

## KnowTheChain 2022 ICT Benchmark

### Additional Disclosure

Company Name: NXP Semiconductors

Date: 30 August 2022

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**

- NXP Labor & Human Rights Commitment ("policy document") states: "We are committed to the abolition of child labor, and we do not accept any form of discrimination based on race, national origin, color, gender, religion, age, pregnancy, sexual orientation, physical or mental disability, or political affiliation. NXP forbids charging fees to employees throughout every stage of employment and prohibits retention of personal or government-issued documents. NXP allows the freedom of association and the right to collective bargaining."
- NXP Supplier Code of Conduct (includes): "Recognized standards, such as the Universal Declaration of Human Rights (UDHR), the United Nations Guiding Principles on Business and Human Rights (UNGP), standards, conventions and guidelines issued by organizations such as the International Labour Organization (ILO), The Organization for Economic Cooperation and Development's (OECD), Social Accountability International (SAI), and the Ethical Trading Initiative (ETI), have been used as references in preparing the NXP Supplier Code of Conduct..."

**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.**

NXP requires its Tier 1 suppliers to sign the following declaration committing to them to the above:

## 25. SUSTAINABILITY DECLARATION

- 25.1 Supplier recognizes having been made fully acquainted with the NXP Supplier Code of Conduct, (<https://www.nxp.com/docs/en/supporting-information/NXP-Supplier-Code-of-Conduct-EN.pdf>) as may be amended from time to time. Supplier hereby commits to comply with all requirements contained therein as further specified in Appendix 6 below

### 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;**

- In 2021 NXP created an 'ESG Management Board' (committee) comprised of Management Team members, and other senior leaders, to lead and coordinate enterprise-wide implementation of ESG strategy and policy, including supply chain, labor and human rights. The ESG Management Board is chaired by our General Counsel, and supported by our Chief Financial Officer, Chief Strategy Officer, Chief Technology Officer, Chief Human Resources Officer, and EVP of Global Operations, and includes other representatives from Investor Relations, Legal, Human Resources, and Sustainability. The ESG Management Board meets monthly to review our ESG performance against our strategy and goals.

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

**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.**

- From NXP's 2021 corporate sustainability report, page 46: *"The CEO and the NXP Management Team, under the supervision of NXP's Board of Directors, are responsible for implementation of NXP's ESG strategy, policies and goals. NXP's ESG Management Board comprised of Management Team members and other senior leaders, leads the implementation of ESG strategy and policy, and ensures appropriate resourcing. The ESG Management Board is chaired by our General Counsel, and supported by our Chief Financial Officer, Chief Strategy Officer, Chief Technology Officer, Chief Human Resources Officer, and EVP of Global Operations, and includes other representatives from Investor Relations, Legal, Human Resources, and Sustainability. The ESG Management Board meets monthly to review our ESG performance against our strategy and goals."*

### INDICATOR 3: TRACEABILITY AND SUPPLY CHAIN TRANSPARENCY

**3.1 the names and addresses of first-tier suppliers;**

- See Appendix H, Top 100 Supplier List in PPENDIX H NXP 2021 corporate sustainability report, page 204.

**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.**

- See 2021 *High-Risk Suppliers by Country and Region from Annual Risk Assessment* in NXP 2021 corporate sustainability report, page 143

**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;**

From NXP 2021 corporate sustainability report, pages 137-139): *“Our supplier risk assessment, developed jointly with our procurement and sustainability teams, are reviewed, and updated to reflect the evolving environment, labor, and human rights landscape. Our supplier risk assessment considers three risk criteria: country, product, and spend. Each criterion has a scale of 1 (lowest risk) to 10 (highest risk). The overall supplier risk score is the product of the three individual scores, expressed as a percentage, which higher percentages implies a higher risk exposure...”*

**SUPPLY CHAIN MANAGEMENT**

**COUNTRY RISK**

The geographical location of a supplier is a key factor in determining risk level, as suppliers in countries with weak regulations, inadequate enforcement of labor rights, and/or ineffective business ethics and environmental laws tend to have high risk exposure. Our Country Risk scores include specific indices from Maplecroft, a third-party partner, which correlates to the NXP Supplier Code of Conduct, and provides an overall weighted Country Risk score.

Use of migrant workers is also a critical element when it comes to labor risk. To account for this, the calculated Country Risk score may be increased by one level after a review by the Sustainability team.

Maplecroft Report	Index	Definition	Relevant Topic in NXP Supplier CoC	NXP Weighted Country Risk Score
Human Rights Risk Atlas	Labor Rights & Protection	Measures the risk of association with, and involvement in, violations of labor rights within a given country. Includes six indicators: child labor, forced labor, trafficking, freedom of association, freedom of collective bargaining, and discrimination in the workplace	Labor and Health & Safety	60%
Legal & Regulatory Environment Risk Atlas	Corporate Governance	Quantifies the quality of corporate governance, based on the quality of existing legal structures, and the extent to which the law is enforced. Includes four indicators: shareholder protection, ethical behavior of firms, strength of auditing and reporting standards, efficacy of corporate boards, and corruption-risk index	Business Ethics	20%
Legal & regulatory environment risk atlas	Legal & Regulatory Environment	Identifies and monitors the strategic and operational risks presented by variations in regulatory and government policy, the costs associated with corruption, and lack of respect for the rule of law	Governance	10%
Climate Change & Environmental Risk Atlas	Climate Change Vulnerability	Evaluates vulnerability of populations to extreme, climate-related events, and changes in major climate parameters over the next 30 years	Environment	10%

Scale used in Maplecroft Scorecard	NXP's Risk Score
0.0 < Score ≤ 2.5	Extreme 10
2.5 < Score ≤ 5.0	High 7
5.0 < Score ≤ 7.5	Medium 5
7.5 < Score ≤ 10.0	Low 1

## SUPPLY CHAIN MANAGEMENT

### PRODUCT/SERVICE RISK

A supplier's materials or services, closest to our products, influences the risk they represent in our value chain. External manufacturers pose the highest level of product risk to NXP. Material suppliers, and manufacturing service subcontractors, pose the second-highest product risk.

The risk level for indirect-spend suppliers, which includes sourcing of all goods and services for NXP business and operations, such as equipment suppliers and indirect service providers, depends on the type of product or service provided. NXP groups suppliers as follows based on the risk score, we compile internally, using data from years of auditing, third party guidance, benchmarking and standards.

Category	Risk Score
External Manufacturing Suppliers (Foundry and Subcon)	10
<b>Category 1</b>	<b>7</b>
Direct Material Suppliers	
Warehousing	
Logistics	
HR-related Services (Recruitment Agencies)	
Construction and Renovation Services	
<b>Category 2</b>	<b>3</b>
Capital Goods (Plant and Machinery)	
Maintenance Repair and Operations	
<b>Category 3</b>	<b>1</b>
Professional Services (Consultancy, Advisers)	
IT-related Services	
Office Services (Telecommunications, Office Products)	
Utilities (Gas, Electricity, Water)	
Travel-management Services	

### ON-SITE CONTRACTOR ASSESSMENT

Service providers and contractors who work on the premises are assigned a risk rating according to the type of service, as shown in table below.

Type of Service	Risk Score
Canteen, Cleaning, Employee Transportation, Security, Temporary Hire (Operators), Warehouse Services, Waste Management, Facility Management (structural)	10
Other: Hardware Maintenance, IT, On-Site Service, Time Hire, Facility Management (incidental)	1



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

See answer 4.1

#### 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.

See 2021 NXP corporate sustainability report, Stakeholder Engagement chapter (pages 15 – 18) and Human Rights Chapter (page 83): *“For the fourth consecutive year, the Annual UN Forum on Business and Human Rights invited NXP to be a featured panelist in a session about lessons learned from the pandemic. We described our work in the supply chain and our efforts to help foreign migrant workers, who are some of the most vulnerable to human-rights abuses during a crisis like the COVID-19 pandemic. We also shared out thoughts on how businesses can collaborate with governments and civil-society organizations to address human rights.”*

*The secretariat of the Bali Process, an official international forum concerned with issues relating to human smuggling, trafficking, and related transnational crimes, invited NXP to a special session, attended by representatives of Bali Process member states, where we discussed in more detail the insights we shared at the State of Play of Forced Labor in the Electronics Sector conference.”*

### INDICATOR 5: DATA ON SUPPLY CHAIN RISKS

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

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

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;

- See NXP 2021 corporate sustainability report Supply Chain Management chapter (page 133 – 147) and the Product Stewardship chapter (pages 148 – 152), in particular NXP’s commitment to responsible minerals.

### 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

- From NXP’s 2021 corporate sustainability report, Supplier Engagement chapter (pages 135 – 136): *“We hold our suppliers accountable for responsible conduct and performance by requiring them to comply with applicable laws and regulations and the NXP Supplier Code of Conduct.”* and *“Our goal is to continue working closely with suppliers who have had audit nonconformance or priority violations, to ensure they fully understand our standards and are equipped with the skills and knowledge to avoid recurrence. The results of these efforts help determine the effectiveness of our standards within the supply chain.”*

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

- From NXP’s 2021 corporate sustainability report, Human Rights chapter, page 83. NXP worked proactively to address and remedy situations that may have resulted in the potential of coerced or forced labor, including employment fees and retention of worker documents.

#### SALIENT HUMAN-RIGHTS ISSUES: 2021 RESULTS

	Our Operations	Our Supply Chain
<b>No Fees</b>	Workers did not pay fees	33% of suppliers audited charged hiring fees. All but one supplier refunded these fees. Dialogue to close the one nonconformances is ongoing
<b>Retention of Documents</b>	Personal documents are retained by workers	Of six suppliers, one has yet to return personal documents to workers
<b>Fair Treatment of Vulnerable Workers During a Pandemic</b>	NXP hired 16 migrant workers from Nepal at our site in Malaysia. These workers were recruited from an employer whose factory was closed due to the pandemic. The workers paid recruitment-related fees to the original employer. After attempts to contact the former employer to repay the fees failed, NXP reimbursed the workers directly	The resumption of more supplier audits enabled NXP to interview workers to understand their well-being during the pandemic. While no serious issues were reported, workers have been provided with the NXP anonymous phone line to report any concerns or impacts to their rights
<b>Working Hours and Rest Days</b>	At one site, the 60-hour working limit was exceeded for approximately 180 workers, or 6% of the site’s direct-labor workforce for a period of 14 weeks. This was due to the labor shortage, challenges in hiring foreign-migrant workers, and border closures	83% of suppliers audited did not monitor working hours and rest days. One supplier has not closed this nonconformance
<b>Young Workers</b>	No child labor. All young workers are in accordance with relevant laws and regulations	No child labor. All young workers are in accordance with relevant laws and regulations
<b>Accurate Contracts</b>	Accurate contracts in native language issued to all workers	50% of suppliers audited had inaccurate contracts. All suppliers have closed this nonconformance
<b>Fair Wages</b>	No discrepancies in wages or benefits	83% of suppliers audited had discrepancies in wages and benefits. All suppliers have closed this nonconformance

## 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");

- From NXP’s 2021 corporate sustainability report, Human Rights chapter (page 81). Our commitment includes a) Clear policy prohibits charging fees to workers and ensures compliance; b) If workers are found to have paid fees to gain employment, reimbursement to workers must

be completed within 30 days of discovery; and c) Grievance mechanism in place to confidentially report policy violations

**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**

- From NXP's 2021 corporate sustainability report, Human Rights chapter (page 83): *"NXP hired 16 migrant workers from Nepal at our site in Malaysia. These workers were recruited from an employer whose factory was closed due to the pandemic. The workers paid recruitment-related fees to the original employer. After attempts to contact the former employer to repay the fees failed, NXP reimbursed the workers directly."*

**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.**

- From NXP's 2021 corporate sustainability report, Supply Chain Management chapter (page 147): *"In 2021, we found three priority violations on No Fees for foreign migrant workers, hired subcontractors, at one of our suppliers in Malaysia. The workers paid recruitment fees, had their wages deducted to pay off the foreign worker levy, and had their passports withheld. The other priority violation was at a supplier in China, where the medical fees had to be paid by the worker upon recruitment."*

#### INDICATOR 8: RESPONSIBLE RECRUITMENT

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

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).

#### 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**

- See NXP Supplier of Code: Page 1 states that this document is informed by *"Recognized standards, such as the Universal Declaration of Human Rights (UDHR), standards issued by organizations such as the International Labour Organization (ILO), Social Accountability International (SAI), and the Ethical Trading Initiative (ETI)."* Further this policy, NXP's human rights policy and other relevant

documents are regularly updated to reflect evolving stakeholder expectations regarding these issues. NXP is also a member of the Responsible Business Alliance (RBA) which holds its members to account for their human rights in supply chain performance.

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

- From NXP's 2021 corporate sustainability report, GRI index (page 192): *"Employees at any of our global locations have always had the freedom to associate and/or right to collective bargaining as provided by local statutes. In the countries where there are collective bargaining agreements, we are compliant with all agreements required by country laws and regulations. Approximately 30% of our employees are covered by collective bargaining agreements."*

## **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**

- From NXP 2021 corporate sustainability report, Supply Chain Management chapter (page 143): *"Suppliers are required to have workplace grievance mechanisms in place that ensure the confidentiality, anonymity, and protection of whistle-blowers who may report any complaints, issues, or concerns. The grievance mechanism must be available in the workers' languages. Suppliers must train their workers on the grievance mechanism and communicate the process to them, so workers can raise concerns without fear of retaliation. Suppliers must state in a policy that they will not tolerate any retaliation by management or any other person or group, directly or indirectly, against anyone who, in good faith, makes an allegation of misconduct or wrongdoing, or who helps management or any other person or group investigate an allegation."*

*The supplier's grievance mechanism must also be made available to their own suppliers. We expect suppliers to investigate, respond and close out all complaints, issues and concerns reported through the grievance mechanism. During a supplier audit, the auditor tests the grievance mechanism thoroughly. During a private worker interview, questions regarding the ways to report a grievance are discussed. After the interview, the auditor provides the worker with the NXP third-party grievance card, which they can use at any time and for any reason to make an anonymous report in the local language."*

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

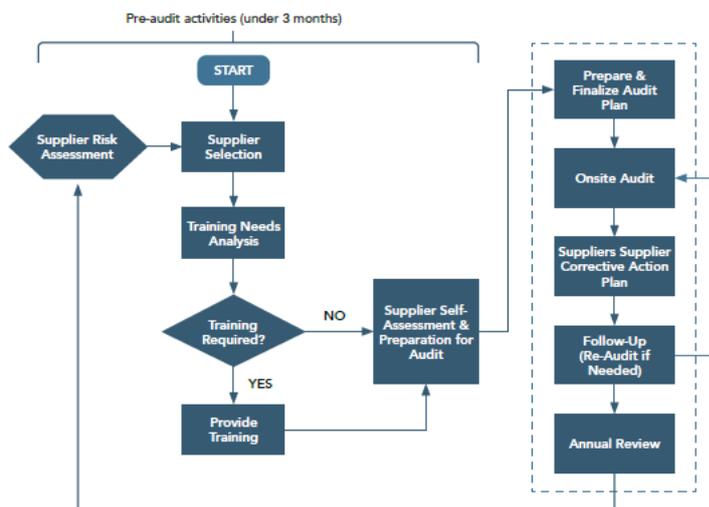
### **10.3 takes steps to ensure that its suppliers' workers or their legitimate representatives are involved in the design and/or performance of the mechanism, to ensure that the workers trust the mechanism.**

## **INDICATOR 11: MONITORING**

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

- From NXP's 2021 corporate sustainability report, Supply Chain Management chapter (page 140): *"NXP's Social Responsibility Audit program is a collaborative and consultative process aimed at guiding suppliers and ensuring they meet the NXP Supplier Code of Conduct as well as the requirements of the NXP Auditable Standards on Social Responsibility. The scope of the audit covers labor and human rights, environment, health and safety, business ethics, management systems, and compliance with the NXP Supplier Code of Conduct. These audits are conducted so suppliers can improve their processes and procedures in these areas. The audits are not intended to pass or fail a supplier, but rather to guide the supplier in a collaborative approach.*

*The NXP Supplier Code of Conduct and the Auditable Standards apply to all NXP suppliers, contractors, onsite service providers, labor agents, and external manufacturers. NXP supplier audits analyze three main aspects of social responsibility: documentation reviews, management and private worker interviews, and physical inspection of all facilities, including any dormitories (onsite audit only). Audits also include interviews with labor agents and onsite service providers, such as janitorial, canteen, security, and other services."*



## SUPPLY CHAIN MANAGEMENT

### RISK ASSESSMENT

The process starts with an annual NXP Supplier Risk Assessment to evaluate which suppliers have a high priority to be audited by NXP.

### TRAINING

Once a supplier is selected for an audit, NXP consults with selected suppliers to determine if additional training is needed.

### SELF-ASSESSMENT

The supplier then completes the NXP Supplier Self-Assessment and sends it back to NXP, including any applicable policies and documentation.

### ONSITE/REMOTE AUDIT

The audit is led by a team of auditors from a third-party audit firm qualified by NXP and accompanied by an RBA-trained NXP auditor. Depending on the size and complexity of the supplier's operations, a typical audit requires two or three full days (onsite audit), and ~18 days (remote audit).

### CORRECTIVE ACTION PLAN

If the audit yields a nonconformance, the supplier must submit a corrective action plan within two weeks of issuance of the final audit report. An effective corrective action plan includes remediation plans that fix the nonconformance, and create a management system to prevent the issue from reoccurring. Audits use classifications for corrective action plans: priority violation, major and minor nonconformance.

- Priority violation – The supplier is given the opportunity to improve performance, but the response and resolution of the violation is non-negotiable. If there is immediate risk of life, the supplier has 24 hours to complete the corrective action. Otherwise, the supplier has seven days to submit a corrective action plan and 30 days to complete the plan. Unresolved priority violations may result in the withdrawal or termination of business.
- Major and/or minor nonconformances – All corrective actions must be approved by NXP and, unless otherwise negotiated or approved, must be fully closed within 90 days. Within that 90-day period, the supplier must update NXP every 30 days.

### FOLLOW-UP

NXP may conduct verification audits to assess whether a supplier has fully addressed all corrective and preventive actions. These audits are scheduled after corrective actions are submitted by the supplier and approved by NXP.

### ANNUAL REVIEW

Upon completion of the annual audit cycle, NXP conducts a review to determine if any suppliers that were audited in the preceding year will be required to be re-audited, based on the severity of the previous audit results.

[This video](#) has more about our Social Responsibility Audit.

### REMOTE AUDITS

Before COVID-19, we typically conducted up to an average of 20 onsite audits per year. We are pleased that in 2021 we managed to conduct eight audits using a combination of onsite, RBA VAP and/or remote audit formats. We worked with our third-party auditing firm, Verité, to develop a new protocol for remote audits, so we could continue our due-diligence work with suppliers.

Under normal circumstances, a typical onsite audit takes only two or three days to complete. Remote audits, however, are significantly more complex, and usually spread over an 18-day period that includes pre-assessment meetings, technical rehearsals, and the audit proper. Most of that time is spent on pre-audit preparations and desktop document reviews.

Pre-Assessment Meeting	Technical Rehearsal	Audit Proper
Validate Facility Information	Detailed Agenda	Opening Meeting
Remote Audit Process, Timeline and Expected Deliverables	Test Software and Hardware, Audio,	Documents Review
Audit Scope	Video Devices	Management Interview
Identification of Auditee Resource Persons	Align Video-Conferencing and File Sharing Platform	Gathering Information from Workers
Overview of Technical Requirements	Employee Roster	Closing Meeting
Overview of Document Review Process		
Confidentiality and Data Privacy Concerns		

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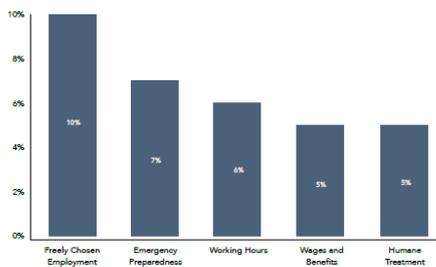
## 11.2 the findings of monitoring reports, including details regarding any violations revealed in relation to forced labour and indicators of forced labour, across supply chain tiers; and

See NXP 2021 corporate sustainability report, Supply Chain Management chapter (pages 142 – 146).

## SUPPLY CHAIN MANAGEMENT

After eight years of auditing our supply chain and more than 4,500 nonconformances, we target the top five as illustrated below. Although 2021 included remote audits and did not evaluate all five categories, Freely Chosen Employment is still the most frequently reoccurring nonconformance.

Top Five Nonconformances by Category 2013-2021



The eight audits conducted in 2021 uncovered five priority violations.

Priority Violations by Category	2021
No Fees	3
Priority Working Hours	1
Retention of Workers Original Documents	1

In 2021, we found three priority violations on No Fees for foreign migrant workers, hired by subcontractors, at one of our suppliers in Malaysia. The workers paid recruitment fees, had their wages deducted to pay off the foreign worker levy, and had their passports withheld. The other priority violation was at a supplier in China, where the medical fees had to be paid by the worker upon recruitment.

### AUDIT CLOSURE RATE

In 2018, we set a goal to close 80% of our supplier nonconformances within the 90-day timeframe. In 2021, we set a new goal at an 85% closure rate. We chose this 5% increase after reviewing improvements in closure-rate performance from audits performed in 2019 and 2020. We continue to provide a 15% threshold since we understand that some corrective actions, such as monetary investments and pandemic-related labor shortages that impact working hours, typically require more than 90 days to close.

In 2013, when we began auditing suppliers, our closure rate was around 40%. Through continuous collaboration with our suppliers, our closure rate has continued to increase year over year.

The closure rate for 2021 was 89%, compared to 97% in 2020. The 8% drop was primarily due to almost double the number of audits completed in 2021 compared to 2020. The lower closure rate is also attributed to the demand on the supply-chain during the ongoing pandemic and production ramp up to overcome the semiconductor shortage. These two trends created challenges in working hours and labor supply at our suppliers in 2021.



While it is our goal to achieve the targeted closure rate, ultimately we aim for a 100% for all audit nonconformances within the calendar year. We continue to work with audited suppliers to fully close out the remaining open nonconformances in the subsequent year. In 2021, not only did we close 89% of 2021's audit nonconformances, we also closed out the remaining 3% of 2020's open nonconformances. At the end of 2021, we have one nonconformance that has remained open since 2019. We continue to address the nonconformity with the supplier.

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## 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).

## 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

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

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.

## NON-SCORED RESEARCH

### 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.*