

Company Name NXP Semiconductors
Industry ICT (Own operations and Supply Chain)
Overall Score 30.4 out of 100

Theme Score	Out of	For Theme
0.9	10	A. Governance and Policies
9.0	25	B. Embedding Respect and Human Rights Due Diligence
6.5	20	C. Remedies and Grievance Mechanisms
7.8	25	D. Performance: Company Human Rights Practices
6.1	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	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: General HRs commitment: The Labor and Human Rights Commitment indicates: 'NXP and our business partners must not be involved in any form of human-rights abuses'. Moreover, according to the Company's Sustainability Policy: 'NXP believes that business can only flourish in societies where human rights are protected and respected. NXP recognizes that business has the responsibility to respect human rights and is capable of contributing to ensuring human rights worldwide'. However, no publicly available policy statement committing it to respect human rights found. 'Must not be involved in human-rights abuses' or 'recognize that business has the responsibility to respect' are not considered formal statements of commitment according to CHRB wording criteria. Although the Company has comprehensive document stating in details its Labor and Human Rights Commitments, this indicator focuses on an explicit commitment to respect human rights, which could not be found. [Labor and Human Rights Commitment, 2021: nxp.com] & [Sustainability Policy, 05/2020: nxp.com] • Not Met: Universal Declaration of Human rights (UDHR): The Supplier Code of Conduct states: 'Recognized standards, such as the Universal Declaration of Human Rights (UDHR) [...] have been used as references in preparing the NXP Supplier Code of Conduct and may be useful sources of additional information'. However, although the UDHR was used as reference to the Supplier Code, no publicly available policy statement committing it to respect the rights under the Universal Declaration of Human Rights found. [Supplier Code of Conduct, 2021: nxp.com] • Not Met: International Bill of Human Rights

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to the UNGPs: The Supplier Code of Conduct states: 'Recognized standards, such as the [...] United Nations Guiding Principles on Business and Human Rights (UNGP) [...] have been used as references in preparing the NXP Supplier Code of Conduct and may be useful sources of additional information'. However, although the UNGPs were used as reference to the Supplier Code, no publicly available policy statement committing it to respect the United Nations Guiding Principles on Business and Human Rights (UNGP) found. [Supplier Code of Conduct, 2021: nxp.com] • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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 Code of Conduct indicates that 'We support the aim of the International Labor Organization (ILO) to arrive at universally accepted labor standards'. However, 'support the aim to arrive at universally accepted standards' is not considered a formal statement of commitment according to CHRB wording criteria. The 2020 MSA states: 'NXP commits to the eight fundamental International Labor Organization (ILO) Conventions: Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87), Right to Organize and Collective Bargaining Convention, 1949 (No. 98), Forced Labor Convention, 1930 (No. 29) and its 2014 Protocol, Abolition of Forced Labor Convention, 1957 (No. 105), Minimum Age Convention, 1973 (No. 138), Worst Forms of Child Labor Convention, 1999 (No. 182), Equal Remuneration Convention, 1951 (No. 100), and Discrimination (Employment and Occupation) Convention, 1958 (No. 111)'. However, although the Company indicates it commits to various ILO, according to CHRB standard, commitments are expected to be placed in Company in formal policy documents, not annual publications. [Code of Conduct, 2021: investors.nxp.com] & [2020 MSA, 07/2021: nxp.com] • Not Met: Company has an explicit commitment to All four ILO Core: The Code of Conduct covers child labour, forced labour, non-discrimination. Regarding freedom of association and collective bargaining it indicates: 'NXP respects employees' rights to join, or form a labor union without fear of reprisal, intimidation or harassment. NXP respects the right to be represented by trade unions and other employee organizations. (...) We do not make employment subject to the condition that a person cannot join a union or must terminate membership in a trade union. Local rights and codetermination are fully respected with a view to reaching agreement on the terms and conditions presented by employees'. According to the Human Rights Policy: 'The rights of workers to associate freely, join or not join labor unions, seek representation, or join workers' councils in accordance with local laws must be respected'. 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 'local rights and codetermination are fully respected' or that those rights' in accordance with local laws must be respected'. The 2020 MSA states: 'NXP commits to the eight fundamental International Labor Organization (ILO) Conventions: Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87), Right to Organize and Collective Bargaining Convention, 1949 (No. 98), Forced Labor Convention, 1930 (No. 29) and its 2014 Protocol, Abolition of Forced Labor Convention, 1957 (No. 105), Minimum Age Convention, 1973 (No. 138), Worst Forms of Child Labor Convention, 1999 (No. 182), Equal Remuneration Convention, 1951 (No. 100), and Discrimination (Employment and Occupation) Convention, 1958 (No. 111)'. However, although the Company indicates it commits to various ILO, according to CHRB standard, commitments are expected to be placed in Company in formal policy documents, not annual publications. [Code of Conduct, 2021: investors.nxp.com] & [Labor and Human Rights Commitment, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: The Supplier Code indicates: 'NXP Suppliers shall comply with the requirements of the NXP Supplier Code of Conduct [...]. Recognized standards, such as [...] conventions and guidelines issued by organizations such as the International Labour Organization (ILO), have been used as references in preparing the NXP Supplier Code of Conduct and may be useful sources of additional information'. However, although the Company indicates that ILO Standards were used as reference to the Supplier Code, no evidence publicly available policy statement found expecting suppliers to commit to respecting the human rights that the ILO has declared to be fundamental rights at work. [Supplier Code of Conduct, 2021: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Company explicitly list All four ILO for suppliers: The Supplier Code of Conduct covers child labour, forced labour, non-Discrimination. Regarding freedom of association and collective bargaining it indicates: 'In conformance with local law, Supplier 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. [Supplier Code of Conduct, 2021: nxp.com] & [Auditable Standards on Social Responsibility, 26/06/2018: nxp.com]
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: The Company indicates that 'NXP is committed to providing safe and healthy working conditions in order to keep us from harm and promoting our health. (...) Health and safety programs, rules, and regulations apply at all sites, and we are all responsible for maintaining a safe workplace by following these health and safety programs, rules and regulations'. [Code of Conduct, 2021: investors.nxp.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Code of Conduct states that 'Our work weeks will not exceed the maximum set by local law and will, in any event, not be more than 60 hours, including overtime, except during emergencies or exceptional circumstances to meet short-term business demand. We will be entitled to have at least one day off per seven day period. Overtime work is voluntary, unless agreed upon by a collective labor agreement or union contract or, during emergencies or exceptional circumstances, to meet short-term business demand'. The Labor & Human Rights Commitment indicates similar working hours provisions: 'A work week must not be more than 60 hours per week, or the maximum set by local law, whichever is stricter, except in emergency or unusual situations, such as natural disasters or national holidays in which mass workers travel to their hometowns. [...] Workers shall have at least one scheduled day off every seven days and not work more than six consecutive days. All overtime work must be voluntary'. 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 paid at a premium rate. The 2020 MSA and the 2021 Sustainability Report indicate that: 'Regular work week cannot exceed 48 hours and the daily scheduled work cannot exceed 12 hours'. The 2020 MSA also notes: "NXP commits to the eight fundamental International Labor Organization (ILO) Conventions". However, according to CHRB standards, commitments are expected to be placed in formal policy documents. [Code of Conduct, 2021: investors.nxp.com] & [Labor and Human Rights Commitment, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company recognizes in the Supplier Code of Conduct the importance of a healthy and safe work environment and has a specific policy for suppliers with health and safety standards that includes occupational safety, emergency preparedness, sanitation, industrial hygiene among others. [Supplier Code of Conduct, 2021: nxp.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Supplier Code states that 'Working hours are not to exceed the maximum set by local law. Further, a work week shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall have at least one scheduled day off every seven days and not work more than six consecutive days. All overtime shall be voluntary'. 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. The 2020 MSA and the 2021 Sustainability Report indicate that: 'Regular work week cannot exceed 48 hours and the daily scheduled work cannot exceed 12 hours'. The 2020 MSA also notes: 'NXP commits to the eight fundamental International Labor Organization (ILO) Conventions'. However, according to CHRB standards, commitments are expected to be placed in formal policy documents. [Supplier Code of Conduct, 2021: nxp.com] & [2020 MSA, 07/2021: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 Company states that it 'is deeply committed to responsibly sourcing minerals in an ethical and humane manner. We are dedicated to ensuring that the minerals contained in our products are obtained, produced, and used in a socially responsible manner. [...] NXP's responsibly sourced mineral program is designed in accordance with the Organization for Economic Cooperation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas including the related supplements on gold, tin, tantalum and tungsten, as it relates to our position as a "downstream" purchaser'. [NXP's Responsibly Sourced Minerals Policy, 02/19: nxp.com] • Met: Based on OECD Guidance: It indicates that 'NXP's responsibly sourced mineral program is designed in accordance with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas including the related supplements on gold, tin, tantalum and tungsten, as it relates to our position as a "downstream" purchaser'. [NXP's Responsibly Sourced Minerals Policy, 02/19: nxp.com] • Met: Requires suppliers to commit to responsible mineral sourcing: The Company indicates in the Supplier Code of Conduct that 'Supplier shall adopt a policy and exercise due diligence on the source and chain of custody of for 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 shall exercise due diligence on the source and chain of custody of these minerals and shall make their due diligence measures available to NXP upon NXP's request. [Supplier Code of Conduct, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals: The Supplier Code of Conduct indicates: 'Supplier shall adopt a policy and exercise due diligence on the source and chain of custody of for 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 shall exercise due diligence on the source and chain of custody of these minerals and shall make their due diligence measures available to NXP upon NXP's request'. Although the Company indicates that suppliers should exercise due diligence in accordance with OECD Guidance for 3TG, no evidence found of a commitment from the Company to follow the OECD Guidance explicitly covering all minerals (beyond 3TG). [Supplier Code of Conduct, 2021: nxp.com] • Not Met: Suppliers expected to make similar requirements of their suppliers: Suppliers shall have a process to communicate the NXP Supplier Code of Conduct or comparable requirements to their own, next-tier suppliers and to monitor supplier compliance to the requirements.' However, no requirement for commitment from suppliers of suppliers could be found. [Supplier Code of Conduct, 2021: nxp.com]
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Women's rights • Not Met: Children's rights: Previous assessment used evidence from the webpage section Company's 'Labor and Human Rights', which CHRB no longer considers a suitable source for policy statements. No further evidence found. • Not Met: Migrant worker's rights: Previous assessment used evidence from the webpage section Company's 'Labor and Human Rights', which CHRB no longer considers a suitable source for policy statements. No further evidence found. • Met: Expects suppliers to respect at least one of these rights: It indicates that 'NXP is committed to upholding the human rights of workers and treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant(...) and any other type of worker'. [Supplier Code of Conduct, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles: Previous assessment used evidence from the webpage section Company's 'Labor and Human Rights', which

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>CHRB no longer considers a suitable source for policy statements. No further evidence found.</p> <ul style="list-style-type: none"> • Not Met: Convention on migrant workers: Previous assessment used evidence from the webpage section Company's 'Labor and Human Rights', which CHRB no longer considers a suitable source for policy statements. No further evidence found. • 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: Regarding its human rights approach, it indicates, in its Sustainability Policy, that 'We have formal grievance and remedy processes to enable anyone, including NXP employees, employees in NXP's supply chain and other external stakeholders, to report human rights concerns'. However, no statement committing to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed was found. The 2020 MSA indicates: 'We are committed to remedying any adverse impacts on workers and to working with our supply chain. This work takes the form of collaboration and development'. Although the Company indicates that it commits to remedy adverse impacts, this content is found in a Slavery and Human Trafficking Statement, which CHRB no longer considers a suitable source for policy statements. Only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Sustainability Policy, 05/2020: nxp.com] & [2020 MSA, 07/2021: nxp.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
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: The 2021 Sustainability Report indicates: 'Our ESG strategy is aligned with and incorporated into the company's long-term business strategy. NXP's Board of Directors has ultimate oversight responsibility for ESG matters. The full board focuses on significant ESG matters, with board committees undertaking oversight of ESG issues relevant to their responsibilities, and then integrating committee work on these issues in their reports to the full board. ESG program oversight is delegated to the Nominating, Governance and Sustainability Committee, which integrates the broad set of ESG considerations into business functions, and delegates aspects of ESG oversight to the Audit and Compensation committees for ESG matters within their core areas of expertise'. It then explains the role that each committee plays regarding ESG: 'Nominating, Governance and Sustainability Committee – Oversight of sustainability policies, goals, and programs. Audit – Oversight of ESG disclosure processes and controls, and internal and external assurance over ESG reporting. Human Resources and Compensation Committee – Oversight of human capital management policies, programs, and initiatives, including company culture, talent development, employee retention, diversity and inclusion, and compensation, including the alignment of ESG goals to incentive pay programs diversity and inclusion, and compensation, including the alignment of ESG goals to incentive pay programs. ESG includes human rights. [2021 Sustainability Report, 2022: nxp.com] • Not Met: Describe HR expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Met: Speeches/letters by Board members or CEO: The 2020 MSA has a foreword written by the CEO stating the Company's focus to identify Human Rights related risks and its accomplishments such as policies, increasing scores in international rankings, closure rates of supplier corrective-actions plans and the establishment of a remote auditing process. The whole communication describes human rights approach. [2020 MSA, 07/2021: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.2	Board responsibility	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy: The 2021 Sustainability Report indicates that the Nominating, Governance and Sustainability Committee has 'Oversight of sustainability policies, goals, and programs', in addition, the Committee 'receives quarterly updates from representatives of the ESG Management Board, and in turn, reports on these efforts in plenary meetings of NXP's Board of Directors'. However, although it indicates that the Committee reports on ESG issues to the Board and the frequency it occurs, it is not clear the processes it has in place to discuss and regularly review its human rights strategy or policy or management processes specifically. [2021 Sustainability Report, 2022: nxp.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 bussiness model and strategy • Not Met: Describe frequency and triggers for reviewing <p>Score 2</p> <ul style="list-style-type: none"> • 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: The Company indicates that the 'social responsibility board is represented by the Chief Human Resources Officer (chair), and representatives from the following functions: Legal, Operations, Finance, Sales, Quality, Purchasing, Business Groups and the Sustainability Office. The NXP social responsibility board establishes strategy and sets targets, while the social responsibility team, under the direction of Senior Director of Sustainability and EHS, performs operational functions. The social responsibility board meets annually to discuss and review the social responsibility program and provide resources to maintain and advance the NXP's social responsibility standards, supplier code of conduct as well as NXP and our suppliers' performance related to labor and human rights'. [MSA 2019, 06/2020: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: The 2020 MSA discloses different teams in charge of Social Responsibility governance. The Social Responsibility Team is responsible for 'Oversee strategies, policies, and goals, and report on various metrics, including input from the Site Steering Committee and purchasing managers, and report monthly to the Sustainability Leadership Team'. In its own operation, it must 'Set targets, conduct annual self assessments and third-party audits, ensure timely closure of corrective-action plans, monitor and control working hours and rest days, and conduct internal capacity building'. As for its supply chain: 'Set targets, ensure supplier commitment to the Supplier Code of Conduct, conduct annual supplier risk assessments, supplier self-assessments, and supplier audits, ensure timely closure of corrective-action plans, and conduct supplier training'. [2020 MSA, 07/2021: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Day-to-day resources and expertise allocation in own ops: See above, in addition to the social responsibility team, the Site Steering Committee is in charge of 'Implement, measure, and validate policies, drive continuous improvement at their respective sites, and report progress to Site Management and the Social Responsibility Team'. The Purchasing team has among its duties 'Oversee the annual supplier risk assessment for social responsibility, meet monthly with the Social Responsibility Team to receive supplier data for input into quarterly supplier business reviews, and include the Material Sourcing Board in meetings when supplier escalations are needed'. Finally, the Legal team is responsible for: 'Review and provide legislative guidance, assist in the review of alleged violations of the Code of Conduct, and review publicly reported documents such as the Supplier Code of Conduct and the NXP Auditable Standards on Social Responsibility'. [2020 MSA, 07/2021: nxp.com] • Met: Resources and expertise allocation in the supply chain: See above, in addition to the social responsibility team, the Purchasing team has among its duties 'Oversee the annual supplier risk assessment for social responsibility, meet monthly with the Social Responsibility Team to receive supplier data for input into quarterly supplier business reviews, and include the Material Sourcing Board in meetings when supplier escalations are needed'. [2020 MSA, 07/2021: nxp.com]
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • 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 senior management performance
B.1.3	Integration with enterprise risk management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: HR risks is integrated as part of enterprise risk system: The Company summarizes its Risk Factors in its 10-K Form 2021, including: 'As our business is global, we need to comply with laws and regulations in countries across the world. (...) we are subject to environmental, data privacy, labor and health and safety laws and regulations in each jurisdiction in which we operate'. However, no further details found on labour/human rights issues that can affect company's operations. [2021 FORM 10-K, 2022: investors.nxp.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
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: The Company indicates: 'All NXP employees and interns are required to complete mandatory, Code of Conduct training that includes education on the ILO Core Labour Standards. In 2019, mandatory Code of Conduct training was administered to all employees'. [MSA 2019, 06/2020: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: Regarding external stakeholder engagement, the 2021 Sustainability Report notes: 'Throughout the year, we engage formally and informally with our stakeholders to explore ESG focus areas, along with trends and developments relevant to our industry'. The 2020 slavery statement indicates: 'Supplier communications take the form of trainings, consultations, collaboration, and discussion during our audits. We also communicate our Supplier Code of Conduct and our Auditable Standards on Social Responsibility to our supply chain. Our suppliers are bound, either contractually or through their conformance signature, to the Supplier Code of Conduct, which states that our business partners will uphold standards for labor and human rights. We require our suppliers to communicate our policy, standards, and expectations to their own suppliers, including external service providers, and also require them to audit and monitor their upstream suppliers'. Regarding engagement with the Community, the webpage section Stakeholder Engagement notes: 'We use community engagement, in the form of ongoing financial assistance and team member volunteerism, to support local nonprofit organizations and educational institutions to strengthen local communities'. However, although the Company indicates how it communicates its expectations to suppliers and that it engages with different stakeholders, it is not clear how it specifically communicates its policy commitments to affected stakeholders, including local communities. The Company has provided additional comments to CHRB regarding this indicator.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>However, no further evidence to meet the requirement found. Communications to supply chain are assessed in indicator B.1.4.b [2020 Sustainability Report, 03/2021: nxp.com] & [2020 MSA, 07/2021: nxp.com]</p> <ul style="list-style-type: none"> • 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: According to its MSA: 'We also communicate our Supplier Code of Conduct and our Auditable Standards down our supply chain. Our suppliers are bound, contractually or through their conformance signature to the Supplier Code of Conduct and commit to our standards which details our expectations for our business partners to uphold labor and human rights standards. We also require our suppliers to communicate our policy, standards and expectations down the chain to their subordinate relationships, including external service providers. We also expect that they audit and monitor their subordinate suppliers'. The Company indicates in the Supplier Code of Conduct that 'Supplier shall have a process to communicate the NXP Supplier Code of Conduct or comparable requirements to their own, next-tier suppliers and to monitor supplier compliance to the requirements'. [Supplier Code of Conduct, 2021: nxp.com] & [MSA 2019, 06/2020: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: In its MSA the Company states: 'Our suppliers are bound, contractually or through their conformance signature to the Supplier Code of Conduct and commit to our standards which details our expectations for our business partners to uphold labor and human rights standards.' [MSA 2019, 06/2020: nxp.com] • Met: Company requires suppliers to cascade down to their suppliers: The 2020 MSA indicates: 'Supplier communications take the form of trainings, consultations, collaboration, and discussion during our audits. We also communicate our Supplier Code of Conduct and our Auditable Standards on Social Responsibility to our supply chain. Our suppliers are bound, either contractually or through their conformance signature, to the Supplier Code of Conduct, which states that our business partners will uphold standards for labor and human rights. We require our suppliers to communicate our policy, standards, and expectations to their own suppliers, including external service providers, and also require them to audit and monitor their upstream suppliers'. [2020 MSA, 07/2021: nxp.com]
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 • Met: How workers are trained on HR policy commitments: The Company indicates: 'All NXP employees and interns are required to complete mandatory, Code of Conduct training that includes education on the ILO Core Labour Standards. In 2019, mandatory Code of Conduct training was administered to all employees'. [MSA 2019, 06/2020: nxp.com] • Met: Trains relevant managers including procurement: The Company indicates that 'Additionally, we train employees whose job functions include purchasing to comply with applicable laws and standards in the locations in which we operate, including prohibitions regarding slavery and human trafficking'. Regarding its supply chain management, it indicates 'NXP's legal and purchasing staff are trained on the policies and practices of the Supplier Code of Conduct. It is our goal to collaborate with our suppliers to make an impact within the supply chain'. [MSA 2019, 06/2020: nxp.com] & [2020 MSA, 07/2021: nxp.com] <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 • Met: Meets both requirements under score 1: See above. • Met: Trains suppliers to meet company's HR commitment: It indicates: 'Training addresses our suppliers and labor agents, in sending and receiving countries, as well as onsite service providers. NXP provides tools and resources to support our suppliers in building and/or improving their social-responsibility programs'. In addition, it indicates: 'NXP provides tools and resources to support our suppliers in building and or improving their social responsibility programs to explicitly commit to the ILO Core Labour Standards. Training is focused on our suppliers, labor agents in both sending and receiving countries and onsite service providers. We train our suppliers, so they know what to expect when NXP conducts onsite audits. The mode of training is either a classroom or webinar session, conducted by the NXP social responsibility team with support from the site subject matter experts. The training is the full requirement of the NXP Supplier Code of Conduct, with special attention to Labor and Human Rights. Training is also conducted upon supplier

Indicator Code	Indicator name	Score (out of 2)	Explanation
			request or prior to their onsite audit. [Supplier Engagement (web), N/A: nxp.com] & [MSA 2019, 06/2020: nxp.com] • Not Met: Disclose % trained
B.1.6	Monitoring and corrective actions	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2 • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company states that 'management must demonstrate a good understanding and commitment to the NXP Code of Conduct (NXP facilities), the Supplier Code of Conduct (supply chain) and meet the requirements of the NXP Auditable Standards on Social Responsibility. NXP requirements for internal and our supply chain must be integrated into policies, procedures, and must be communicated effectively to all levels of workers. (...) Every two years, each manufacturing site undergoes either a third-party audit, conducted by Verité and auditing against the NXP Auditable Standards on Social Responsibility, or a Responsible Business Alliance (RBA) Validated Assessment Program (VAP), conducted by a designated audit firm and auditing against the RBA Code of Conduct. Each audit firm is specially trained in labor and human rights and performs on-site inspections (including dormitories if applicable), reviews documents, and conducts private interviews with management and randomly selected workers. A formal report is issued, and any corrective actions are tracked until successfully closed'. [2020 MSA, 07/2021: nxp.com] • Not Met: Proportion of supply chain monitored: The 2021 Sustainability Report indicates: 'NXP has business relationships with more than 10,000 suppliers globally'. It also states: 'Suppliers undergo an annual supplier risk assessment [...] to evaluate which suppliers have a high priority to be audited by NXP'. It is not clear, however, whether all these more than 10.000 suppliers undergo these risk assessments/screening to determine which are to be audited. [2021 Sustainability Report, 2022: nxp.com] • Met: Describe how workers are involved in monitoring: The Company indicates that as part of the human rights due diligence, in the processes and tools used context, there's internal collaboration with the NXP purchasing team to review the results of the human-rights due diligence in the supply chain. Part of this work entails a 'monthly review of audit closure status (30/60/90-day closure deadlines), and scheduling of review and follow-up verification audits, if necessary'. [2020 MSA, 07/2021: nxp.com] Score 2 • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2 • Met: Describes corrective action process: It indicates: 'If the audit results in a nonconformance, the supplier must submit a corrective action plan that addresses both correction and prevention within a set period of time. If there is a priority violation, the supplier is given the opportunity to improve performance, but the response to and resolution of the violation is non-negotiable. The supplier has seven days to submit a corrective action plan and 30 days to complete the plan. If there is immediate risk of life, the supplier has 24 hours to complete the corrective action. Unresolved priority violations can result in the withdrawal or termination of business. Other nonconformances can be registered as either major or minor. The list of major and minor nonconformances is issued to the supplier within two weeks of the closing meeting. All corrective actions must be approved by NXP and, unless otherwise negotiated or approved, must be fully closed within 90 days. Within that 90-day period, the supplier must update the NXP team every 30 days'. [2020 MSA, 07/2021: nxp.com] • Met: Disclose findings and number of corrective action: The Company discloses its non-conformances by category, among them were: freely chosen employment, working hours, wages and benefits, humane treatment. Also, there were 4,500 findings of non-conformances. As it is mentioned above: 'If the audit results in a nonconformance, the supplier must submit a corrective action plan that addresses both correction and prevention within a set period of time'. [2020 MSA, 07/2021: nxp.com]
B.1.7	Engaging and terminating business relationships	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR affects selection of suppliers: The Company states in its modern slavery statement that it conducts 'self- assessments and, if necessary, a third-party audit of suppliers prior to onboarding'. [2020 MSA, 07/2021: nxp.com] • Met: HR affects on-going supplier relationships: It also indicates: 'NXP Suppliers shall comply with the requirements of the NXP Supplier Code of Conduct, and require its own suppliers do the same. NXP may visit (and/or have external 3rd party monitors visit) Supplier facilities to assess compliance with the NXP Supplier

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Code of Conduct. Violation of the NXP Supplier Code of Conduct may result in an immediate termination of the relationship with NXP'. The Supplier Code of Conduct contains the Company's human rights expectations. [Supplier Code of Conduct, 2021: nxp.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: In addition, it indicates: 'NXP provides tools and resources to support our suppliers in building and or improving their social responsibility programs to explicitly commit to the ILO Core Labour Standards. Training is focused on our suppliers, labor agents in both sending and receiving countries and onsite service providers. We train our suppliers, so they know what to expect when NXP conducts onsite audits. The mode of training is either a classroom or webinar session, conducted by the NXP social responsibility team with support from the site subject matter experts. The training is the full requirement of the NXP Supplier Code of Conduct, with special attention to Labor and Human Rights. Training is also conducted upon supplier request or prior to their onsite audit. Our NXP sites also provide guidance and consultation to suppliers on their experience and knowledge in implementing the standards and share best practices. We also provide the RBA's eLearning academy resources as a part of our supplier trainings. To address the findings from our supplier audits, NXP conducts consultation sessions with our auditees and hold 30, 60 and 90-day follow-up meetings to discuss their corrective action plan and provide additional training to our standards'. [MSA 2019, 06/2020: nxp.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: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company indicates in its 2019 MSA: 'Stakeholder engagements are conducted at many levels, including NXP employees, our supply chain, workers of our suppliers, and with independent external human rights experts. In order to systematically identify these stakeholders, we use a network of contacts spanning across many industries to pinpoint areas for engagement. We prioritize stakeholders based on criteria such as relevance, willingness and capacity to engage'. The 2021 Sustainability Report discloses its different stakeholders, including: team members and suppliers, as well as different means of communication to different stakeholders. In the case of suppliers, it indicates that it 'NXP supplier audits analyze three main aspects of social responsibility: documentation reviews, management and private worker interviews, and physical inspection of all facilities, including any dormitories (onsite audit only)'. [2021 Sustainability Report, 2022: nxp.com] & [MSA 2019, 06/2020: nxp.com] • Not Met: Provides two examples of engagement with stakeholders: The 2021 Sustainability Report indicates: 'For the fourth consecutive year, the Annual UN Forum on Business and Human Rights invited NXP to be a featured panellist in a session about lessons learned from the pandemic. We described our work in the supply chain and our efforts to help foreign migrant workers, who are some of the most vulnerable to human-rights abuses during a crisis like the COVID-19 pandemic. We also shared out thoughts on how businesses can collaborate with governments and civil-society organizations to address human rights'. Also, 'In 2021, we engaged in capacity building and other activities that strengthened our supply-chain partnerships, and provided opportunities for our customers to participate. One such capacity building activity was a collaboration with a customer on a webinar focused on Managing Labor and Human Rights Risks in the Supply Chain. A total of 35 participated, representing nine supply chain partners in the interactive webinar session'. Although the Company provides examples of engagement with stakeholders, it is not clear these are affected or potentially affected stakeholders. The indicator focuses on cases of engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years, such as local communities, employees, trade unions, workers in the supply chain, local communities in the supply chain, etc. [2021 Sustainability Report, 2022: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • 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	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: Identifying risks in own operations: The Company states in its MSA: 'We involve all relevant functions and businesses across NXP and engage with external stakeholders to identify practices that may lead to a greater risk of non-compliance with our policies and standards. The NXP social responsibility and purchasing teams identify salient human rights risks through our own risk analysis and through the collaboration between key stakeholders such as industry associations, expert groups, NGOs and results from the supplier assessments and audits'. [MSA 2019, 06/2020: nxp.com] • Met: Identifying risks through relevant business relationships: It indicates: 'Approximately 10,000 suppliers are included in our annual risk-assessment analysis. The risk assessment identifies suppliers that are at risk of having human rights issues relating to forced/bonded labor, the migrant worker index, fair wages, humane treatment, child labor, and/or health and safety. As part of our annual risk assessment, NXP engages with advisory firms Verisk Maplecroft and Verité Cumulus to identify potential forced-labor and human-trafficking risks in our supply chains. Verisk Maplecroft screens our supply chain for inherent risk and uses predictive models to evaluate areas such as forced labor, child labor, and working conditions. Verité Cumulus provides NXP with online technology to identify forced labor and human-trafficking risks with our labor agents. Verité Cumulus also maps and assesses our labor agents, in both the receiving and sending countries, and their recruitment practices. Three risk criteria are considered when assessing a supplier: geographical risk, product risk, and business criticality'. [2020 Sustainability Report, 03/2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicted above, according to the 2020 Sustainability Report, the Company's social responsibility and purchasing teams identify salient human rights risks both in its own operations: 'The NXP Social Responsibility and Purchasing teams identify salient human-rights risks using our own risk analysis, collaboration with key stakeholders such as industry associations, expert groups, and NGOs, along with results from supplier assessments and audits'. Also, regarding its supply chain: 'As part of our annual risk assessment, NXP engages with advisory firms Verisk Maplecroft and Verité Cumulus to identify potential forced-labor and human-trafficking risks in our supply chains. Verisk Maplecroft screens our supply chain for inherent risk and uses predictive models to evaluate areas such as forced labor, child labor, and working conditions. Verité Cumulus provides NXP with online technology to identify forced labor and human-trafficking risks with our labor agents. Verité Cumulus also maps and assesses our labor agents, in both the receiving and sending countries, and their recruitment practices'. The 2021 Sustainability Report also notes as part of its supply chain management: 'During an audit, worker interviews are conducted in private and at random. To determine the number of worker interviews to be conducted, we take the square root of the worker population'. [2020 Sustainability Report, 03/2021: nxp.com] & [2021 Sustainability Report, 2022: nxp.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
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 webpage section Labor and Human Rights indicates: 'Identifying salient human-rights risks through risk assessments, collaboration with key stakeholders, and the results from our audit program, help identify the most critical to labor and human rights issues within NXP and our supply chain. [...] To prevent and mitigate adverse human-rights impacts, we use input from internal and external sources to prevent human-rights abuses from occurring. For each element of the due diligence process, we take steps to gather information from many sources and then use strategies, processes and tools to address and analyze the input. [...] Each of the four elements of the UN Guiding Principles on Business and Human Rights incorporate inputs into our strategy, processes, and tools to the desired outputs. However, it is not clear how relevant factors, such as geographical, economic, social and other factors, are taken into account when assessing its human rights risks within its own operations. The Company has provided additional comments to CHRB regarding this indicator. However, evidence was not material. [Labor and Human Rights (web), N/A: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How process applies to supply chain: The 2020 Sustainability Report indicates that when assessing its human rights risks within its supply chain: ‘Three risk criteria are considered when assessing a supplier: geographical risk, product risk, and business criticality. Each criterion has a scale of 1 (lowest risk) to 10 (highest risk). All three criteria are scored, and the product of these scores becomes the supplier’s overall risk score. Geographical risk is a key factor in determining overall risk levels, as suppliers in countries with weak regulations, inadequate enforcement of labor rights, and/or ineffective business ethics and environment laws tend to have a high-risk exposure. Each country gets a score from each index: labor rights and protection, corporate governance, legal and regulatory environment, and climate-change vulnerability. The set of weights reflect best-practice benchmarks from the industry and non-governmental organizations, as well as sensitivity analysis. Use of migrant workers is a critical risk element when it comes to labor and human rights. To account for this risk, country outcome from the quantitative approach is increased by one level. Taiwan, China, Malaysia, Singapore, Japan, and Korea tend to employ the highest number of migrant workers’. In its webpage section Labor and Human Rights, the Company discloses what it considers to be its salient human rights issues within its supply chain: Forced and Bonded Labour, Working Hours and Rest Days, Young Workers, Accurate Contracts, Fair Wages. [Labor and Human Rights (web), N/A: nxp.com] & [2020 Sustainability Report, 03/2021: nxp.com] • Met: Public disclosure of the results of HR assessment: The Company discloses the results of its assessments, in its 2020 Sustainability Report: ‘We annually conduct a supplier risk assessment to determine our audit schedule for high-risk suppliers. Risk is assigned according to three scoring categories: <49% (low risk), 50% - 70% (medium risk) and 71%-100% (high risk). In the 2020 assessment, 131 suppliers scored above 49%, 76 suppliers scored above 70%, and 19 suppliers scored 100%. For those suppliers that scored greater than 70%, the top three countries were Taiwan, China, and Malaysia’. In its webpage section Labor and Human Rights, the Company discloses what it considers to be its salient human rights issues within its supply chain: Forced and Bonded Labour, Working Hours and Rest Days, Young Workers, Accurate Contracts, Fair Wages. [2020 Sustainability Report, 03/2021: nxp.com] & [Labor and Human Rights (web), N/A: nxp.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
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"> • Met: Action Plans to mitigate risks: The Company discloses information about its actions to 'mitigate these risks through improvements to our policies, strategies, collaborative capacity building, self-assessments and audits within NXP and our supply chain'. For instance, with respect 'Retention of documents', the Company indicates: 'Clear policy in place that workers are not required to surrender personal documents; Personal, lockable, secured storage units are available in facilities, dormitories/housing or both; Grievance mechanism is in place to confidentially report any violations of this policy.' It also presents its actions planned for the next years: 'From 2020 thru 2022, we will continue to work with expert organizations, NGOs, CSOs and Academia to advance our program and standards. We will increase our efforts at an industry level to identify and remediate actual and potential cases of labor and human rights abuses. We will integrate labor and human rights risks through the Environment, Social and Governance (ESG) board which will report to the Nominating and Governance Committee of NXP’s Board of Directors. We will deploy a worker voice app for labor and human rights across our manufacturing facilities and create a labor and human rights remediation committee to effectively and efficiently respond to any worker grievance. We will deploy a labor and human rights survey and identify strengths and weaknesses of our program from the workers voice by engaging with external stakeholders like Verité to review our social responsibility program. We will update the Supplier Code of Conduct and create a supply chain portal to enhance engagement and communication with supplier and to manage our supply chain requirements and metrics. In the supply chain, our goal is to continue raising awareness through webinars and targeted training to help our suppliers develop a best in class program'. [MSA 2019, 06/2020: nxp.com] • Met: Description of how global system applies to supply chain: See above. [MSA 2019, 06/2020: nxp.com] • Met: Example of actions decided on at least 1 salient HR issues: The Company provides a video where the Company describes the problem of modern slavery in Indonesia and how it ensures that practices are adequate, policy, audits, etc. The

Indicator Code	Indicator name	Score (out of 2)	Explanation
			video mentions also training, making people aware of their rights, provision of passports for free, and visits to schools to address concerns and explaining processes and steps until joining the Company's factory. The process refers to recruitment young people in Indonesia for working in Company's facilities in Malaysia. [The Fight Against Modern Slavery - Youtube video, N/A: youtube.com] Score 2 <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: System for tracking or monitor if actions taken are effective: It indicates: 'Our in-place due-diligence processes respect the way we manage labor and human rights (...) risks associated with our operations and supply chain. Such due diligence includes risk assessments, compliance monitoring, remediation, measurement, and public reporting'. However, no further description found of its system for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. [2020 Sustainability Report, 03/2021: nxp.com] • Not Met: Lessons learnt from checking system effectiveness Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Provides two examples of comms with stakeholders: In its feedback to CHRB, the Company makes reference to its stakeholder engagement system. However, the indicator is looking for two examples demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. No evidence found. [2021 Sustainability Report, 2022: nxp.com] Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company indicates: 'At NXP we make use of communication programs to ensure that every employee is informed on their worker voice rights. Employees can report to their manager through the open-door policy, the country ethics compliance liaison, ethics committee and or the 3rd party Grievance line (anonymous reporting is available). Information about the whistleblower and complaint channels are easily accessible and visible (external website, intranet, grievance box, 3rd party grievance lines, posters, etc.)'. [MSA 2019, 06/2020: nxp.com] Score 2 <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The Speak Up page is available in more than 30 languages. See above description of awareness for employees. [Ethics (web), N/A: nxp.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: It indicates: 'Supplier shall have ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by the NXP Supplier Code of Conduct and to foster continuous improvement'. [Supplier Code of Conduct, 2021: nxp.com] • Met: Expect Suppliers to convey expectation to their own suppliers: The Supplier Code of Conduct indicates: 'Supplier shall have ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by the NXP Supplier Code of Conduct and to foster continuous improvement'. Also: 'Supplier shall have a process to communicate the NXP Supplier Code of Conduct or comparable requirements to their own, next-tier suppliers and to monitor supplier compliance to the requirements'. [Supplier Code of Conduct, 2021: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company indicates that 'All employees within NXP and outside stakeholders, a supplier, a supplier's employee or NGO for example, can report incidents to NXP. Even workers in the supply chain are provided NXP's grievance email and local phone number'. [MSA 2019, 06/2020: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The Speak Up page is available in more than 30 languages. However, it is not clear how external individuals and communities are made aware of the grievance mechanism. [Speak Up (web), N/A: speakupfeedback.eu] • Met: Communities access mechanism direct or through suppliers: The 2021 Sustainability Policy indicates: 'We have formal grievance and remedy processes to enable anyone, including NXP employees, employees in NXP's supply chain and other external stakeholders, to report human rights concerns'. The 2020 slavery statement notes: 'Any NXP employee, as well as any supplier, supplier employee, NGO, or other external stakeholder, can report an incident to NXP. Even workers in the supply chain are provided with NXP's grievance email and a local phone number'. [2021 Sustainability Report, 2022: nxp.com] • Not Met: Expect supplier to convey expectation to their own suppliers: The Supplier Code of Conduct indicates: 'Supplier shall have ongoing processes, including an effective grievance mechanism, to assess workers' understanding of and obtain feedback on or violations against practices and conditions covered by the NXP Supplier Code of Conduct and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation'. Additionally, 'NXP Suppliers shall comply with the requirements of the NXP Supplier Code of Conduct, and require its own suppliers do the same'. However, it is not clear the Company expects suppliers to convey the same 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, since NXP direct suppliers have access to the Company's mechanism. [Supplier Code of Conduct, 2021: nxp.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: It indicates: 'The general approach to all complaints includes an initial assessment of the grievance, the appointment of an investigation team with the right expertise and skill set to gather all relevant evidence, and an in-depth investigation to define appropriate remedial action(s) in the quickest possible timeframe. While it's difficult to set a fixed timetable for resolution, since complaints vary in scale and complexity, most can be dealt with in under two months. Based on the findings of the investigation, a decision is made about whether the grievance is substantiated. If the grievance is substantiated, we take appropriate follow-up actions. These actions can include education, organizational changes, counselling, reprimands, suspension, and/or termination, depending on the nature and severity of the finding and the party's willingness and ability to rectify the issue'. However, it is not clear the process for informing the complainant throughout the investigation. • 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: It indicates: 'The NXP Ethics Committee reviews grievances and oversees investigations into alleged violations of the CoC. The Ethics Committee includes senior leaders from Legal, Internal Audit, Human Resources and Sustainability from the Americas, Europe and Asia-Pacific regions. The Ethics Committee meets bi-weekly to discuss all reports received and to monitor the progress of ongoing investigations'. However, it is not clear how complaints or concerns for workers and all external individuals and communities

Indicator Code	Indicator name	Score (out of 2)	Explanation
			may be escalated to more senior levels or independent third party adjudicators or mediator. Escalation is expected to be a complainant option. [Ethics (web), N/A: nxp.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: It indicates: 'Our commitment to promote a culture of integrity means anyone can voice concerns without fear of retaliation'. [Ethics (web), N/A: nxp.com] • Met: Practical measures to prevent retaliation: Also: 'Grievances can also be submitted using the phone or web option of the SpeakUp line, which is hosted by an independent third party and facilitates anonymous reporting'. [Ethics (web), N/A: nxp.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: The 2021 Sustainability Report notes: 'We have a strict non-retaliation policy to protect those who report concerns and grievances. Anyone who reports a concern in good faith are protected from retaliation in the form of harassment or adverse employment or career consequences'. The 2021 Sustainability Policy indicates: 'We have formal grievance and remedy processes to enable anyone, including NXP employees, employees in NXP's supply chain and other external stakeholders, to report human rights concerns'. The 2020 slavery statement notes: 'Any NXP employee, as well as any supplier, supplier employee, NGO, or other external stakeholder, can report an incident to NXP'. [Supplier Code of Conduct, 2021: nxp.com] & [Labor and Human Rights Commitment, 2021: nxp.com]
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: The Supplier Code of Conduct indicates: 'Supplier shall maintain programs to ensure the confidentiality, anonymity and protection of supplier and worker whistleblowers, unless prohibited by law'. Also, 'Supplier shall create and maintain documents and records to ensure regulatory compliance and conformity to Supplier's requirements along with appropriate confidentiality to protect privacy'. The 2021 Sustainability Report notes: 'Concerns and grievances can be confidentially lodged using various reporting channels, such as management, ethics liaisons, or the NXP Ethics Committee. There are dedicated ethics liaisons regionally and in each country. Concerns and grievances can also be submitted using the phone or web option of SpeakUp, a system hosted by an independent third party that facilitates anonymous reporting. [...] All concerns raised are taken seriously. We apply the highest standards of confidentiality in the handling of all reports received'. However, it is not clear it does not require confidentiality provisions (e.g., non-disclosure agreements) with respect to human rights grievances. [Supplier Code of Conduct, 2021: nxp.com] & [2021 Sustainability Report, 2022: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms: The Company provides comments to CHRB regarding this indicator, however, it is not clear the process by which it cooperates with state-based non-judicial grievance mechanism(s) on complaints brought against it (i.e National Contact Points). • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse 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"> • Met: Describes how remedy has been provided: The Company reports in its MSA: 'In 2019 we received two notifications from our grievance mechanism of labor and human rights abuses from a supplier and 2nd tier supplier. In both cases, we launched an investigation, followed by an on-site audit revealing various forms of forced labor. All affected workers were remediated, such as reimbursement from recruitment fees and the return of their personal documents'. [MSA 2019, 06/2020: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance	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

Indicator Code	Indicator name	Score (out of 2)	Explanation
	mechanism(s) and incorporating lessons learned		Score 2 <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result relating to minimum wages, overtime hours, and legally mandated benefits. • 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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets target date: It indicates: 'Compensation and benefit practices must comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Workers must be compensated for overtime at pay rates greater than regular hourly rates. (...) No worker is paid less than the legal minimum wage with equal pay for equal work. If the country does not have a legally set minimum wage, the industry prevailing wage must apply as the standard. All overtime hours must be paid at the appropriate overtime rate applied to the base wage as required by applicable laws and regulations or employment contract, whichever is higher'. However, it is not clear the Company has a time bound target for paying all workers a living wage or the company indicates that pays all workers a living wage. A living wage should include basic needs plus some discretionary for employees and his/her family and/or depends. [Labor and Human Rights Commitment, 2021: nxp.com] • Not Met: Describes how living wage determined Score 2 <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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Discloses living wage requirements in supplier code or contracts: It indicates: 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Supplier Code of Conduct, 2021: nxp.com] • Not Met: Improving living wage practices of suppliers Score 2 <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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Avoids business model pressure on HRs (purchasing practices): The Company states in its MSA 2018 (dated 2019): 'NXP's lead time from the requesting of the material to the time it is delivered is approximately 6-8 weeks and up to 12 weeks depending on the commodity. NXP stocks our factories through consignment programs where we continuously keep inventory in our factories so we can forecast within a 12-week timeframe. [...] These actions aim to decrease the risk of modern slavery, such as not making demands of suppliers through insufficient payments, late orders or tight deadlines'. No new relevant evidence found in latest revision. [MSA 2018, 2019: nxp.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact Score 2 <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	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: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): It indicates: 'Our supply chain is large, complex, and multi-tier deep, involving thousands of suppliers around the world. (...) One of the main challenges that we face is managing the complexity of our interlinked global supply chains beyond our Tier 1 suppliers. We have made progress in mapping the labor agent network in our supply chain by engaging with Verité Cumulus. Verité Cumulus conducted a due-diligence assessment on 21 of our suppliers who recruit and hire foreign migrant workers. Through this assessment, we have identified and mapped 32 receiving agents and 40 sending agents, covering the recruitment of 11,463 foreign migrant workers. Future reports will include additional activities to map Tier 2 suppliers and will cover our efforts to screen and prioritize supply-chain partners and labor agents. We also include our Supplier List, which representing 98% of procurement expenditures for materials, manufacturing, and assembly of our products worldwide for calendar year 2020'. [2020 MSA, 07/2021: nxp.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 disclose a 'Supplier List [which] represents 98% of procurement expenditures for materials, manufacturing, and assembly of our products worldwide for fiscal year 2020'. The list contains supplier name and qualified location. It is not clear, however, if this list also considers indirect suppliers, or only direct. [Top 100 Supplier List 2020, 2021: nxp.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)	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: Does not use child labour: The Company indicates that 'We will always adhere to the legal minimum age requirements in all countries in which we operate with commitments to the principles of the United Nations Convention on the Rights of the Child and the UNICEF Children's Rights and Business Principles. We will never employ children under the age of 16, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is stricter'. [CSR Report 2018, 2019: nxp.com] • Met: Age verification of workers recruited: The Company indicates that 'To make sure all our employees are age-qualified, NXP has a strong age-verification process during the recruitment and selection process. This includes at a minimum, inspection and verification of at least two forms of identification and visual identification'. [CSR Report 2018, 2019: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remediation if children identified: The Company indicates that 'If an underage worker were found, NXP would immediately implement a remediation program which includes protecting the young worker from reprisal and provide the completion of the young worker's compulsory education'. [CSR Report 2018, 2019: nxp.com]
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 Supplier Code of Conduct indicates: 'Child labour is not allowed in any stage of manufacturing. (...) Supplier shall implement an appropriate mechanism to verify the age of workers. (...) If child labour is identified, assistance/remediation is provided'. [Supplier Code of Conduct, 2021: nxp.com] • Not Met: How working with suppliers on child labour: The Labor & Human Rights Commitment indicates: 'Child labor is prohibited. The term "child" refers to any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is stricter. Subject to compliance with local laws and regulations, the use of legitimate workplace apprenticeship or internship programs which employ young workers between the ages of 16 and 18, and comply with all laws and regulations, is supported. However, young workers must not perform work that may be likely to jeopardize their health or safety, including for example night-shift, overtime, or hazardous work'. However, it is not clear how it proactively works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [Labor and Human Rights Commitment, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assesment of number affected by child labour in supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Analysis of trends in progress made: The Company provides, in its 2018 slavery statement (published in 2019), a chart with findings in relation to child labour for the last six reporting years. The 2021 Sustainability Report indicates it found 'No child labor. All young workers are in accordance with relevant laws and regulations' among its 2021 results (this last report doesn't seem to show trends). [MSA 2018, 2019: nxp.com] & [2021 Sustainability Report, 2022: nxp.com]
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	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: Job seekers and workers do not pay recruitment fee: It indicates: 'NXP has had a no-fees policy for all workers, including temporary, migrant, intern, contract, direct employee, and all other types of worker, for internal operations since 2013, and for suppliers since 2016. This policy ensures workers are not required to pay fees, deposits, or debt repayments for their recruitment or employment'. [Labor and Human Rights Commitment, 2021: nxp.com] Met: Commits to fully reimbursing if they have paid: It indicates: 'If NXP discovers that any fees have been paid by workers, either in our company or our supply chain, these fees must be reimbursed to the worker by their direct employer'. [Labor and Human Rights Commitment, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: How practices are implemented and monitored for agencies, labour brokers or recruiters: In addition, in its CSR report, the Company indicates: 'To address concerns at all stages of the recruitment process, NXP started a comprehensive training and audit program of all labor agents and sub-agents in the sending and receiving countries to ensure compliance with the NXP standards and to mitigate the risk of modern day slavery. [...] In addition to training our suppliers, we also educate students that are potential employees of NXP within the villages of the sending country to educate them on their human rights and what it is like to be a foreign migrant worker'. [CSR Report 2018, 2019: nxp.com]
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (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: Debt and fees rules in codes or contracts: The Supplier Code of Conduct indicates: 'Workers shall not be required to pay employers' agents, or sub-agents recruitment fees or other related fees for their employment. Such fees and expenses include, but are not limited to expenses associated with recruitment, processing, or placement of workers. If any such fees are found to have been paid by workers, Supplier shall be responsible that such fees shall be repaid to the worker'. [Supplier Code of Conduct, 2021: nxp.com] Not Met: How working with suppliers on debt & fees: The Labor & Human Rights Commitment indicates: 'NXP has had a no-fees policy for all workers, including temporary, migrant, intern, contract, direct employee, and all other types of worker, for internal operations since 2013, and for suppliers since 2016. This policy ensures workers are not required to pay fees, deposits, or debt repayments for their recruitment or employment. [...] If NXP discovers that any fees have been paid by workers, either in our company or our supply chain, these fees must be reimbursed to the worker by their direct employer'. However, it is not clear how it proactively works with suppliers to eliminate recruitment fees and related costs, including by ensuring full reimbursement to workers where relevant. [Labor and Human Rights Commitment, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment of the number affected by payment of recruitment fees: The 2021 Sustainability Report indicates that, according it is 2021 assessments, 'NXP hired 16 migrant workers from Nepal at our site in Malaysia. These workers were recruited from an employer whose factory was closed due to the pandemic. The workers paid recruitment-related fees to the original employer. After attempts to contact the former employer to repay the fees failed, NXP reimbursed the workers directly'. However, those are cases that happened withing its own operations. This indicator focuses on the supply chain. It is not clear the number affected by (scope of) the payment of recruitment fees or related costs in its supply chain. [2021 Sustainability Report, 2022: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Analysis of trends in progress made: The Company discloses a chart showing non-compliances for the last six reporting years, reporting in its MSA 2019: 'Freely Chosen Employment, Emergency Preparedness and Sanitation, Wages and Benefits represents the highest non-conformances in the 2019 Top Supplier Non-Conformances chart.' In addition, in its MSA 2018, it indicates: 'However, there has been a decrease in number of finding over the years and 65% of the suppliers audited in 2018 are recruiting workers ethically.[...] we analyzed a few specific topics (No Fees Policy, Working Hours , Restriction of Withholding personal documentation) within the Freely Chosen Employment clause to determine if there has been progress made since 2017. [...] All suppliers that were identified of having a No Fees priority violations have since implemented a no fees policy. Four of our suppliers have repaid the fees to the workers and have successfully closed out this finding. The remaining three suppliers have implemented the no fees policy and are in the process of repaying the fees to the workers.' [MSA 2018, 2019: nxp.com] & [MSA 2019, 06/2020: nxp.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 Labor and Human Rights Commitment indicates: 'Workers must be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure are prohibited. (...) Wages must be paid in a timely manner in which there is no delay in accordance with local legal requirements and contractual agreement. No worker is paid less than the legal minimum wage with equal pay for equal work. (...) All overtime hours must be paid at the appropriate overtime rate applied to the base wage as required by applicable laws and regulations or employment contract, whichever is higher'. Additionally, 'For each pay period, employees must be provided with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed and in which deductions for room and board have consent of the worker. Workers must not be forced or required to participate in a forced savings or loan scheme where repayment terms are indicative of debt bondage or forced labor. Deductions required by applicable law and regulations, such as taxes and social insurance, must be understood by the worker'. However, no evidence found where it states that pays workers in full. [Labor and Human Rights Commitment, 2021: nxp.com] • Met: Payslips show any legitimate deductions: It indicates: 'For each pay period, employees must be provided with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed and in which deductions for room and board have consent of the worker'. [Labor and Human Rights Commitment, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How these practices are monitored for agencies, labour brokers or recruiters: In addition, in its CSR report, the Company indicates: 'To address concerns at all stages of the recruitment process, NXP started a comprehensive training and audit program of all labor agents and sub-agents in the sending and receiving countries to ensure compliance with the NXP standards and to mitigate the risk of modern day slavery. [...] In addition to training our suppliers, we also educate students that are potential employees of NXP within the villages of the sending country to educate them on their human rights and what it is like to be a foreign migrant worker.' [CSR Report 2018, 2019: nxp.com]
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 Supplier Code of Conduct 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. (...) Supplier shall pay workers in a timely manner'. Similarly, the Labor & Human Rights Commitment indicates: 'for each pay period, employees must be provided with an understandable wage statement that includes sufficient information to verify accurate compensation for work performed and in which deductions for room and board have consent of the worker. Workers must not be forced or required to participate in a forced savings or loan scheme where repayment terms are indicative of debt bondage or forced labor. Deductions required by applicable law and regulations, such as taxes and social insurance, must be understood by the worker'. The 2021 Sustainability Report also notes 'Wages are paid within 14 days after the end of the working period'. [Supplier Code of Conduct, 2021: nxp.com] & [Labor and Human Rights Commitment, 2021: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with supply chain to pay workers regularly and on time Score 2 • Not Met: Assessment of the number affected by failure to pay directly: The 2021 Sustainability Report indicates: '83% of suppliers audited had discrepancies in wages and benefits. All suppliers have closed this nonconformance'. However, it is not clear the number affected by (scope of) failure to pay in full and on time in its supply chain. [2021 Sustainability Report, 2022: nxp.com] • Not Met: Provides analysis of trends demonstrating progress
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	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: Does not retain documents or restrict movement: The Company indicates: 'NXP, suppliers, and labor agents may not withhold personal documents, travel/residency permits, or government-issued documents unless required by law. Personal, lockable storage facilities must be provided for the safekeeping of such documents'. [Labor and Human Rights Commitment, 2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How these practices are monitored for agencies, labour brokers or recruiters: It indicates: 'We randomly interview foreign migrant workers prior to leaving their home country to ensure that they are being recruited ethically. The recruitment process must meet NXP's stringent requirements, meaning workers must be informed of grievance mechanisms and the grievance process must reflect NXP's zero-tolerance policy against retaliation. Upon arrival at the NXP facility, all workers (foreign migrant workers and employees) go through an on-boarding process that includes training on the company's policies and programs for labor and human rights and covers topics such as workers' rights and responsibilities, contract terms, how to report illegal practices and abuse, the no-fee policy, appropriate working conditions, how to read and understand details of a pay slip, working hours, control of government-issued documents, housing conditions, and protections for workers who lodge grievances or report violations'. [2020 MSA, 07/2021: nxp.com]
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"> • Met: Free movement rules in codes or contracts: The Supplier Code of Conduct indicates: 'All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without any penalty if reasonable notice is given as per worker's employment contract. Supplier, agents and sub-agents may not hold or otherwise destroy, conceal, or confiscate employees' identity or immigration documents, such as government - issued identification, passports, or work permits. Supplier can only hold documentation if such holdings are required by law'. Additionally, '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'. [Supplier Code of Conduct, 2021: nxp.com] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Met: Provides analysis of trends demonstrating progress: The Company discloses a chart showing non-compliances for the last six reporting years: 'Freely Chosen Employment, Emergency Preparedness and Sanitation, Wages and Benefits represents the highest non-conformances in the 2019 Top Supplier Non-Conformances chart.' In addition, it indicates in its MSA 2018 (published in 2019): 'However, there has been a decrease in number of finding over the years and 65% of the suppliers audited in 2018 are recruiting workers ethically.[...] we analyzed a few specific topics (No Fees Policy, Working Hours , Restriction of Withholding personal documentation) within the Freely Chosen Employment clause to determine if there has been progress made since 2017. [...] Withholding of personal or governmental identification documents is a priority violation. In 2018, our results show a significant decrease in the percent of suppliers withholding personal documentation. All identified suppliers have implemented policies and have returned the personal documents.' [MSA 2018, 2019: nxp.com] & [MSA 2019, 06/2020: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Commits not to interfere with union rights / Steps to avoid intimidation or retaliation: The Labor and Human Rights Commitment indicates: 'The rights of workers to associate freely, join or not join labor unions, seek representation, or join workers' councils in accordance with local laws must be respected. Workers or their representatives must be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, discrimination, intimidation, or harassment. Within the framework of applicable laws, regulations, and prevailing labor relations and employment practices, workers have the right to be represented by labor unions or other worker organizations, and to engage in collective bargaining'. However, no further details of measures it puts in place to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the right to form and join a trade union of their choice. Moreover, it is not clear whether the Company supports these rights in case these are restricted under local law, for instance, supporting alternative measures or equivalent worker bodies. The Company provides, in its feedback to CHRB, additional information on the right to Freedom of Association and Collective Bargaining found in its Supplier Code of Conduct: 'In conformance with local law, Supplier 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 shall be able to openly communicate and share ideas, concerns, and grievances with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment'. No evidence was found, however, on practical measures put in place in its own operations to prohibit any form of harassment or retaliation against workers seeking to exercise these rights. [Labor and Human Rights Commitment, 2021: nxp.com] & [Supplier Code of Conduct, 2021: nxp.com] • Not Met: Discloses % total direct operations covered by collective CB agreements: The 2021 Sustainability Report indicates: 'NXP was one of only seven companies to receive the 2021 Industrial Relations Excellence Award in Taiwan, recognizing our collaborative and healthy working relationship with the union representing our employees'. However, it is not clear the proportion of its total direct operations workforce covered by collective bargaining agreements. [2021 Sustainability Report, 2022: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 Supplier Code of Conduct indicates: 'In conformance with local law, Supplier 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 shall be able to openly communicate and share ideas, concerns, and grievances with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment. Supplier shall respect – within the framework of laws, regulations, and prevailing labour relations and employment practices – the right of its employees to be represented by labour unions and other employee organizations. Supplier will engage in negotiations, either on its own behalf or through employers' associations, with a view to reaching agreement on employment conditions'. However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. In cases where the Company refers to local law, evidence is needed of equivalent worker bodies, parallel mechanisms, etc. In its feedback to CHRB, the Company quoted the Labor & Human Rights Commitment which states: 'The rights of workers to associate freely, join or not join labor unions, seek representation, or join workers' councils in accordance with local laws must be respected. Workers or their representatives must be able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, discrimination, intimidation, or harassment. Within the framework of applicable laws, regulations, and prevailing labor relations and employment practices, workers have the right to be represented by labor unions or other worker organizations, and to engage in collective bargaining'. On the one hand, the rights to Freedom of association and collective bargaining are also limited to the law in the Labor & Human Rights Commitment and on the other hand, it is not clear that the Commitment would be part of its contractual agreements as required by the indicator. Part of the indicator focuses on the Company being expected to require suppliers respect for the right of all workers to form and join a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law), hence that the local law restriction does not seem to accommodate for the rights of all workers. [Supplier Code of Conduct, 2021: nxp.com] & [Labor and Human Rights Commitment, 2021: nxp.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress: The previous explanation read: The Company discloses a chart with number of non-compliances regarding 'freedom of association' for the last six reporting years. No new relevant evidence found in latest revision. [MSA 2018, 2019: nxp.com]
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	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 process to identify H&S risks and impacts: It indicates: 'Corporate EHS and the EHS Standards Committee establish risk-mitigation strategies and also develop and deploy standards, programs, and procedures to reduce risks to health and safety worldwide. In addition, each manufacturing site's EHS Team collaborates closely with the onsite manufacturing teams to review safety metrics within our factories. Every incident is closely scrutinized, with a root-cause analysis. The corrective actions taken are communicated to our global sites for continuous improvement. Each Safety Committee/Worker Council includes designated employees who are encouraged to consult and participate in the EHS Management System process. These committees perform periodic walkthroughs to evaluate safety and potential areas of risk to continuously improve and demonstrate our commitment to safety. The committees meet regularly to assist with hazard identification and risk assessments, investigate incidents, implement EHS policies, identify opportunities for continual improvement of the EHS Management Systems, and take an active role in safety awareness and training'. [2020 Sustainability Report, 03/2021: nxp.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The injury rate in 2020 was 0.08. [2020 Sustainability Report, 03/2021: nxp.com] • Met: Discloses Fatalities for last reporting period: There were zero fatalities in 2020. [2020 Sustainability Report, 03/2021: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Occupational disease rate for last reporting period: The 'Number of Occupational Illnesses and Injuries' for 2020 seems to be 23, as it is in a chart and it does not disclose the exact number. [2020 Sustainability Report, 03/2021: nxp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Set targets for H&S performance: The Company's 2020 goal is to 'achieve zero workplace injuries and illnesses'. [2020 Sustainability Report, 03/2021: nxp.com] • Met: Met targets or explain why not or what is doing to improve management systems: It indicates: 'Our 2020 injury rate of 0.08 is our lowest ever recorded. It is also well below the semiconductor-industry averages published by the European Semiconductor Industry Association (ESIA) and the Semiconductor Industry Association (SIA), which ranges from 0.5 to 0.9'. The Company also conducts Risk Assessments, Self-Assessments, Audits and training. It further explains in its 2020 Sustainability Report each of those actions. [2020 Sustainability Report, 03/2021: nxp.com]
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 Supplier Code of Conduct indicates: 'NXP recognizes 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, the consistency of production, and worker retention and morale. NXP also recognizes that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace'. It then lists suppliers requirement for health and safety: Occupational Safety, Emergency Preparedness, Occupational Injury and Illness, Industrial Hygiene, Physically Demanding Work, Machine Safeguarding, Sanitation, Food, and Housing, Health and Safety Communication and Worker Health and Safety Committees. [Supplier Code of Conduct, 2021: nxp.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period: The Company indicates, in its feedback to CHRB, that its 2021 Sustainability Report discloses health and safety figures. However, it is not clear the data makes reference to its supply chain, as it indicates 'own workers and contractors' and 'our manufacturing sites'. The 2021 Sustainability Report discloses numbers of Nonconformances by Category and it includes health and safety. However, no quantitative information on health and safety for workers at suppliers related to injury rates or lost days (or near miss frequency rate) for the last reporting period found. [2021 Sustainability Report, 2022: nxp.com] • Not Met: Fatalities disclosures for lasting reporting period: The Company indicates, in its feedback to CHRB, that its 2021 Sustainability Report discloses health and safety figures. However, it is not clear the data makes reference to its supply chain, as it indicates 'own workers and contractors' and 'our manufacturing sites'. The 2021 Sustainability Report discloses numbers of Nonconformances by Category and it includes health and safety. However, no figures for fatalities for last reporting period found. [2021 Sustainability Report, 2022: nxp.com] • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S: Although the Company indicates in its 2021 that 'VAP audits evaluate [...] health and safety [...]', no description found of how it works with its supply chain to improve their practices in relation to health and safety. [2021 Sustainability Report, 2022: nxp.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 Supplier Code of Conduct indicates: 'There is to be no harsh or inhumane treatment of workers, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers'. However, although the Company indicates that it has supplier provisions to prohibit harassment, no description found of the process it has in place, within its own operations, to prohibit and address harassment, intimidation and violence specifically against women. [Supplier Code of Conduct, 2021: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Working conditions take account of gender: The Labor & Human Rights Commitment indicates: 'Discrimination based on [...] gender, [...] pregnancy [...] in hiring and employment practices, such as wages, promotions, rewards, and access to training, is prohibited'. The Auditable Standards on Social Responsibility indicates: 'Workers who are identified as pregnant and nursing mothers do not perform work deemed, by a qualified health professional, to be hazardous to pregnant women and nursing mothers. In such case, Auditee accommodates or transfers existing pregnant workers and nursing mothers to non-hazardous positions, without diminution of salary and benefits, during the pregnancy or nursing period'. It also notes: 'This Standard applies to all NXP Semiconductors facilities, locations, and organizations. It applies equally to all NXP suppliers, contractors, and external manufacturers'. [Labor and Human Rights Commitment, 2021: nxp.com] & [Auditable Standards on Social Responsibility, 26/06/2018: nxp.com] • Not Met: Measures and steps to address gender pay gap at all levels of employment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
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: In its Supplier Code of Conduct the Company states under 'Occupational Safety': 'Reasonable steps must also be taken to remove pregnant women/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, as well as include reasonable accommodations for nursing mothers. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns'. The Company also makes reference to its Labor & Human Rights Commitment in its feedback to CHRB. It indicates 'No worker is paid less than the legal minimum wage with equal pay for equal work. If the country does not have a legally set minimum wage, the industry prevailing wage must apply as the standard'. However, it is not clear the Labor & Human Rights Commitment is be part of its contractual agreements with suppliers as required by the indicator (alternatively to be a requirement of the supplier code of conduct). It also provides additional health related comments for this indicator, whoever they seem to apply to their team members. This indicator focuses on supply chain provisions. No evidence was found that the Company requires the supplier to pay equal pay for equal work, to have measures to ensure equal opportunities throughout all levels of employment in its contractual arrangements with suppliers or supplier code of conduct. [Supplier Code of Conduct, 2021: nxp.com] & [Labor and Human Rights Commitment, 2021: nxp.com] • Not Met: How working with suppliers on women's rights <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
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"> • Met: Respects max hours, min breaks and rest periods in its own operations: The Company indicates: 'A work week must not be more than 60 hours per week, or the maximum set by local law, whichever is stricter, except in emergency or unusual situations, such as natural disasters or national holidays in which mass workers travel to their hometowns. (...) Workers are allowed legally mandated time off, including breaks, holidays, vacation days and other types of time off, such as maternity leave. Workers shall have at least one scheduled day off every seven days and not work more than six consecutive days. All overtime work must be voluntary'. It also states in its NXP Auditable Standards on Social Responsibility that 'Regular workweek shall not exceed 48 hours.' [Labor and Human Rights Commitment, 2021: nxp.com] & [Auditable Standards on Social Responsibility, 26/06/2018: nxp.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: How it implements and checks this in its operations: The NXP Auditable Standards on Social Responsibility describes how this is audited. It discloses the minimum requirements and the different rating according to levels of compliance. [Auditable Standards on Social Responsibility, 26/06/2018: nxp.com]
D.4.9.b	Working hours (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not Met: Working hours in codes or contracts: The Supplier Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a work week shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall have at least one scheduled day off every seven days and not work more than six consecutive days. All overtime must be voluntary'. However, it is not clear it requires suppliers to respect applicable international standards concerning maximum hours and minimum breaks and rest periods, as it indicates it expects suppliers to observe local law (requirement should include a regular working week of a maximum of 48 hours). Requirements have to be reflected in its contractual arrangements with suppliers or supplier code of conduct. The 2021 Sustainability Report indicates: 'Regular work week cannot exceed 48 hours and the daily scheduled work cannot exceed 12 hours a day'. However, it is not clear this is part of its contractual arrangements with suppliers as required by the indicator. [Supplier Code of Conduct, 2021: nxp.com] & [2021 Sustainability Report, 2022: nxp.com] Not Met: How working with suppliers on working hours <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Assessment of number affected by excessive working hours Met: Provide analysis of trends in progress made: The Company discloses a chart showing the number of non-compliances regarding working hours for the last six reporting years. Number of non-compliances has decreased during last year. The Company indicates: 'Working hours continues to be a challenge for NXP suppliers as it is difficult to change the business model to achieve a 60-hour limit. All suppliers are working on limiting the working hours but only a few of the suppliers have successfully closed out these findings. While working hours is a priority finding, and must be closed within 90 days, there may be some instances where the closure timeline is extended. Some examples include capital expenditure, changing and adjusting manpower and operational/manufacturing resources. Any extended priority finding for working hours is reviewed and approved by NXP and is regularly followed up until finding is approved and closed.' [MSA 2018, 2019: nxp.com]
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"> Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Supplier Code of Conduct indicates: 'Supplier shall adopt a policy and exercise due diligence on the source and chain of custody of for 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'. 'Our suppliers are bound, contractually or through their conformance signature to the Supplier Code of Conduct and commit to our standards which details our expectations for our business partners to uphold labor and human rights standards'. [Supplier Code of Conduct, 2021: nxp.com] Not Met: Works with smelters/refiners and suppliers to build capacity <p>Score 2</p> <ul style="list-style-type: none"> Met: Contractual requirement to disclosure smelter/refiner information: The Supplier Code of Conduct states that 'Supplier shall exercise due diligence on the source and chain of custody of these minerals and shall make their due diligence measures available to NXP upon NXP's request'. 'Our suppliers are bound, contractually or through their conformance signature to the Supplier Code of Conduct and commit to our standards which details our expectations for our business partners to uphold labor and human rights standards'. [Supplier Code of Conduct, 2021: nxp.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 surveys its suppliers with the conflict minerals reporting template to identify smelters and refiners, and assesses whether they are compliant with the RMI RMAP. See descriptions below. However, no further evidence found, including which are the risks it faces. [Conflict Minerals Report 2019, 29/05/2020: nxp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identification of smelter/refiners and OECD Guidance: The Company identified 97 suppliers who provided materials likely to incorporate Covered Minerals. It surveyed all and received valid responses. 'Based on the information provided by our suppliers and information otherwise obtained through the due diligence process, NXP has reasonably determined that the facilities that may have been used to process NXP's Covered Minerals in 2019 include the smelters and refiners (SORs) listed in Annex I.' Then the Company states that it used information received through the RMI RMAP or equivalent independent third-party audit programs, and information otherwise obtained through our research to identify countries of origin. 'We identified 251 SORs for the Covered Minerals in our supply chain. These 251 SORs were compliant with a third-party audit program (Conformant). Among these 251 SORs, 24 were reported as sourcing Covered Minerals from the DRC Region; all 24 were compliant with the RMI RMAP assessment protocols.' [Conflict Minerals Report 2019, 29/05/2020: nxp.com] Score 2 • Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company publicly discloses a list of 251 smelters or refiners that works with that have been identified based on the information provided by suppliers and information otherwise obtained through the due diligence process and the 3rd party validation: 'NXP identified zero high-risk SORs (either not validated or in the process of becoming compliant with a third-party audit program). We identified 69 medium-risk SORs (validated with unknown sourcing region) and 182 SORs were considered low-risk (validated with sourcing location confirmed).' These smelters are listed in the report. [Conflict Minerals Report 2019, 29/05/2020: nxp.com] • Not Met: Risk identification and disclosure covers all minerals: The Company indicates that the covered minerals in the risk identification processes are: '[...]columbite-tantalite (coltan), cassiterite, wolframite, tantalum, tin, tungsten and gold, [...]' and therefore this does not cover all minerals from conflict affected and high-risk areas. [2020 FORM SD, 2021: nxp.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: The Company indicates that it has escalation procedures for suppliers who provide products that incorporate minerals from smelters or refiners that do not comply with third-party audit program or have not provided details on the sourcing of covered minerals in their supply chain. 'Under these procedures, our procurement organization will develop a list of corrective actions including a timeline for compliance and a decision to continue or temporarily suspend trade with the supplier during the corrective action period'. Other measures that it intends to 'continue taking the following steps' include: 'Update the list of products and Covered Minerals Suppliers to be included in NXP's due diligence process'; 'Re-engage each Covered Minerals Supplier to obtain current and accurate information about the supplier's supply chain of Covered Minerals; Execute NXP's escalation procedure with each Covered Minerals Supplier that (i) is non-responsive to requests for information or (ii) does not have systems in place to ensure sourcing of materials that comply with a third-party audit program; Assist suppliers in due diligence activities or education; Participate in industry initiatives encouraging "conflict-free" supply chains and identifying "conflict-free" smelters and refiners, including initiatives to add cobalt and other minerals to the scope; and Review due diligence measures to evaluate whether appropriate to (i) incorporate recent responsible sourcing developments and insights and (ii) include additional minerals and countries of origin'. It also plans to 'continue to assist suppliers in due diligence activities or education', participating in industry activities encouraging conflict-free supply chains and identifying conflict-free smelters. [Conflict Minerals Report 2019, 29/05/2020: nxp.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy: It indicates: 'In 2016, NXP joined the European Partnership for Responsible Minerals (EPRM) as a strategic partner. The EPRM is a multi-stakeholder partnership in which governments, NGOs, and private sector work together to create better social and economic conditions for mine workers and local mining communities, by increasing the number of mines that adopt responsible mining practices in Conflict and High-Risk Areas'. However no further details found on consulting with suppliers and affected stakeholders to agree on strategy for risk management.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			[2020 FORM SD, 2021: nxp.com] • Not Met: Risk management and response processes cover all minerals

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Forced labour; working hours; right to security of persons • Headline: NXP & other electronics companies' supplier accused of forced labour of migrant workers in Malaysia • Story: On June 28, 2019, Danwatch, a Danish investigative media and research centre, published an investigation report detailing alleged fundamental human and labour rights violations against Nepalese and Indonesian migrant employees working at Malaysian factories producing components for major electronics companies, including NXP. The report is based on interviews with workers employed by labour agency JS Global, which supplies workers to manufacturing companies, including German industrial group Possehl, which supplies products to Infineon, ST Microelectronics, NXP, Texas Instruments, Vishay and Diodes Inc. Employees reported several allegations constituting some form of forced labour <ul style="list-style-type: none"> - excessive recruitment fees (exceeding amounts required by Malaysian government-approved agencies for the legalisation of workers' status) - arbitrary reductions of wages - violent threats when employees complained about wage reduction or non-payment - passport confiscation - excessive overtime work <p>[Danwatch, 28/06/2019, "Forced labour behind your screen": danwatch.dk]</p>
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: The company responded to the Danwatch report by emphasising that it is not a direct customer of Possehl. However, "NXP – once becoming aware of alleged labor issues at this particular sub-tier supplier – has been working closely together with Possehl, industry associations and other ICT companies to remedy the position of the affected workers with the priority on the repayment of fees and back-wages and making sure that workers will be treated with respect, dignity and be able to be repatriated to their home country if requested or required. While we are working on this matter with other parties and to safeguard the rights of the involved workers, we will not comment further beyond this statement." [Business and Human Rights Resource Centre, 07/2019, "NXP statement related to the article "Forced labour behind your screen" by Danwatch, 28 June 2019": media.business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The response mentions "labor issues" in general and refers to "repayment of fees and back-wages" as well as "making sure workers will be treated with respect, dignity and be able to be repatriated to their home country if requested". It does not, however, directly address the alleged withholding of documents that is the factor preventing many workers from returning to their home countries or the issue of undocumented workers. <p>The company provides information on their work on labor brokers in Malaysia on its document called "2021 Slavery and Human Trafficking Statement", however, this information does not expressly refer to the specific allegation.</p> <p>In addition, the company provided feedback for this indicator mentioning its document "NXP CSR". Taking this into consideration, NXP is not addressing the allegation and the company is just denying it, as it state: "NXP's Labor and Human Rights commitment, Supplier Code of Conduct and Auditable Standards on Social Responsibility expressly prohibit the allegations this report highlights including fees, excessive overtime and retention of worker documents". There is no further information addressing in detail the allegation. [Business and Human Rights Resource Centre, 07/2019: media.business-humanrights.org] [2021 Slavery and Human Trafficking Statement, 2021: nxp.com]</p>
E(1).2	The company has investigated and taken	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: The company states it "has been working closely together with Possehl, industry associations and other ICT companies to remedy the position of the affected workers with the priority on the repayment of

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>fees and back-wages and making sure that workers will be treated with respect, dignity and be able to be repatriated to their home country if requested or required." No evidence found of the company working directly with the affected workers or their representatives. [Business and Human Rights Resource Centre, 07/2019: media.business-humanrights.org]</p> <ul style="list-style-type: none"> • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: On its website the company claims to have implemented policies to prevent abuse by labour brokers in Malaysia. However, the described actions were taken before the publication of the Danwatch report and the specific allegations. There is no evidence that the company undertook further actions following the allegations. [Labor brokers, migrant workers, and passport retention in Malaysia, N/A: nxp.com] • 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)	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: Provided remedy: In its CSR report for FY2019 the company outlines cases of workers paying recruitment fees for employment in Malaysia in its supply chain. According to the report, "all but one of those suppliers have repaid the fees to their workers. The remaining supplier is in the process of repayment." This statement is in accordance with a statement by Possehl, claiming that outstanding wages had been paid to the affected workers. [Possehl, 01/07/2019, "Clarification/reply to the article published by Spiegel+ on 28 June 2019": possehl.de] [CSR Report 2019, 2019: nxp.com] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: The claims of remedy by both NXP Semiconductors and Possehl refer only to outstanding wages and recruitment fees, they do not, however, include the return of documents. According to Possehl payments were made before the publication of the news article that referenced the allegations. The subsequent publication of the article and the Electronics Watch report demonstrate that the remedy provided by Possehl is not considered satisfactory. [Possehl, 01/07/2019: possehl.de] [CSR Report 2019, 2019: nxp.com] • Met: Remedy delivered: There is no indication that the payments have not been made. • 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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