

# Best Buy Co. Inc.

**TICKER**  
NYS:BBY

**MARKET CAPITALIZATION**  
US\$21 billion

**HEADQUARTERS**  
United States

**DISCLOSURES**

UK Modern Slavery Act: Not applicable

California Transparency in Supply Chains Act: Yes

**TARGETS**

None

**OVERALL RANKING**

**10** out of **49**

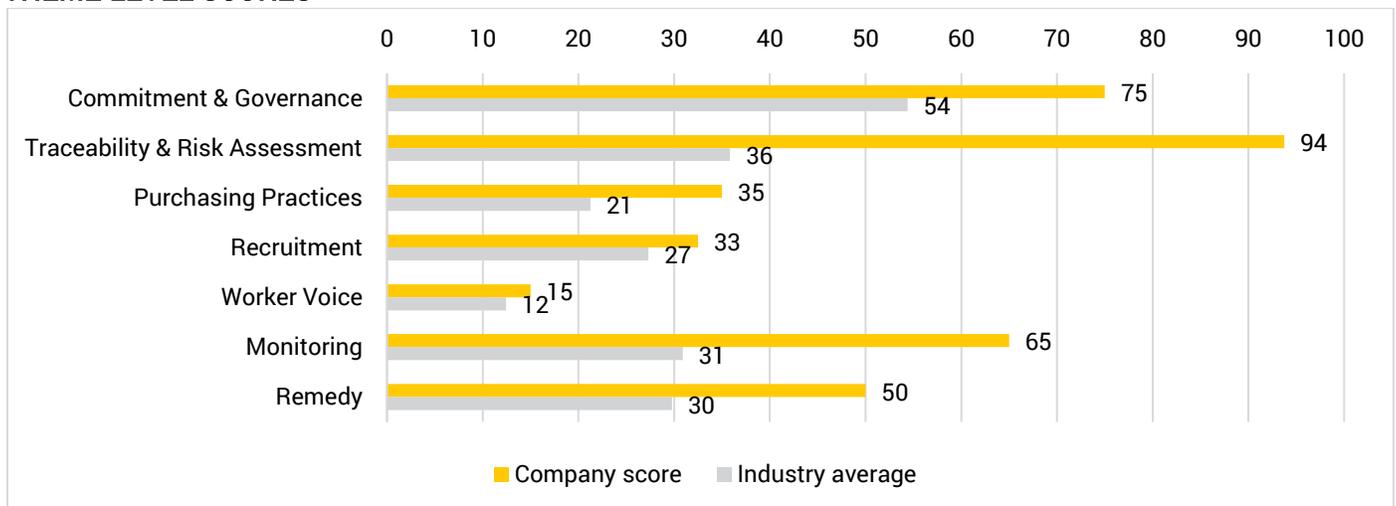
**OVERALL SCORE**

**52** out of **100**

**SUMMARY**

Best Buy Co. Inc. (Best Buy), a US-based electronics retailer, ranks tenth out of 49 companies, disclosing more information on its forced labor policies and practices than its peers across all themes, including its larger competitors Amazon and Walmart. The company's score is based on its good performance on the themes of Commitment & Governance, Monitoring, and in particular, Traceability & Risk Assessment, where it achieved the highest score. Additional steps the company could take to address forced labor risks in its supply chains include strengthening its disclosure and practices on the themes of Purchasing Practices, Recruitment, and Worker Voice.

**THEME-LEVEL SCORES**



Research conducted through October 2019 or through January 2020, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

**KEY DATA POINTS**
**SUPPLIER LIST**

No

**NO-FEE POLICY**

Yes (Employer Pays Principle)

**AVERAGE SUPPLIER SCORE**

N/A

**REMEDY FOR SUPPLY CHAINS WORKERS**

Yes

**HIGH-RISK SOURCING COUNTRIES**

 China<sup>1</sup>
**ADDRESSES FORCED LABOR RISKS RELATED TO THIRD-PARTY PRODUCTS**

No

**LEADING PRACTICES**

**Training:** Best Buy discloses that it trains relevant staff on its forced labor policies. It also notes that potential suppliers receive training on its supplier code, which covers forced labor, before starting with the company. It notes that, in addition to the initial training on its code, “100% of [its] private label suppliers receive training on forced labor within the first year of working with Best Buy.” Best Buy also reports that it has conducted in-depth supplier training on forced labor in high-risk regions: in Taiwan, training in 2018 focused on migrant workers and, in China, training was provided to suppliers on student workers.

**NOTABLE FINDINGS**

**Stakeholder Engagement:** Best Buy discloses that it “partnered with a Hong Kong-based NGO and created a toolkit for the factories we contract with in China to help identify and prevent forced labor conditions among student workers.”

**Traceability & Risk Assessment:** Best Buy discloses the number of its suppliers and includes an estimation of the number of workers and, notably, the number of migrant workers they employ. It also discloses a list of potential smelters and refiners of 3TG used by its supply chains as well as a list of potential countries of origin of 3TG. The company further discloses detail on its process to assess risks in different tiers of its supply chains that includes different sources and methods used, as well as risks identified in multiple tiers of its supply chains.

**Recruitment:** Best Buy’s supplier code states that where workers paid recruitment fees, such fees are to be repaid to the worker. Upon identifying worker-paid recruitment fees in Taiwan in 2018, the company reports that it worked with its suppliers to develop corrective action plans. It states that it ensured through spot checks and third-party audits that fees were reimbursed to all impacted workers.

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**OPPORTUNITIES FOR IMPROVEMENT**

**Purchasing Practices:** The company may consider adopting responsible purchasing practices (such as improving planning and forecasting) and providing procurement incentives (such as price premiums or increased orders) to suppliers to encourage or reward good labor practices. It is further encouraged to disclose outcomes of its process to assess forced labor risks at potential suppliers.

**Recruitment:** 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. It may also consider providing details of how it supports responsible recruitment in its supply chains (for example, by sharing due diligence findings on recruitment fees with peers or by supporting the development of responsible recruitment schemes).

**Worker Voice:** To support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. Where there are regulatory constraints on freedom of association, the company may consider ensuring workplace environments in which workers in its supply chains are able to pursue alternative forms of organizing. Further, the company may consider disclosing data about the practical operation of a grievance mechanism available to workers in its supply chains, such as the number of grievances filed, addressed, and resolved, or an evaluation of the effectiveness of the mechanism.

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**ENGAGED WITH KNOWTHECHAIN**

Yes ([Provided Additional Disclosure](#)).

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<sup>1</sup> The US Department of Labor lists China as a country where electronics may be produced using forced labor. US Department of Labor (20 September 2018), "[List of Goods Produced by Child Labor or Forced Labor](#)."