



## COMBATING MODERN SLAVERY AND HUMAN TRAFFICKING

MICRON TECHNOLOGY, INC. STATEMENT FOR FISCAL YEAR 2021

Micron Technology, Inc. provides memory and storage technologies and products, and has global supply chains sourcing materials and components required to produce these technologies and products.

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 and its subsidiaries, including but not limited to Micron Europe Ltd. under the [UK Modern Slavery Act 2015](#), and constitutes our slavery and human trafficking statement for Micron's fiscal year ending September 2, 2021.

This statement sets out the steps Micron has taken to ensure, as far as practicable, 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 [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.

These policies apply to everyone who works for Micron worldwide, including team members (employees, officers and directors), contractors and other temporary workers. We expect all third parties (such as vendors, suppliers, contractors, distributors, sales representatives) we work with to adhere to these policies or, in the alternative adopt 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/or 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 (see “Auditing” section of this statement), 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](http://www.micron.com), 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 has established robust verification processes for onboarding new suppliers. Micron requires all new suppliers to respond to a due diligence questionnaire, which assesses labor and ethics compliance against Micron supplier expectations. Where responses indicate potential issues or concerns, Micron takes additional steps to investigate, and if significant issues are substantiated, the supplier application is rejected.

Micron uses a third-party due diligence provider to screen and review suppliers for potential compliance, ethics, reputational and other issues, including forced labor. We also use a third-party supply chain risk provider to monitor our supply base against real time global events, including publicly-known labor violations. Micron also conducts direct audits and assessments. In FY2021, Micron assessed nearly 1300 suppliers. These reviews include remote assessments, supplier audits, and audits of on-site labor suppliers to understand foreign worker hiring practices. Micron works with local recruitment agents to ensure compliance with standard labor practices, and references a number of external resources to support our reviews, including the U.S. Department of State’s Trafficking in Persons Report, the RBA Labor Migration Corridor Database, and the RBA Practical Guide to Due Diligence on Recruitment Fees in International Supply Chains.

### **Risk Assessment**

Many of Micron’s customers and suppliers have established verification processes similar to Micron’s and we collaborate in those assessments. Alongside the third party due diligence providers and resources noted above, Micron leverages RBA risk assessment tools and methods in our operations and reviews of suppliers. The RBA risk assessment processes can be found 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.

These risk assessments generally include a review to identify potential working hours violations; human rights violations associated with the extraction and sourcing of conflict minerals; forced labor in higher risk



jurisdictions; violation of local labor requirements; and limitations on freedom of movement as a result of regulations or supplier policies, including policies related to the ongoing COVID-19 pandemic.

### **Measuring Effectiveness**

We consider the Micron facilities' strong performance on audits, improvement in audit findings over time at our suppliers, and ability to successfully close audit findings to be a measure of effectiveness of Micron and RBA programs. Micron facilities are audited on a bi-annual basis utilizing the RBA Validated Assessment Program. Scores from these audits are used to measure the effectiveness of Micron policy and process in many areas including labor and human rights.

### **Auditing**

Micron engages third parties to conduct audits of our facilities using the RBA's [Validated Assessment Program](#) (VAP). In FY2021, Micron's VAP Audits did not identify any forced labor practices or human trafficking concerns.

Micron reserves the right to audit its suppliers. Indeed, Micron conducts audits of all suppliers operating on Micron sites, including their respective labor practices. In addition, the Company requires contract manufacturing suppliers to undergo VAP audits. Many other Micron suppliers either retain third parties to conduct audit of their operations or are subject to audit by other RBA member companies.

Micron's audits of suppliers sometimes find labor conditions that do not meet company and industry expectations, in which case Micron follows up until corrective actions are made. Regarding FY2020 supplier findings related to pay, working hours, and living conditions among the company's construction suppliers in Malaysia, corrective actions were made. While Micron is unaware of new findings in FY2021, Micron continues to monitor for potential concerns. More generally, as audits expand into the supply chain, more issues may be identified because of the larger number of suppliers covered.

RBA Audits are typically announced prior to being conducted.

### **Certification**

Micron's standard terms and conditions require a supplier to comply with all applicable laws, including laws against slavery or human trafficking. In addition, suppliers have been required to certify compliance with these requirements since December 2019.

### **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. Contractors who do not meet Code of Conduct and/or RBA requirements are generally removed from Micron's supply chain.

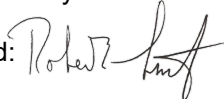
As stated in our Code of Business Conduct and Ethics, Micron is committed to creating a "speak up" environment where people can report suspected violations and participate in investigations without fear of retribution or retaliation. If someone suspects that human rights violations are occurring in Micron's supply chain, they have a responsibility to speak up. Reports may be made in person or through Micron's Helpline, which allows for anonymous reporting.

### **Training**

All of Micron's team is trained on our Code of Business Conduct and Ethics. Micron provides its managers and 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 requests suppliers take an online training course focused on these expectations. Since FY2018, over 4,000 suppliers have been trained on Micron Supplier Responsibility and Compliance Expectations, which includes human rights.

Approved by Board of Directors of Micron Technology, Inc. on January 13, 2022.

Signed: 

Name: Robert E. Switz

Title: Board Chair

Date of Signature: January 24, 2022