

# Broadcom Inc.

**TICKER**  
NAS:AVGO

**MARKET CAPITALIZATION**  
US\$102 billion

**HEADQUARTERS**  
United States

**DISCLOSURES**  
UK Modern Slavery Act: Yes

**TARGETS**  
None

California Transparency in Supply Chains Act: Yes

## OVERALL RANKING

**40 out of 49**

(2018 Rank: 37 out of 40)

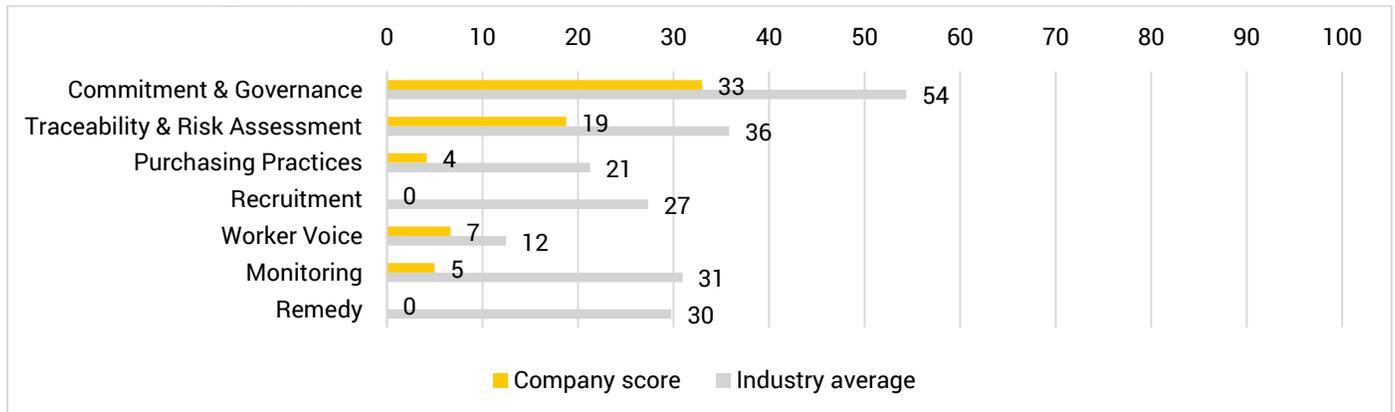
## OVERALL SCORE

**10 out of 100**

## SUMMARY

Broadcom Inc. (Broadcom), a semiconductor supplier to companies such as Apple, Cisco, Dell, and Hewlett Packard Enterprise, discloses significantly less information on its forced labor policies and practices than its peers. Compared to 2018, the company's score increased by four points by reinstating the following: a commitment to addressing forced labor, staff training on forced labor, a grievance mechanism, and supplier audits. However, it still scores significantly lower than it did in [2016](#) when it had stronger disclosure and practices in place. The company's score is mostly based on its performance on the themes of Commitment and Governance and Traceability and Risk Assessment. The company is encouraged to improve its performance and disclosure on the themes of Commitment and Governance, Recruitment, and Remedy.

## 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**

No

**AVERAGE SUPPLIER SCORE**

N/A

**REMEDY FOR SUPPLY CHAINS WORKERS**

No

**HIGH-RISK SOURCING COUNTRIES**

 China<sup>1</sup>
**LEADING PRACTICES**

None.

**NOTABLE FINDINGS**

**Commitment & Governance:** Broadcom states that it is committed to respecting human rights and avoiding complicity in human rights abuses throughout its business and supply chains. The company discloses a supplier code of conduct (which prohibits forced labor) and states that its suppliers should “encourage their suppliers to adhere to similar environmental and social responsibility principles.” The code is easily accessible from the company’s website. Broadcom discloses that it communicates its requirements to its suppliers during onboarding.

**Traceability and Supply Chain Transparency:** Broadcom discloses a list of smelters and refiners and the countries in which they are based. It also explains that it asks its suppliers to trace the chain of custody of conflict minerals in their supply chains.

**Grievance Mechanism:** The company discloses a compliance hotline that can be used to report violations of its Code of Ethics and Business Conduct, which sets standards for its suppliers and clarifies that suppliers are expected to implement its supplier code. The mechanism appears to be available to anyone, and its details are included in the company’s modern slavery statement.

**OPPORTUNITIES FOR IMPROVEMENT**

**Commitment & Governance:** The company is encouraged to establish and disclose a managerial structure with clear responsibilities and accountability for the implementation of its supply chain policies that address forced labor and human trafficking and provide oversight of such policies at the board level. The company may further consider engaging with relevant stakeholders on forced labor and human trafficking (e.g., policy makers, worker rights organizations, or local NGOs) in countries in which its suppliers operate. The company is also encouraged to participate actively in one or more pertinent multi-stakeholder or industry initiatives.

**Recruitment:** To address the risk of exploitation of migrant workers through recruitment agencies in its supply chains, the company is encouraged to take steps to ensure that workers in its supply chains are not charged fees during any recruitment-related process. The company may further consider taking steps to ensure that such fees are reimbursed to the workers and/or provide evidence of payment of recruitment-related fees by suppliers if it discovers that fees have been paid by workers in its supply chains. The company is also encouraged to take steps to ensure that the rights of workers in vulnerable conditions, such as migrant workers, are respected (e.g., to verify workers' passports and other personal documents are not retained).

**Remedy:** The company may consider establishing a process for creating corrective action plans with suppliers that are found to violate the [ILO core labor standards](#), which include the elimination of forced labor. It may also consider designing a procedure to ensure that remedy is provided to its suppliers' workers where such rights have been violated and disclosing examples of remedy outcomes for workers in its supply chains.

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**ENGAGED WITH KNOWTHECHAIN**

No.

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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.](#)"