2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains
I. INTRODUCTION

Apple 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 all share. 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 our own business operations. This prohibition is explicitly stipulated in Apple's Anti-Human Trafficking Policy, the Apple Supplier Code of Conduct ("Code") and the related Apple Supplier Responsibility Standards ("Standards"). Our strict Code requires suppliers to uphold the rights of the millions of people touched by our supply chain globally.

Apple's supply chain is large and complex, involving thousands of suppliers and companies around the world. The work performed in our supply chain is varied, from mining and smelting operations, to the manufacturing sites that build components and perform final assembly of our products, to the recyclers who capture materials from products returned by customers. This work also includes service providers that support our operations, such as our logistics partners and the retail janitorial teams that maintain Apple stores.

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. 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 2019 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains (the “Statement”) reflects Apple's progress during 2019 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 International Labour Organization ("ILO") standards) in our supply chain and our own operations.

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 years ended September 29, 2019.
II. APPLE ANTI-HUMAN TRAFFICKING POLICIES

Apple’s Management Oversight of Anti-Human Trafficking Policies

Apple maintains a robust governance structure and internal management system to enforce compliance with our policies to prevent human trafficking and the use of involuntary labor, and to implement supply chain human rights due diligence programs.

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. A number of cross-functional teams are responsible for carrying out related efforts with respect to Apple’s anti-human trafficking policies, including, but not limited to, our Global Security, Business Conduct, and Supplier Responsibility ("SR") teams. The Global Security team sits within Apple’s Legal and Global Security organization and seeks to identify risks across Apple and our supply chain, and mitigate them with efficient and effective security solutions. The Business Conduct team also sits within Apple’s Legal and Global Security organization and sets policies and provides guidance to ensure that Apple conducts business ethically, honestly, and in full compliance with applicable laws and regulations.

The SR team sits in Apple’s World Wide Operations organization and coordinates activities related to our 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 team, Business Conduct, Legal, Finance, Product Design, Procurement, Manufacturing Operations, and Retail. Apple teams regularly consult with senior management to review progress and update ongoing strategy.

Apple’s Anti-Human Trafficking Policy

Apple’s Business Conduct policy and related business conduct principles apply to employees, independent contractors, consultants, and others who do business with Apple. The policy applies to every business decision in every area of the company worldwide. If employees know of a possible violation of legal or regulatory requirements, Apple’s Business Conduct policy, or any other Apple policy, including Apple’s Anti-Human Trafficking Policy, they are required to notify their manager, or a representative of Apple’s Human Resources, Legal, Internal Audit, or Finance organization, 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.

We are dedicated to protecting children wherever our products are made or used. Apple’s Global Security Investigations and Child Safety team supports implementation of our robust policies focused on child protection at all levels of our software platforms and services, and throughout our supply chain. As part of this commitment, Apple uses image matching technology to help find and report child exploitation. Much like spam filters in email, our systems use electronic signatures to find suspected child exploitation. We validate each match with individual review by an Apple employee. Accounts with child exploitation content violate our terms and conditions of service, and any accounts we find with this material are immediately disabled.

Apple has launched a law enforcement training program to educate law enforcement on how to request data from Apple to assist with investigations. Thousands of law enforcement officials around the world have participated in this training course. Apple sponsors the Crimes Against
Children Conference annually. Apple is a member of the Internet Watch Foundation and The Technology Coalition, which are organizations dedicated to eradicating online child abuse.

Pursuant to Apple’s App Store Review Guidelines, apps offered on the App Store must comply with all legal requirements in any location where made available. Apps that solicit, promote, or encourage criminal or clearly reckless behavior are rejected. In extreme cases, such as apps that are found to facilitate human trafficking or the exploitation of children, Apple will notify the appropriate authorities.

**Apple’s Supplier Code of Conduct**

Suppliers are required to operate in accordance with our Code and in full compliance with all applicable laws and regulations. Apple is committed to the highest standards of social and environmental responsibility, ethical conduct, and human rights.

Apple’s Code was established in 2005 and draws upon internationally recognized standards, including the United Nations (“UN”) Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (“UNGPs”), the ILO Declaration on Fundamental Principles and Rights at Work, 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”).

Our Code is published in 15 languages and is publicly available on [apple.com](http://apple.com). To continually raise our high standards, we reevaluate our Supplier Code and Standards annually to ensure that they uphold human rights and reflect the values expected by Apple and our stakeholders. Each year, we release a progress report that details our suppliers’ performance in meeting the standards outlined by our Code.

In 2012, we extended the application of our Code to services suppliers, including AppleCare contact centers, logistics, and repair centers. Since 2015, our Code has been applied to Apple’s retail supply chain and suppliers that provide janitorial and other services to Apple Stores worldwide. In 2018, we took steps to further strengthen implementation of our Code at the initial stages where labor is recruited. We continued mapping high risk migration corridors for foreign contract workers in our supply chain and began directly engaging labor agents in sending and receiving countries.

Suppliers are also required to apply our requirements to their sub-contractors, next-tier suppliers and third party recruitment agencies, through all levels of the supply chain. If a supplier is unwilling or unable to meet our requirements, the supplier risks removal from Apple’s supply chain.

**Apple’s Supplier Responsibility Standards**

Our Code is supplemented by our Standards, which provide additional clarity regarding Apple’s requirements. Apple suppliers must meet these Standards to be in compliance with the Code. The Standards include broad coverage of human rights topics, including anti-discrimination and abuse, prevention of underage labor, juvenile and student worker protections, working hours management, wages, benefits, and contracts, freedom of association and collective bargaining, and the responsible sourcing of materials. In addition, our 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”).
In order for a workplace to be safe, healthy, and respectful, supplier employees must be aware of and able to exercise their rights. That’s why we require all suppliers to train their employees on workplace rights. The ability for supplier employees to speak up without fear of retaliation is fundamental to labor and human rights protections. Apple’s Code and Standards align with the ILO’s fundamental Conventions, including standards relating to the right to freedom of association and collective bargaining. Where country law substantially restricts freedom of association, our suppliers are required to allow alternative means for workers to individually and collectively engage with supplier management, including processes for workers to individually and collectively express their grievances and protect their rights regarding working conditions and terms of employment.

III. EVALUATING RISKS IN OUR SUPPLY CHAIN (VERIFICATION)

We identify salient human rights risks through our own risk analysis and through the channels we maintain with key stakeholders and partners. These include supplier employee interviews and surveys; consultations with human rights, labor, and environmental industry experts; expert groups we convene on specialized emerging human rights topics; United Nations and U.S. government labor and human rights reporting and consultations; media reports; results of our supplier assessments; discussions with supplier management teams; and incident reports received through our partners around the world.

In addition to our own internal monitoring, risk reports come to us from civil society organizations, news outlets, people in the supply chain or their communities, local whistleblower mechanisms, and third-party hotlines as well as through the reporting mechanisms we make available directly to all supplier employees, Apple employees, and the general public. These reports can come to us in any language and can be anonymous.

We identify and mitigate risks in our supply chain through improvements to our policies and strategies, and through collaborative capability building with our suppliers. We integrate findings and learnings into the annual updates to our Code and Standards.

Our approach to prioritizing salient risks draws from the UNGP key concepts of scale (gravity of the impact on human rights), scope (the number of people impacted), and remediability (the resources and partnerships required to remediate an identified risk). Our efforts to identify and mitigate risks align with the Business and Human Rights Due Diligence guidelines, contained in the UNGPs. Strategies implemented as a result of these processes include those focused on eliminating exploitative labor practices and the eradication of debt-bonded labor.

Evaluating the Risk of Debt-Bonded Labor

We believe that no one should have to pay to get a job. We have been working for over a decade to eradicate debt-bonded labor from our supply chain. Of the millions of people who work in our supply chain, a small percentage are foreign contract workers who choose to leave their home countries to work, and who may, as a result, be vulnerable to debt-bonded labor.

Debt-bonded labor is a form of modern slavery that occurs when a person is forced to work in order to repay a debt or other obligation. It can also involve the withholding of personal identity documents, making it impossible for the person to leave their job.

In 2019, we continued mapping 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. The result of this effort informed both our supplier audit selections and programming decisions.

If an Apple supplier uses foreign contract workers, a specialized labor and human rights assessment is conducted in the employees’ native language. If debt-bonded labor is found, we require suppliers to provide a direct remedy, where suppliers repay their employees for any recruitment fees paid. We then verify that payments were made in full and on time through an independent auditor.

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.

**Materials Due Diligence**

Apple conducts robust due diligence on the source and chain of custody of minerals in its global supply chain but does not directly purchase or procure raw minerals from mine sites. Our responsible minerals sourcing programs are informed by and designed to conform in all material respects with the OECD Due Diligence Guidance. Our Code and Responsible Sourcing Standard require our suppliers to engage with smelters and refiners to assess and identify a broad range of risks beyond conflict, including social, environmental, and human rights risks. In 2019, Apple strengthened its Responsible Sourcing Standard by more clearly describing how its requirements apply to all levels of the supply chain, including traders, sub-suppliers, mines, and collection points for recycled minerals used in its products.

In 2010, we were one of the first companies to map minerals in 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 cobalt supply chain. In 2019, 100% of our identified 3TG and cobalt smelters and refiners participated in independent third party audits, which go beyond conflict to consider human rights risks. In 2019, Apple directed its suppliers to remove 18 smelters and refiners that were not willing to participate in, or complete, a third party audit or that did not otherwise meet Apple’s requirements for the responsible sourcing of minerals.

Deeper in our chain, we utilize independent, third party audits to assess risk at smelter and refiner sites. As of December 31, 2019—for the fifth straight year—100 percent of the 267 identified smelters and refiners in Apple’s supply chain for all applicable Apple products manufactured during calendar year 2019 participated in an independent third party conflict minerals audit program for 3TG. These audits encompassed the smelters and refiners that provide materials for Apple’s iPhone®, iPad®, Mac®, iPod touch®, Apple TV®, Apple Watch®, AirPods®, HomePod™, and Beats® products; Apple Card™; and all Apple accessories.

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. Apple continued to work with the Responsible Minerals Initiative (RMI) to fund, design, and launch the Minerals Grievance Platform ([mineralsgrievanceplatform.org](http://mineralsgrievanceplatform.org)). Through the platform, industry organizations, non-governmental organizations (NGOs), and third party audit programs collectively screen and conduct due diligence on filed grievances. This collaboration increases
transparency, consistency, and accountability in how public allegations concerning smelters and refiners are identified, addressed, and resolved.

Since 2017, we partnered with the Fund for Global Human Rights, a leading human rights organization, to support their work with grassroots human rights defenders in the Democratic Republic of the Congo (“DRC”).

In 2019, Apple continued to provide funding to Pact Institute, an international development NGO, to deliver rights awareness training to miners, youth, and community officials in Artisanal and Small-scale Mining (ASSM) communities in the DRC. These training sessions were designed to raise awareness on a range of human rights issues. Through this partnership, Pact has reached over 60,000 people since 2016 with rights awareness training based, in part, on the internationally recognized training curriculum developed by the United Nations International Children's Emergency Fund (UNICEF).

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 DRC. The HRIA results informed Apple’s decision-making with respect to the location of the potential project.

IV. AUDITS IN OWN BUSINESS AND SUPPLY CHAIN

Internal Monitoring

Apple has robust systems and processes in place for receiving and investigating allegations. Apple employees are able to lodge complaints through a dedicated helpline, via email, online, or by phone. Allegations can be submitted anonymously through an independently managed, third party whistleblower line, Ethicspoint. Employees can access Ethicspoints through local toll free numbers provided on our website and through Ethicspoint’s website. All allegations are assessed and investigated, as appropriate.

Supply Chain Audits

Every year, we assess supplier performance against our Code. Apple selects suppliers for assessment based on a number of factors, including geographic risk, previous audit performance, manufacturing process risks, and planned spending. We also take into account concerns brought to us by internal teams, external stakeholders, and NGOs. In addition to regular, pre-scheduled assessments, we also conduct unannounced audits. These surprise assessments encourage our suppliers to continue to meet our standards at all times, not just during scheduled visits.

In 2019, a total of 1,142 assessments were conducted across manufacturing sites, AppleCare contact centers, logistics sites, distribution centers, Apple Stores, and identified 3TG and cobalt smelters and refiners. Apple-managed assessments in 2019 covered 98 percent of Apple’s supplier spend, and of the 801 manufacturing assessments conducted, 17 percent were initial assessments where we visited facilities for the first time. We conducted 70 unannounced assessments and investigations where the supplier facility was provided no advance notice. Beyond manufacturing facilities, we assessed 30 AppleCare Contact Centers and 8 logistics centers in 19 countries.
During an Apple managed audit, over 500 criteria are evaluated to ensure compliance and identify improvement areas against our Code. This includes assessments of human rights protections in the work place. Core Violations are the most serious level of violation of our Code. Any supplier with a documented Core Violation is placed on probation until the satisfactory completion of their next audit. If we find violations of our Code or Standards during an assessment, we partner with the supplier to develop a Corrective Action Plan (“CAP”) to build the supplier’s capabilities and make the required improvements. CAPs typically aim to resolve issues within 90 days, and often include on-site and remote coaching, training, and toolkit implementations. After the supplier has made the necessary improvements, we verify the completion of each item in the CAP before finalizing and closing the assessment.

### Audits of Janitorial Suppliers at Apple Stores

Since 2015, the Supplier Code has been applied to Apple’s retail supply chain, specifically janitorial suppliers and other services to Apple’s retail stores.

**2015**
- Our Code requirements were included in retail and janitorial contracts. In order to increase transparency and ensure that people in our janitorial supply chain are protected, we restrict subcontracting of our janitorial services to one level down and with the prior permission of Apple.

**2016**
- We extended our Code to include employees working for Apple Retail store suppliers and began conducting assessments to identify opportunities to improve and strengthen both their management systems and their employee training.

**2019**
- We continued to conduct janitorial supplier assessments at Retail stores. We also worked to strengthen management systems, working hour compliance, employment contracts, and grievance channels.
Specialized Debt-Bonded Labor Audits

Apple has a zero tolerance policy for supplier employees 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 (the most serious level of violation) of our Code and limited permissible fees to one month’s wages. In 2015, Apple mandated that zero fees be charged to prospective workers.

Milestones in elimination of debt-bonded labor in our supply chain:

<table>
<thead>
<tr>
<th>Year</th>
<th>Event</th>
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<tbody>
<tr>
<td>2008</td>
<td>We made debt-bonded labor a Core Violation of our Code and limited permissible fees to one month’s net wages for foreign contract workers.</td>
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<tr>
<td>2015</td>
<td>We mandated that no fees can be charged to foreign contract workers.</td>
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<tr>
<td>2018</td>
<td>We strengthened implementation of our Code of Conduct at the initial stages when labor is recruited and began assessing labor recruitment risks deeper in the supply chain and earlier in a supplier’s hiring process.</td>
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<tr>
<td>2019</td>
<td>We went deeper to identify the root causes of debt-bonded labor and worked with labor agent directly on fair recruitment practices.</td>
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To further strengthen implementation of our Prevention of Modern Slavery Standards, we use a specialized bonded-labor assessment process in certain high-risk environments, such as in high-risk geographies, in areas where employment of foreign contract workers typically occurs, and during first-time assessments of suppliers. In 2019 specialized debt-bonded labor assessments were conducted in Taiwan, Thailand, Japan, Singapore, Malaysia, and the United Arab Emirates.

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

Worker interviews are an integral part of the specialized debt-bonded labor assessments. Workers who participate in these interviews are selected to build a representative sample of countries of origin, labor agencies used, on-boarding dates, work positions, work shifts, and gender. Interviews are conducted without supplier management present, and in the employees’ native language(s). After interviews, workers are given a contact number, so they have the opportunity to securely and confidentially provide additional feedback to Apple, including
anything they consider to be unethical behavior. We encourage workers to report any retaliation to us and, follow up to address any reported issue. In 2019, over 31,000 phone calls were made to supplier employees to verify that they were not retaliated against for participating in interviews during an assessment.

**Addressing Code Violations and Remedy**

Core Violations are the most serious level of violation of our Code. These include cases of underage or involuntary labor, human trafficking, document falsification, or intimidation of, or retaliation against, workers for participating in assessments.

When a Core Violation is identified, Apple issues a Notice of Probation directly to the president or CEO of the supplier, and the supplier is commercially penalized. Our Code requires that Core Violations be addressed immediately, and when appropriate, we also report these violations to local authorities.

Any supplier with a documented Core Violation is placed on probation until the satisfactory completion of their next audit. During probation, the issue that caused the Core Violation is monitored closely by Apple, and if the supplier does not demonstrate necessary progress toward corrective action, they risk removal from our supply chain. To date, 22 manufacturing supplier facilities have been removed from our supply chain.

Apple is committed to continuing our efforts to root out and remediate instances of debt-bonded labor from our supply chain. When we discover violations of our Code related to this issue, we believe direct remedy by the suppliers to affected individuals is required. Since 2008, US$32.3 million in recruitment fees have been repaid to 36,599 employees by suppliers.

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 our 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.

We take third party allegations concerning our suppliers very seriously. Allegations can come from different sources, including civil society organizations, news outlets, people in the supply chain, and anonymous reports through the channels we make available to supplier employees and the public. Thorough investigations are conducted and violations are remedied.

**V. TRAINING AND CAPABILITY BUILDING**

**Apple Employee Training**

All Apple employees and interns are required to complete mandatory, annual Business Conduct training that includes education on key points in 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\(^1\) may result in disciplinary action, including, but not limited to, employee termination.

All Apple corporate employees are provided annually with information on key points in the Code as well as Apple’s SR issue reporting process and are instructed to report anything that might be considered a violation, including forced labor, trafficking, or ethical violations.

**Capability-Building for Apple Suppliers on Mitigating Anti-Trafficking Risks**

Apple provides platforms, tools, and resources to support our suppliers in building their capabilities. Our SupplierCare platform provides online tools for suppliers to improve their operations and refine new processes. Through the platform, suppliers are able to collaborate with us to track assessment results, develop Corrective Action Plans for assessment findings, reference best-practice resources, and monitor the progress of these improvements. SupplierCare extends capability-building by providing on-demand educational content to increase understanding of our Code and best practices to maintain compliance with our Standards, including foreign worker protections and the responsible sourcing of minerals. In 2019, we engaged over 950 suppliers with digital training content.

In addition to online resources, Apple deploys experts to train and support suppliers on site to resolve immediate issues and improve their management systems to prevent recurrence. Introduced in 2016, the Supplier Responsibility Subject Matter Expert team comprises more than 30 experts with robust industry experience and knowledge to solve both management and technical issues, including in the recruitment and management of foreign contract workers and prevention of forced labor. The team has worked with suppliers in China, Taiwan, Vietnam, India, Thailand, Indonesia, the Philippines, Korea, Malaysia, Japan, and Cambodia.

Certain suppliers, such as those that provide retail janitorial and facilities services to Apple 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.

**Training on Workplace Rights**

Protection begins with rights awareness. Under the Code and Standards, suppliers are required to educate their employees 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 their employees attend a new-hire orientation training on local labor laws and the human rights protections outlined in the Code. Since 2007, 19.4 million people in Apple’s supply chain have been trained on their workplace rights.

Beyond educating supplier employees on their rights, Apple currently partners with over 20 organizations that support grass roots activists and human rights defenders.

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\(^1\) 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 support human trafficking and forced labor.
Due Diligence Toolkit on Responsible Recruitment

While Apple believes that suppliers should provide a direct remedy to protect workers and make them whole, to truly eradicate debt-bonded labor, we have to stop it from happening in the first place.

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 receive training 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 different locations, benefitting migrant workers from Philippines, Indonesia, Nepal, and Vietnam.

Over the last two years, we have gone deeper to identify the root causes of debt-bonded labor. In addition to mapping the movement of foreign contract workers in our supply chain, we began working directly with labor agents to provide training on fair recruitment practices, including topics, such as conducting workers interviews and how to deliver effective pre-departure 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. We also strengthened our pre-departure orientation (PDO) training in the Philippines and included labor agencies and civil society organizations that are certified by the government to carry-out PDO trainings across all industries.

In 2019, we expanded our strategic partnership with the International Organization for Migration (IOM), the leading global expert on migration, to address the need for comprehensive, easy to use tools to conduct due diligence in the recruitment and ongoing employment of foreign workers. Consulting closely with stakeholders, we developed and tested the Responsible Recruitment Due Diligence Toolkit (the “Toolkit”). The Toolkit, aligned with the OECD Due Diligence Guidance, offers suppliers and labor agents a comprehensive “how-to” guide with practical tools covering six core areas: embedding responsible recruitment into policies and management systems; identifying and assessing risks; preventing and mitigating risks; tracking implementation and results; communicating how risks are addressed; and providing access to remediation. The tools are designed to be simple and easy for suppliers to adopt and include a self-assessment checklist, worker training records, a fees and expenses calculator, and a grievance and remediation tracker.

We held training sessions on the Toolkit in those countries where the most prevalent migration corridors in our supply chain exist including Malaysia and Singapore, as well as to eight key labor agents in the Philippines sending workers to Taiwan and Malaysia. The Toolkit aligns with internationally accepted standards and best practices and is now being used widely in Apple’s supply chain. It is also designed for broad, global adoption across industries, is being shared with other companies through the Responsible Business Alliance (RBA), the world’s largest industry coalition dedicated to corporate social responsibility in supply chains. It will also be adapted for global use by the IOM.
VI. GOING BEYOND: WORKING TOGETHER FOR PROGRESS

Apple is committed to systemic engagement and working in collaboration with stakeholders beyond its own supply chain. To do this, we engage with industry associations, civil society, academics and governments to share our progress, and to promote best practices. Through convening stakeholder roundtables and expert groups, we also learn from others’ perspectives and seek critical feedback on our programs.

A number of the organizations we work with, as well as the tools, training, and best practices we have developed and shared are listed below:

- In 2019, Apple continued to chair the Board of the Responsible Business Alliance. We served on the Steering Committee of the RMI, and on the Responsible Labor Initiative, of which we were a founding member.

- Apple’s Risk Readiness Assessment (“RRA”) tool was made available on the RBA industry-wide platform, and as of December 31, 2018, 287 companies are utilizing the tool to assess human rights and other risks in their sourcing supply chains. To strengthen our efforts deeper in the supply chain, Apple participates in the European Partnership for Responsible Minerals and the Responsible Artisanal Gold Solutions Forum.

- The Remediation Guidelines for Victims of Exploitation in Extended Minerals Supply Chain developed together with the IOM outline step-by-step approaches to be taken by companies, assessors, and smelters or refiners to mitigate issues in their sourcing supply chain.

- Apple funds the Humanity United Working Capital Fund, an early-stage venture fund that invests in scalable innovations to meet the growing demand for more transparent and ethical supply chains, addressing the urgent need to protect vulnerable workers and to source responsibly.

- 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 employment in our retail services supply chain. As part of the program, 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. In 2019, we expanded our work with the survivors of human trafficking survivors to Europe.

- In 2019, we attended a number of major events to share our work on bonded labor and support for human rights defenders, including the ILO International Labor Conference, the ILO’s inaugural meeting of the Global Business Network on Forced Labor, The OECD Forum on Responsible Mineral Supply Chains Forum, the UN Business and Human Rights Forums in Geneva and Bangkok, and the 2019 Australian Dialogue on Business and Human Rights.

- In October 2019 we co-hosted an event in London with the Thomson Reuters Foundation, an international organization focused on bringing awareness to human rights issues, to mark the United Kingdom’s Anti-Slavery Day. This event created and strengthened relationships between organizations dedicated to the eradication of modern slavery across the United Kingdom and beyond. Apple was the 2018 recipient of the Thomson Reuters Foundation's Stop Slavery award.
VII. PUBLIC REPORTING

Apple annually publishes a number of documents related to our commitment to upholding human rights and ending modern slavery, including this Statement, Apple’s Supplier Code of Conduct and Standards, Apple’s Supplier Responsibility Progress Report, and Apple’s Conflict Minerals Report, through which we report transparently the progress we have made in our efforts in prevention of, among other things, modern slavery. These documents can be found at apple.com/supplier-responsibility.

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. Each year, we update and strengthen the Supplier Code and Standards, drawing on new and updated standards and best practices recognized internationally to advance social and environmental responsibility. Accordingly, by agreeing to comply with our Supplier Code and Standards, all suppliers are obligated to continue making progress and complying with higher standards.

We are committed to the highest standards of social responsibility and continue to work with others across industries towards 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 March 3, 2020 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.

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Peter R. Denwood
Director

Dated: March 3, 2020