

KnowTheChain 2022 ICT Benchmark

Additional Disclosure

Company Name: Intel Corporation

Date: 25-Aug-22

Guidance:

- Please add any additional information you wish to provide under the relevant indicator elements below.
- We welcome examples of leading practices.
- Unless you are sharing leading practices, please limit the information to indicators for which KnowTheChain could not yet identify sufficient information on your website.
- Note KnowTheChain has already undertaken a review of your website. Should you wish to include links to existing disclosure, please specify the page number / section you are referring to.

INDICATOR 1: SUPPLIER CODE OF CONDUCT AND CAPACITY BUILDING

1.1 has a supplier code of conduct that requires suppliers to respect the ILO core labour standards, which include the elimination of forced labour; and requires suppliers to cascade/implement standards that are in line with the company's supplier code of conduct; and

The principles behind the "fundamental" ILO Core Labour standards as defined by the ILO at <https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm> are included in Intel's Global Principles on Human Rights <https://www.intel.com/content/www/us/en/policy/policy-human-rights.html>, with which suppliers must comply:

Fundamental ILO Core Labour Standard	Relevant Intel Principle
1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)	Freedom of Association/Collective Bargaining
2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98)	Freedom of Association/Collective Bargaining
3. Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)	Prevention of Human Trafficking, Forced Labor, and Child Labor
4. Abolition of Forced Labour Convention, 1957 (No. 105)	Prevention of Human Trafficking, Forced Labor, and Child Labor
5. Minimum Age Convention, 1973 (No. 138)	Prevention of Human Trafficking, Forced Labor, and Child Labor
6. Worst Forms of Child Labour Convention, 1999 (No. 182)	Prevention of Human Trafficking, Forced Labor, and Child Labor
7. Equal Remuneration Convention, 1951 (No. 100)	Diversity and Non-discrimination and Harassment Prohibition
8. Discrimination (Employment and Occupation) Convention, 1958 (No. 111)	Diversity and Non-discrimination and Harassment Prohibition

9. Occupational Safety and Health Convention, 1981 (No. 155)	Workplace Safety
10. Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)	Workplace Safety

Similarly, these are in the RBA Code of Conduct to which our suppliers must comply AND cascade as required in the RBA Code of Conduct itself.

As noted in our May'22 CSR Report (Page 29, <https://csrreportbuilder.intel.com/pdfbuilder/pdfs/CSR-2021-22-Full-Report.pdf>) in 2021, we discussed human rights issues with our investors and NGOs. We also are a signatory to the UN Global Compact, a member of the Global Business Initiative on Human Rights, and a participant in the Centre for Sport and Human Rights and the Partnership on AI.

Our Modern Slavery Statement <https://www.intel.com/content/www/us/en/corporate-responsibility/statement-combating-modern-slavery.html> contains a more detailed set of prohibitions and requirements for ourselves and our suppliers on Page 2:

Intel Expectations to Address the Risks of Modern Slavery Fees

- No levies or placement fees or costs, even if allowed by local law
- No fees or costs charged to workers as defined by the RBA
- No worker debt to obtain or keep a job
- Fees and costs charged to workers must be repaid within 90 days

Contracts and Resignation Terms

- Employment contracts must be in the employee's native language
- No detrimental changes to the contract or work conditions
- Resignation must be voluntary
- Notice period cannot exceed one month
- Resignation notice penalty cannot exceed 60% of one month's wages

Worker Rights

- No holding original identification documents of workers
- Secure personal storage required
- Workers freedom of movement required

Control Systems

- Monitor recruiters and labor agents
- Interview foreign and migrant workers
- Documented policies and procedures must be in place (e.g., whistleblowing and grievance policies).

1.2 engages in capacity building to enable its suppliers to cascade its supply chain policies that address forced labour to their own supply chains and/or trains suppliers below the first tier on such policies, and measures the effectiveness of capacity building.

Since 2014 we have co-led training in multiple SE Asia countries with HP Enterprise, HP Inc., Seagate and Western Digital. Prior to the COVID-19 pandemic, it was in person and workshop style giving company reps the chance to get a deep understanding of the issue and develop some actions to

take. During the COVID-19 pandemic, the sessions have been webinars which have allowed for broader attendance. For 2022 we contracted noted NGO Verite to lead two 2-part training sessions (each part has 2 geo-friendly offerings) in early August. The agenda in the first part included a discussion on the 11 ILO Indicators of Forced Labor led by a Political Officer from the US Embassy in Kuala Lumpur. The first sessions were attended by almost 600 attendees globally. A deeper dive session with breakouts to simulate the workshop approach, which will have over 150 participants in late August. The agenda will cover:

- Key principles and approaches to developing a forced labour remediation policy
- Importance of ensuring effective remediation for violations to the recruitment fees standards
- List types of effective remedy and preventive controls for recruitment fees violation
- Share insights and key learning from the breakout sessions

INDICATOR 2: MANAGEMENT AND ACCOUNTABILITY

2.1 has a committee, team, program, or officer responsible for the implementation of its supply chain policies that address forced labour; and discloses how incentives for staff (e.g. bonuses, part of employee performance reviews) are tied to improvements in working conditions in supply chains;

As noted in our May'22 CSR Report Pages 24-25: "We believe having an integrated strategy and embedding corporate responsibility across the company is the most effective management approach to drive continuous improvements in our performance. We have established cross-functional Management Review Committees (MRCs) of senior executives who manage corporate responsibility and sustainability activities across the organization [including one specifically focused on Supply Chain, inclusive of forced and bonded labor]."

Further: "We have established an integrated approach to managing human rights across our business, including board-level oversight and the involvement of senior-level Management Review Committees. For example, our annual Combating Modern Slavery and Ensuring Transparent Supply Chains statement is discussed with our Board and signed by one of our directors. Our Corporate Responsibility Office manages our human rights program, and responsibility is also embedded across the company through a cross-Intel Human Rights Steering Committee, which includes members from Supply Chain, and close partnerships with global teams that develop and implement policies and actions related to our human rights risks. In 2021, we added our human rights program to an annual Ethics and Legal Compliance review process, which resulted in increased visibility and awareness of human rights topics across the organization, [including forced and bonded labor]. Key learnings will help to drive further improvements."

Within Supply Chain Responsibility (a part of Global Supply Chain) we have Senior Managers of Supply Chain Human Rights and Assessment and also of Responsible Sourcing. Their responsibilities include identifying risks of forced labor and driving and verifying corrective actions, including repaying workers who paid fees to get or keep their jobs. Repayments to almost 900 workers were made in 2021 totaling \$1.8M, and 2022 year to date is \$653K to over 2,800 workers).

As noted in our May'22 CSR Report Page 24 "Linking Compensation to Corporate Responsibility Factors: Since 2008, we have linked a portion of our executive and employee compensation to corporate responsibility factors in our Annual Performance Bonus (APB). In 2021, we included environmental, social, and governance (ESG) metrics aligned with our culture transformation and

2030 RISE goals, including diversity and inclusion, employee experience, climate change, and water stewardship. In 2022, we set out new metrics in these same areas. For more detail, see our 2022 Proxy Statement and the Sustainable and Inclusive sections of this report.”

Per our 2022 Proxy statement Page 35 <https://www.intc.com/filings-reports/all-sec-filings/content/0000050863-22-000011/proxy2022.htm>: "Corporate responsibility and ESG matters play an important role at Intel, and the Board is actively involved in overseeing our corporate responsibility initiatives. A number of directors have expertise on key ESG issues, such as Mr. Smith who oversaw Boeing’s strengthened focus on sustainability, Mr. Weisler who championed diversity and inclusion as well as sustainability and corporate responsibility while leading HP, Dr. Lavizzo-Mourey who has focused on companies’ efforts to promote social good in the form of public health through her work at the Robert Wood Johnson Foundation, and Dr. Goldsmith who has been active in promoting diversity and inclusion in the field of electrical engineering.

Independent Board Oversight of ESG...The Board has given the

- Corporate Governance and Nominating (CGN) Committee the primary responsibility for oversight of ESG issues at Intel, with additional topics also reviewed by other committees
- Compensation Committee the responsibility for oversight of human capital issues, and
- Audit & Finance Committee the responsibility for oversight of our ethics and compliance program.

Management provides formal updates to the CGN Committee at least twice each year and at least annually to the full Board on the company’s ESG performance and disclosure. In 2021, this included a review of the annual Corporate Responsibility Report and updates on issues including environmental sustainability, climate risk, human capital, human rights, political accountability, and investor outreach and feedback."

2.2 discloses how it trains relevant decision-makers within the company on risks and policies that address forced labour; and

Our May’22 CSR report page 25 refers to the Intel Code of Conduct: "All employees are expected to complete annual online training, through which they also certify adherence to the Code. Instruction-led training is also provided to Intel executives. In addition, a targeted population completes an annual disclosure process to monitor compliance with the Code."

Page 12 of Intel Code of Conduct contains section “Respecting Human Rights” which includes “remediating any known issues.”

2.3 has tasked a board member or board committee with oversight of its supply chain policies that address forced labour, and describes how the experiences of affected workers or relevant stakeholders (such as civil society, unions, and workers or their representatives) informed board discussions.

We noted in the 2021 Modern Slavery statement "The annual Intel Modern Slavery and Human Trafficking Statement is reviewed by the CGN Committee and approved by the full board" and "This Statement was approved by the directors of Intel Corporation on April 13, 2022, and signed on the board's behalf by Omar Ishrak, Chairman of the Board."

We also review progress on our 2030 CSR Goals, known as RISE 2030, short for Responsible, Inclusive, Sustainable, Enabling, including our supply chain human rights goal on Page 8 of our

May'22 CSR report: "Scale our supplier responsibility programs to ensure respect for human rights across 100% of our tier 1 contracted suppliers and higher risk tier 2 suppliers."

As noted in our May'22 CSR Report Page 24: "Linking Compensation to Corporate Responsibility Factors: Since 2008, we have linked a portion of our executive and employee compensation to corporate responsibility factors in our Annual Performance Bonus (APB). In 2021, we included environmental, social, and governance (ESG) metrics aligned with our culture transformation and 2030 RISE goals, including diversity and inclusion, employee experience, climate change, and water stewardship. In 2022, we set out new metrics in these same areas. For more detail, see our 2022 Proxy Statement and the Sustainable and Inclusive sections of this report."

Further on Page 25: "Management provides formal updates to the CGN Committee at least twice each year and at least annually to the full Board on the company's ESG performance and disclosure. In 2021, this included review of the annual Corporate Responsibility Report and updates on issues including environmental sustainability, climate risk, human capital, human rights, political accountability, and investor outreach and feedback. A number of directors have expertise on key ESG issues and as part of every Board search, our Board is committed to actively seeking women and minority candidates, as well as candidates with diverse backgrounds, experiences, and skills—see page 35 of our 2022 Proxy Statement for details."

Further on Page 26: "We engage with trade associations to help us work collaboratively with other companies and groups to address key public policy issues on a range of corporate responsibility and sustainability issues. Recent examples include: • Responsible Supply Chain: Partnering with the Responsible Business Alliance (RBA), Responsible Minerals Initiative (RMI), Responsible Labor Initiative (RLI) and other stakeholders to educate policymakers on the benefits of collective action on responsible global supply chain practices. Watch the video. • Sustainable Corporate Governance: Working with the RBA, Digital Europe, and other stakeholders to improve the knowledge and understanding of policymakers on the benefits of common approaches to responsible business conduct and to align future due diligence requirements with existing international frameworks."

INDICATOR 3: TRACEABILITY AND SUPPLY CHAIN TRANSPARENCY

3.1 the names and addresses of first-tier suppliers;

We are aware of the locations of our Top 100 suppliers, as disclosed in our May'22 CSR report <https://csrreportbuilder.intel.com/pdfbuilder/pdfs/CSR-2021-22-Full-Report.pdf> Page 99.

3.2 the names and locations of below-first-tier suppliers (this does not include raw material suppliers); and

3.3 the sourcing countries of at least three raw materials at high risk of forced labour.

INDICATOR 4: RISK ASSESSMENT

4.1 details on how it conducts human rights supply chain risk or impact assessments that include forced labour risks or assessments that focus specifically on forced labour risks, including through engaging with relevant stakeholders (such as civil society, unions, and workers or their representatives) in countries in which its suppliers operate;

4.2 details on forced labour risks identified in different tiers of its supply chains; and

Our 2021 Modern Slavery statement notes on Page 4: "And, we have improved the lives of approximately 46,000 workers through fee repayments, returned passports, amended contracts, and other improvements related to the prevention of slavery and human trafficking." This figure includes workers in multiple tiers of our supply chain, including to the 3rd tier in some cases.

Second and third tier risks include agent/recruitment fees, foreign worker levies, passport retention/withholding, substandard living conditions, unclear or incomplete worker agreements, unclear/inaccurate/missing payslips, and weak record-keeping on working hours and wages. These are risks that we have successfully identified and remediated with tier one suppliers. Whilst second and third tier suppliers present more difficulty, we recognise the importance of continuing this work.

4.3 how it has consulted with relevant stakeholders (such as civil society, unions, and workers or their representatives) in steps taken to address the risks identified.

As noted in our SEC Filing for 2021 (<https://www.intel.com/content/www/us/en/corporate-responsibility/conflict-free-sec-filing.html>) on Page 5: "Intel also holds a leadership position in the Public-Private Alliance for Responsibly Minerals Trade (PPA)...In late 2019 [August], Intel participated in a delegation organized by the PPA with NGOs, U.S. Government representatives, and other technology companies to visit the DRC and neighboring Rwanda to observe and discuss challenges faced in the mining industry. A key takeaway from this experience was the need for companies to increase upstream program support to ensure the sustainability and improve the livelihoods of the most vulnerable communities tied to our supply chain. A few examples of projects supported by Intel in 2021 are (1) Congo Power, an alliance providing mining areas with clean power, specifically funding the power needs for community training in addition to the educational programming at the Dr. Mukwege School and (2) PACT-RMI Youth Vocational Training Program, a program aimed at providing mining alternatives to Congolese youths; and (3) the development of the world's first Congo-focused collection and a repository for Congolese-written documents on the DRC in North America at the University of British Columbia (UBC) library. We believe that empowering marginalized workers in our supply chain is a crucial step in promoting human rights. Intel also recognizes the local socio-economic importance of the artisanal and small-scale mining (ASM) sector in CAHRAs and seeks to assist ASM sites in meeting downstream compliance requirements through the Better Mining ASM Mine Monitoring Program in partnership with Responsible Minerals Initiative (RMI) and RCS Global. Intel also supported a digital suite designed specifically for the ASM that will create new pathways to track, access, and share data about practices in mining communities. Maintaining a connection and providing support to the communities that we depend on in our vast global supply chain is a crucial component to our responsible minerals program."

5.1 the percentage or number of supply chain workers who are women;

Using supplier assessment data gathered in 2022, primarily from Tier 1 suppliers but also some limited deeper tiers, 36% of workers in our supply chain are women.

5.2 the percentage or number of supply chain workers who are migrant workers' and

Using supplier assessment data gathered in 2022, primarily from Tier 1 suppliers but also some limited deeper tiers, 3% of workers in our supply chain are foreign or migrant workers.

5.3 the percentage or number of supply chain workers that are being paid a living wage.

INDICATOR 6: PURCHASING PRACTICES

6.1 commits to responsible buying practices in its contracts with suppliers;

Our standard contracts require suppliers to comply with the Intel Code of Conduct and the RBA Code of Conduct. Both of which prohibit practices which can lead to forced labor conditions. Suppliers are also required to comply with all policies on the Supplier Policy portal, <https://www.intel.com/content/www/us/en/supplier/governance/supplier-policies.html>, where we post the RBA Code, the Intel Code, our Annual Supplier Letter (which is sent to ALL suppliers annually and re-iterates the requirement to comply with the Intel and RBA Codes).

Although the RBA Code of Conduct explicitly requires fees paid by workers to be repaid, since 2019, in certain higher risk situations, during the bidding process, we have and will continue to deploy an additional addendum which focusses in on the prohibition of fees and identification possession and specifically notes: "Fees found to be charged are repaid within 90 days" It is intended to bring high focus to forced labor and poor living condition risk. The suppliers are required to waterfall or flow it down to their sub-suppliers.

6.2 describes how it has adopted responsible purchasing practices in the first tier of its supply chains, which includes planning and forecasting, and how it ring-fences labour costs; and

Soon after COVID-19 began to materially spread, Intel established a command center which met weekly to discuss supply chain challenges. Supply Chain ESG was an included topic for discussion, supplier communications on our response and expectations of suppliers and published guidelines to protect workers. This can be seen at: <https://www.intel.com/content/www/us/en/supplier/documents/top-guidelines-for-protection-of-workers-during-covid19.html>

Due to worker shortages, Suppliers wanted exceptions to the RBA Code. To be clear on the limits of time and days which workers could work, it included a section to allow temporary change in working hours from 60 to 72 hours (in line with RBA exception) and re-iterate our expectation of workers working no more than 6 consecutive workdays (i.e., no exception, which is stricter than the RBA which granted an exception). See section 1.9 Expectations regarding working hours and rest days. This can be seen at: <https://www.intel.com/content/www/us/en/supplier/documents/supplier-coronavirus-policy.html>

6.3 discloses two quantitative data points demonstrating that it has responsible purchasing practices in place that address the risk of forced labour.

INDICATOR 7: RECRUITMENT-RELATED FEES

7.1 requires that no worker in its supply chains should pay for a job—the costs of recruitment-related fees should be borne not by the worker but by the employer ("Employer Pays Principle");

7.2 provides detail on the implementation of the Employer Pays Principle in its supply chains by demonstrating how it works to prevent the charging of fees to supply chain workers in different supply chain contexts; and

We work across the full life cycle of our suppliers to set the expectation workers do not pay fees to get or keep their job and if it is found that they did, that they are repaid. First, our supplier selection process includes a survey to understand whether a supplier has foreign workers and who pays the recruitment related fees. Suppliers disclosing the employment of foreign workers will have to provide additional disclosures and will often have to undergo an audit to determine whether workers are experiencing conditions that could lead to forced labor. If it is found that workers are paying, depending on the magnitude and situation, we may not further engage until the workers are repaid.

In the past 3 years we have identified risks of fee charging in different higher risk commodities such as construction, PCB, and passives, amongst others. Suppliers of these commodities have been required to undergo audits to determine whether workers are experiencing conditions that could lead to forced labor.

7.3 in the event that it discovers that fees have been paid by workers in its supply chains, provides evidence of re-payment of recruitment-related fees to workers. The company describes how it engages with affected workers in the remediation process.

We have begun to use the RBA Standard for the Investigation and Repayment of Fees to Workers, Jun'21. In Step 3 there are specific worker engagement expectations where 20% of the workers must be interviewed and noted On Page 5: "(a.) The Entity must interview all relevant parties. Entities are encouraged to hire an independent third party to conduct worker interviews and document these fees. (i.) Interviewers must be able to interview workers in the native language of the worker or in a language the worker can understand. (ii.) Interviews must be conducted in a private setting, following worker interview protocols for social compliance audits. (b.) The worker interview process must be introduced and explained to workers by the Entity's representative (see 2 b). Workers must be given contact information for the interviewer (in case they would like to voluntarily provide further information), as well as information on how to access the Entity's grievance mechanism. (i.) Any information gathered from non-worker interviews should be incorporated/shared with the independent third party prior to calculating fees to be repaid (e.g. fees knowingly paid by workers)"

Further on Page 8: "The Entity should have their worker payments verified through a closure audit."

This approach is being used with multiple suppliers recruiting foreign workers. In one case, RBA Voices will be deployed as a secondary means, through a survey on a mobile phone to verify that workers were repaid and are content with the amount.

INDICATOR 8: RESPONSIBLE RECRUITMENT

8.1 discloses information on the recruitment agencies used by its suppliers; and

Through our supplier risk assessment process, audits and ongoing program to reach Tier 2 and beyond, we are familiar with the use of recruitment agencies and are actively engaged in audits/CAP/remedy with suppliers in multiple countries.

8.2 provides details of how it supports responsible recruitment in its supply chains (e.g. by collaborating with relevant stakeholders to engage policy makers to strengthen recruitment standards).

Intel is actively engaged directly and indirectly via our trade associations with policymakers to improve or introduce policy and regulation on FL. Most recently, Intel has been working with RBA, DigitalEurope, AmCham EU, other associations and stakeholders on new legislation on FL which will be proposed by the European Commission in September. Intel is also pro-actively engaged on the proposed EU directive on corporate sustainability due diligence (CS3D) and other sectoral EU due diligence legislation such as batteries and minerals. In the UK, Intel is engaged primarily as a member of TechUK with the UK Government, in particular the Home Office and Foreign Commonwealth & Development Office (FCDO) on updating the Modern Slavery Act. Intel has also been closely tracking and is in the process of implementing other global national human rights due diligence laws. Internationally, Intel has also inputted to the stock-taking processes updating the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multi-National Enterprises.

As noted in our SEC Filing to 2021 (<https://www.intel.com/content/www/us/en/corporate-responsibility/conflict-free-sec-filing.html>) on Page 4: "We have worked extensively for over a dozen years on the issue of conflict minerals, as part of our work on responsible mineral sourcing. We recognize that broad collaborative efforts among governments, non-governmental organizations (NGOs), civil society experts, and industry are needed to identify and mitigate the risk of contributing to serious human rights abuses and conflict related to mineral extraction in the Covered Countries. Intel is a steering committee member of the Responsible Minerals Initiative (RMI), unique member code INTC, and active contributor to multiple RMI sub-teams. Intel is also an active member of the OECD Multi-Stakeholder Steering Group, which advises on implementation for the OECD Guidance, and the European Partnership for Responsible Minerals (EPRM), where we collaborate with companies in the electronics and other industries (e.g. jewelry, automotive, medical instrumentation, and others) and other stakeholders, such as public authorities and civil society groups, to address responsible mineral sourcing issues. Additionally, we are members of, and provide support to, the International Tin Association's International Tin Supply Chain Initiative (iTSCi). Intel also holds a leadership position in the Public-Private Alliance for Responsible Minerals Trade (PPA), which promotes responsibly sourced minerals from the Covered Countries. We are also part of the CRAFT Code Committee, which assisted in the development of the Code of Risk-mitigation for Artisanal and Small-Scale Mining engaging in Formal Trade (CRAFT)."

INDICATOR 9: FREEDOM OF ASSOCIATION

9.1 works with independent local or global trade unions and/or other legitimate worker representatives to improve freedom of association in its supply chains;

9.2 discloses that it is party to a global framework agreement that covers its supply chains and/or an enforceable supply chain labour rights agreement with trade unions or worker organisations; and

Intel is a:

- Signatory to the UN Global Compact
- Member of OECD Multi-Stakeholder Group on Minerals Supply Chains (OECD Guidelines on Minerals Supply Chain Due Diligence)
- Implementer of OECD MNE Guidelines (see above)
- Implementer of the UNGPs

As noted in our CSR Report Page 24: "We have developed corporate guidelines and policies that take into account the concept of shared value and frameworks such as the UN Global Compact, International Labour Standards, OECD Guidelines for Multinational Enterprises, and the UN Sustainable Development Goals."

9.3 discloses the percentage of supply chains covered by collective bargaining agreements.

Using supplier assessment data gathered in 2022, primarily from Tier 1 suppliers but also some limited deeper tiers, approximately 51% of the facilities reported having a collective bargaining agreement in place.

INDICATOR 10: GRIEVANCE MECHANISM

10.1 takes steps to ensure a formal mechanism to report a grievance to an impartial entity regarding labour conditions in the company's supply chains is available to its suppliers' workers and their legitimate representatives across supply chain tiers; and

As noted in our CSR Report Page 25: "The anonymous reporting channel consists of an Integrity Line through which anyone can report alleged misconduct via messaging or an online reporting tool managed by an independent third party. We inform employees, managers, and other stakeholders about Intel's non-retaliation policy, which prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation."

This channel is known as the Integrity Line and is public:

<https://secure.ethicspoint.com/domain/media/en/gui/31244/index.html>

10.2 discloses data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved; and

As noted in our CSR Report Page 25: "The Board and senior management receive periodic reports of statistics related to misconduct, as well as details about key investigations. Our Ethics and Compliance Business Champions encourage employees to stay current with their ethics and compliance training, review verified investigations quarterly with business group leaders, and raise employee awareness regarding how to report concerns. In 2021, the largest categories of verified cases involved falsification of documents, conflicts of interest, and compliance items. Consistent concerns are addressed through senior management discussions, employee communications, process and controls improvements, and individual corrective action measures, where appropriate. Each quarter, Intel's Ethics and Compliance Oversight Committee (ECOC) receives formal reports from various Intel organizations and reviews risk topics that span business groups."

The Integrity Line (<https://secure.ethicspoint.com/domain/media/en/gui/31244/index.html>) is public and communicated to ALL suppliers every Q4 in our annual supplier letter, is posted throughout each of our physical facilities and at our construction sites where any on-site construction and/or service suppliers, equipment installers and maintenance personal, and any visitor would see it, and is accessible online to anyone, anywhere in the world. After someone completes a submission / complaint, they are assigned a unique code called a "report key." They are instructed to write down their report key and password and keep them in a safe place. After 5-7 business days, they can use the report key and password to check their submission / complaint for any questions from the investigators. The filer can provide additional information at any time.

10.3 takes steps to ensure that its suppliers' workers or their legitimate representatives are involved in the design and/or performance of the mechanism, to ensure that the workers trust the mechanism.

The Integrity Line (<https://secure.ethicspoint.com/domain/media/en/gui/31244/index.html>) is communicated to on-site suppliers' workers during what we call New Contractor Orientation.

INDICATOR 11: MONITORING

11.1 its methodology for monitoring the implementation of its supply chain policies addressing forced labour;

11.2 the findings of monitoring reports, including details regarding any violations revealed in relation to forced labour and indicators of forced labour, across supply chain tiers; and

Per our Proxy Statement on Pages 21-22: "As of May 5, 2022, Intel decided to cease sourcing from all smelters located in Russia." We are working with our direct suppliers to remove all metal processors located in Russia from our supply chain.

We conduct over 100 audits a year of our suppliers using the RBA Code of Conduct. So far in 2022, our efforts have resulted in over 2,800 workers from 8 Tier 1 and 4 Tier 2 parts/materials suppliers being repaid an overall total of \$650K. We currently have 4 other suppliers we are engaged with where findings can be contributors of forced labor that we are working on with corrective action plans to determine the fees paid and move to repayment; at least one also has excessive working hour. Other suppliers have findings which are being addressed through corrective action plans and then verified with closure audits.

We have begun co-auditing with some of our suppliers to build accountability and get deeper into the supply chain. Through one such engagement where we have ongoing monitoring, some of the foreign workers at a Tier 2 supplier were found to be living in conditions below our standards and where it was not felt the situation could be corrected. The suppliers were required to move all the workers to new living accommodations.

11.3 the use of worker-driven monitoring (i.e., monitoring undertaken by independent organisations that includes worker participation and is guided by workers' rights and priorities).

In an effort to strengthen worker's voice, Intel has been part of the RLI's Responsible Workplace Program with a supplier's workers being surveyed on their current situation on fees and passports. From 2018-20 (pre-COVID) we had engaged a consultant/NGO in several countries to work with suppliers with repeat issues including fee changing. As part of the effort, a worker survey was deployed with results relayed to the facility and to Intel.

At facilities undergoing RBA VAP Audits workers are given auditor contact information should they want to voluntarily provide additional information outside the interview setting and/or off-site,

As noted in RBA Fee Standard Jun'21: "Workers must be given contact information for the interviewer (in case they would like to voluntarily provide further information), as well as information on how to access the Entity's grievance mechanism."

In one case, RBA Voices will be deployed in Q4'22 as a secondary means, through a survey on a mobile phone to verify that workers were repaid and are content with the amount.

INDICATOR 12: REMEDY AND RESPONSE TO ALLEGATIONS

A(1) a process for responding to potential complaints and/or reported violations of policies that address forced labour and how it engages affected stakeholders as part of this process; and

If and when any concerns over human rights violations of a supplier are noticed in the media, observed by an employee, or reported to Intel, the Human Rights and Assessment team will go through a number of steps which include conducting a check to confirm if we are sourcing from supplier/facility, understanding the last due diligence work done and then convening the Crisis Management Team if there is/has been/or might be future purchasing from the supplier. Next steps vary but often include asking the supplier to respond to the concern or allegation, conducting an audit, and working with others in the industry to build leverage. We are one of several customers to a supplier whose situation of foreign migrant workers paying fees was made known through alerts to the RBA and other customers (not directly to Intel). An RBA SVAP (Supplemental Validated Audit Program) audit was required showed fee charging. To determine proper repayment, a 3rd party, was used to interview workers and get a more complete account of what they paid to get and keep their jobs. At present the supplier is repaying workers based upon the outcome of that work. Subsequently there will be a closure audit and deployment of RBA Voices, a worker voice mechanism.

Intel contracts with a 3rd party to take internal and external complaints including those on human rights violations such as forced labor: <https://secure.ethicspoint.com/domain/media/en/gui/31244/index.html> As noted in our CSR report Page 25: "The anonymous reporting channel consists of an Integrity Line through which anyone can report alleged misconduct via messaging or an online reporting tool managed by an independent third party. We inform employees, managers, and other stakeholders about Intel's non-retaliation policy, which prohibits retaliation against anyone who, in good faith, reports a concern or participates in an investigation."

The Integrity Line is communicated to ALL suppliers every Q4 in our annual supplier letter, is posted throughout each of our physical facilities and at our construction sites where any on-site construction and/or service suppliers, equipment installers and maintenance personal, and any visitor would see it, and is accessible online to anyone, anywhere in the world. After someone completes a submission / complaint, they are assigned a unique code called a "report key." They are instructed to write down your report key and password and keep them in a safe place. After 5-7 business days, they can use the report key and password to check their submission / complaint for any questions from the investigators. The filer can provide additional information at any time.

A(2) at least two examples of outcomes of its remedy process in practice, covering different supply chain contexts, for its suppliers' workers.

So far in 2022, our efforts have resulted in over 2,800 workers from 8 Tier 1 and 4 Tier 2 parts/materials suppliers being repaid an overall total of \$650K.

In addition to fee repayment, other remedy includes movement to safe and healthy living accommodations. We have begun co-auditing with some of our suppliers to build accountability and get deeper into the supply chain. Through one such engagement with a construction supplier where we have ongoing monitoring, some of the foreign workers at a Tier 2 supplier were found to be living in conditions below our standards and where it was not felt the situation could be corrected. The suppliers were required to move all the workers to new living accommodations.

At another Tier 2 supplier we audited, workers were not in possession of their passports. We worked with the Tier 1 to get the Tier 2 to return all withheld worker passports."

In addition, where an allegation is identified in a company's supply chains:

- B.1.1 that it engages in a dialogue with the stakeholders reportedly affected in the allegation(s)
- B.1.2 outcomes of the remedy process in the case of the allegation(s); and
- B.1.3 evidence that remedy(ies) are satisfactory to the victims or groups representing the victims.

Where an allegation is identified in the company's supply chains, but is denied by the company:

- B.2.1 a description of what actions it would take to prevent and remediate the alleged impacts; and
- B.2.2 as part of this process, it would engage with affected stakeholders and their representatives.

Reporting Legislations

UK Modern Slavery Act: Where applicable, the company discloses at least one statement under the UK Modern Slavery Act.

Yes/No. Please provide link to a publicly available statement.

California Transparency in Supply Chains Act: Where applicable, the company has a disclosure under the California Transparency in Supply Chains Act.

Yes/No. Please provide link to a publicly available statement.

Australia Modern Slavery Act: Where applicable, the company discloses at least one statement under the Australia Modern Slavery Act.

Yes/No. Please provide link to a publicly available statement.

High Risk Sourcing

Please indicate whether your company sources from China or Malaysia. Note where a company does not provide this information, KnowTheChain will review the company's website as well as third party sources to identify relevant information.

[Intel does source from China and Malaysia.](#)

EOR