

Broadcom Inc.

TICKER

NasdaqGS:AVGO

MARKET CAPITALIZATION

US\$102 billion

HEADQUARTERS

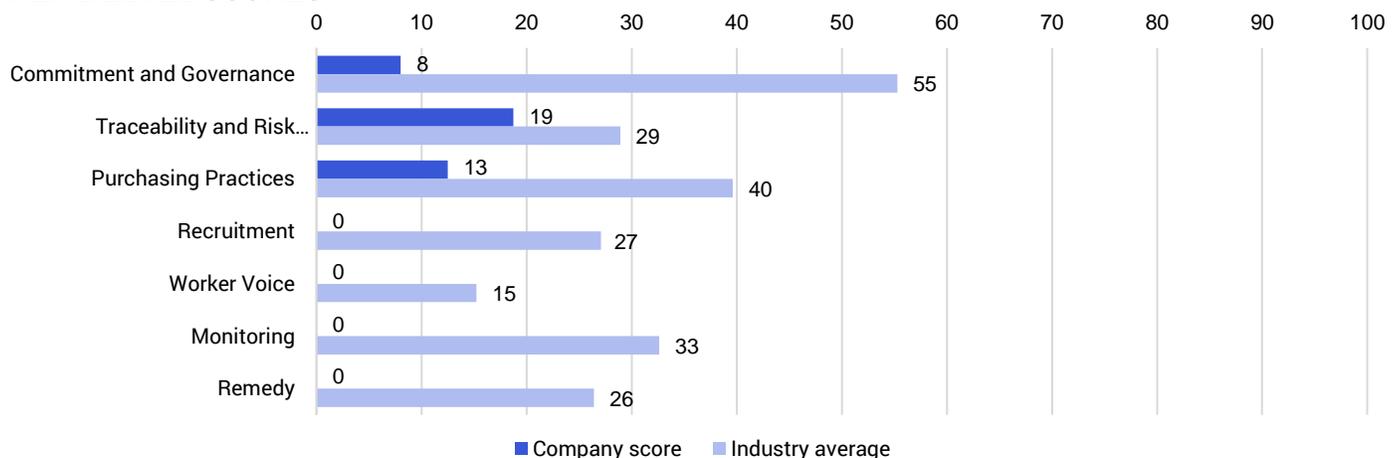
United States

COMPLIANCE
UK Modern Slavery Act: [None available](#)
California Transparency in Supply Chains Act: [Not applicable](#)
COMMITMENTS
[None](#)
COMPANY'S OVERALL RANKING
37 out of 40

(2016: 13 out of 20)

COMPANY'S OVERALL SCORE
6 out of 100
SUMMARY

Broadcom Inc. (Broadcom) is a semiconductor supplier to companies such as Apple, HP and Hewlett Packard Enterprise. It ranks 37th out of 40 companies. The company discloses less information on its forced labor policies and practices than its peers and is the lowest scoring US company. Since 2016, its score has decreased substantially, from 33 to 6. This is due in large part to the decrease in information made available by the company on its efforts to address forced labor and human trafficking. For example, the company no longer discloses a modern slavery statement, a Human Rights Policy nor a Sustainability Report. It is also no longer a member of the Responsible Business Alliance. The company may consider reinstating its commitment to address forced labor, and improving its performance and disclosure on the themes of purchasing practices and recruitment.

THEME LEVEL SCORES


LEADING PRACTICES

None

NOTABLE FINDINGS

Supplier Code of Conduct: Broadcom discloses a Supplier Environmental and Social Responsibility Code of Conduct that states that its suppliers shall comply with all applicable laws, rules and regulations, and explicitly mentions the ILO Conventions covering the four fundamental freedoms. The company states that it requires every contractor to certify each fiscal year that they have reviewed, understand and agree to abide by its policies and guidelines.

Traceability: The company discloses a list of the names and locations of smelters and refiners of tantalum, tin, tungsten and gold ('3TG') in its supply chain. The company details how it requires suppliers to trace the origins of 3TG in its supply chains and provide updates through a Conflict Mineral Reporting Template.

Cascading standards through the Supply Chain: Broadcom requires "suppliers to encourage their suppliers to adhere to similar social responsibility standards".

OPPORTUNITIES FOR IMPROVEMENT

Commitment and Governance: The company may consider reinstating a public commitment to address human trafficking and forced labor. It is also encouraged to establish responsibilities and accountability for implementing its supplier code of conduct and to train internal staff and suppliers on this standard. In addition, the company may consider establishing training programs to ensure that relevant decision-makers within the company and its supply chains are aware of the risks related to human trafficking and forced labor and effectively implement the company's policies and standards.

Recruitment: To address the risk of exploitation of migrant workers through recruitment agencies in its supply chains, the company may consider requiring recruitment agencies used by its suppliers to uphold workers' rights and ensuring that workers in its supply chains are not charged fees during any recruitment-related process. The company is also encouraged to ensure recruitment agencies used by its suppliers are audited, and to work with suppliers to guarantee migrant workers' rights are respected (e.g., to ensure workers' passports or other personal documents are not retained).

Monitoring: The company may consider adopting and disclosing a supplier monitoring process to verify that its suppliers are compliant with its supply chain standards. Implementing specific practices, such as interviewing workers and conducting unannounced audits of suppliers may help the company detect forced labor risks in its supply chains. Disclosing information on the results of its supplier audits, such as the percentage of suppliers audited annually or a summary of findings, assures stakeholders that the company has strong monitoring processes in place.

COMPANY PROVIDED ADDITIONAL DISCLOSURE

[No](#)