



## SLAVERY AND HUMAN TRAFFICKING

Micron Europe Ltd. provides memory and storage technologies and products, and has global supply chains sourcing materials and components required to produce these technologies and products. Micron Europe Ltd. is a wholly-owned subsidiary of Micron Technology, Inc.

The [California Transparency in Supply Chains Act \(SB 657\)](#) requires many companies, including Micron, to disclose on their websites the efforts they take to eradicate slavery and human trafficking from their direct supply chains. SB 657 requires disclosures regarding verification, auditing, certification, internal accountability and training. This statement is also made for Micron Europe Ltd. under the UK Modern Slavery Act 2015, and constitutes our slavery and human trafficking statement for Micron Europe Ltd's fiscal year ending August 29, 2019.

This statement sets out the steps Micron has taken to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business. These are ongoing measures.

### Policy

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

At Micron, we are committed to respecting human rights, and our core business philosophy is to conduct business with uncompromising integrity and professionalism. Our [Code of Business Conduct and Ethics](#) clearly lays out our commitment to fair labor standards in our own operations and those of suppliers, stating that we never participate in human trafficking or slavery of any kind and that we hold our suppliers to our Code and standards of ethical conduct. To clarify and reinforce these commitments, Micron issued a new [Human Rights Policy](#) in January 2019, which states that Micron forbids the use of forced, bonded (including debt bondage), indentured labor; involuntary or exploitative prison labor, slavery or trafficking in our own operations and in those of our supply chain.

As stated in these policies, they apply to everyone who works on Micron's behalf worldwide, including team members (employees, officers and directors), temporary workers, vendors, suppliers and contractors, and we expect our suppliers and contractors to adopt the same or similar standards to those of Micron.

In August 2008, Micron joined the Electronics Industry Citizenship Coalition, now known as the Responsible Business Alliance. The RBA is comprised of leading companies that have joined together to promote responsible working conditions, ethical business practices, and environmental stewardship globally throughout the supply chain. RBA members adhere to a common RBA Code of Conduct, which addresses supply chain performance expectations for labor, health and safety, environmental practices, ethics and management systems. The RBA Code of Conduct includes a commitment to Freely Chosen Employment.

Micron and its subsidiaries expect suppliers to comply with the Micron and RBA codes regardless of local business practices or social customs, and as may be requested by Micron, to demonstrate adherence to those codes. Based on audit results and closure of identified gaps, we believe that our suppliers' compliance with the codes reduces the risks of human trafficking and slavery in our supply chain.

For more information on the RBA and to view the RBA Code of Conduct, visit <http://www.responsiblebusiness.org>.

For more information about Micron's policies, visit Micron's Corporate Governance page at [www.micron.com/about/our-commitment/operating-thoughtfully/governance](http://www.micron.com/about/our-commitment/operating-thoughtfully/governance), which includes links to our Code of Business Conduct and Ethics, our Human Rights Policy, and other statements related to our commitment and expectations of suppliers.

### **Verification and Due Diligence**

Micron provides major suppliers and certain other categories of suppliers with a questionnaire that includes questions about labor issues, and requires their participation and answers. Upon receipt and review of the questionnaire, if any answers appear to be unacceptable, Micron further investigates the supplier.

In FY2019, Micron used a 3<sup>rd</sup> party service provider to screen and review suppliers for issues including forced labor. We also use a 3<sup>rd</sup> party supply chain risk provider to monitor our supply base against real time Global events, including labor violations. No violations relating to forced labor or human trafficking were found in either instance.

Micron has also assessed over 900 supplier manufacturing locations through our own direct review process since FY2018. In FY2018 and FY2019, Micron worked with several large suppliers to understand their foreign worker hiring practices by mapping these workers' journeys. This included on-the-ground review and worker interviews at several supplier locations to verify these practices, finding no indication of forced or bonded labor or other forms of modern slavery at those locations. We also work with recruitment agents in the country of hire to make sure they follow proper procedures to avoid forced labor practices.

### **Risk Assessment**

We collaborate with customers and suppliers in their risk assessments, and we use RBA risk assessment tools and methods in our own operations and review of our suppliers, which can be found online at <http://www.responsiblebusiness.org>. Additionally, labor processes and practices are part of Micron's scoring of suppliers receiving annual risk and compliance business review scorecards.

### **Measuring Effectiveness**

We consider the lack of audit findings at Micron facilities or our suppliers to be a measure of effectiveness of Micron and RBA programs.

### **Auditing**

Micron reserves the right to audit its suppliers. Micron has engaged third parties to conduct audits of our own facilities using the RBA's [Validated Assessment Program \(VAP\)](#), which have identified no findings of forced labor practices or human trafficking. We conduct audits of all suppliers operating on

Micron sites, which review these suppliers' labor practices against our requirements noted above. In addition, we request our large manufacturing suppliers have third party VAP audits. Some of our other suppliers have also been audited by third parties retained by themselves or by other RBA member companies.

RBA Audits are typically announced prior to being conducted.

### **Certification**

Micron's standard terms and conditions require compliance with all applicable laws, including laws against slavery or human trafficking. As of December 2 2019, 100% of new suppliers qualified are required to electronically sign this expectation.

### **Internal Accountability**

Micron requires all team members and contractors to follow the standards and principals set forth in Micron's Code of Business Conduct and Ethics, as well as the Code of Conduct of the RBA. Team members who fail to comply are subject to disciplinary action and contractors who fail to comply may be removed from Micron's supply chain.

As stated in our Code of Business Conduct and Ethics, Micron is committed to creating an environment where people can report suspected violations and participate in investigations without fear of retribution or retaliation. If someone suspects that human rights violations are occurring in Micron's supply chain, they are expected to speak up. People may contact in-person resources or our 3<sup>rd</sup> party Compliance Hotline which allows anonymous reporting.

### **Training**

All of Micron's team is trained on our Code of Business Conduct and Ethics. Micron provides managers and its employees who have direct responsibility for supply chain management with knowledge and information regarding Micron's requirements, including RBA compliance. This includes training of Micron procurement team members in our expectations regarding supplier responsibility.

Micron also provides training for suppliers on the Micron Code and RBA expectations, and request suppliers take an online training course focused on these expectations. Since FY2018, over 3,000 suppliers on Micron Supplier Responsibility and Compliance Expectations, which includes human rights.

**Approved by Board of Directors of Micron Europe Ltd on February 28, 2020**

Signed: 

**Name: Graham Paul Kingwell**

**Title: Director**

**Date of Signature: 28 February, 2020**