

Broadcom Ltd.

TICKER:
NASDAQ:AVGO

MARKET CAPITALIZATION:
US\$ 32 billion

HEADQUARTERS:
United States

13 OUT OF 20
Company’s Overall Ranking

33 OUT OF 100
Company’s Overall Score

Broadcom LTD. (Broadcom) discloses relatively limited information on its management approach of forced labor risks in its supply chain, ranking thirteenth on the benchmark overall. The company discloses an awareness of the risks of forced labor and ranks above the benchmark average in the area of commitments and governance, which is due to its disclosure of human trafficking and supply chain policies and standards. However, Broadcom has an opportunity to improve its benchmark performance in the areas of recruitment, worker voice, and remedy, since it ranks below the benchmark average across each of these areas.

THEME LEVEL SCORE

Commitment and Governance	70 out of 100
Traceability and Risk Assessment	50 out of 100
Purchasing Practices	56 out of 100
Recruitment	17 out of 100
Worker Voice	11 out of 100
Monitoring	25 out of 100
Remedy	0 out of 100

LEADING PRACTICES

None.

NOTABLE FINDINGS

Commitments and Governance: Broadcom discloses a Position on Slavery and Human Trafficking in response to the California Transparency and Supply Chain Act, as well as a Human Rights Policy which prohibits forced, compulsory, and child labor. The company states that it "is supportive of efforts to help eradicate slavery and human trafficking in supply chains and plans to continually evaluate and strengthen its practices, procedures and policies for suppliers and employees."

Traceability and Risk Assessment: Broadcom demonstrates in its Conflict Minerals Report 2015 that it has taken steps to trace its supply chain and conduct risk assessments, especially with respect to conflict minerals. The company discloses that it collects data regarding conflict minerals from all of



its suppliers and reports a list of the names and locations of smelters in its supply chain, including the minerals it produces.

Purchasing Practices: Broadcom's Policy on Human Rights states that the company contractually requires each supplier to acknowledge and implement the Electronic Industry Citizenship Coalition's (EICC) Code of Conduct. In its Position on Slavery and Human Trafficking it states that it aims to work with suppliers to ensure full compliance with the EICC principles.

OPPORTUNITIES FOR IMPROVEMENT

Recruitment: Broadcom is encouraged to disclose its approach in the recruitment of workers in its supply chain. Broadcom applies the most recent version of the EICC Code of Conduct (version 5.1), which states that workers shall not be required to pay employers' or agents' recruitment fees, and that, if fees are found to have been charged, they must be repaid. The company may consider disclosing supporting evidence for the implementation of this recruitment fees policy.

Worker Voice: Broadcom is encouraged to ensure that suppliers' employees are granted the right to freedom of association, especially in environments where there are regulatory constraints on freedom of association, and are provided with an accessible, formal grievance mechanism that facilitates impartial reporting of suppliers' workers' grievances. Broadcom may also consider engaging with suppliers' workers outside of the context of the factories in which they work.

Remedy: Broadcom is encouraged to disclose evidence of a process to create corrective action plans when suppliers are found to be in violation of the company's standards, including on forced labor. It may also consider disclosing evidence of remedy programs for supply chain workers whose rights have been violated.

COMPANY PROVIDED ADDITIONAL DISCLOSURE:

[No.](#)

