

# 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains



### I. Introduction

Apple¹ is committed to treating everyone in our business and supply chain with dignity and respect, to upholding human rights across our global network of suppliers, and to protecting the planet. We set high standards to respect and empower those who build our products, while conserving the planet's resources.

Human trafficking and the use of involuntary labor are strictly prohibited in Apple's supply chain and "own" business. This prohibition is explicitly stipulated in the Apple Supplier Code of Conduct ("Supplier Code") and the related Apple Supplier Responsibility Standards ("Standards"). The Supplier Code is one of the strongest in the industry and helps to uphold the rights of the millions of people touched by our supply chain around the world. Apple conducts human rights due diligence across our supply chain, including at the deepest levels where minerals in our products may be sourced.

Apple designs and manufactures products requiring resources from all over the world, including from a global network of suppliers that provide materials, components, and product assembly. The operations of Apple's suppliers range in size from a few employees to hundreds of thousands employees, and in aggregate these suppliers employ millions of people at their respective facilities every year.

The California Transparency in Supply Chains Act of 2010 requires certain companies to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains for tangible goods offered for sale and the U.K. Modern Slavery Act 2015 requires certain commercial organizations to prepare and publish a slavery and human trafficking statement for the financial year describing the steps, if any, the organization has taken during the financial year 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.

This 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains (the "Statement") reflects Apple's progress during 2018 (including the financial year ended in September 2018), and ongoing efforts, working collectively, to combat and prevent human trafficking, slavery, or servitude, forced, compulsory, or involuntary labor, and worst forms of child labor (as defined by the International Labour Organization ("ILO") in our supply chain and own operations.

# II. Apple Anti-Human Trafficking Policies and Supplier Code

# Apple's Management Oversight of Anti-Human Trafficking Policies

Apple strictly prohibits human trafficking and the use of involuntary labor in our supply chain and "own" business. We have a robust internal management system overseeing Apple's anti-human trafficking business conduct policies and supply chain human rights due diligence programs.

<sup>1</sup> The term "Apple" as used in this Statement refers collectively to Apple Inc. and its subsidiaries, including Apple Europe Limited, Apple (UK) Limited and Apple Retail UK Limited whose financial year ended September 29, 2018.

Apple Inc.'s Board of Directors oversees its CEO and other senior management in the competent and ethical operation of Apple on a day-to-day basis, including implementation of Apple's programs.

A number of cross-functional teams are responsible for carrying out related efforts with respect to Apple's anti-human trafficking policies, including our Global Security, Business Conduct, and Supplier Responsibility ("SR") teams. The Global Security team sits within Apple's Legal group and seeks to identify risks across the enterprise and mitigate them with efficient and effective security solutions. The Business Conduct team also sits within Apple's Legal group and works to have Apple conduct business ethically, honestly, and in full compliance with applicable laws and regulations. The SR team sits in Apple's World Wide Operations group and seeks to coordinate activities related to our Supplier Code and our strategy to eradicate modern slavery. It works across a number of Apple business groups, teams and functions, including, but not limited to, Apple's Global Security Investigations and Child Safety ("ICS") team, Business Conduct, Legal, Finance, Product Design, Procurement, Manufacturing Operations, and Retail groups. Members of the Apple groups regularly consult with senior management to review progress and set ongoing strategy.

#### **Apple's Anti-Human Trafficking Policy**

Apple conducts business ethically, honestly, and in full compliance with applicable laws and regulations. This applies to every business decision in every area of the company worldwide. Apple's Business Conduct policy and related business conduct principles apply to employees, independent contractors, consultants, and others who do business with Apple. If employees, consultants, or others know of a possible violation of Apple's Business Conduct policy or legal or regulatory requirements, they are required under the policy to notify a manager, Human Resources, Legal, Internal Audit, Finance or Apple's Business Conduct helpline. Failure to comply with Apple's Business Conduct policy, or failure to report a violation, may result in disciplinary action up to and including termination of employment or the end of an individual's working relationship with Apple.

Apple's Anti-Human Trafficking Policy, which is a part of Apple's Business Conduct & Global Compliance program, is provided to all new employees. The policy requires that an Apple employee who becomes aware of a violation of the policy, such as engaging in severe forms of trafficking in persons or using forced labor, report this condition to Apple's Business Conduct team or to a third-party hotline.

We are dedicated to protecting children throughout our ecosystem wherever our products are used and have continued to support innovation in this space. Apple's ICS team supports implementation of our robust policies focused on child protection at all levels of our software platform and throughout our supply chain.

#### **Apple's Supplier Code of Conduct**

We are committed to the highest standards of social and environmental responsibility, ethical conduct, and human rights. Our suppliers are required to provide safe working conditions, treat their employees with dignity and respect, conduct business fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for Apple. Suppliers are required to operate in accordance with our Supplier Code and in full compliance with all applicable laws and regulations.

Apple's Supplier Code draws upon internationally recognized standards, including the United Nations ("UN") Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights ("UN Guiding Principles"), the ILO's International Labor Standards, and the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas ("OECD Due Diligence Guidance").

The Supplier Code applies at all levels of our supply chain, including labor agents and recruiters and areas where the materials for our products may be sourced. In 2012, we extended our Supplier Code beyond manufacturing into the service domain to include AppleCare contact centers, logistics, and repair centers. Since 2015, the Supplier Code has been applied to Apple's retail supply chain and suppliers that provide janitorial and other services to Apple's retail stores worldwide. In 2018, we took steps to further strengthen implementation of our Supplier Code at the initial stages when labor is recruited.

Suppliers are required to adhere to the Supplier Code and Standards, including any subsequent amendments or updates. Suppliers are also required to apply our requirements to their suppliers, and so forth, through all levels of the supply chain. If a supplier is unwilling or unable to meet our requirements, the supplier risks being removed from Apple's supply chain. To date, 20 manufacturing supplier facilities have been removed from our supply

chain. Smelters and refiners deeper in our supply chain are held to similar standards and if they exhibit a lack of commitment to meet our Supplier Code and Standards, they risk losing Apple's business. In 2018, five tin, tantalum, tungsten, and gold, and two cobalt smelters and refiners were removed from our supply chain. The names of these suppliers have been included on a "Do Not Source List" that is published on an internal website available to Apple employees.

The Supplier Code is published in 15 languages and is publicly available on <a href="mailto:apple.com">apple.com</a>. To maintain and continually raise our high standards, we reevaluate our Supplier Code and Standards annually to ensure that it upholds human rights and reflects the values expected by Apple and our stakeholders. Each year, we publicly report on Supplier Code compliance, including how our suppliers are assessed on all labor and human rights protections outlined in the Supplier Code.

#### **Prevention of Involuntary Labor Requirements**

The Supplier Code is supplemented by the Standards that include a range of human rights topics, such as anti-discrimination and abuse; prevention of underage labor; juvenile and student worker protections; working hours management; wages, benefits, and contracts; and responsible sourcing of materials. In addition, the Standards include detailed sections covering anti-modern slavery-related requirements, including: prevention of involuntary labor, third-party employment agencies, and foreign contract worker protections (collectively, the "Prevention of Modern Slavery Standards").

We believe an individual should not have to pay to work. Apple has a zero tolerance policy for any supplier employee paying fees for employment at any of our suppliers, even if those fees fall within the legal limits of the supplier's operating country. In 2008, we made debt-bonded labor a core violation of our Supplier Code and limited permissible fees to one month's wages. In 2015, we went further to mandate that zero fees could be charged to prospective workers for recruitment opportunities, even if those fees fell within the legal limits of the supplier's operating country. When fees are charged, Apple requires direct remedy, and suppliers must repay any fees paid by their employees to obtain their jobs.

# III. Evaluating Risks in Our Supply Chain (Verification)

Apple conducts human rights due diligence throughout the supply chain to assess potential negative human rights impacts and identify salient human rights risks, including with respect to risks of human trafficking and slavery. Strategies developed and implemented include ones focused on eliminating unethical labor practices with the aim of protecting people in our supply chain and eradicating debt-bonded labor.

Through our responsible procurement program, we assess new suppliers before they enter our supply chain and before business is awarded. A dedicated team in Apple's Product Operations group uses a supplier selection framework that includes comprehensive questions on human rights and risks of human trafficking, including on debt-bonded labor. In 2018, we enhanced this framework to assess labor recruitment risks deeper in the supply chain and earlier in a supplier's hiring process.

We continuously strengthen our efforts to uphold the rights of foreign-contract workers in our supply chain. When labor supply is limited in one country but plentiful in another, some suppliers rely on third-party recruiters to secure foreign-contract workers from countries such as the Philippines, Nepal, Thailand, Indonesia, and Vietnam. A foreign contract worker is a person who seeks employment in a country other than the one of which he or she is a citizen. Of the millions of people who work at Apple supplier facilities every year, a small percentage are foreign contract workers. These individuals can be particularly vulnerable to debt-bonded labor, a form of modern slavery. Debt-bonded labor occurs when a person is forced to work in exchange for the repayment of a debt or other obligation—sometimes levied as a fee for receiving a job in the first place.

In 2018, we took steps to map our labor supply chain in greater detail to better understand the movement of foreign contract workers and to identify which geographic corridors created the most risk and vulnerabilities for individuals entering our supply chain. As part of this mapping process and risk analysis we used publicly available information including the United States Department of State Trafficking in Persons Report, and the Global Estimates of Modern Slavery, published by the ILO and Walk Free Foundation in partnership with the UN International Organization for Migration ("IOM"). Our risk analysis informed both our supplier audit selections and programming decisions. Apple also partnered with experts in the field

and utilized services of third party auditors to identify, assess and manage risks of human trafficking in the supply chain.

#### **Deeper in Our Supply Chain**

We also look for issues outside of audits and other key verification activities. Apple integrates human rights due diligence across all levels of our supply chain, including where minerals in our products may be sourced. Apple is proud to be recognized as a worldwide leader in the responsible sourcing of minerals in our products. Our responsible minerals sourcing programs are informed by and designed to conform in all material respects with the OECD Due Diligence Guidance.

In 2010, we were one of the first company to map our supply chain, including from manufacturing to the smelter and refiner level for tin, tantalum, tungsten, and gold ("3TG"). In 2014, we started mapping our supply chain for cobalt and completed that mapping in 2016. In 2018, 100% of our identified 3TG and cobalt smelters and refiners participated in independent third party audits. Apple's independent third party audits go beyond conflict to consider human rights risks. In 2018, we expanded our efforts to measure the impact of minerals due diligence systems on people in mining communities. In addition, we funded an international expert and an organization specializing in land rights to conduct initial research for a human rights impact assessment ("HRIA") of the impact of a potential minerals traceability project on a local community in the Democratic Republic of the Congo ("DRC"). The HRIA results informed Apple's decision-making with respect to the location of the potential project.

Apple believes that empowering independent voices in the supply chain is critical to identifying, assessing, and remedying risks related to human trafficking and involuntary labor. In 2018, we continued to provide funding to the Fund for Global Human Rights, an organization that supports local human rights defenders and local activists in multiple countries, including in the DRC. Apple also continued to support the International Tin Association's International Tin Supply Chain Initiative whistleblowing mechanism in the DRC that allows people to anonymously voice concerns in their local language related to the extraction, trade, handling, and export of minerals so allegations of misconduct can be surfaced and reported.

## IV. Audits and Internal Accountability

#### **Apple's Internal Monitoring Process**

All Apple employees participate in a mandatory, annual Business Conduct training that includes education on Apple's Anti-Human Trafficking Policy. The policy describes the escalation process by which employees and other third parties may report violations related to the policy to Apple's Business Conduct team or through anonymous reports via a third-party hotline. Any violation of the Anti-Human Trafficking Policy or the applicable U.S. Federal Acquisition Regulation<sup>2</sup> may result in disciplinary action, including, but not limited to, employee termination. Apple verifies that its employees are legally authorized to work in the jurisdiction for which they are hired. Apple is also an equal opportunity employer and does not discriminate on the basis of race, color, creed, religion, sex, national origin, marital status, age, sexual orientation, gender identity characteristics or expression, genetic information, physical or mental disability, pregnancy, medical condition, or U.S. military or protected veteran status in all aspects of employment.

#### **Supply Chain Audits and Capability-Building Program**

Every year, we audit supplier performance against our Supplier Code. Unique to Apple's process is the training and capability building that accompanies each audit. Driving some of the highest standards in the world means continuously raising them, and helping our suppliers meet them. In 2018, we completed 770 Apple-managed supplier audits covering manufacturing facilities, logistics and repair centers, and contact center facilities. If we discover that standards aren't being met, we work side by side with suppliers to help them improve. Apple selects upcoming supplier audits based on a number of factors, including geographic risk, previous audit performance, manufacturing process risks, and planned spend. We also

<sup>2</sup> Providers of goods and services to the U.S. Government are required to comply with the applicable Federal Acquisition Regulation and its requirements, which include a policy prohibiting activities that contribute to or upport human trafficking and forced labor.

take into account concerns brought to us by internal teams, external stakeholders, and non-governmental organizations ("NGOs") to make decisions about audit selection. In addition to regular, pre-scheduled audits, we randomly select facilities for unannounced audits by Apple or independent third-party auditors. These surprise audits help encourage our suppliers to continue to meet our standards at all times—not just during scheduled visits.

Apple-managed audits in 2018 covered 93 percent of Apple's supplier direct spend. Applemanaged audits typically take multiple days. Over 500 criteria are evaluated to ensure compliance and identify improvement areas against our Supplier Code. Every year, we provide a public update on our progress through our Supplier Responsibility Progress Report and have done so for over a decade.

#### **Specialized Debt-Bonded Labor Audits**

To further strengthen implementation of our Prevention of Modern Slavery Standards, we use a specialized bonded-labor auditing process in certain high-risk environments, such as in high-risk geographies, in areas where employment of foreign contract workers typically occurs, and in the case of first-time audits of suppliers. Each assessment includes an Apple employee and a third-party auditor. In 2018 specialized debt-bonded labor audits were conducted in Taiwan, Vietnam, Thailand, Japan, Singapore, Malaysia, and the United Arab Emirates.

The purpose of the audits is to identify and verify that no fees were paid by foreign contract workers and identify gaps in procedures for recruiting, contracting, and managing foreign contract workers. Each audit includes a check of corresponding documents from suppliers and labor agents, and interviews with labor agents and foreign contract workers.

We review a supplier's policies and procedures with respect to monitoring by the supplier of its labor agencies, including legal, recruitment, payroll, disciplinary records, grievance systems, communication protocols, and dormitory management. Typically, over 50 document and record types are evaluated.

Worker interviews are an integral part of the specialized debt-bonded labor audits. Workers who participate in these interviews come from a representative sample of a country of origin, labor agencies used, on-boarding dates, work positions, work shifts, and gender. Interviews are conducted without supplier management present, and in the workers' native language(s). After interviews, workers are given a phone number, so they have the opportunity to securely and confidentially provide additional feedback to our team, including anything they consider to be unethical behavior. We encourage workers to report any retaliation to us, and we, along with our third-party audit partners, follow up with all suppliers to address any reported issue. In 2018, nearly 36,000 phone calls were made to workers to ensure that they were not retaliated against for sharing a concern. We also have an internal system that enables our employees to alert Apple if they perceive an issue within their office, or if they visit a facility and see or hear something of concern. Following each submission, Apple investigates the reported issue to determine whether the report identifies a violation of our Supplier Code and Standards. In 2018, 17 incidents were reported and investigated, with the SR team following up on each within 24 hours.

#### Addressing Code Violations and Remedy

We consider any violation of core elements of the Supplier Code to be the most serious breaches. These include cases of underage or involuntary labor, human trafficking, document falsification, or intimidation of or retaliation against workers for participating in audits.

If debt-bonded labor is uncovered, immediate action is taken:

**Debt-Bonded Labor Corrective Action Process** 



Violation
 identification
 Apple assessor and third-party auditor identify debt-bonded
 labor violation



2. Violation
communication
Apple communicates
violation to supplier



3. Signs terms
Supplier signs
probation terms and



4. Repayment plan Supplier submits repayment plan for Apple approval



5. Employee payment Supplier repays its employee



6. Payment
verification
Third-party auditor
verifies repayment

When a core violation is identified, Apple issues a Notice of Probation directly to the president or CEO of the supplier, and we work to reduce production volumes at the offending supplier. Core violations are required to be addressed immediately. When appropriate, we also report these violations to local authorities.

Any supplier with a documented core violation is placed on probation until successful completion of their next audit. During probation, the issue is monitored closely by Apple auditors, and if we believe the supplier is not truly committed to corrective action, we consider terminating our business relationship.

Apple is committed to continuing our efforts to root out and remediate instances on debt-bonded labor from our supply chain. When the Supplier Code is not met, we believe direct remedy is required. This includes a supplier repaying any fees paid by supplier employees to obtain their jobs. Since 2008, US\$30.9 million in recruitment fees have been repaid to 36,137 employees by suppliers. In 2018, two cases of debt-bonded labor were uncovered in Japan at two supplier sites. In each case, the supplier was required to repay all fees to their impacted employees. A total of US\$616,000 in recruitment fees was repaid to 287 supplier employees.

Reimbursement amounts are based on the range of fees identified through worker interviews and cross verification with applicable labor agencies or the supplier. The average of the total self-reported fees is taken per category as outlined in the Standards. Fee categories are outlined in detail in our Prevention of Modern Slavery Standards which are publicly available. If there is a dispute on the fee scope, amount, or date of repayment, Apple engages directly with the supplier to address the objection and enforce repayment to impacted workers. Finally, through third party auditors, Apple conducts verification of all payments made.

\$30.9<sub>M</sub>

\$616K

recruitment fees repaid to 36,137 supplier employees by suppliers since 2008 recruitment fees repaid to 287 supplier employees by suppliers in 2018

## V. Training and Capability Building

#### Training Apple Employees on Anti-Trafficking Policy

Apple employees learn about the risk of trafficking in our supply chain during Apple's Business Conduct training. In 2018,100% of Apple's employees, as well as interns and flexible workforce, were trained on Apple's Anti-Human Trafficking Policy as part of Apple's annually required mandatory Business Conduct training program. Apple employees are encouraged to use mechanisms such as our Business Conduct helpline to report and discuss potential issues, including forced labor. All Apple corporate employees are provided annually with information on the Supplier Code and Apple's SR issue reporting process, and they are instructed to report anything that might be considered a violation, including forced labor, trafficking, or ethical violations. In addition to annual training, employees supporting Apple's government contracting efforts also receive additional training from the Business Conduct team to ensure their knowledge and awareness of legal requirements.

# Capability-Building Apple Supply Chain Partners on Anti-Trafficking Policy

To support capability building of our suppliers, Apple's SupplierCare platform provides tutorials to educate suppliers on the Supplier Code requirements and best practices for business conduct. Tutorials range in topics from foreign contract worker protections to the responsible sourcing of minerals. New suppliers are enrolled in a three-month on-boarding process prior to their initial assessment. Apple also provides suppliers ongoing remote technical support, and, in some cases, onsite training to increase their understanding of the Supplier Code.

Certain suppliers, such as those that provide janitorial and facilities services to Apple retail stores and other sites, also receive specialized training related to human trafficking

prevention and ways to mitigate risks associated with debt-bonded labor that are specific to the service supply chain.

In addition, programs are also in place to ensure that people in Apple's supply chain understand their workplace rights and that those rights are respected. Under the Supplier Code and Standards, suppliers are required to educate workers on Apple's Prevention of Modern Slavery Standards and must provide contracts that accurately describe an employee's work; a clear account of wages and benefits, including leave; and information on Apple's zero tolerance policy on recruitment fees. Suppliers also are required to have supplier employees attend a new-hire orientation training on local labor laws and the human rights protections outlined in the Supplier Code. Since 2007, 17.3 million people in Apple's supply chain have been trained on their workplace rights.

In 2018, we took steps to strengthen implementation of Apple's standards at the recruitment level with the aim of moving further from remedy to prevention. Apple continued to partner with the IOM to develop tools and trainings for suppliers on topics such as conducting worker interviews.

Through participating labor agents, we have taken steps to educate prospective supply chain employees about their workplace rights before they leave their country of origin, including strengthening pre-departure orientations where individuals are educated on their labor rights, contract terms, the culture of their new country of employment, and how to anonymously report illegal practices and abuse. Since 2015, pre-departure orientations have been organized in six different locations, benefitting migrant workers from Philippines, Indonesia, Nepal, and Vietnam.

In 2018, we enhanced our program to work directly with labor agencies in sending countries to focus beyond the content of training, to effective methods of delivering the training. Five of the largest labor agencies who provide foreign contract workers to our supply chain participated in training to effectively deliver a pre-departure orientation to foreign contract workers in their primary language. Together these agencies account for sending approximately 15,000 foreign contract workers abroad every year.

# VI. Going Beyond: Working Together for Progress

Our commitment to people reaches beyond our supply chain. Apple's ICS team maintains strong partnerships with law enforcement agencies, governments, NGOs and non-profit organizations whose work is focused on protecting children online, as well as children located in the communities around our manufacturing sites. Apple has created and rolled out a worldwide child-safety training program to educate law enforcement on, as well as technical training on how to use, Apple devices and software. We have trained thousands of law enforcement officers all around the world.

In addition to these partnerships, we are an active member of Internet Watch Foundation and The Technology Coalition, organizations dedicated to eradicating child sexual abuse. We are a sponsor of the Crimes Against Children Conference, which is the largest conference of its type in North America. The yearly conference attracts more than 6,000 law enforcement officers, social workers, probation and parole officers, computer forensic experts and members from private industry.

We seek industry-wide progress, and work in the collective to encourage others to join us in our commitment to people and tackle supply chain challenges together. In 2018, Apple chaired the board of the Responsible Business Alliance; served on the Steering Committee of the Responsible Minerals Initiative; and served on the Responsible Labor Initiative, of which we were a founding member. We convened stakeholder groups on responsible recruitment and presented our Bonded Labor remediation program at conferences such as the Responsible Business Alliance Annual Conference. To strengthen our efforts deeper in the supply chain, we served on the Governance Committee of the Public-Private Alliance for Responsible Minerals Trade, and continued our participation in the European Partnership for Responsible Minerals.

We also develop and share tools with the aim of working to increase protections for people in the supply chain. In 2018, we completed the transition of Apple's Risk Readiness Assessment ("RRA") tool to an industry-wide platform. As of December 31, 2018, 265 companies from a diverse set of industries that were seeking a tool to assess human rights risks in their sourcing supply chains utilized the RRA tool. In addition, we worked with the IOM to create a clear roadmap for companies and their suppliers to address human rights allegations related to mineral sourcing in their supply chain. The resulting Remediation

Guidelines for Victims of Exploitation in Extended Minerals Supply Chain were informed by the UN Guiding Principles and outline step-by-step approaches to be taken by companies, assessors, and smelters or refiners to mitigate issues in their sourcing supply chain. They also state who is responsible for actions to be taken and give a step-by-step process to remedy the issue. The guidelines are publicly available.

In 2018, Apple was awarded the Thomson Reuters Foundation's Stop Slavery Award. The Stop Slavery Award recognizes companies that have taken concrete steps to eradicate forced labor from their supply chains. The aim is to demonstrate that business plays a critical role in putting an end to modern-day slavery worldwide. We went further in our commitment to end modern slavery to create a path for trafficking survivors to obtain full-time employment in our retail services supply chain. Participants receive counseling, vocational support services, and regular medical exams for two years as they adjust to their new employment in the Apple supply chain.

## VII. Public Reporting

Annually Apple publishes a number of documents related to our commitment to upholding human rights and ending modern slavery, including this Statement as well as Apple's Supplier Responsibility Progress Report and Conflict Minerals Report, through which we transparently report the progress we have made in our efforts in prevention of, among other things, modern slavery. These documents can be found at <a href="mailto:applier-responsibility">applier-responsibility</a>.

### VIII. Certification

To do business with Apple, suppliers must agree to operate in full compliance with all applicable laws and regulations, and adhere to our Supplier Code and Standards. Our Supplier Code and Standards go beyond compliance with existing law and draws on existing, new, and updated internationally recognized standards to advance social and environmental responsibility. Accordingly, by agreeing to comply with our Supplier Code and Standards, all suppliers are obligated to adhere to ongoing advancements toward higher standards.

We are committed to the highest standards of social responsibility and continue to work with industries toward combating human trafficking and slavery in our supply chain and in our own operations.

## IX. Signature

In accordance with the U.K. Modern Slavery Act 2015 and guidance thereunder, this 2018 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains was approved on February 25, 2019 by the directors of each of Apple Europe Limited, Apple (UK) Limited, and Apple Retail UK Limited (as prior statements were in previous years in accordance with the Act) and has been signed by the undersigned director for and on behalf of each of Apple Europe Limited, Apple (UK) Limited, and Apple Retail UK Limited to the extent that this Statement relates to the activities of those respective entities.

Peter R. Denwood

Director

Dated: February 25, 2019