics and emerging issues from our stakeholders. [...] Stakeholder Review: Every two years, we engage a third party to update our materiality assessment. Our most recent update was completed in early 2021, building on the previous assessment that was used to inform the development of our 2030 strategy and goals. The latest assessment included review of industry best practices and reports, [...] analysis of issues identified through stakeholder dialogue during the year, and completion of interviews with internal and external stakeholders. [...] We use this information to inform changes to our strategies, goals, and ongoing engagement and disclosure practices.' However, no details found on the input given by affected stakeholders on human rights issues. [CSR 20-21, 2021: csrreportbuilder.intel.com] • Not Met: Describe how views influenced company's HR approach

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	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: In its CSR 2020/21, the Company indicates: 'In 2016, we engaged a third party to conduct a human rights impact assessment (HRIA) to review our processes and validate our human rights risks. The HRIA confirmed that we were addressing our most salient human rights risks, and reaffirmed our need to assess potential risks associated with emerging technologies. In 2018, we built on the results of that assessment and conducted an additional internal Artificial Intelligence and Autonomous Driving HRIA, including assessment of potential risks related to product misuse, algorithmic bias, algorithmic transparency, privacy infringement, limits on freedom of expression, and health and safety.[...] In 2020 and early 2021, we completed an updated third-party HRIA, involving multiple internal teams and Responsible AI interviews with external stakeholders. The new assessment resulted in the update of our salient human rights risks, including the addition of potential impacts in the areas of product responsibility and responsible AI.' The Company has provided comments to CHRB regarding this indicator. However, the content of it was already in use. [CSR 20-21, 2021: csrreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Identifying risks through relevant business relationships: As indicated above, the Company reports about its HRIA process. However, this process seems to be focus in own operations. The Company indicates, in its 2021-22 Corporate Responsibility Report, its risk-based approach to supplier assessment. It includes information on new supplier assessment, self-assessment, audit and training/attestation. It also indicates: 'As a founding member of the Responsible Business Alliance (RBA), we hold our suppliers accountable to the same expectations we have for ourselves. Over the past decade, we have directly engaged with our suppliers to verify compliance and build capacity to address risks of forced and bonded labor and other human rights issues. We also engage with indirect suppliers through our programs on forced and bonded labor and responsible minerals. Our significant investments of time and resources are aimed at influencing system-level, industry-wide improvements to protect and empower workers in the global electronics supply chain and to reduce community impacts. Although the Company indicates it has various assessment and auditing tools, it is not clear they are part of a proactive identification of human rights risks that faces as a company. Evidence found seems to focus on compliance. The description should include the process it uses to identify which are its potential human rights risks and impacts associated to its businesses through the supply chain. [CSR 20-21, 2021: csrreportbuilder.intel.com] & [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above, the Company indicates that it conducted interviews with external stakeholders and engaged a third party to conduct its HRIA process. The Company indicates in its feedback to CHRB that it has many channels where stakeholders can contact them. However, no further information was found with respect the external stakeholders consulted or the third party engaged. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified: The Company indicates its Salient human Rights Risks within its employees, supply chain workers and end user/data subjects. However, it is not clear the risks were identified specifically in relation to new country operations, new business relationships, new human rights challenges or conflict affecting particular locations, including through heightened due diligence in any conflict-affected areas. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com]
B.2.2	Assessing 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"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates: 'In 2016, we engaged a third party to conduct a human rights impact assessment (HRIA) to review our processes and validate our human rights risks. The HRIA confirmed that we were addressing our most salient human rights risks, and reaffirmed our need to assess potential risks associated with emerging technologies. In 2018, we built on the results of that assessment and conducted an additional internal Artificial Intelligence and Autonomous Driving HRIA, including assessment of potential risks related to product misuse, algorithmic bias, algorithmic transparency, privacy infringement, limits on freedom of expression, and health and safety.[...] In 2020 and early 2021, we completed an updated third-party HRIA, involving multiple internal teams and Responsible AI interviews with external stakeholders. The new assessment resulted in the update of our salient human rights risks, including the addition of potential impacts in the areas of product responsibility and responsible AI'. However, no evidence found on how different factors were taken into account, such as geographical, economic, social or other factors in determine saliency of different human rights issues. [CSR 20-21, 2021: csrreportbuilder.intel.com] • Not Met: How process applies to supply chain • Met: Public disclosure of the results of HR assessment: The Company discloses its salient human rights issues in its CSR 2020/2021: 'Freedom from Slavery and of Movement, Freedom of Expression and Right to Privacy, Non-discrimination, Right to a Clean, Healthy, and Sustainable Environment, Right to Decent Work and Rest and Leisure, Right to Humanitarian Treatment in Armed Conflict, Right to Life and Security of Person, Right to Peaceful Assembly and Association'. The Company has provided an additional source to this indicator, however key information was already in use. [Salient human rights risk mapping 2021, 2021: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Action Plans to mitigate risks: The Company indicates that its Human Rights Priorities are: 'Continue to assess and strengthen the Intel Global Human Rights Principles, policies, due diligence processes [...]; Engage in additional stakeholder and industry dialogues regarding potential human rights issues related to emerging technologies, including responsible AI; Significantly expand our impact in responsible minerals and accelerate the creation of new sourcing standards. [...]; Continue our work to combat forced and bonded labor in the first and second tiers of our supply chain'. However, no further information found about the steps taken / Action Plans designed to face the human rights risks identified and assessed, particularly related to labour rights. [CSR 20-21, 2021: csrreportbuilder.intel.com] • Not Met: Description of how global system applies to supply chain: The 2021-22 Corporate Responsibility Report indicates: 'Supplier assessments and audits cover more than 300 environmental, safety, and human rights factors, and help us determine a supplier's risk profile. The audits, conducted by a mix of third parties and Intel personnel, follow the RBA VAP and help us identify where immediate action is needed and where longer term, corrective "targeted action plans" should be put in place. [...] We provide regular feedback to suppliers on their overall progress and achievements, and integrate corporate responsibility considerations into our Excellence, Partnership, Inclusion, and Continuous Improvement (EPIC) program'. However, although the Company indicates it performs assessments and audits as well as it provides regular feedback to suppliers, it is not clear its global system to prevent, mitigate or remediate its salient human rights issues applied to its supply chain. Current evidence seems to focus in monitoring compliance (assessed in indicator B.1.6) [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] • Met: Example of actions decided on at least 1 salient HR issues: In addition, it indicates: 'In 2017, we required that 17 of our suppliers who employ foreign and migrant workers embark on deep analyses of their risk-management approaches. The process includes an audit of at least one recruiting agent per supplier. Thus far, five audits have been conducted, with positive results overall. Suppliers are addressing common findings such as inconsistent communications, monitoring, and management systems. As a result of these efforts, we have pinpointed risks deeper in our supply chain. In 2018, we identified risks and gaps in the areas of construction and packaging, and are now looking more broadly at suppliers in those areas. We also required that approximately 50 of our suppliers work with at least three of their own major suppliers to assess and address their risks of forced and bonded labor. Our work at this tier 2 level has resulted in changes to supplier policies and procedures, and stronger engagements with recruiting and labor agents. We have uncovered and are now addressing a number of issues, including fees and passport holding.' The Company has provided an additional source to this indicator, however key information was already in use. [CSR Report 2018, 2019: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
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"> • Not Met: System for tracking or monitor if actions taken are effective: The Company indicates, in its 2021-22 Corporate Responsibility Report, how it reviews the progress of corrective action plans a result of non-compliances identified in audits. However, it is not clear the system for tracking or monitoring the actions taken in response to the salient 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. Current evidence seems to focus in individual supplier tracking. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
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"> • Not Met: Provides two examples of comms with stakeholders: In its feedback to CHRB regarding this indicator, the Company makes reference to a series of sources, including a webpage on Campus data, another one on pay data. It has also made reference to 2021 Annual Supplier Letter where the Company reaffirms its expectations. Additionally, the Company highlights its 2021-22 Corporate

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Responsibility Report, where information of its Integrity Line is found among comprehensive information on how it manages its Human Rights approach. Finally, the 2022 Proxy Statement was brought to attention, where the Company states reiterates its Human Rights commitments and its supply chain responsibility approach. However, this indicator focuses on how the Companies ensure meaningful information reaches affected stakeholders, how it responds, in communication terms, to issues raised by stakeholders and about their access to those communications. The Company is expected to provide two of such examples. No evidence found. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] & [2021 Annual Supplier Letter, 12/2021: intel.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

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"> • Met: Channel accessible to all workers: The Company indicates in its Global Human Rights Principles that it has 'put in place formal grievance and remedy processes to enable anyone, including employees, employees of Intel's suppliers, and other external stakeholders, to report human rights concerns through our third-party-operated ethics reporting portal'. [Global Human Rights Principles, 11/2019: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: Its Ethics Point Portal is available in English, Spanish and Chinese. In addition, in its Anti-Slavery and Human Trafficking Statement, the Company indicates that 'Individuals can report concerns to Intel by email, telephone, or letter, in English or their local language'. In its CR 2021 the Company indicates: 'All employees are expected to complete annual Code of Conduct training, through which they also certify adherence to the Code'. The Code includes references to its Ethics Point. [Reporting Portal, N/A: secure.ethicspoint.com] & [CSR 20-21, 2021: csrreportbuilder.intel.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The RBA Code of Conduct (which is a requirement for suppliers) requires an 'effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement'. And it also requires that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code'. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] • Met: Expect Suppliers to convey expectation to their own suppliers: The RBA Code of Conduct (which is a requirement for suppliers) requires an 'effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement'. And it also requires that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code'. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org]
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"> • Met: Grievance mechanism for community: The Company indicates in its Global Human Rights Principles that it has 'put in place formal grievance and remedy processes to enable anyone, including employees, employees of Intel's suppliers, and other external stakeholders, to report human rights concerns through our third-party-operated ethics reporting portal'. [Global Human Rights Principles, 11/2019: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: Its Ethics Point Portal is available in five languages. In addition, in its Anti-Slavery and Human Trafficking Statement, the Company indicates that 'Individuals can report concerns to Intel by email, telephone, or letter, in English or their local language.' The 2021-22 Corporate Responsibility Report indicates: 'Each year, our CEO communicates with all employees and managers about the importance of ethics and legal compliance, including regular reminders on our strong commitment to always act with integrity. This "tone from the top"—reiterated by our senior leadership and proliferated in our corporate required annual ethics and compliance training, regular communications throughout the year, company-wide

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>ethics culture surveys, awareness trainings, annual ethics and compliance summits, and educational resources—helps to create and maintain an ethical and legally compliant culture’. However, no further information describing how the Company ensures stakeholder awareness. [Reporting Portal, N/A: secure.ethicspoint.com] & [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com]</p> <ul style="list-style-type: none"> • Not Met: Communities access mechanism direct or through suppliers: The 2021-22 Corporate Responsibility Report indicates: ‘The anonymous reporting channel consists of an Integrity Line through which anyone can report alleged misconduct via messaging or an online reporting tool managed by an independent third party. We inform employees, managers, and other stakeholders about Intel’s non-retaliation policy, which prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation’. The Company states in its RBA Commitment Letter: ‘[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same.’ The Code indicates: ‘Ongoing processes, including an effective grievance mechanism, to assess workers’ understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation’. However, it is not clear that external individuals and communities have access to it, in order to raise Complaints or concerns about human rights issues at the Company’s suppliers. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] & [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] • Not Met: Expect supplier to convey expectation to their own suppliers: See above. The 2021-22 Corporate Responsibility Report indicates: ‘We expect our suppliers and their suppliers to comply with the Intel Code of Conduct, Intel’s Supplier policies, and the RBA Code of Conduct (RBA Code). The RBA Code describes industry environmental, social, and ethical standards, and is consistent with the Intel Global Human Rights Principles, the Intel Statement on Combating Modern Slavery, and the UN Guiding Principles on Business and Human Rights. For more, read our RBA Commitment Letter’. However, it is not clear the Company expects suppliers to convey the expectation [to have a channel from which external individuals and communities can access to raise Complaints or concerns about human rights issues at the Company’s suppliers] on access to grievance mechanism(s) to their suppliers. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
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"> • Not Met: Response timescales and how complainants will be informed: The Company indicates on its Ethics Portal website: ‘After you complete your report, you will be assigned a unique code called a "report key." Write down your report key and password and keep them in a safe place. After 5-7 business days, use your report key and password to check your report for questions. You can provide additional information at anytime.’ However, no further information about response timescales was found. [Reporting Portal, N/A: secure.ethicspoint.com] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level: The 2021-22 Corporate Responsibility Report indicates: ‘The Board and senior management receive periodic reports of statistics related to misconduct, as well as details about key investigations. [...] Consistent concerns are addressed through senior management discussions, employee communications, process and controls improvements, and individual corrective action measures, where appropriate’. However, it is not clear how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			complainant's discretion. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com]
C.5	Prohibition of retaliation for raising complaints or concerns	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public statement prohibiting retaliation: The Company states in its Global Human Rights Principles that it 'does not tolerate retaliation against anyone who in good faith reports possible violations of law, the Intel Code of Conduct, or other company policies or procedures, questions on-going or proposed conduct, or participates in an internal investigation'. As indicated in previous indicators, external stakeholders have access to grievance mechanism. [Global Human Rights Principles, 11/2019: intel.com] • Met: Practical measures to prevent retaliation: In its CSR report, the Company indicates: 'We maintain multiple channels for employees and others to report concerns, including reporting anonymously, as permitted by applicable law around the world. The anonymous reporting channel consists of a telephone and online reporting tool managed by an independent third party. We inform employees, managers, and other stakeholders about Intel's non-retaliation policy, which prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation.' The Code of Conduct, which include the Non-Retaliation provision, also indicates: 'Employees who violate the Code are subject to discipline, up to and including termination of employment subject to applicable law'. As indicated in C.1, employees are made aware of the grievance mechanism. [CSR 20-21, 2021: csrreportbuilder.intel.com] & [Code of Conduct, 2022: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable): The 2021-22 Corporate Responsibility Report indicates: 'As a result of our efforts to ensure the protection of human rights in the work place, our suppliers have returned \$25 million in fees to their workers since 2014. In 2021, our progress also included expansion of our work in responsible minerals sourcing, and the achievement of \$1.4 billion in annual spending with diverse-owned suppliers—a 10-fold increase compared to 2015'. However, although the Company provides examples of actions taken in its supply chain, it is not clear it is as a result of a process by which it cooperates with state-based non-judicial grievance mechanism on complaints brought against it. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com]
C.7	Remedying adverse impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The Company reports in its MSA 2020: 'In 2020, \$8,3M in fees were returned to 7,600 workers by suppliers for a total returned of approximately \$23 million in fees to more than 20,000 workers since 2014. This equates to approximately three to five months of base pay [...]' In addition, in its CSR Report 2019-2020: 'As a result of our efforts, our suppliers have returned over \$15 million in fees to workers since 2014. [...] Our ongoing assessments and efforts to reach deeper into the supply chain encompass more than 38,000 workers in our extended supply chain.' In addition, in its Anti-Slavery and Human Trafficking Statement 2018, it declared: 'Our diligence continues to positively impact workers throughout the supply chain, having returned approximately \$15 million in fees to more than 13,100 workers since 2014. Since that time, new rigorous practices and policies also help ensure fee collection does not easily recur. To date, we have improved the lives of approximately 38,000 workers through fee repayments, returned passports, amended contracts, and other improvements related to anti-slavery and human trafficking'. [Statement on Combating Modern Slavery 2020, 2021: intel.com] & [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes to systems, processes and practices to stop similar impact: In its 2018 CR Report, the Company states: 'As a result of our efforts, our suppliers have returned over \$14 million in fees to workers since 2014. In some instances, we have faced challenges in gaining cooperation in repaying workers quickly, and we work closely with suppliers to determine acceptable gap closure plans. As we have learned more about the contributing factors to forced and bonded labor, we have

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>adjusted our tools and processes to align with likely risks. Many challenges exist in combating this issue, in particular, lack of full visibility into our multi-tier supply chain and difficulty in tracing the multiple levels of recruiting and labor agents who source workers. Through our work on this issue, we have found that some of the agents take advantage of vulnerable workers. [...] In 2017, we required that 17 of our suppliers who employ foreign and migrant workers embark on deep analyses of their risk-management approaches. The process includes an audit of at least one recruiting agent per supplier. Thus far, five audits have been conducted, with positive results overall. Suppliers are addressing common findings such as inconsistent communications, monitoring, and management systems.' [CSR Report 2018, 2019: csrreportbuilder.intel.com]</p> <ul style="list-style-type: none"> • Met: Describe approach to monitoring implementation of agreed remedy: The 2021 Statement on Combating Modern Slavery indicates: 'Suppliers are required to draft comprehensive corrective action plans (CAPs) to address audit findings, and we work closely with them to document actions taken to remedy those findings. We then monitor their progress until the issues are resolved. If suppliers do not make enough progress to close the audit findings or their actions do not result in sustainable changes, suppliers are then placed on a 'get well action plan'. If the 'get well action plan' is not successful, we take additional actions, which can include ending the supplier relationship. Intel's Supply Chain Responsibility Management Review Committee (MRC) reviews CAPs quarterly, or more frequently, as needed. We require an RBA Closure Audit and/or an in-person visit to confirm CAP closure, including fee repayment'. [2021 Statement on Combating Modern Slavery, 13/04/2022: intel.com]
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"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

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"> • Not Met: Pays living wage or sets target date • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.4.1.b	Living wage (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.4.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Avoids business model pressure on HRs (purchasing practices) • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company indicates in its CSR 2020/21: 'More than 9,000 tier 11 suppliers in 89 countries provide direct materials for our production processes, intellectual property, tools and machines for our factories, logistics and packaging services, software, office materials, and travel services for Intel. We also rely on others to manufacture, assemble, and test some of our components and products. A list of our Top 100 Production and Service Suppliers by Spends is included in the Appendix.'. However, it is not clear whether suppliers, including direct and indirect suppliers, have been, or are being mapped. [CSR 20-21, 2021: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses the list of its Top 100 Production and Service Suppliers by Spends in its CSR 2020/21, indicating that 'These companies represent approximately 75% of Intel's total supply chain spends in 2020.' However, the list does not include locations. [CSR 20-21, 2021: csrreportbuilder.intel.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not use child labour: The Company states in its Human Rights Principles: 'Intel will not employ anyone under the age of 16 in any position, and workers under the age of 18 should not perform hazardous work, overtime, or night shift work.' [Global Human Rights Principles, 11/2019: intel.com] • Met: Age verification of workers recruited: The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same.' The Code indicates: 'Child labor is not to be used in any stage of manufacturing. (...) Participants shall implement an appropriate mechanism to verify the age of workers. (...) If child labor is identified, assistance/remediation is provided'. The 2021-22 Corporate Responsibility Report indicates: 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols. Every year we complete the RBA Self-Assessment Questionnaire (SAQ) and publish the results on our corporate website. We follow the RBA Validated Assessment Program (VAP) to conduct audits of our finished goods factories'. The RBA Self-Assessment Questionnaire (SAQ) includes a question that covers age verification. [RBA Code commitment letter, 2020: intel.com] & [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified: The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same.' The Code indicates: 'Child labor is not to be used in any stage of manufacturing. (...) Participants shall implement an appropriate mechanism to verify the age of workers. (...) If child labor is identified, assistance/remediation is provided'. However, it is not clear how it develops, participates in or contributes to programmes for transition from employment to education, enabling children to attend and remain in education, if and when child labour is found in its operations and how it improves working conditions for young workers where relevant.
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"> • Met: Child Labour rules in codes or contracts: The RBA Code of Conduct indicates: 'Child labor is not to be used in any stage of manufacturing. [...] Participants shall implement an appropriate mechanism to verify the age of workers. [...] If child labor is identified, assistance/remediation is provided'. Suppliers are required to follow this code. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] & [Annual Supplier Letter 2021, 2021: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on child labour: The 2021-22 Corporate Responsibility Report indicates: 'In 2021, we partnered with more than 50 suppliers to elevate their safety management systems to ensure safe work practices at Intel sites. In addition, we worked with 43 suppliers to close 131 occupational health and safety audit findings and improve worker conditions in their factories. Beyond our core capability-building offerings, we have long engaged with supply chain sustainability consultants to offer suppliers training and programs focused on topics like work-hours management, occupational health and safety, environmental issues, and prevention of forced and bonded labor. [...] Over the past decade, we have directly engaged with our suppliers to verify compliance and build capacity to address risks of forced and bonded labor and other human rights issues'. Also, 'We continue to collaborate extensively with supply chain-related organizations—including the Responsible Business Alliance (RBA) [...] to help set electronics industry-wide standards, develop audit processes'. However, no details found in relation to proactive work carried out by the Company to improve performance of suppliers in relation to child labour and to improve working conditions for young workers in its agricultural supply chain. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Job seekers and workers do not pay recruitment fee: The Company states in its RBA Commitment Letter: 'we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same.' The Code indicates: 'Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment'. [RBA Code commitment letter, 2020: intel.com] & [RBA Code commitment letter, 2020: intel.com] • Met: Commits to fully reimbursing if they have paid: It also adds: 'If any such fees are found to have been paid by workers, such fees shall be repaid to the worker'. [RBA Code commitment letter, 2020: intel.com] & [RBA Code commitment letter, 2020: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters: The 2021-22 Corporate Responsibility Report indicates: 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols. Every year we complete the RBA Self-Assessment Questionnaire (SAQ) and publish the results on our corporate website. We follow the RBA Validated Assessment Program (VAP) to conduct audits of our finished goods factories'. The RBA Self-Assessment Questionnaire (SAQ) includes questions on fees and reimbursement. However, although the Company indicates it applies the SAQ to its own operation, it is not clear whether it monitors agencies/labour brokers/recruitment intermediaries. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] & [RBA Self-Assessment Questionnaire (SAQ), 2021: responsiblebusiness.org]
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"> • Met: Debt and fees rules in codes or contracts: The RBA Code of Conduct indicates: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. [...] Workers shall not be required 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'. Suppliers are required to follow this code. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] & [Annual Supplier Letter 2021, 2021: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: In its CSR 2018, the Company indicates: 'We have worked to build a strong system to detect and address risks of forced and bonded labor among our suppliers and their recruiting and labor agents. Our Anti- Slavery and Human Trafficking Statement details the expectations we have for ourselves and our suppliers, including prohibitions against holding worker passports and charging workers fees to obtain or keep employment. As a result of our efforts, our suppliers have returned over \$14 million in fees to workers since 2014. [...] In 2017, we required that 17 of our suppliers who employ foreign and migrant workers embark on deep analyses of their risk-management approaches. The process includes an audit of at least one recruiting agent per supplier. Thus far, five audits have been conducted, with positive results overall. Suppliers are addressing common findings such as inconsistent communications, monitoring, and management systems. [...] In 2018, we identified risks and gaps in the areas of construction and packaging, and are now looking more broadly at suppliers in those areas. We also required that approximately 50 of our suppliers work with at least three of their own major suppliers to assess and address their risks of forced and bonded labor. Our work at this tier 2 level has resulted in changes to supplier policies and procedures, and stronger engagements with recruiting and labor agents'. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees: The 2021 Statement on Combating Modern Slavery indicates: 'To date, fees have been returned to more than 21,000 workers. And, we have improved the lives of approximately 46,000 workers through fee repayments, returned passports, amended contracts, and other improvements relates to the prevention of slavery and human trafficking'. However, it is not clear the scope of the collection of recruitment fees and costs as of this date. No further details found. [2021 Statement on Combating Modern Slavery, 13/04/2022: intel.com] • Met: Analysis of trends in progress made: The Company discloses information about the number of incidents related to risks for forced and bonded labor (2015-2019). [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com]
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or 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"> • Not Met: Pays workers in full and on time: The Company states in its RBA Commitment Letter: 'we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same.' The Code indicates: 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted'. However, it is not clear it pays workers in full and on time. [RBA Code commitment letter, 2020: intel.com] & [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] • Met: Payslips show any legitimate deductions: It also adds: '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'. [RBA Code commitment letter, 2020: intel.com] & [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters: The 2021-22 Corporate Responsibility Report indicates: 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols. Every year we complete the RBA Self-Assessment Questionnaire (SAQ) and publish the results on our corporate website. We follow the RBA Validated Assessment Program (VAP) to conduct audits of our finished goods factories'. The RBA Self-Assessment Questionnaire (SAQ) includes a question that XXX. However, although the Company indicates it applies the SAQ to its own operation, and the SAQ contains questions related deduction in wages, it is not clear how it implements and monitors this practice with employment agencies/labour brokers/recruitment intermediaries. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] & [RBA Self-Assessment Questionnaire (SAQ), 2021: responsiblebusiness.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct, which requires: '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.' [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] & [Annual Supplier Letter 2021, 2021: intel.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress: The 2021-22 Corporate Responsibility Report indicates: 'We continue to collaborate extensively with supply chain-related organizations—including the Responsible Business Alliance (RBA) [...] to help set electronics industry-wide standards, develop audit processes'. However, no analysis of trends demonstrating progress found. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com]
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Does not retain documents or restrict movement: In its CSR 2019/20 the Company states: 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols'. In addition, in its MSA 2020, it states: 'Intel fully supports the vision and goals of the RBA within our global operations and we require our suppliers (and their supply chain) to comply with the RBA Code.' In this document it describes its expectations, including 'no holding worker's original identification; secure personal storage must be provided; workers must have freedom of movement'. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] & [Statement on Combating Modern Slavery 2020, 2021: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters: The 2021-22 Corporate Responsibility Report indicates: 'We have worked to build a strong system to detect and address risks of forced and bonded labor among our suppliers and their recruiting and labor agents, including reaching over 135 suppliers at the tier 2 level. Our Statement on Combating Modern Slavery details the expectations we have for ourselves and our suppliers, including prohibitions against holding worker passports [...]. Since 2014, our ongoing assessments and efforts to reach deeper into the supply chain have positively affected more than 46,000 workers in our extended supply chain'. Additionally, the 2021 Statement on Combating Modern Slavery notes: 'we have required that approximately 50 of our suppliers work with at least three of their own major suppliers to assess and address their risks of forced and bonded labor. Our work has resulted in numerous positive changes made by Tier 2 suppliers to their staffing and recruiting policies and closer engagement and expectation setting with their recruiting agents'. However, although the Company indicates it is assessing recruiting agencies, they seem to be agencies that recruit for their suppliers, rather than for the Company itself. The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same'. The 2021-22 Corporate Responsibility Report indicates: 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols. Every year we complete the RBA Self-Assessment Questionnaire (SAQ) and publish the results on our corporate website. We follow the RBA Validated Assessment Program (VAP) to conduct audits of our finished goods factories'. However, although the Company indicates it applies the SAQ to its own operation and the SAQ contains questions related to freedom of movement, it is not clear how it implements and checks the practice in employment agencies/labour brokers/recruitment intermediaries. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] & [2021 Statement on Combating Modern Slavery, 13/04/2022: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Free movement rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct, which indicates: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters.[...] All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. 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'. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] & [Annual Supplier Letter 2021, 2021: intel.com] • Met: How working with suppliers on free movement: The Company states in its 2018 CR Report: 'Minimizing the risk of slavery and human trafficking in our operations and supply chain requires overcoming two notable challenges: gaining visibility into our multi-tier supply chain and tracing multiple levels of labor agents who source workers. To address these challenges, in 2017 we asked 17 suppliers who employ foreign and migrant workers (FMWs) to perform an in-depth analysis of their risk management approaches. These suppliers were required to (1) align their policies to the RBA, (2) cascade those policies to their recruiting agents, (3) map the journey of their FMWs from their home countries to factories, (4) assess the risks associated with that journey, and (5) provide action plans to close any gaps in their practices vs. our expectations, as laid out in our Antislavery and Human Trafficking Statement'. It also indicates that . In 2018, we identified risks and gaps in the areas of construction and packaging, and are now looking more broadly at suppliers in those areas. We also required that approximately 50 of our suppliers work with at least three of their own major suppliers to assess and address their risks of forced and bonded labor. Our work at this tier 2 level has resulted in changes to supplier policies and procedures, and stronger engagements with recruiting and labor agents. We have uncovered and are now addressing a number of issues, including fees and passport holding.' The Company has provided an additional source to this indicator, however key information was already in use. [CSR Report 2018, 2019: csrreportbuilder.intel.com] & [Anti-Slavery and Human Trafficking Statement 2018, 05/2019: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Not Met: Provides analysis of trends demonstrating progress: The 2021-22 Corporate Responsibility Report discloses figures of 'Findings that May Trigger Forced and Bonded Labor Risks' from 2017 to 2021. It includes finding closed and in process. However, no analysis of trends demonstrating progress specifically on restrictions on workers found. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com]
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company states in its Global Human Rights Principles that it 'recognizes that in many of the locations where we operate, employees have the right to freely associate or not associate with third-party organizations such as labor organizations, along with the right to bargain or not bargain collectively in accordance with local laws. Intel respects those rights and is further committed to treating our employees with dignity and respect and creating an environment of open communication [...]'. It also has provisions prohibiting harassment and discrimination, although union membership is not found among the protected groups. However, there is no reference to measures put in place to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the rights to freedom of association and collective bargaining, and a commitment to respect these rights company-wide, as it indicates the rights are 'in accordance with local laws'. 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. [Global Human Rights Principles, 11/2019: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Discloses % total direct operations covered by collective CB agreements: The Company reports in its Appendix to CSR 2020-21 GRI Index that : 'Approximately 21% of employees are covered by a union, Works Council, or collective agreement'. [Appendix & Additional Data to the CSR 2020/21, 2021: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: FoA & CB rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.' However, it is not clear whether the Company is respecting those rights in all contexts, as it indicates 'in conformance with local law'. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on FoA and CB • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
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"> • Not Met: Describes process to identify H&S risks and impacts: The 2021-22 Corporate Responsibility Report indicates that health and safety is of high 'potential impact on stakeholder decisions' and on 'the impact on Intel's business and external systems' in its ESG Materiality Matrix. It also indicates that 'Since 2001, we have maintained a multi-site certification to the internationally recognized ISO 14001 and ISO 45001 standards to ensure that our manufacturing sites sustain a comprehensive, fully integrated EHS management system'. The Company has an Environmental, Health & Safety Policy. However, no explicit description found of the process it has in place to identify its health and safety risks and impacts. [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company reports an 'Occupational Safety and Health Administration (OSHA) recordable rate of 0.75' (p.35). [CSR 20-21, 2021: csrreportbuilder.intel.com] • Met: Discloses Fatalities for last reporting period: The Company reports zero fatalities in last reporting period. [CSR 20-21, 2021: csrreportbuilder.intel.com] • Not Met: Occupational disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company indicates in its CSR Report 2019-2020 that its 'ultimate goal is to achieve zero serious injuries through continued investment in and focus on our core safety programs and injury-reduction initiatives'. No further information found in last review. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] • Met: Met targets or explain why not or what is doing to improve management systems: The Company reports the following: Intel ended 2020 with an Occupational Safety and Health Administration (OSHA) recordable rate of 0.75, compared to the most recently published US semiconductor industry average recordable rate of 0.9.1 Our days away case rate was 0.16, compared to the semiconductor industry average of 0.4.1 Ergonomic related or CTDs remained the most prevalent type of injury experienced at Intel in 2020, followed by strains/sprains. We had zero fatalities for employees or contract workers working on site in 2020. There were 24 high-consequence injuries during 2020 with 50% CTD injuries and 25% strain/sprain injuries. Learnings have been integrated into our 2021 ergonomics program plans with a focus on early intervention'. [CSR 20-21, 2021: csrreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> • Met: Sets out clear Health and Safety requirements: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct includes health and safety requirements, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for last reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: The Company indicates: 'We set high safety training and performance expectations during our contracting process and orientation for new suppliers. In 2018, we added safety assessment and additional training programs to strengthen the safety performance of all suppliers. One element of our program is to ensure that our suppliers have key global safety standards and employee safety training programs in place and evaluate the supplier safety performance for compliance with the ANSI standards, OSHA regulations, and Intel's minimum safety requirements. In 2019, we expanded these programs to include all suppliers who have employees who perform potentially hazardous work at our facilities. In addition, Intel worked with 43 suppliers to close 205 occupational health and safety audit findings and improve worker conditions in their factories.' [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.a	Women's rights (in own production or 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"> • Not Met: Process to stop harassment and violence against women: The Company includes an anti-harassment provision in its Code of Conduct and in its Global Human Rights Principles, however no description found of processes in place to prohibit harassment, intimidation and violence against women. [Code of Conduct, 2022: intel.com] & [Global Human Rights Principles, 11/2019: intel.com] • Not Met: Working conditions take account of gender • Met: Measures and steps to address gender pay gap at all levels of employment: The Company indicates that 'Since 2019, we have achieved gender pay equity globally and we continue to maintain race/ethnicity pay equity in the US. We achieve pay equity by closing the gap in average pay between employees of different genders or race/ ethnicity in the same or similar roles after accounting for legitimate business factors that can explain differences, such as location, time at grade level, and tenure. Intel's legal and human resources teams work with third-party experts using proven statistical modelling techniques to monitor and advance global pay equity. We have continued to evolve our methodology over time, and our calculations now include stock grants in addition to base pay and bonuses. Individual employees who are identified as having a gap through this analysis receive appropriate adjustments. Based on our 2020 assessment, on average, women globally made \$1 for every \$1 men made and on average, URM employees in the US made \$1 for every \$1 non-URM employees made'. [CSR 20-21, 2021: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Provides analysis of trends demonstrating closing gender pay gap: The Company indicates in its CSR 2020/21: 'Intel's legal and human resources teams work with third-party experts using proven statistical modelling techniques to monitor and advance global pay equity. We have continued to evolve our methodology over time, and our calculations now include stock grants in addition to base pay and bonuses. Individual employees who are identified as having a gap through this analysis receive appropriate adjustments. Based on our 2020 assessment, on average, women globally made \$1 for every \$1 men made and on average, URM employees in the US made \$1 for every \$1 non-URM employees made. A key component of our pay equity strategy is our commitment to transparency, which helps us to hold ourselves accountable and encourage action by others. In support of this goal, we first publicly released our EEO-1 survey pay data in 2019. Although the US Equal Employment Opportunity Commission subsequently decided it would not continue to require the reporting of pay information, we felt it was important to continue collecting the data and to disclose it publicly in 2020.' [CSR 20-21, 2021: csrreportbuilder.intel.com]
D.4.8.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: '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.' The Global Human Rights Principles contains provisions on diversity which suppliers are expected to follow. However, no reference to measures to ensure equal opportunities throughout all levels of employment found. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] & [Global Human Rights Principles, 11/2019: intel.com] • Not Met: How working with suppliers on women's rights: The 2019-20 Corporate Responsibility Report indicates that: 'Inclusion of diverse-owned suppliers is built into our operations, and outlined in our Supplier Diversity Policy. We have integrated requirements for including diverse suppliers into our supplier bidding, selection, and management processes, and in our Supplier Continuous Quality Improvement (SCQI) award. We apply these expectations and requirements to tier 1 suppliers, and we also expect our non-diverse suppliers to report their own spending with diverse-owned suppliers and subcontractors. In 2019, 53% of our top 120 non-diverse suppliers reported their tier 2 diverse spending, an 18% increase from 2018.' 'We met our commitment to reach more than \$1 billion in annual spending with tier 1 and tier 2 certified diverse suppliers. We also exceeded our goal to spend \$200 million with women-owned businesses globally, reaching \$279 million by the end of 2019.' However, it is not clear how it is working with suppliers in order to improve working conditions for women workers in the supply chain. The 2021-22 Corporate Responsibility Report indicates: 'We continue to collaborate extensively with supply chain-related organizations—including the Responsible Business Alliance (RBA) [...] to help set electronics industry-wide standards, develop audit processes, conduct training [...]'. However, it is not clear how it proactively works with suppliers specifically to improve their practices in relation to women's rights. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] & [2021-22 Corporate Responsibility Report, 2022: csrreportbuilder.intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.a	Working hours (in own production or 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"> • Not Met: Respects max hours, min breaks and rest periods in its own operations: The Company indicates in its Global Human Rights Principles that 'Working hours are not to exceed the maximum set by local law or no more than 60 hours per week, whichever is stricter. Workers should not work longer than 6 consecutive days without at least one day off.' The Company states in its RBA Commitment Letter: '[...] we align our global operations with the provisions of the RBA Code of Conduct, aggressively implement the RBA Code of Conduct and actively encourage and support our suppliers to do the same. Similarly, the Code indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. [...] Workers shall be allowed at least one day off every seven days'. However, no evidence found of references to international standards, standard weekly hours. In its feedback to CHRB, the Company makes reference to RBA VAP Working hours Guidance, which elaborates on the RBA provision on working hours, hence without reference to international standards or 48 hours of maximum hours for regular working week. [Global Human Rights Principles, 11/2019: intel.com] & [RBA Code commitment letter, 2020: intel.com] • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Met: How it implements and checks this in its operations: The 2021-22 Corporate Responsibility Report indicates: 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols. Every year we complete the RBA Self-Assessment Questionnaire (SAQ) and publish the results on our corporate website. We follow the RBA Validated Assessment Program (VAP) to conduct audits of our finished goods factories'. The RBA Self-Assessment Questionnaire (SAQ) includes questions on working hours. Even if it doesn't meet working hours commitment, the Company describes a system to monitor compliance with its commitments. [2021-22 Corporate Responsibility Report, 2022: csreportbuilder.intel.com] & [RBA Self-Assessment Questionnaire (SAQ), 2021: responsiblebusiness.org]
D.4.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Working hours in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' In addition the 2019-20 Corporate Responsibility Report indicates: indicates that 'We hold ourselves accountable to meet or exceed the same standards that we set for our suppliers, and audit ourselves to the same protocols.'; and with respect to suppliers audit process it states: 'The audits, conducted by a mix of third parties and Intel personnel, follow the RBA VAP'. The VAP Manual defines emergency or unusual situations where the working hours limit could be exceeded. However, no evidence found of requirement to comply with ILO requirements or not exceeding 48 hours of regular working week in supplier code/contracts. The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] & [2019-2020 CSR Report, 2020: csreportbuilder.intel.com] • Not Met: How working with suppliers on working hours: The 2021-22 Corporate Responsibility Report indicates: 'Beyond our core capability-building offerings, we have long engaged with supply chain sustainability consultants to offer suppliers training and programs focused on topics like work-hours management, occupational health and safety, environmental issues, and prevention of forced and bonded labor'. Additionally, 'Due to supply chain shortages, many companies in the electronics industry have faced severe worker shortages, which has created pressure for longer working hours and fewer days off for workers. Intel has continued to press suppliers to abide by the RBA Code of Conduct, including allowing workers a day of rest each week, limiting workers to no more than 60 hours of work per week, and making all overtime voluntary'. However, no further details found of the training programs or any other proactively work with suppliers to improve their practices in relation to working hours. [2021-22 Corporate Responsibility Report, 2022: csreportbuilder.intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Not Met: Provide analysis of trends in progress made
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Responsible sourcing minerals policy requires suppliers to 'Establish and maintain a publicly available policy on responsible mineral sourcing that aligns with the OECD Guidance'; Establish due diligence frameworks and management systems consistent with the OECD Guidance'. The Company indicates in its Conflict minerals disclosure that 'Feature requirements related to responsible mineral sourcing in our standard template for supplier contracts and specifications so that current and future suppliers are obligated to comply with our policies on responsible minerals sourcing, including participation in a supply chain survey and related due diligence activities. We communicate our Responsible Minerals Sourcing Policy and contractual requirements to relevant suppliers annually'. [Conflict Minerals Report 2020, 2021: intel.com] & [Responsible Minerals Sourcing Policy, 05/2022: intel.com] • Met: Works with smelters/refiners and suppliers to build capacity: The Company indicates in its Conflict Minerals Report 2020: 'When an incomplete or inaccurate response was identified, we contacted the applicable surveyed supplier [...]. 24 of these 28 surveyed suppliers provided an updated CMRT which we determined, [...] to be completed and accurate. We continue to work on capacity building with the remaining suppliers [...] to ensure accuracy of future declarations.' In addition, in its Report from 2019, it indicated: 'Since 2009, [it] visited 116 different smelter and refiner facilities in 24 countries with the goal of providing education on conflict minerals, collecting country of origin information of the conflict minerals in our supply chain, and encouraging participation in the Responsible Minerals Assurance Process (RMAP), [...]'. In addition, it indicates in its 2018 Form SD: 'If a smelter or refiner in our supply chain was not yet conformant to a responsible mineral sourcing validation program or had not yet begun participation in such a program, Intel and other RMI member companies proactively attempted to contact such facilities to request country of origin information for the conflict minerals the facilities processed, as well as to encourage and assist their participation in a responsible mineral sourcing validation program and, in some cases, visited such facilities on-site'. The 2021-22 Corporate Responsibility Report indicates different work carried out: 'A few examples of projects supported by Intel in 2021 are: Congo Power, an alliance providing mining areas with clean power, specifically funding the power needs for community training in addition to the educational programming at the Dr. Mukwege School; PACT-RMI Youth Vocational Training Program, aimed at providing mining alternatives to Congolese youths; and the development of the world's first Congo-focused North American collection and repository for Congolese-written documents on the Democratic Republic of the Congo (DRC), at the University of British Columbia library. [...] Intel also recognizes the local socio-economic importance of the artisanal and small-scale mining (ASM) sector in CAHRAs and seeks to assist ASM sites in meeting downstream compliance requirements through the Better Mining ASM Mine Monitoring Program in partnership with Responsible Minerals Initiative (RMI) and RCS Global. Intel also supported a digital suite designed specifically for the ASM sector, which will create new pathways to track, access, and share data about practices in mining communities'. The 2021 Form SD indicates: 'Our next steps will be to work with our suppliers to continue mapping our supply chain for the targeted minerals, as well as other priority minerals zinc and lead'. [Conflict Minerals Report 2020, 2021: intel.com] & [Conflict Minerals Report 2019, 05/2020: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Contractual requirement to disclosure smelter/refiner information: The RBA Code of Conduct is part of the Company's commercial contracts with its suppliers. However, no explicit requirement to disclose smelter/refiner information was found. The Environmental Product Content Specification for Suppliers and outsourced Manufacturers indicates: 'Suppliers must retain records of its supply chain activities related to Conflict Minerals [...]. Whenever applicable, Intel will include Responsible Minerals in our existing audit and customer disclosure programs. Supplier will allow Intel to share audit and other relevant due diligence information provided by the Supplier with Intel's customers, industry trade groups, the general public, or government regulators'. It is not clear that it incorporates into commercial contracts/written agreements with suppliers' requirements to disclose to the company (as necessary on a confidential basis) updated smelter/refiner information for any 3TG mineral used in the production of its parts, materials, components and products. [RBA Code of Conduct (Version 7.0), 2021: responsiblebusiness.org] & [Environmental, Health and Safety Policy, 2021: intel.com] • Not Met: Contractual requirement covers all minerals
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"> • Not Met: Risk identification and disclosure in line with OECD Guidance: The Company states in its CSR 2020-2021 that it uses the information of the smelter/refiners identification process (See below) to identify potential mineral supply-chain risks.' The Company describes the different steps for identifying and assessing risks, including identification of smelters and refiners through direct suppliers using CMRT, identify scope (conflict minerals from covered countries) assess due diligence practices of smelters and refiners, and carry out spot checks of smelters and refiners. The White Paper: Intel's Efforts to Achieve a Responsibly Sourced Mineral Supply Chain notes: 'each year we conduct a supply chain survey to identify the smelters and refiners that process the metal contained in the products supplied to Intel, and the country of origin and trade of minerals used. We then compare those smelters and refiners to the list of facilities that conform to a responsible mineral sourcing validation program such as the RMI's RMAP. We use the information to identify potential mineral supply-chain risks'. The 2021 SD Form indicates: 'Our risk assessment is designed to identify risks in our supply chain. This includes direct suppliers not meeting our contractual requirements related to conflict minerals as well as smelters and refiners that are not conformant to a responsible mineral sourcing validation program or that we have reason to believe may source conflict minerals from the Covered Countries. We document mineral country of origin information for the smelters and refiners identified by the supply chain survey, as provided from sources including the supply chain survey, responsible mineral sourcing validation programs, direct contact with smelters and refiners, and from publicly available sources such as smelter and refiner websites'. However, description found of risks identified (i.e how many suppliers are at risk or description of what are the risks that it faces). The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material. [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] & [Conflict Minerals Report 2020, 2021: intel.com] • Met: Identification of smelter/refiners and OECD Guidance: In its CSR 2020-2021, the Company indicates: 'Each year we conduct a supply chain survey to identify the smelters and refiners that process the 3TG and cobalt contained in the products supplied to Intel, and the country of origin of minerals used. We then compare those smelters and refiners to the list of facilities that conform to a responsible minerals sourcing validation program such as RMI's Responsible Minerals Assurance Process (RMAP). We use the information to identify potential mineral supply chain risks.' In addition, the Company states in its White Paper 'We also evaluate whether a supplier meets our conflict minerals policy or contractual requirements based on information included in the CMRT.' [2019-2020 CSR Report, 2020: csrreportbuilder.intel.com] & [White Paper: Efforts to achieve a responsibly sourced mineral supply chain, 05/2021: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses the list of all its smelters/refiners in its supply chain which have been validated. [Conflict Minerals Report 2020, 2021: intel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Risk identification and disclosure covers all minerals: The Company states in its Conflict Minerals Report 2020: Intel's mission for the future is to maintain the positive progress we have made on 3TG and Cobalt to date, and to proactively address emerging risks from the expanding scope of materials and geographies.' However, this is a work in progress. [Conflict Minerals Report 2020, 2021: intel.com]
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"> • Met: Describes mineral risk management plan for supply chain: Risk management plan include 'perform risk mitigation efforts to bring suppliers into conformity with our policy or contractual requirements, which efforts may include working directly with suppliers to consider an alternative source for the necessary conflict minerals. We attempt to contact smelter and refiner facilities that are not conformant to a responsible mineral sourcing validation program to assess their due diligence practices, request country of origin and chain of custody information for the conflict minerals processed by the facilities and encourage and assist in their participation in such a program'. It also reports supporting development and implementation of due diligence practices and RMAP. [Conflict Minerals Report 2019, 05/2020: intel.com] • Met: Monitoring, tracking and whether better risk prevention/mitigation over time: The Company reports in its Conflict Minerals Report 2019 about the measures performed during last reporting year: 'Monitored and tracked surveyed suppliers, and smelters and refiners identified by surveyed suppliers, which we identified as not meeting our conflict minerals policy or contractual requirements, to determine their progress in meeting those requirements. Performed risk mitigation effort with surveyed suppliers we identified as not in conformity with our conflict minerals policy or contractual requirements by working with them to bring them into compliance. In 2019, visited three smelters and refiners that were not conformant to a responsible mineral sourcing validation program to encourage and assist their participation in such a program. Provided 13 progress reports to TSCG senior management and two progress reports to our CEO that summarized the status of our responsible minerals program.' [Conflict Minerals Report 2019, 05/2020: intel.com] • Not Met: Disclose better risk prevention/mitigation over time [Conflict Minerals Report 2019, 05/2020: intel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy: The 2021-22 Corporate Responsibility Report discloses examples of engagement with suppliers, however, they are through projects to improve mining communities. The 2021 SD Form indicates: Supplier engagement, 'Feature[s] requirements related to responsible mineral sourcing in our standard template for supplier contracts and specifications so that current and future suppliers are obligated to comply with our policies on responsible minerals sourcing, including participation in a supply chain survey and related due diligence activities. We communicate our Responsible Minerals Sourcing Policy and contractual requirements to relevant suppliers annually'. However, it is not clear how it engages with suppliers and affected stakeholders to agree on its strategy for risk management. [2021-22 Corporate Responsibility Report, 2022: csreportbuilder.intel.com] & [2021 Form SD, 2022: intc.com] • Not Met: Risk management and response processes cover all minerals: The Company states in its Conflict Minerals Report 2020: Intel's mission for the future is to maintain the positive progress we have made on 3TG and Cobalt to date, and to proactively address emerging risks from the expanding scope of materials and geographies.' However, this is a work in progress. While the Conflict Minerals Report contains information about cobalt, no evidence could be found that these risk management and response processes cover all minerals. [Conflict Minerals Report 2020, 2021: intel.com]

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"> Area: Health & safety Headline: Intel among leading electronics firms fall short in protecting female workforce from exposure to hazardous chemicals 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. <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. [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": business-humanrights.org] [Briefing, 25/01/2021, "Hazardous chemicals in ICT manufacturing and the impacts on female workers in the Philippines": swedewatch.org]</p>
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> Not Met: Public response: The company engaged with Swedewatch in the compilation of the follow-up report. Swedewatch cited the response in the report as "Intel declared that its Global Human Rights Principles include workplace safety and supplier responsibility, and that its Corporate Responsibility Materiality Matrix identifies workers' health and safety as a top priority. According to Intel, an HRIA has prioritised supplier labour rights, including health and safety. [...] With regards to HRDD, Intel referred to the RBA standards for risk assessment and audits. The company explained that some suppliers, including those in the Philippines, are required to participate in third-party RBA audits that examine human rights, health and safety, industrial hygiene and hazardous substances." The response cited by Swedewatch does not show an acknowledgement of the allegation by the company. <p>In addition, the company provided feedback for this indicator, however, it was found not relevant for the assessment as Intel did not respond to the specific allegation. In particular, none of the documents provided address any point about female workers' exposure to hazardous chemicals in the Philippines. [Briefing, 25/01/2021: swedewatch.org] [CEPN, "Clean Electronics Production Network": centerforsustainabilitysolutions.org] [Responsible Business Alliance, "RBA Industry Focus Process Chemical Policy": responsiblebusiness.org] Score 2</p> <ul style="list-style-type: none"> Not Met: Detailed response: See above. [Briefing, 25/01/2021: swedewatch.org]
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: Score 1</p> <ul style="list-style-type: none"> Not Met: Engaged with stakeholders: Intel referred to a CEPN initiative to investigate and eliminate potential exposure to workers in supply chains. Part of this effort involves identifying suppliers in the Philippines and other countries to conduct further due diligence on the chemicals being used, and to ensure that proper controls and programs are in place. Intel did not provide detail on any dialogue with suppliers in the Philippines, apart from the RBA assessments that Intel states include self-assessments and dialogue with suppliers in Philippines. None of the actions described indicates that the company or its suppliers engaged with the affected stakeholders. [Briefing, 25/01/2021: swedewatch.org] [CEPN, "Clean Electronics Production Network": centerforsustainabilitysolutions.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Identified cause: Intel referred to a CEPN initiative to investigate and eliminate potential exposure to workers in supply chains. Part of this effort involves identifying suppliers in the Philippines and other countries to conduct further due diligence on the chemicals being used, and to ensure that proper controls and programs are in place. Intel did not provide detail on any dialogue with suppliers in the Philippines, apart from the RBA assessments that Intel states include self-assessments and dialogue with suppliers in Philippines. The company does not present underlying causes of the events. [Briefing, 25/01/2021: swedwatch.org] [CEPN, "Clean Electronics Production Network": centerforsustainabilitysolutions.org] Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link Score 2 <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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.

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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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