

**Company Name** Micron Technology  
**Industry** ICT (Own operations and Supply Chain)  
**Overall Score** 13.7 out of 100

Theme Score	Out of	For Theme
1.7	10	A. Governance and Policies
2.7	25	B. Embedding Respect and Human Rights Due Diligence
4.5	20	C. Remedies and Grievance Mechanisms
2.1	25	D. Performance: Company Human Rights Practices
2.7	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company states 'We are strongly committed to respecting and protecting human rights wherever we operate.' [2020 Code of Business Conduct and Ethics, 2020: <a href="https://micron.com">micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Not Met: Commitment to the UNGPs: It indicates that 'At Micron, we are committed to respecting human rights. To ensure the integrity of our efforts, Micron's Human Rights Policy is guided by common principles found within the (...) UN Guiding Principles on Business and Human Rights'. However, 'guided by' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, 2019: <a href="https://micron.com">micron.com</a>]</li> <li>Not Met: Commitment to the OECD Guidelines for Multinational Enterprises: It indicates that 'At Micron, we are committed to respecting human rights. To ensure the integrity of our efforts, Micron's Human Rights Policy is guided by common principles found within the (...) the Organization for Economic Co-operation and Development Guidelines for Multinational Enterprises'. However, 'guided by' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, 2019: <a href="https://micron.com">micron.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Not Met: Company has a commitment to the ILO Core: The HR Policy states that 'we are committed to respecting human rights. To ensure the integrity of our efforts, Micron's Human Rights Policy is guided by common principles found within the (...) International Labor Organization's Declaration on Fundamental Principles and Rights at Work'. However, 'guided by' is not considered a formal statement of</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<p>commitment according to CHRB wording criteria. [Human Rights Policy, 2019: <a href="http://micron.com">micron.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Company has a explicit commitment to All four ILO Core: The HR policy covers child labour, non-discrimination, and forced labour. In relation to freedom of association and collective bargaining, it states that 'Micron respects the rights of workers to form and join trade unions of their own choosing, to bargain collectively and to peacefully assemble as permitted under applicable local law'. However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'under applicable local law'. [Human Rights Policy, 2019: <a href="http://micron.com">micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company expect suppliers to commit to ILO Core: The letter 'Company Commitment' indicates that 'Micron Technology, Inc. is committed to actively implementing the Responsible Business Alliance (RBA), (...) and requires its suppliers to do the same'. The RBA Code indicates that '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 the Company expects suppliers to commit to respect the human rights that the ILO has declared to be fundamental rights at work. [RBA V.7, 2021: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [Company Commitment, N/A]</li> <li>• Not Met: Company explicitly list All four ILO for suppliers: The letter 'Company Commitment' indicates that 'Micron Technology, Inc. is committed to actively implementing the Responsible Business Alliance (RBA), (...) and requires its suppliers to do the same'. The RBA Code covers child labour, non-discrimination, and forced labour. In relation to freedom of association and collective bargaining, the 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 suppliers 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. [RBA V.7, 2021: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [Company Commitment, N/A]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Company is 'committed to providing all team members with a safe work environment. (...) Our Company complies with all health and safety laws, as well as with Company health and safety policies that may go beyond what the law requires. This compliance includes the standards in the RBA Code of Conduct. Specifically, we meet the RBA's standards for occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, housing and health and safety communication'. [2020 Code of Business Conduct and Ethics, 2020: <a href="http://micron.com">micron.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: It states that 'we follow all applicable laws relating to working hours and wages, as well as all RBA Code of Conduct guidelines. Under these guidelines, work weeks must not exceed the maximum set by local law and generally should not be more than 60 hours per week, including overtime. In addition, all workers are allowed at least one day off every seven days'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [2020 Code of Business Conduct and Ethics, 2020: <a href="http://micron.com">micron.com</a>] &amp; [Human Rights Policy, 2019: <a href="http://micron.com">micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The letter 'Company Commitment' indicates that 'Micron Technology, Inc. is committed to actively implementing the Responsible Business Alliance (RBA), (...) and requires its suppliers to do the same'. The RBA Code indicates that 'Participants recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Participants also recognize that ongoing worker input and education are essential to identifying and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>solving health and safety issues in the workplace'. It then lists and describes its health and safety standards, that include: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication. [RBA Code of Conduct, 1/1/2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [Company Commitment, N/A]</p> <ul style="list-style-type: none"> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The letter 'Company Commitment' indicates that 'Micron Technology, Inc. is committed to actively implementing the Responsible Business Alliance (RBA), (...) and requires its suppliers to do the same'. It 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'. 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. [RBA Code of Conduct, 1/1/2018: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [Company Commitment, N/A]</li> </ul>
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Responsible mineral sourcing: The Company 'is committed to ensuring that conflict minerals used in the manufacture of its Products do not directly or indirectly fund violence or human rights abuses in the Democratic Republic of the Congo or adjoining countries'. [Conflict Minerals Policy] &amp; [Conflict Minerals Policy]</li> <li>• Met: Based on OECD Guidance: The Company 'executes due diligence on the source and chain of custody of conflict minerals in its supply chain in conformance with the Organization for Economic Cooperation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas'. [Conflict Minerals Policy]</li> <li>• Met: Requires suppliers to commit to responsible mineral sourcing: The Company's Supplier Requirements 'requires its suppliers to source conflict minerals from smelters validated (or on the path to validation) as compliant with conflict-free sourcing standards like the Conflict Free Smelter Program'. The Supplier Requirements Standard 'describes the minimum quality, business process, manufacturing, compliance, and documentation requirements for Suppliers'. Additionally, supplier compliance includes 'Adopting a conflict mineral or responsible mineral policy dedicated to the goal of achieving a conflict-free supply chain'. Moreover, the letter 'Company Commitment' indicates that 'Micron Technology, Inc. is committed to actively implementing the Responsible Business Alliance (RBA), (...) and requires its suppliers to do the same'. The Code indicates that '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'. [Supplier Requirements Standard CW, 2019: <a href="https://media-micron.com">media-micron.com</a>] &amp; [RBA V.7, 2021: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commits to follow OECD Guidance for all minerals: According to the Supplier Requirements Standard, the Company defines conflict minerals as 'those minerals regulated by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. They include columbite-tantalite, also known as coltan (and its derivative tantalum); cassiterite (and its derivative tin); wolframite (and its derivative tungsten); and gold.' This does not include all minerals. The Supplier Requirements Standard 'describes the minimum quality, business process, manufacturing, compliance, and documentation requirements for Suppliers'. [Supplier Requirements Standard CW, 2019: <a href="https://media-micron.com">media-micron.com</a>]</li> <li>• Not Met: Suppliers expected to make similar requirements of their suppliers: According to the Supplier Requirements Standard, Micron requires Suppliers to comply, adopting 'a conflict mineral policy dedicated to the goal of achieving a conflict-free supply chain'. However, as stated above, this does not include all minerals. The Supplier Requirements Standard 'describes the minimum quality, business process, manufacturing, compliance, and documentation requirements for Suppliers'. [Supplier Requirements Standard CW, 2019: <a href="https://media-micron.com">media-micron.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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"> <li>• Met: Migrant worker's rights: The letter 'Company Commitment' indicates that 'Micron Technology, Inc. is committed to actively implementing the Responsible Business Alliance (RBA), (...) and requires its suppliers to do the same'. The Code indicates that 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including (...) migrant'. [RBA V.7, 2021: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [Company Commitment, N/A]</li> <li>• Met: Expects suppliers to respect at least one of these rights: The letter 'Company Commitment' indicates that 'Micron Technology, Inc. is committed to actively implementing the Responsible Business Alliance (RBA), (...) and requires its suppliers to do the same'. The RBA Code contains the following commitment to migrant workers rights: 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including...migrant...and any other type of worker'. [RBA V.7, 2021: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>] &amp; [Company Commitment, N/A]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: The Company commits to remedy</li> <li>• Not Met: Company expect suppliers to make this commitment: The Supplier Requirement Standard indicates that 'Suppliers are responsible for adhering to the SRS requirements. Failure to meet these requirements may result in the loss of existing and/or future Micron business, in addition to other remedies as agreed upon by the parties in applicable agreements'. The Supplier Requirements Standard 'describes the minimum quality, business process, manufacturing, compliance, and documentation requirements for Suppliers'. However, it is not clear the Company expects suppliers to commit it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Supplier Requirements Standard CW, 2019: <a href="https://media-micron.com">media-micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Not Met: Work with suppliers to remedy impact</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The Code states the following: 'To keep all of our team members safe, we never engage in or tolerate any form of violence. This includes both threats and acts of violence, as well as intimidation, threatening conduct, bullying and attempts to instil fear in others'. Additionally, 'Micron is committed to creating a "speak up" environment where we can report suspected violations and participate in investigations without fear of retribution or retaliation. No one may retaliate against you for raising a concern or participating in an investigation in good faith. Anyone who retaliates against someone who makes a good faith report may be subject to discipline, up to and including termination'. It is unclear if this extends to people who oppose Company operations or who have raised questions about activities. [2020 Code of Business Conduct and Ethics, 2020: <a href="https://micron.com">micron.com</a>]</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

## A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The purpose of the Governance and Sustainability Committee (the "Committee") of the Board of Directors (the "Board") of Micron Technology, Inc. (the "Company") shall be to: [...] Sustainability. Assist the Board in overseeing and monitoring the Company's development and integration of material social and environmental strategies.' Material issues include human rights. [Governance and sustainability committee charter, 29/4/2019: <a href="https://micron.com">micron.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describe HR expertise of Board member</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Speeches/letters by Board members or CEO: The company's CEO, Sanjay Mehrotra, submitted an open letter together with other executives highlighting the importance of respect and inclusion during pride celebration. [CEO Letter on Respect and Inclusion, 2021: <a href="https://micron.com">micron.com</a>]</li> </ul>
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board/Committee review HRs strategy</li> <li>• Not Met: Examples/trends re HR discussion in the last reporting period: The Company's proxy statement state 'the Board also reviewed our responsible sourcing and human rights efforts, including our conflict minerals report outlining our response to human rights and other concerns related to mineral sourcing as well as our annual modern slavery and human trafficking statement.' However, no further information found on the human rights issues or topics discussed. [SEC Disclosure -Proxy Statement, 2021: <a href="https://investors.micron.com">investors.micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Incentives for at least one board member: The Company state that "We provided annual short-term incentive cash awards to our executive officers.... The Compensation Committee established a profitability goal and five operational metrics for evaluating performance in fiscal 2021, which includes performance on sustainability issues including labor practices, health and safety, environmental issues including climate change and water, and management systems. The company state that 'achievement of certain milestones... including... diversity, equality and inclusion (increasing representation of underrepresented groups at the new hire and senior leader levels; pay equity for underrepresented groups; increasing the inclusion index score in the Company's engagement survey; and all team members completing one ally training session during fiscal 2021).' However, it is unclear what human rights issues is link to the incentive and which board member is responsible for it. [SEC Disclosure -Proxy Statement, 2021: <a href="https://investors.micron.com">investors.micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other board performance criteria</li> </ul>
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Board process to review bussiness model and strategy</li> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Senior responsibility for HR implementation and decision making: The Company has 'A Chief Compliance Officer responsible for compliance and ethics issues at Micron, a position currently held by Joel Poppen, Vice President of Legal Affairs, General Counsel, and Corporate Secretary.' This is the Executive sponsor for the Human Rights policy. [Compliance and Ethics Program, 24/4/2019: <a href="https://micron.com">micron.com</a>] &amp; [Human Rights Policy, 2019: <a href="https://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How it assigns Day-to-day responsibility</li> <li>• Not Met: Day-to-day resources and expertise allocation in own ops</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Senior manager incentives for human rights</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Performance criteria made public</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: HR risks is integrated as part of enterprise risk system: 'At Micron we regularly assess risks, including human-rights-related risks, and we regularly review our policies to ensure we are appropriately addressing these risks'. However, it does not mention whether there are included in enterprise risk management system(s). [Human Rights Policy, 2019: <a href="http://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Provides an example</li> <li>• Not Met: Audit Ctte or independent risk assessment: With board oversight and through several senior and executive level councils and committees, we seek relevant guidance from stakeholders and subject matter experts and perform appropriate assessments and adopt and implement policies we deem needed. We regularly conduct due diligence and audits across our supply chain to assess supplier compliance with these and other requirements'. However, no mention of how it assesses the adequacy of the enterprise risk management systems in managing human rights. [Human Rights Policy, 2019: <a href="http://micron.com">micron.com</a>]</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a</li> <li>• Met: Communicates its policy to all workers in own operations: Employees are required to acknowledge that they have read and understood the Code of Conduct, which includes parts of the Company's human rights policy. The Code has been translated into seven languages. [Code of Business Conduct and Ethics, 08/2020: <a href="http://micron.com">micron.com</a>] &amp; [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a</li> <li>• Not Met: Steps to communicate policy commitments to supply chain</li> <li>• Met: Requires suppliers to communicate policy requirements: The Company sends letters to suppliers communicating them the code application. The letter includes both RBA code and Micron code of business conduct. In the letter it is indicated that 'Micron and its subsidiaries expect suppliers to adopt and implement the RBA Code of Conduct and Micron Code of Business Conduct and Ethics regardless of local business practices or social customs. Micron will also monitor your adherence to these codes, which may include verification visits and audits'. In addition, The RBA Code of Conduct states that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code.' [Global Supply Chain Vice President's RBA statement, 6/5/2019: <a href="http://micron.com">micron.com</a>] &amp; [RBA V.7, 2021: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How HR commitments made binding/contractual: The Company indicates that it expects suppliers to meet high standards of ethical performance in all of their business interactions. 'We hold our suppliers to our Code and our standards of ethical conduct. In addition, our suppliers must follow RBA standards on labor, health, safety, environment, ethics and management system—regardless of local law or custom.' However, the Company does not describe how its human rights policy commitments are reflected within contractual or other binding arrangements with its suppliers. [2020 Code of Business Conduct and Ethics, 2020: <a href="http://micron.com">micron.com</a>]</li> <li>• Not Met: Company requires suppliers to cascade down to their suppliers: 'Micron expects our suppliers to meet high standards of ethical performance in all of their business interactions'. However, the Company does not demonstrate that it requires its suppliers to cascade the contractual or other binding requirements down their supply chain. [2020 Code of Business Conduct and Ethics, 2020: <a href="http://micron.com">micron.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Met: How workers are trained on HR policy commitments: The Company's employees 'receive regular computer-based training and certify annually that they have read, understand and will continue to comply with the Code' of Conduct. 'The Code and all other global policies, including translations in seven languages, are available to all team members on an internal SharePoint site.' The Company 'believes strongly in the importance of up-to-date, comprehensive and easy to understand and follow ethics and compliance policies and practices. Every employee, manager and officer at Micron is expected to live up to these standards and is required to attend regular training sessions on ethics and compliance issues.' [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>] &amp; [Compliance and Ethics Program, 24/4/2019: <a href="http://micron.com">micron.com</a>]</li> <li>• Not Met: Trains relevant managers including procurement: The Company 'provides managers and its employees who have direct responsibility for supply chain management with knowledge and information regarding Micron's requirements, including RBA compliance.' No details found, however, on how procurement teams and managers are trained. [Slavery and Human Trafficking, 25/4/2019: <a href="http://micron.com">micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment</li> <li>• Not Met: Disclose % trained</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Scores at least 1 on A.1.2.a</li> <li>• Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company is audited by the RBA to monitor compliance with the RBA Code of Conduct, and 'all 12 Micron manufacturing facilities earned perfect scores of 200 on RBA audits, qualifying these sites for RBA Platinum recognition.' [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>] &amp; [Auditee Preparation RBA, 8/2019: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not Met: Proportion of supply chain monitored</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a</li> <li>• Not Met: Describes corrective action process</li> <li>• Not Met: Disclose findings and number of corrective action</li> </ul>
B.1.7	Engaging and terminating business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: Conflict minerals affect the decision to begin negotiations. Additionally, other 'Suppliers identified as high-risk may be audited in person to ensure they are in compliance with' the Company's Code of Conduct. The Company 'may develop a mitigation plan and request improvement actions of any suppliers found to be out of compliance or the supplier may be removed from the supply base.' This process applies to both the selection of new suppliers and renewal of supplier relationships. [Supplier Requirements Standard, 2019] &amp; [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: See above [Supplier Requirements Standard, 2019] &amp; [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements: The Company states the following: 'Micron is currently working with RBA and several suppliers in Taiwan to better understand foreign migrant workers' experiences and address any violations that may be occurring in these locations. During an assessment of two of these suppliers in 2018, [...] we discovered some dorm overcrowding at one supplier site due to an increase in workers. We expect this supplier to make improvements promptly to its workers' living conditions.' However, this indicator looks for proactive work carried out together with suppliers to improve their practices (not as a response to non-compliances). [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>]</li> </ul>
B.1.8	Approach to engagement	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	with affected stakeholders		<ul style="list-style-type: none"> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues</li> <li>• Not Met: Describe how views influenced company's HR approach</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifying risks in own operations</li> <li>• Not Met: Identifying risks through relevant business relationships: The Company states: 'We monitor and address myriad potential supply chain risks, from natural disasters to financial vulnerability to human rights infractions'. However, no evidence of a description of the process to identify the human rights risks. [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company describes the following: 'At Micron we regularly assess risks, including human-rights-related risks, and we regularly review our policies to ensure we are appropriately addressing these risks. [...] We regularly conduct due diligence and audits across our supply chain to assess supplier compliance with these and other requirements.' The Company describes its process to assess risks from its different suppliers (assesses suppliers, gives them a score, audits and carries out plans). However, it is not clear the process it follows to assess the different human rights it faces as a Company. Evidence seems to focus in determining suppliers' specific risks and compliance, as the Company also reports evidence of audits. The company indicate during feedback process that 'As an RBA member, Micron participates in the same RBA assessment and audit processes for our own operations that our suppliers participate in, including assessment of human rights impacts noted in the RBA Code, such as forced and child labor.' However, no public information found in relation to that. [Human Rights Policy, 2019: <a href="http://micron.com">micron.com</a>] &amp; [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>]</li> <li>• Not Met: How process applies to supply chain</li> <li>• Not Met: Public disclosure of the results of HR assessment</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Action Plans to mitigate risks: In order to mitigate risks, the Company updates its policies following the risk assessment. 'At Micron we regularly assess risks, including human-rights-related risks, and we regularly review our policies to ensure we are appropriately addressing these risks. With board oversight and through several senior and executive level councils and committees, we seek relevant guidance from stakeholders and subject matter experts and perform appropriate assessments and adopt and implement policies we deem needed.' [Human Rights Policy, 2019: <a href="http://micron.com">micron.com</a>]</li> <li>• Not Met: Description of how global system applies to supply chain: Although the Company provides evidence of supply chain monitoring, this indicator looks for evidence of general action plans carried out to prevent and mitigate human right salient issues of its supply chain. Evidence found focuses in due-diligence audits for monitoring compliance with policies. [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>]</li> <li>• Not Met: Example of actions decided on at least 1 salient HR issues: The Company indicates that it is implementing 'Responsible Business Alliance's guidelines on working hours, which state that employees in all functions should work no more than 60 hours per week, with one day off every six days. We are also expanding offerings to support employee mental health'. However, this indicator looks for evidence of action plans taken as a response to human rights salient issues identified. The Company describes these actions, however, it is not clear if it is</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			made in the context of an improvement action plan due to an assessed salient issue. [2019 Sustainability report, 2019: <a href="https://micron.com">micron.com</a> ] Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: System for tracking or monitor if actions taken are effective: The Company provided evidence of monitoring its Human Rights commitments, however, no description of a system to monitor actions taken could be found.</li> <li>• Not Met: Lessons learnt from checking system effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
B.2.5	Communicating on human rights impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: Questions or concerns are directed to the department manager. If the complainant is not comfortable doing so, the alternative is the Compliance Hotline. The Company's Compliance Hotline is 'an ethics and compliance reporting service provided by the Company that permits anyone—employees, customers, vendors, agents, suppliers or members of the general public—to ask questions, report concerns, or follow up on matters on which they have already reported.' [EthicsPoint FAQ, 24/4/2019: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>] &amp; [Code of Business Conduct and Ethics, 08/2020: <a href="https://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages and workers aware: The Company 'has established toll-free numbers in every country in which the Company has facilities. Multilingual operators are available so that callers can make reports or ask questions in their native tongue.' [EthicsPoint FAQ, 24/4/2019: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Met: Describe how workers in the supply chain have access to grievance mechanism: As stated above, the Company mechanism is available to suppliers (anyone).</li> <li>• Not Met: Expect Suppliers to convey expectation to their own suppliers</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: As stated in C.1, the Compliance Hotline is available to members of the general public. [EthicsPoint FAQ, 24/4/2019: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Describes accessibility and local languages and stakeholder awareness: As stated previously, the channel is available in all relevant languages where the Company operates. 'The Compliance Hotline has two methods of intake. The first is by toll-free telephone number, which is staffed 24 hours a day, seven days a week, every day of the year. When you call, a professionally trained EthicsPoint intake specialist will guide you through a series of questions designed to identify the relevant details of your report or question. [...] The second option is to use the web intake portal system. This intake portal is available anywhere that you have access to the Internet. The intake portal asks you for the same types of relevant details about your question or concern as the telephone-based system. Again, you may choose to remain anonymous, and EthicsPoint will make no attempt to track your web address or otherwise identify you.' [EthicsPoint FAQ, 24/4/2019: <a href="https://secure.ethicspoint.com">secure.ethicspoint.com</a>]</li> <li>• Not Met: Communities access mechanism direct or through suppliers</li> <li>• Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
C.3	Users are involved in the	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Engages users to create or assess system</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	design and performance of the channel(s)/mechanism(s)		<ul style="list-style-type: none"> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism</li> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed</li> <li>• Not Met: Describe support (technical, financial,etc) available for equal access by complainants</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Met: Escalation to senior/independent level: It may be necessary to 'escalate a complaint or allegation to Legal/Compliance, senior HR leadership, supervisors and/or to senior management, and/or, after consultation with Legal/Compliance, to Micron's Audit Committee Chair, Audit Committee, or Board of Directors.'</li> </ul> [Micron Internal Investigations Guidelines: <a href="https://business-humanrights.org">business-humanrights.org</a> ]
C.5	Prohibition of retaliation for raising complaints or concerns	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company states the following: 'No one may retaliate against you for raising a concern or participating in an investigation in good faith. Anyone who retaliates against someone who makes a good faith report may be subject to discipline, up to and including termination.'</li> </ul> [Code of Business Conduct and Ethics, 08/2020: <a href="https://micron.com">micron.com</a> ] <ul style="list-style-type: none"> <li>• Met: Practical measures to prevent retaliation: The third party Compliance Hotline allows for anonymous reporting. [Human Rights Policy, 2019: <a href="https://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive rights</li> <li>• Not Met: Company does not require confidentiality provisions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Describes how remedy has been provided</li> <li>• Not Met: Says how it would provide remedy for victims if no adverse impact identified</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Changes to systems, processes and practices to stop similar impact</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy</li> <li>• Not Met: Approach to learning from incident to prevent future impacts</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Pays living wage or sets target date</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how living wage determined: The Company states: 'Micron complies with all applicable wage laws in the jurisdictions in which we operate. We respect and follow local laws relating to minimum wages, overtime pay, and benefits. We further expect our suppliers and contractors to meet these requirements'. However, there is no mention of living wage. [Human Rights Policy, 2019: <a href="https://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Paying living wage</li> <li>• Not Met: Definition of living wage reviewed with unions</li> </ul>
D.4.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Discloses living wage requirements in supplier code or contracts</li> <li>• Not Met: Improving living wage practices of suppliers</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.4.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company may request 'basic information about Supplier's supply chain resiliency using Supply Chain Mapping, which includes data-points such as manufacturing locations, emergency contacts, recovery time objectives, and locations of critical sub-tier suppliers.' Additionally, it discloses that it maps suppliers at the manufacturing level. However, it is unclear whether this includes all direct and indirect suppliers and components. [Supplier Requirements Standard, 2019] &amp; [2019 Sustainability report, 2019: <a href="https://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why: The Conflict Minerals Report includes a list of smelters/refiners, however, no further evidence found about public list of all suppliers. [Conflict Minerals Report 2019, 2020: <a href="https://investors.micron.com">investors.micron.com</a>]</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Does not use child labour: The company Code of Conduct state 'Child labour is not used in any Company operations. We do not use child or forced labor in any of our operations or facilities, and we never participate in human trafficking or slavery of any kind. In all our operations, we do not permit exploitation of children; physical, verbal or emotional abuse.' [2020 Code of Business Conduct and Ethics, 2020: <a href="https://micron.com">micron.com</a>]</li> <li>• Not Met: Age verification of workers recruited: The Company indicates: 'Factories are regularly audited for conformance to these standards, and our human rights policy requires employees to be 16 or older'. However, it is unclear that the Company verifies the age of the employee at the time they are hired. [2019 Sustainability report, 2019: <a href="https://micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Remediation if children identified</li> </ul>
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Child Labour rules in codes or contracts: Although there is a commitment against child labour, no details found in relation to age verification measures nor remediation programmes in case child labour is found. [Code of Business Conduct and Ethics, 08/2020: <a href="https://micron.com">micron.com</a>] &amp; [RBA V.7, 2021: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Job seekers and workers do not pay recruitment fee</li> <li>• Not Met: Commits to fully reimbursing if they have paid</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Debt and fees rules in codes or contracts: The code of business conduct and ethics contains a commitment against forced labour. In addition, in the context of fair labour standards, the code states that "we hold our suppliers to the same high standards that we hold ourselves to. This means we expect our suppliers to embrace and follow this code and the RBA Code". The RBA code in these matters states that: 'Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.' [RBA V.7, 2021: <a href="https://www.responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not Met: How working with suppliers on debt &amp; fees: The Company 'is currently working with RBA and several suppliers in Taiwan to better understand foreign migrant workers' experiences and address any violations that may be occurring in these locations. During an assessment of two of these suppliers in 2018, we found that they do not charge fees to these workers and do not have issues related to working hours. [...] Micron aims to continue to further investigate foreign worker journeys from home country to working country among our key suppliers and address any forced labor violations.' However, no description of how the Company works with suppliers to eliminate imposing financial burdens on workers could be found. [2019 Sustainability report, 2019: <a href="https://www.micron.com">micron.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Pays workers in full and on time</li> <li>• Not Met: Payslips show any legitimate deductions</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Does not retain documents or restrict movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: How these practices are monitored for agencies, labour brokers or recruiters</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Free movement rules in codes or contracts: The code of business conduct and ethics contains a commitment against forced labour. In addition, in the context of fair labour standards, the code states that "we hold our suppliers to the same high standards that we hold ourselves to. This means we expect our suppliers to embrace and follow this code and the RBA Code". The RBA code in this matters states that: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. [...] Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.' [RBA V.7, 2021: <a href="https://responsiblebusiness.org">responsiblebusiness.org</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Company 'respects the rights of workers to form and join trade unions of their own choosing' and to bargain collectively. It also does not 'engage in or tolerate any form of violence. This includes both threats and acts of violence, as well as intimidation, threatening conduct, bullying and attempts to instil fear in others'. However, no description of measures in place to prohibit intimidation or threats to workings seeking to exercise these rights could be found, nor whether commitment to non-retaliation covers people seeking to exercise these rights (no evidence found in publicly available sources mentioning explicitly this case). [Human Rights Policy, 2019: <a href="https://micron.com">micron.com</a>] &amp; [Code of Business Conduct and Ethics, 08/2020: <a href="https://micron.com">micron.com</a>]</li> <li>• Met: Discloses % total direct operations covered by collective CB agreements: '12 percent of Micron's workforce is covered by collective bargaining agreements.' [2019 Sustainability report, 2019: <a href="https://micron.com">micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> </ul>
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: FoA &amp; CB rules in codes or contracts: Suppliers are required to adopt similar standards to those in the Human Rights Policy and Code of Conduct. The Human Rights Policy outlines the respect of the right to Freedom of Association and to Collective Bargain: 'Micron respects the rights of workers to form and join trade union associations of their own choosing, to bargain collectively and to peacefully assemble as permitted under applicable local law'. However, no details found on alternatives for those countries where there are legal restrictions to the exercise of these rights. The Code of Conduct states the following relating to general intimidation and harassment: 'we never engage in or tolerate any form of violence. This includes both threats and acts of violence, as well as intimidation, threatening conduct, bullying and attempts to instil fear in others'. However, no particular evidence found in relation to union members or representatives. Finally, the RBA code, that applies to suppliers, indicates in the context of Freedom of association and collective bargaining that 'workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.' However, the same way that the human rights policy, the RBA code commits to collective bargaining 'in conformance with local law', not making clear whether there would be alternative mechanisms in those places where there are legal restrictions. [Human Rights Policy, 2019: <a href="https://micron.com">micron.com</a>] &amp; [Code of Business Conduct and Ethics, 08/2020: <a href="https://micron.com">micron.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process to identify H&amp;S risks and impacts: Micron continues to adapt on-site work protocols to prioritize the health and safety of our team members. We carefully assess risk in each location to protect our teams and support business needs. The return of team members to Micron sites will be based on a range of considerations, such as virus prevalence, location, job role and business needs. Meanwhile, we continue to enforce the strong preventative measures we implemented at our sites from the start of the COVID-19 outbreak and deploy new protocols as needed to promote safety.' [2021 Sustainability Report, 2021: <a href="https://www.media-micron.com">media-micron.com</a>]</li> <li>• Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The company reported a 0.59 injury rate for the last reporting year. [2021 Sustainability Report, 2021: <a href="https://www.media-micron.com">media-micron.com</a>]</li> <li>• Met: Discloses Fatalities for last reporting period: The company reported no fatalities for the last reporting period. [2021 Sustainability Report, 2021: <a href="https://www.media-micron.com">media-micron.com</a>]</li> <li>• Not Met: Occupational disease rate for last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Set targets for H&amp;S performance: The Company indicate 'To this end, we are strengthening our focus on serious injury prevention by tracking potential and real life-altering injuries. These injuries are often associated with our nine critical risks. We aim to reduce these serious injuries by placing ownership on each site leader. If an incident occurs on a Micron site, we require leaders to take action to help prevent a similar incident in the Micron network. Our goal is to reach zero life altering injuries by FY22. ' [2021 Sustainability Report, 2021: <a href="https://www.media-micron.com">media-micron.com</a>]</li> <li>• Not Met: Met targets or explain why not or what is doing to improve management systems</li> </ul>
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Sets out clear Health and Safety requirements</li> <li>• Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period</li> <li>• Not Met: Fatalities disclosures for last reporting period</li> <li>• Not Met: Occupational disease rates for the last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.8.a	Women's rights (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Process to stop harassment and violence against women</li> <li>• Not Met: Working conditions take account of gender: The Company allows for flexible work arrangements and has a Team Member Assistance Program, which includes helping finding child care at no cost to the employee. Specific to women's reproductive health, the Company describes its Mother's Room Guidelines: 'Supervisors will provide nursing mothers reasonable break time to express breast milk for their nursing child for a period of up to two years after the birth of their child. [...] Understanding that every mother's situation is unique, a general guideline for supervisors is that expression may take 20-30 minutes at a time and may need to happen every two to three hours'. However, no details found in relation to impacts at work related to reproductive health (work positions that might affect reproductive health). [Benefits &amp; Wellbeing - Mothers' Rooms, 2019: <a href="https://www.business-humanrights.org">business-humanrights.org</a>]</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>
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"> <li>• Not Met: Women's rights in codes or contracts</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.9.a	Working hours (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Respects max hours, min breaks and rest periods in its own operations</li> <li>• Not Met: Assesses ability to comply with its commitments when allocating work/targets</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: How it implements and checks this in its operations</li> </ul>
D.4.9.b	Working hours (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Working hours in codes or contracts: Code of business conduct and ethics, required for suppliers, states that 'we follow all applicable laws relating to working hours and wages, as well as all RBA Code of Conduct guidelines. Under these guidelines, work weeks must not exceed the maximum set by local law and, generally, should not be more than 60 hours per week, including overtime. In addition, all workers are allowed at least one day off every seven days'. However, no evidence found of references to international standards, standard weekly hours. [Code of Business Conduct and Ethics, 08/2020: <a href="http://micron.com">micron.com</a>] &amp; [RBA V.7, 2021: <a href="http://responsiblebusiness.org">responsiblebusiness.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on working hours</li> <li>• Not Met: Assessment of number affected by excessive working hours</li> <li>• Not Met: Provide analysis of trends in progress made</li> </ul>
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company seeks 'to align to international due diligence best practices set forth in the Organization for Economic Co-operation and Development's (OECD) Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas'. These requirements include providing Conflict Minerals Reporting Templates, updating them within two weeks of any changes, adopting a conflict mineral policy, participating in audits, and adopting contractual provisions in agreements to adopt conflict mineral policies in the supply chain and complete diligence surveys. However, it is not clear if contractual/commercial agreements with suppliers require them to carry out their due diligence explicitly based on OECD Guidelines. [2019 Sustainability report, 2019: <a href="http://micron.com">micron.com</a>] &amp; [Supplier Requirements Standard, 2019]</li> <li>• Met: Works with smelters/refiners and suppliers to build capacity: The Company states 'In 2019, we required all new suppliers to take a Supplier Compliance Training, which helped increase awareness of and focus on our requirement that Micron suppliers may only use Conformant smelters and refiners.' Additionally, 'we worked with our suppliers to help raise awareness of our expectations, provide ongoing education concerning our requirements, and provide training through our risk mitigation and escalation process.' In relation to smelters and refiners, the Company describes the following: 'We are members of multiple RMI working groups, including the RMI Smelter Engagement Working Group, which was tasked with identifying and influencing smelters in the supply chains of RMI members to join the RMAP and become validated as responsibly sourced.' [Conflict Minerals Report 2019, 2020: <a href="http://investors.micron.com">investors.micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Contractual requirement to disclosure smelter/refiner information: Supplier compliance includes updating 'CMRTs within two (2) weeks of any smelter or refiner changes within the entire supply chain. Such changes may include adding a new smelter, removal of a smelter, or when a smelter changes on the Responsible Material Initiative ("RMI") list.' As indicated above, Company's conflict mineral requirements include 'Adopting contractual provisions in Supplier's supply chain agreements that direct successive upstream suppliers to adopt conflict mineral policies and complete necessary conflict mineral diligence surveys.' [Supplier Requirements Standard, 2019]</li> <li>• Not Met: Contractual requirement covers all minerals</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Risk identification and disclosure in line with OECD Guidance: In relation to risk assessment, the Company indicates that it screened and analysed templates from all 3TG-exposed suppliers. 'We reviewed all CMRT responses and updates received [...] and determined whether the disclosed smelters were recognized by RMI or equivalents as processors of 3TG metals, and if so, whether they had been validated as Conformant with these organizations'. Additionally, it is 'committed to ensuring that minerals used in the manufacture of our products do not directly or indirectly fund violence or human rights abuses in the DRC or adjoining countries.' However, no further details found including risks identified (or potential risks that it might face). [Conflict Minerals Report 2019, 2020: <a href="https://investors.micron.com">investors.micron.com</a>] &amp; [2019 Sustainability report, 2019: <a href="https://micron.com">micron.com</a>]</li> <li>• Met: Identification of smelter/refiners and OECD Guidance: The Company describes the following: 'Through the CMRT [Conflict Minerals Reporting Template] we request information from suppliers regarding their 3TG supply chains, including the names and locations of smelters and refiners of 3TG as well as the country of origin of 3TG processed by such smelters and refiners. We then ask that suppliers review and acknowledge our Responsible Minerals Policy and our SRS, which sets out our expectations that all smelters and refiners in our supply chain are, and remain, validated as Conformant'. 'We reviewed all CMRT responses and updates received for the year ended December 31, 2019 and determined whether the disclosed smelters or refiners were recognized by RMI or equivalents as processors of 3TG metals, and if so, whether they had been validated as Conformant with these organizations.' [Conflict Minerals Report 2019, 2020: <a href="https://investors.micron.com">investors.micron.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses in its Conflict Minerals Report the list of reported smelters and refiners. This list includes the status of the smelter, which can be conformant, non-conformant, etc. [Conflict Minerals Report 2019, 2020: <a href="https://investors.micron.com">investors.micron.com</a>]</li> <li>• Not Met: Risk identification and disclosure covers all minerals</li> </ul>
D.4.10.c	Reporting on responsible sourcing of minerals	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes mineral risk management plan for supply chain: The Company describes the following: 'management of our conflict minerals program was provided by a cross-functional Conflict Minerals Steering Team, with representatives from Micron's Procurement, Supply Chain, Quality, Finance, Sales, Sustainability and Legal departments, headed by a Senior Procurement Compliance Manager. The Steering Team met at least monthly during the year [...] Oversight of the Steering Team was provided by a cross-functional Conflict Minerals Executive Team comprised of Vice President-level executives'. 'We reviewed all CMRT responses and updates received for the year ended December 31, 2019 and determined whether the disclosed smelters or refiners were recognized by RMI or equivalents as processors of 3TG metals, and if so, whether they had been validated as Conformant with these organizations. We reviewed supplier CMRTs for accuracy and overall adherence to our conflict minerals requirements, as delivered through our inquiry letter to suppliers, and we began our risk mitigation (and escalation processes, if necessary) set out in our conflict minerals procedures with suppliers having disclosed any smelters or refiners that were not Conformant. If a supplier reports a CMRT that includes smelters or refiners not yet listed as Conformant, we implement our risk mitigation procedures, beginning with direct outreach to the supplier and escalating discussions up the management structure of our respective companies. We work with these suppliers throughout the risk mitigation process to provide awareness of Micron's goal to only source from Conformant smelters or refiners.' The Company also participates in RMI smelter engagement team tasked with influencing smelters in the supply chains of RMI members to join the RMAP and become validated. It also works with teams to define future protocols, procedures, issue resolutions and training. The Company also indicates that improvements include 'expand our conflict minerals program to a broader Responsible Sourcing program designed to ensure responsible sourcing of additional minerals and include more geographies as solutions are deployed and implemented through RMI. [Conflict Minerals Report 2019, 2020: <a href="https://investors.micron.com">investors.micron.com</a>]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time: The Company found all its smelters and refiners to be Conformant with the RMI Responsible Minerals Assurance Process, which means there are no smelters with potential risks. However, no description of a process to monitor and track effectiveness of risk prevention and mitigation measures could be found. No further details regarding monitoring or tracking risk prevention could be found in the latest version of the report. [SEC filing Conflict Minerals Disclosure, 31/05/2019: <a href="https://investors.micron.com">investors.micron.com</a>] &amp; [Conflict Minerals Report 2019, 2020: <a href="https://investors.micron.com">investors.micron.com</a>]</li> <li>• Met: Disclose better risk prevention/mitigation over time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Suppliers and stakeholders engaged in risk management strategy</li> <li>• Not Met: Risk management and response processes cover all minerals</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found, and so the score of 10.97 out of 80 points scored in themes A-D has been applied to produce a score of 2.74 out of 20 points for theme E.

### Disclaimer

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

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

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

continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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