

# How We Work to Prevent Forced Labor In Our Supply Chain

Apple has zero tolerance for forced labor. In the more than 50 countries and regions where our suppliers operate, we have teams of experts, including independent third-parties, who monitor our suppliers and put in place industry leading procedures to help ensure that no one is forced to work. Our comprehensive policies start before we even sign a contract with suppliers, and we are consistently raising the bar.

1

## We set the highest standards.

Eliminating forced labor begins with setting and maintaining the highest standards. Our standards often go above and beyond legal requirements to protect people from forced labor risks.



### Aligning with international frameworks.

Apple policies and our supplier requirements align with international labor and human rights standards, including those of the International Labour Organization, the United Nations Guiding Principles on Business and Human Rights (UNGPs), and the Organisation for Economic Co-Operation and Development.



### The Apple Human Rights Policy

Our Human Rights Policy outlines how we treat everyone, including our customers, employees, business partners, and the people across every level of our supply chain.

[Read the Apple Human Rights Policy](#)



### The Apple Supplier Code of Conduct and Supplier Responsibility Standards

Our supplier requirements contain strict standards for responsible labor recruitment, and apply to all suppliers, protecting workers globally. We go above and beyond legal requirements in many places by strictly prohibiting labor recruitment in regions where we cannot conduct adequate due diligence and by maintaining a zero recruitment fees policy, because we believe no one should pay to secure a job.

[Read the Apple Supplier Code of Conduct and Supplier Responsibility Standards](#)

2

## We engage early.

To address forced labor risks at its roots, we know that our work has to begin before people enter our supply chain.



### Thorough mapping informs our strategy.

An effective strategy requires deep understanding of our supply chain. To date, we have mapped over 1,000 labor recruitment agencies that work with our suppliers across 32 countries.



### A leading strategy requires leading tools.

The Apple Responsible Labor Recruitment Toolkit, developed in partnership with the International Organization for Migration, provides suppliers and their labor agencies with easy-to-use tools that help them effectively manage and report data, mitigating forced labor risks before people even enter our supply chain. In addition to providing hands-on training, we are making these tools openly available for others to use.



### Awareness is power.

We require our suppliers to provide their employees with training on their workplace rights on their first day on the job. This helps to ensure that every person is aware of their rights and what to do if they're not being respected, which includes the ability to anonymously contact Apple directly. Foreign Contract Workers, who make up a very small percentage of people in our supply chain, also receive training prior to leaving their home country, as well as upon arriving in their destination country. To date, our suppliers have provided workplace rights training to over 23.6 million people. In addition, last year we directly engaged with over 350,000 people in our supply chain to learn more about their workplace experience.



### Investing in consistent improvement.

Through our new Supplier Employee Development Fund, we're investing \$50M to expand programs designed to continue to improve the rights training experience, worker voice platforms, and supplier employee education opportunities.

3

## We hold suppliers accountable.

Once we've implemented thorough preventative measures, independent, third-party assessments verify that our suppliers are meeting our standards. Looking for evidence of forced labor is part of every supplier assessment. If we find any violations of our Code and Standards, we take swift action to remedy the issue and improve their operations.



### A close look.

We regularly conduct independent, third-party assessments, including surprise assessments, of our suppliers, verifying compliance with over 500 points across our standards. This includes an extensive document review to be sure all hiring and personnel records are in place and accurate. In addition to specialized forced labor assessments for at-risk suppliers, we also require many suppliers to participate in facility-wide assessments, such as the Validated Assessment Program, to verify performance across the supplier's entire business. In the event that we find gaps in a supplier's compliance or capabilities, we require them to implement a Corrective Action Plan. To date, our assessments have covered 94 percent of our direct manufacturing spend.



### We investigate every report.

In addition to thoroughly assessing our suppliers' performance in upholding our standards, we also receive reports from the press, governments, civil society, people in our supply chain, and encourage the public to report concerns via [apple.com/supplier-responsibility](#). We investigate every report, and frequently have Apple teams onsite within 24 hours.



### Swift action and steep penalties.

Forced labor in any form is a Core Violation (the most serious violation level) of our requirements. If a Core Violation is discovered, the supplier's CEO is notified and the supplier is immediately placed on probation, pending the successful completion of a Corrective Action Plan. Probation can include no new projects, no new business, and termination of existing business. In addition to commercial penalties, if a supplier is unable or unwilling to meet our standards, they risk removal from our supply chain. Since 2009, we have directed the removal of 24 manufacturing supplier facilities, and 170 smelters and refiners for failure to meet our requirements.



### Action this year.

In FY21, across more than 1,100 assessments, we found no instances where anyone was forced to work in our supply chain. We did find two cases where employees of the same supplier in Taiwan paid recruitment fees. Per our requirements, the supplier directly repaid their employees for those fees. To date, our suppliers have directly repaid \$33.2M in recruitment fees to 37,322 of their employees.

4

## We track progress and report transparently.

Consistent improvement requires transparency and accountability. Since 2007, we have been publishing reports on our efforts across all of our work to transparently share our progress and challenges.



### People and Environment in Our Supply Chain Annual Progress Report

Published annually since 2007 (formerly known as the Supplier Responsibility Progress Report), this report contains a detailed accounting of our progress, challenges, and future plans across all areas of our supplier requirements.

[Read our Annual Progress Report](#)



### Efforts to Combat Human Trafficking and Slavery Disclosure

This disclosure is a specialized filing that focuses specifically on our efforts to prevent and address forced labor risks throughout our supply chain, and includes our due diligence process for our entire business, including manufacturing, materials and goods sourcing, and services. This report also demonstrates our alignment with the UNGPs and meets regulatory requirements in the UK, Australia, and California.

[Read our disclosure](#)



### Consistently raising the bar.

We revisit all of our supplier requirements every year, consistently raising the bar that suppliers must meet in order to continue doing business with us, and publish the updates publicly.

[Read the Apple Supplier Code of Conduct and Supplier Responsibility Standards](#)



### Take a closer look.

We publish additional reports that provide a transparent look at our supply chain. Our Conflict Minerals Report describes our work to responsibly source materials. Our Smelter and Refiner List publishes a list of all identified tin, tungsten, tantalum, gold (3TG), cobalt, and lithium smelters and refiners across our global supply chain, and the Apple Supplier List shares the companies and their locations that comprise at least 98 percent of our direct manufacturing spend.

[Read our disclosures](#)

5

## We regularly engage and partner with stakeholders.

Engagement with stakeholders and rights holders is critical to accountability, ensuring we're taking action where it's needed, and to achieving rapid progress.



### The International Labour Organization (ILO)

We work closely with the ILO on a number of projects, including those related to rights and advancing worker voice. Apple is a member of the ILO Global Business Network on Forced Labor, and serves on the steering committee.



### The International Organization for Migration (IOM)

Apple partners with the IOM on multiple initiatives, including the development of our Responsible Labor Recruitment Toolkit and training our suppliers on the Toolkit.



### Responsible Business Alliance (RBA)

Apple collaborates with the RBA and its member companies frequently throughout the year on initiatives spanning the entirety of our program. As a full member, we serve in several leadership capacities including serving on the board of directors, being a founding and steering committee member of the Responsible Labor Initiative, and serving on the steering committee of the Responsible Minerals Initiative.



### Responsible Labor Initiative (RLI)

Apple is a founding member and serves on the steering committee of RLI, which was established by the RBA as a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted.



### Fund for Global Human Rights

Apple partners with the Fund to support grassroots activists, as well as human rights and environmental defenders, which empowers local voices.