

# Micron Technology Inc.

**TICKER**

NasdaqGS:MU

**MARKET CAPITALIZATION**

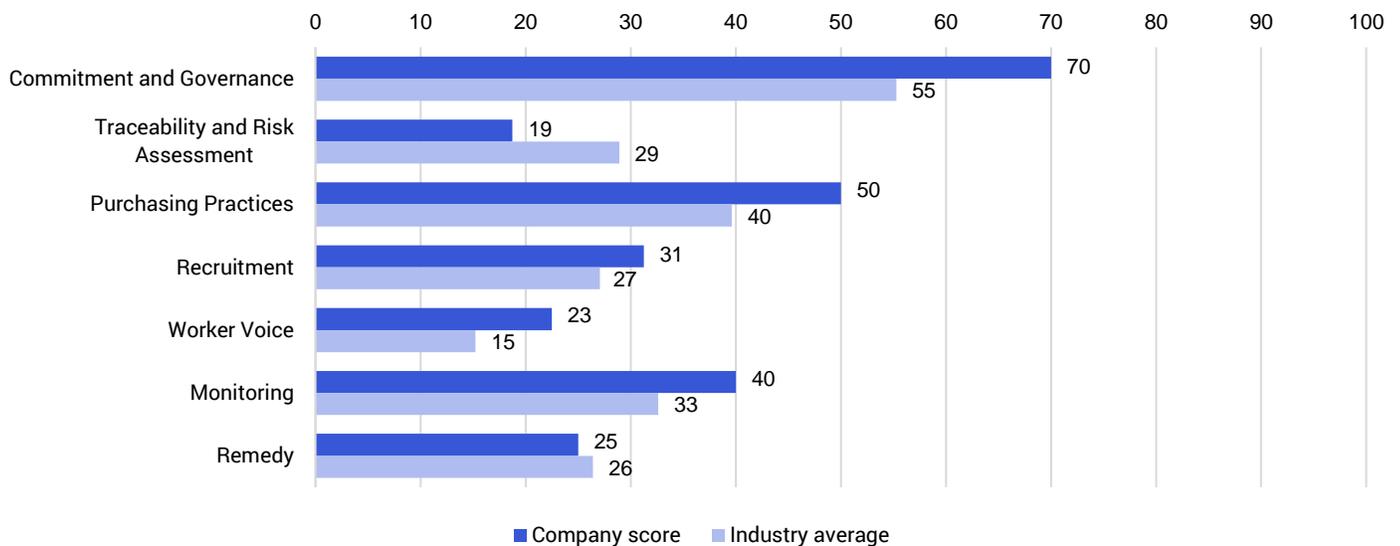
US\$51 billion

**HEADQUARTERS**

United States

**COMPLIANCE**
UK Modern Slavery Act: [Disclosure available, but not compliant](#)
California Transparency in Supply Chains Act: [Disclosure available, but not compliant](#)
**COMMITMENTS**
[None](#)
**OVERALL RANKING**
**15 out of 40**
**OVERALL SCORE**
**37 out of 100**
**SUMMARY**

Micron Technology Inc. (Micron), a semiconductor company supplying to companies such as Apple, HP, and Intel, ranks 15<sup>th</sup> out of 40 companies. It discloses more information on its forced labor policies and practices than its peers on all themes except traceability and risk assessment and remedy. The company has an opportunity to improve its performance and disclosure on the themes of traceability and risk assessment, recruitment, and worker voice.

**THEME LEVEL SCORES**


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## LEADING PRACTICES

None

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## NOTABLE FINDINGS

**Commitment and Governance:** Micron communicates its supplier code of conduct (which covers forced labor) to its suppliers through several communications on the company's website, including an open letter to suppliers and a quality requirements document. Micron is a full member of the Responsible Business Alliance (RBA), and as such must communicate the RBA code of conduct to its entire supply chain. Micron describes that it has a sustainability council comprised of senior leaders that develops the company's sustainability strategy and is overseen by the company's board of directors. A sustainability program manager coordinates work across offices and functions. Oversight is provided by a director and a vice-president of sustainability. The company discloses that it provides managers and employees with direct responsibility for supply chain management with "information regarding Micron's requirements, including EICC [now RBA] compliance".

**Purchasing Practices:** Micron's 'Terms and Conditions of Purchase' state that suppliers must agree to comply with its Supplier Quality Requirements Document which includes provisions on forced labor. The terms and conditions state that any violation of RBA's Code of Conduct will "be a material breach of this Order". Micron requires suppliers to cascade standards throughout its supply chains.

**Monitoring:** Micron discloses that it uses RBA's Validated Audit Process (VAP) for supplier audits. The VAP includes a review of relevant documents, such as working hour records and payroll, formal and informal interviews with workers which are conducted privately, and visits to production facilities and related worker housing.

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## OPPORTUNITIES FOR IMPROVEMENT

**Traceability and Risk Assessment:** The company is encouraged to assess and disclose forced labor and human trafficking risks in different tiers of its supply chains. Further, the company may consider disclosing the names and addresses of its first-tier suppliers and information on its suppliers' workforces.

**Recruitment:** The company may consider requiring employment recruitment agencies — and where relevant employment agencies — in its supply chains to uphold workers' fundamental rights and freedoms, and to disclose information on the recruitment agencies used by its suppliers. To avoid the exploitation of migrant workers in its supply chains, the company is encouraged to ensure that employment and/or recruitment agencies used in its supply chains are monitored, and to provide details of how it supports ethical recruitment in its supply chains (for example, by using ethical recruitment agencies or supporting the development of ethical recruitment schemes).

**Worker Voice:** To prevent and address forced labor and human trafficking risks in its supply chains, the company is encouraged to take steps to ensure that workers in its supply chains are educated on their rights and can exercise their right to freedom of association. While the company has a publicly available hotline available to submit grievances related to human rights in the supply chain, the company may consider ensuring that this or another mechanism is communicated to, trusted and used by suppliers' workers.

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## COMPANY PROVIDED ADDITIONAL DISCLOSURE

[Yes](#)