



# Human Rights Transparency Report

2025

# Contents

<b>Board of Directors' approval</b>	<b>03</b>
<b>Foreword</b>	<b>04</b>
<b>Overview</b>	<b>05</b>
About Microsoft	05
Operations	06
Human rights across the value chain	07
<b>Microsoft's salient issues</b>	<b>09</b>
Accessibility	10
Digital Safety & Privacy	12
Responsible AI	15
Labor Rights & Employee Wellbeing	20
Responsible Sourcing	23
<b>Grievance mechanisms</b>	<b>32</b>
<b>Looking ahead</b>	<b>34</b>
<b>Appendix</b>	<b>35</b>
Annex 1: Our reporting entities	35
Annex 2: Mapping of sections to laws	36
Annex 3: Supplier monitoring and findings	37
Annex 4: Respecting human rights through the years	39



## Board of Directors' approval

This statement describes the actions taken by Microsoft Corporation and its subsidiaries covered by reporting requirements (the Reporting Entities listed in Annex 1) during Fiscal Year 2025 (FY25) to respect human rights, prevent modern slavery and human trafficking, and protect the environment in our operations and our supply chains, and to promote decent working conditions. This statement is made pursuant to the [United Kingdom \(UK\) Modern Slavery Act](#), [Australian Modern Slavery Act<sup>1</sup>](#), the [Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act](#), and the [Norwegian Transparency Act<sup>2</sup>](#)

(collectively the Relevant Reporting Laws). Microsoft Corporation and the Reporting Entities are hereinafter collectively referred to as Microsoft. A mapping of the sections of the report to each law's reporting requirements is provided in [Annex 2](#).

The statement reflects our global, risk-based approach to identify and address human rights risks, including modern slavery, health and safety, and environmental risks in our value chain. In this statement, we reference "modern slavery," which includes forced, debt-bonded, indentured, child, slave, or involuntary labor

(including prison labor) and human trafficking.

Microsoft continues to develop, implement, and enforce measures that allow workers in our global supply chains and our employees to exercise their human rights and protect the environment. Senior management of the supply chain teams contributing to goods and services sold by the Reporting Entities were consulted and have contributed to and reviewed the content of this statement.

This statement is signed by Penny Pritzker<sup>3</sup> in her capacity as a director

of Microsoft and member of the Microsoft Board of Directors, and as Chair of the Microsoft Board of Directors Environmental, Social, and Public Policy Committee. The Microsoft Board of Directors approved this statement for the Reporting Entities at its December 2, 2025, meeting as the parent entity.



**Penny Pritzker**  
Director, Microsoft Board of Directors;  
Chair, Environmental, Social, and  
Public Policy Committee

<sup>1</sup> For the purposes of the Australian Modern Slavery Act 2018 (Cth), the Australian Reporting Entities conduct business for Microsoft in Australia as subsidiaries and this statement is approved by the Microsoft Board of Directors as the parent entity. Microsoft Pty Ltd is a proprietary company limited by shares and its principal operations are to market, distribute, and sell Microsoft's goods and services in Australia. Microsoft Australia Holdings Pty Ltd and Microsoft Datacenter (Australia) Pty Ltd are also proprietary companies limited by shares and together operate Microsoft's Australian datacenter servers. LinkedIn Singapore Pte Ltd is a private company limited by shares and is a registered foreign company in Australia (as of 22 October 2016) which supports the operation delivery of Microsoft's social and professional network platform, LinkedIn, in the Asia-Pacific region. Of all Australian Reporting Entities, only Microsoft Australia Holdings Pty Ltd owns and controls other entities, including Microsoft Datacenter (Australia) Pty Ltd.

<sup>2</sup> Microsoft's Norwegian entities are in scope of our global due diligence program to fulfill the obligations of the Norwegian Transparency Act, including our global policies, risk assessments, risk mitigation, remediation, and grievance mechanisms. Our global operations and supply chain, including the sourcing of products, services, and equipment, are all within scope of the same global policies, including our Microsoft Supplier Code of Conduct and procurement program, and will be described jointly for the purposes of this report.

<sup>3</sup> This approval also aligns with requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Law, which requires an attestation: "For purposes of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, this report was approved by the board of directors of Microsoft Corporation pursuant to subparagraph 11(4)(b)(i) of that act on its own behalf and on behalf of each of the Canadian Reporting Entities."

# Foreword

As we navigate an era defined by rapid AI transformation, our responsibility to uphold respect for human rights is more important than ever. Our commitment to earning trust is clear: we build technology that is trusted and trustworthy, guided by the values of respect, integrity, and accountability. Earning trust is fundamental to how we empower organizations and individuals to achieve more.

As Microsoft marks its 50th anniversary, we will bring together our Human Rights Report and Supply Chain Integrity Statement into a single Human Rights Transparency Report. This unified approach reflects our conviction that respect for human rights is core to our mission and must be embedded across our global value chain. This report is grounded in five priority areas identified through our recent corporate human rights impact assessment: Accessibility, Digital Safety & Privacy, Responsible AI, Labor Rights & Employee Wellbeing, and Responsible Sourcing.

We conducted two corporate human rights impact assessments during our last fiscal year: one looking across our value chain to identify the most significant current human rights issues for the company focused on our operations, supply chain, and services, and another on the development and deployment of generative AI technologies. Grounded in international human rights instruments like the UN Guiding Principles on Business and Human Rights (UNGPs) and the Universal Declaration of Human Rights (UDHR), these assessments confirmed that our policies are directed at our most salient risks and help us to build upon our underlying historical commitments to, and investments in, fundamental rights. Insights from these assessments helped to sharpen our focus on opportunities to strengthen governance, expand tailored training, and deepen stakeholder engagement.

We know that respecting human rights is not only a legal obligation,

but also a strategic imperative for a global company operating around the world. Operating globally at a time of geopolitical instability requires strong cross-company coordination to help us ensure we approach each context-specific situation with a conflict-sensitive, human-rights lens. We also use insights gained from external reviews and stakeholder engagements to look for opportunities to strengthen our due diligence and governance practices.

While this work reflects our commitment in the most challenging contexts, we continue to strengthen practices across the broader organization. Our Human Rights Advisory Council continues to convene with Microsoft's senior leaders, bringing together external experts to advise on risks, mitigation measures, and opportunities to advance human rights. Given our focus on expansion of infrastructure to meet global demand for AI services, we continue to invest in our supply chain and in environmental and human rights risk assessment,

monitoring, and remediation capabilities for suppliers constructing and operating our datacenters.

As regulatory frameworks evolve and global dynamics shift, we will continue to build trusted relationships and promote digital resilience in alignment with our human rights commitments.

Our promise is to drive responsible innovation, build trusted and trustworthy technology, and advance inclusive progress in the AI era. This report seeks to demonstrate accountability and our continued commitment to upholding responsible business practices so that our technology empowers people and communities everywhere.



A handwritten signature in black ink that reads "Teresa J. Hutson".

**Teresa Hutson**  
Corporate Vice President  
Trusted Technology Group

# Section 1

# Overview



## About Microsoft

Founded in 1975, Microsoft is a publicly traded (NASDAQ: MSFT) technology company that remains focused on its mission to empower every person and every organization on the planet to achieve more. In this age of artificial intelligence (AI), where the potential for accelerated human achievement is greater than ever, Microsoft is committed to making digital technology and AI available broadly and doing so responsibly.

We develop, support, and deploy a broad portfolio of technology solutions for individuals and businesses that advance accessibility, digital safety, privacy, and responsible AI. This includes cloud-based solutions, operating systems, productivity and collaboration tools, server and business applications, management and development tools, and video games. Our products and services span technical support, consulting, and online advertising, as well as devices such as PCs, tablets, and gaming consoles. We know that people will use our products if they trust us, which is why we uphold the highest standards of trust, safety, and responsible business standard as we develop and deploy technology.

As we aim to build and maintain the appropriate guardrails that build trust in

the technology we develop, we remain deeply committed to respecting human rights across our entire value chain. Our human rights governance process is guided by international human rights laws and norms, with oversight beginning at the highest levels of leadership. The [Environmental, Social, and Public Policy \(ESPP\) Committee](#) of Microsoft's Board of Directors reviews key non-financial risks, including human rights concerns, that could impact the company's trust with customers and the public.

At an operational level, Microsoft's Corporate, External, and Legal Affairs (CELA) organization, led by Vice Chair and President Brad Smith, is responsible for driving the company's human rights program. Within CELA, the Responsible Business Practices team coordinates human rights due diligence across our value chain, and engages with a broad range of stakeholders—from the international human rights community to academia and civil society—to inform our approach. Additionally, this team works with other specialist groups (e.g., Office of Responsible AI and Privacy and Regulatory Affairs) to address emerging risks and integrate human rights considerations into new technology domains.

# Operations

As of June 30, 2025, we employ approximately 228,000 people on a full-time basis: 125,000 in the US and 103,000 internationally. Our corporate headquarters is in Redmond, Washington. We own and lease facilities domestically and internationally, primarily for offices, datacenters, and research and development. The largest owned international properties include space in the following locations: China, India, Ireland, and the Netherlands; and the largest leased international properties include space in the following locations: Australia, Canada, China, France, Germany, India, Ireland, Israel, Japan, the Netherlands, and the United Kingdom. Our office locations are listed here.



Algeria	Czechia	Jamaica	Pakistan	Taiwan
Angola	Denmark	Japan	Panama	Thailand
Argentina	Dominican Republic	Jordan	Paraguay	Trinidad and Tobago
Armenia	Ecuador	Kazakhstan	Peru	Tunisia
Australia	Egypt	Kenya	Philippines	Türkiye
Austria	El Salvador	Kuwait	Poland	Ukraine
Azerbaijan	Estonia	Latvia	Portugal	United Arab Emirates
Bahrain	Finland	Lebanon	Puerto Rico	United Kingdom
Bangladesh	France	Lithuania	Qatar	United States
Belgium	Georgia	Luxembourg	Republic of Korea	Uruguay
Bolivia	Germany	Macao SAR	Romania	Vietnam
Bosnia and Herzegovina	Greece	Malaysia	Russia	
Brazil	Guatemala	Malta	Saudi Arabia	
Bulgaria	Honduras	Mauritius	Senegal	
Canada	Hong Kong	Mexico	Serbia	
Chile	Hungary	Morocco	Singapore	
China	Iceland	Netherlands	Slovakia	
Colombia	India	New Zealand	Slovenia	
Costa Rica	Indonesia	Nigeria	South Africa	
Côte d'Ivoire	Ireland	North Macedonia	Spain	
Croatia	Israel	Norway	Sri Lanka	
Cyprus	Italy	Oman	Sweden	
			Switzerland	

# Human rights across the value chain

Our commitment to human rights spans our entire value chain: from our supply chain to our business operations to our products and services. Our approach is guided by international standards. We align with the UN Guiding Principles on Business and Human Rights' expectations for corporations to respect human rights, and we follow its operational expectations for policy commitment, due diligence, stakeholder engagement, and remediation.



## Policy commitment

We develop policies with clear expectations for employees, suppliers, and partners, which are reinforced through training, due diligence, and accountability measures. Our [Global Human Rights Statement](#), [Supply Chain Human Rights Policy Statement](#), and [Trust Code \(Standards of Business Conduct\)](#) prohibit harassment, discrimination, forced labor, and child labor, while promoting freedom of association, freedom of expression, and safe working conditions. Our policies also include expectations for ethical conduct, privacy, and inclusion. They are regularly updated, communicated through internal channels, and reviewed with organized labor groups, including works councils.

## Due diligence

We conduct ongoing human rights due diligence to proactively identify, assess, and address risks across our value chain. Over 2024 and 2025, we carried out an independent corporate human rights impact assessment to evaluate our end-to-end operations, confirming five priority areas: Accessibility, Digital Safety & Privacy, Responsible AI, Labor Rights & Employee Wellbeing, and Responsible Sourcing. These findings guide our risk management, mitigation, and remediation efforts, and inform our internal training, governance structures, and operational

safeguards to help us stay compliant with local legal requirements while promoting a culture of prevention and continuous improvement.

## Stakeholder engagement

Collaboration and transparency are central to our strategy, with external stakeholder engagement playing a critical role in our approach to respecting human rights. We engage with a wide range of stakeholders—including employees, supply chain workers, works councils, governments, NGOs, industry peers, and potentially affected communities and individuals—to gather diverse perspectives and inform our efforts. Since 2018, our Human Rights Advisory Council, composed of external experts in disciplines that intersect with human rights and technology, has helped inform strategic decisions at the highest levels of leadership. We also participate in multiple multistakeholder initiatives, reinforcing our belief that advancing human rights is a shared responsibility.

## Remediation

To build a culture of trust, our employees and external stakeholders must be able to easily raise a concern so that we can address, and aim to resolve, the problem. This is why we maintain multiple channels

where concerns can be safely reported. Our [Microsoft Integrity Portal](#), for example, is a 24/7 phone and online service, available in multiple languages, that allows anonymous reporting of human rights issues and other concerns. All concerns are handled confidentially, and we enforce strict anti-retaliation protections. We leverage post-incident reviews to help us identify patterns and improve our systems. We also publish transparency reports and disclosures, viewable on the [Microsoft Reports Hub](#), to share our progress and challenges, reinforcing our commitment to accountability and continuous improvement.

Our approach to human rights is rooted in the belief that technology must serve people and respect their fundamental rights. We embed human rights into our operations through strong governance, clear policies, and meaningful stakeholder engagement.



## Microsoft's Global Human Rights Statement

[Microsoft's Global Human Rights Statement](#), available in over a dozen languages, outlines our commitment to respecting and promoting human rights. This commitment is grounded in international human rights laws, principles, and norms that apply to Microsoft and all its subsidiaries. The statement expands on our human rights responsibilities, detailing the foundational principles that form the basis of our approach to respecting human rights, identifying key areas of impact, and describing our internal governance structure.

## Responding to geopolitical instability

In a time of increasing geopolitical instability, Microsoft is committed to a human rights-respecting approach across our business and in the geographies in which we operate, emphasizing strong cross-company coordination and context-specific responses.

### Cross-company coordination for human rights

Microsoft's Enterprise Risk and Crisis Management and Responsible Business Practices teams, among many other internal stakeholders, work closely to ensure human rights considerations inform company decisions. Our efforts are context-specific, responsive to situations on the ground and our operations in the area. As the situation warrants, we carry out heightened human rights due diligence, seeking external insights, to help ensure our activities align with our commitments.

### Responding to geopolitical challenges

During 2025, our processes were tested as we responded to allegations of human rights impacts stemming from potential misuse of our technology in the conflict between Israel and Hamas. When *The Guardian* published detailed allegations regarding mass surveillance of civilian populations by a unit of Israel Ministry

of Defense (IMOD), [we refocused our external investigation](#) led by Covington & Burling LLP, a law firm with deep expertise in business and human rights, and incorporated technical assistance from an independent consulting firm. In [September 2025](#), based on evidence found during our ongoing investigation, we disabled a set of services to a unit within IMOD as a step to ensure compliance with our terms of service.

We plan to use insights we've gained, including from our engagement with civil society, dialogue with employees, and our recent independent human rights impact assessment on our corporate salient risks, to continue to improve our processes and operations. We have strengthened our diligence processes by expanding how employees can report information and concerns about how our technology is developed and deployed, and we are enhancing our existing pre-contract review process for evaluating engagements that require additional human rights due diligence. We plan to share our progress on many of these efforts in our next Human Rights Transparency Report.

### Responsible infrastructure and supply chain due diligence

Microsoft applies thoughtful due diligence

as we expand our global infrastructure and engage our supply chain. Our business decision-making processes relative to datacenter siting and ongoing operations incorporate human rights diligence including [engagement with local communities](#). And we extend our standards for responsible sourcing to our suppliers through our [Responsible Sourcing of Raw Materials Policy](#). In-scope suppliers are required to implement raw materials sourcing policies that follow the steps set out by the OECD's Due Diligence Guidance. You can learn more about our raw materials sourcing in our annual [Conflict Minerals Report](#).

We also partner with multistakeholder groups such as the [Initiative for Responsible Mining Assurance](#) (IRMA), industry organizations such as the [Responsible Minerals Initiative](#) (RMI), and others to advance responsible practices throughout the ecosystem. We extend our practices to partner with on-the-ground organizations to maximize benefits to surrounding communities. Through our collaboration with RMI and IRMA, we seek to create, implement, and scale international standards developed with balanced stakeholder representation.

## Section 2

# Microsoft's salient issues



Identifying our most salient human rights risks and the opportunities to address them is a critical component of our human rights governance. In 2024, we commissioned a third-party expert to identify the human rights most at risk of negative impact through the company's full value chain, including our upstream supply chain, our own operations, and the use of our products and services.

The saliency assessment was grounded in international human rights instruments, including the UNGPs, the Universal Declaration of Human Rights, and relevant conventions such as the Convention on the Rights of the Child. Assessors evaluated the severity of potential human rights risks, identified Microsoft's relationship to those potential risks, reviewed existing management practices, and conducted stakeholder (including rightsholder) engagement. An executive summary of the saliency assessment is available [here](#).

The assessment identified five priority areas for Microsoft's ongoing focus and engagement. These issues reflect both continuity and evolution in our commitment to ongoing human rights due diligence and underscores our efforts to drive positive impact across our operations, products, supply chain, and communities. Issues like accessibility, digital safety, privacy, responsible AI, and

responsible sourcing remain critical areas of focus, while identification of labor rights and employee wellbeing as a focus area reflects the growing risks to wellbeing in the workforce.

We are committed to transparency and accountability, sharing key insights into the current state of our recently identified salient issues. In this report, we highlight some of our learnings and reaffirm our commitment to reporting on our progress in the following years.

### Our salient human rights issues

- 1 Accessibility
- 2 Digital Safety & Privacy
- 3 Responsible AI
- 4 Labor Rights & Employee Wellbeing
- 5 Responsible Sourcing

# Accessibility

The Universal Declaration of Human Rights proclaims, "Individuals are free and equal in dignity and rights, and no individual holds greater claim to a human right than another." Building on this principle, we view accessibility as a fundamental right and we are committed to making accessibility a core part of our mission and business model. With over 1.3 billion people globally experiencing disability, and 83% of people expected to encounter disability in their lifetime, accessibility is both a responsibility and an opportunity. We believe that when accessibility is prioritized, everyone benefits.

As we enter the AI era, Microsoft continues to lead with a technology-first approach, advancing accessible innovation that addresses long-standing barriers in education, employment, and digital access. Our commitment spans more than three decades and is reflected in our products, partnerships, and people. From AI-powered tools that support communication and mobility to our Neurodiversity Hiring Program and global skilling initiatives, we are building a future where accessibility drives innovation and expands economic participation.

We follow the "Nothing about us without us" principle of the disability rights movement. Together with our partners, customers, and the disability community, we are shaping a more equitable and accessible world—one where technology empowers everyone to thrive.

Our approach to integrating accessibility into our business model is built on four pillars:

- 1 **Technology**  
We lead with inclusive design and AI innovation, embedding accessibility into products like [the Xbox Adaptive Joystick](#), [Copilot](#), [Live Captions in Windows](#) and [Sign Detection in Teams](#).
- 2 **People**  
We invest in disabled talent and skilling, including programs like the [Neurodiversity Hiring Program](#) and the [Accessibility Fundamentals learning path](#).
- 3 **Partnership**  
We collaborate with NGOs, policymakers, and commercial partners to scale adoption and impact globally.
- 4 **Policy and regulation**  
We advocate for inclusive standards and responsible AI, supporting frameworks like the European Accessibility Act.

This approach reflects our belief that accessibility drives innovation, expands opportunity, and benefits everyone.

## Policies and processes

Microsoft's accessibility efforts are supported by a robust set of policies, processes, and tools that ensure durable product conformance and inclusive innovation:

- **Accessibility Conformance Reports (ACRs)**  
Microsoft [Accessibility Conformance Reports](#) describe how our products and services support globally recognized accessibility standards and can be used to make informed decisions about technologies used to create more accessible workplaces.
- **Shifting left**  
We embed accessibility early in the development lifecycle through our "shifting left" approach, ensuring accessibility is considered from design through deployment.
- **Disability Answer Desk (DAD) and Enterprise Disability Answer Desk (eDAD)**  
These services provide dedicated support for customers with disabilities, including AI-powered assistance.

- **Neurodiversity Program**  
Our [Neurodiversity Program](#) is designed to attract and hire highly skilled, job-ready candidates through an innovative interview process that enables efficient and merit-based recruitment.
- **Product innovation**  
Accessibility is built into our product ecosystem—from adaptive accessories and accessible gaming (e.g., Xbox Adaptive Controller) to AI-driven tools like Seeing AI and Immersive Reader.

These policies and processes reflect our commitment to embedding accessibility into every layer of our business—from product development and customer support to hiring and training.



## Memberships and engagements

The challenges facing people with disabilities are complex, and no single company or sector can solve them alone. We remain committed to prioritizing partnerships that expand accessibility awareness and adoption globally, while strengthening operational efficiency to scale support effectively.

- [Answer ALS](#) & [ALS TDI](#) partnered with Microsoft to create the [Neuromine data portal](#) on Azure. This portal now powers over 400 research projects globally, advancing ALS research with AI.

- We actively engage with EU stakeholders, most recently to prepare for the European Accessibility Act (EAA) that went into effect in June 2025, requiring key products and services to be accessible for all users.
- In 2025, the 15th annual Microsoft [Ability Summit](#) hosted 20,000 attendees from over 160 countries. This event brought together people with disabilities, domain experts, designers, engineers, marketers, and HR professionals to discuss the future of accessible AI and technology.



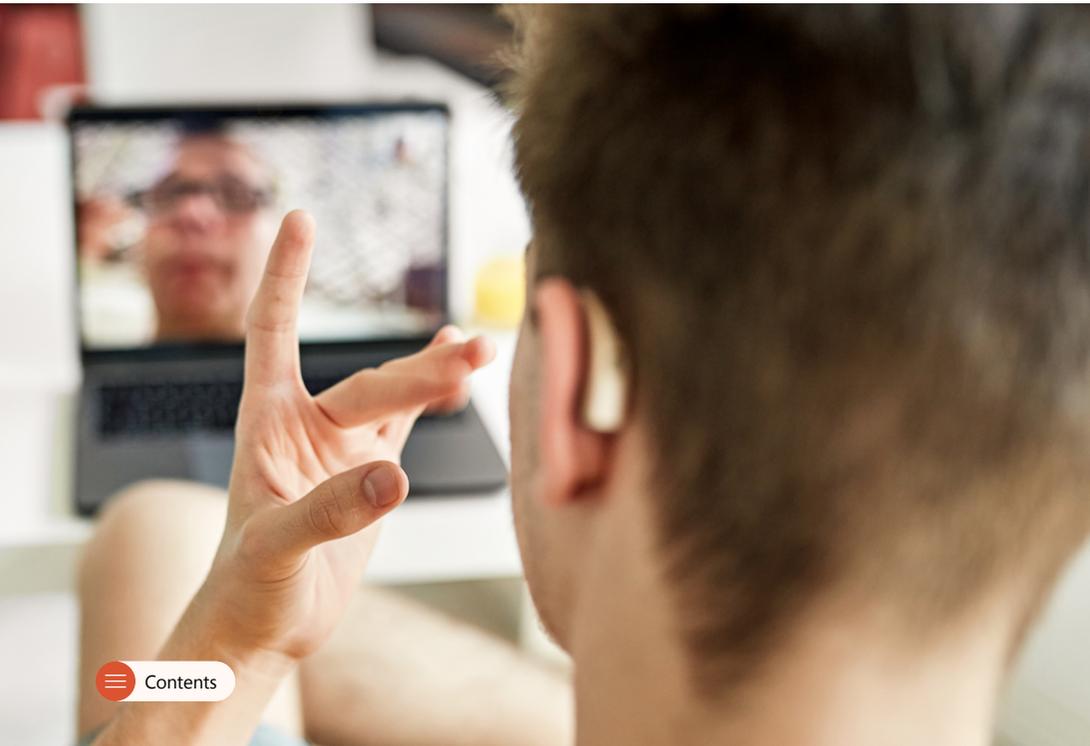
## Be My Eyes

Microsoft has joined forces with [Be My Eyes](#), a global platform connecting blind and low-vision individuals with volunteers and companies, to pioneer more inclusive AI models. This collaboration addresses the critical “disability data desert” in AI training, where datasets often lack representation of people with disabilities, leading to biased and inaccessible technologies.

By integrating anonymized video data from Be My Eyes, Microsoft aims to enhance scene understanding and descriptive accuracy in AI systems,

making them more useful for the 340 million people worldwide who are blind or have low vision. This initiative reflects Microsoft’s broader commitment to accessibility as a fundamental right, embedding inclusive design into company culture, technology development, hiring practices, and policy advocacy.

As AI continues to shape the future, Microsoft’s partnership with Be My Eyes sets a precedent for ethical and trustworthy innovation, demonstrating accessibility is not an afterthought but a foundational principle.



## Internal and external training

Microsoft offers a range of accessibility training programs to build awareness and enhance technical skills:

- **Accessibility resources:**  
All Microsoft accessibility content available for customers can be found on our website.
  - [Training and resources](#)
- **Accessibility Skilling:**  
A free, virtual learning path available internally and externally, covering inclusive design and accessible AI. It can be integrated into organizational learning systems.
  - [Accessibility Fundamentals on Microsoft Learn](#)
  - [Accessibility Fundamentals SCORM package](#)
- **LinkedIn Learning:**  
Accessibility-focused courses are available to Microsoft employees and the public, supporting continuous learning on inclusive practices.
  - [Microsoft accessibility courses on LinkedIn Learning](#)
- **Partner training:**  
We collaborate with organizations like [Teach Access](#) and [Founderz](#) to deliver scalable accessibility skilling programs globally.

- [AI Skills for the Disability Community \(with Founderz\)](#)
- [Inclusive design practices](#)
- **Accessibility Academy:**  
This internal hub offers role-based training and best practices for building accessible products.
  - [Accessibility Academy \(internal only\)](#)

## Risk management, mitigation, and remediation

Microsoft treats accessibility as a driver of innovation and a business imperative. We proactively identify and address accessibility risks by investing in inclusive design, improving testing processes, and embedding accessibility into product development from the outset. When issues arise, we have systems in place

to respond, act, and collaborate with partners when necessary to remediate. These efforts are supported by strong governance, including regular leadership reviews and operational oversight. This approach builds a culture of accessibility and integrates it into broader risk and compliance frameworks, while advancing innovation.



# Digital Safety & Privacy

At Microsoft, we have a responsibility to help protect our users, especially children, from illegal and harmful online content and conduct. We are committed to contributing to a safer online ecosystem by developing technologies and operating our business in a manner that respects privacy, freedom of expression, and digital safety. Our approach is designed to empower users to create, connect, and share knowledge safely, while maintaining control over their personal data.

Our digital safety work is risk-proportionate, guided by three core principles:

- 1 Calibration:** We tailor our safety measures to the unique characteristics of each service, including the user base, features, and business model.
- 2 Content moderation:** We make our policies clear to our users and provide transparency on our enforcement processes and outcomes.
- 3 Collaboration:** Addressing complex online harms is a whole-of-society challenge, so we are committed to multistakeholder engagement and to working with experts to inform our approach.

In parallel, our commitment to privacy is grounded in strong data governance practices and guided by our four privacy commitments:

- 1 You control your information:** We give you the ability to control your data, along with clear and meaningful choices over how your data is used.
- 2 Your data is protected:** We rigorously protect your data using encryption and other security best practices.
- 3 You can expect privacy by design:** We design our products with a core commitment to upholding user privacy.
- 4 We stand up for your rights:** We fight for stronger privacy laws and protections, and will protect your rights if a government request is made for your data.



## Policies and processes

Our policies and processes are designed to respect freedom of expression, privacy, and human rights across all of Microsoft's platforms and services. For our consumer services, the [Microsoft Services Agreement](#) includes a Code of Conduct that defines behaviors and content that are not permitted. Explanations of these policies are publicly available on our [digital safety site](#). To ensure these expectations are meaningful and accessible, we may also tailor them to specific platforms—for example, the [Xbox Community Standards](#) provide additional guidance on how the Code of Conduct applies within gaming. Also, recognizing the importance of digital safety for all age groups, we offer a youth-friendly version of our policies to help young people understand how to navigate online spaces responsibly.

Our [Digital Safety Content Report](#) offers insights into the actions we take to address

serious online harms, including child sexual exploitation and abuse, violent extremist and terrorist content, and non-consensual intimate imagery. For gaming-specific safety, our [Xbox Transparency Report](#) provides additional data on enforcement trends and user reporting, helping our community understand how we maintain a safe and welcoming environment.

We are committed to respecting the rule of law and protecting user rights when responding to government requests for data or content removal. Each request is carefully reviewed to ensure it is legally valid, compliant with applicable laws, and consistent with international human rights standards. We provide detailed reporting on these requests through our [Transparency reports hub](#), which includes information on law enforcement inquiries, national security orders, and copyright-related removals.

We also believe that privacy is a fundamental human right. Our [Privacy at Microsoft](#) site outlines our data practices and includes our privacy statement, which explains how we collect and use personal data.

To further support transparency, we publish a biannual [Privacy Report](#) that highlights key developments in our privacy practices and provides insights into how we manage and protect user data.

## Engagements and memberships

Our partnerships and collaborations are critical to our efforts to advance digital safety while respecting human rights. We participate in a range of multistakeholder and cross-industry initiatives, including the [Christchurch Call to Action](#), the [Global Internet Forum to Counter Terrorism](#), the [Tech Coalition](#), the [WeProtect Global Alliance](#), and the [World Economic Forum Global Coalition for Digital Safety](#). We also participate in a range of forums and engage with experts and victim advocates to inform our work. In FY25, we announced a new partnership with [StopNCII.org](#) to pilot use of victim-reported cases of non-consensual intimate imagery to remove that content from Bing's image search index. We also joined the [Tech Coalition's Lantern program](#), an industry-leading child safety collaboration.

To protect privacy, we also participate in broad range of programs. Microsoft partners with or is a stakeholder in various cross-industry groups, including the [Future of Privacy Forum](#), the [Center for Democracy & Technology](#), and the [United Nations Commission on Science and Technology for Development \(CSTD\) Data Governance Working Group](#).

We also engage with external stakeholders to advocate for policies that advance the

right to freedom of expression online. Microsoft is a member of the [Freedom Online Coalition Advisory Network](#), a founding member and board alternate of the [Global Network Initiative \(GNI\)](#), and a founder of the [Coalition for Content Provenance and Authenticity](#).

Our fifth GNI independent assessment is underway as of this report's publication. In our previous 2022 assessment, we were encouraged by the finding of the independent assessor regarding the degree of commitment "at the highest levels of the company to implementing the GNI Principles," reflecting that "respect for the GNI Principles is not an afterthought at Microsoft, but is rather 'baked in' to how the company conducts its day-to-day business."

## Internal and external training

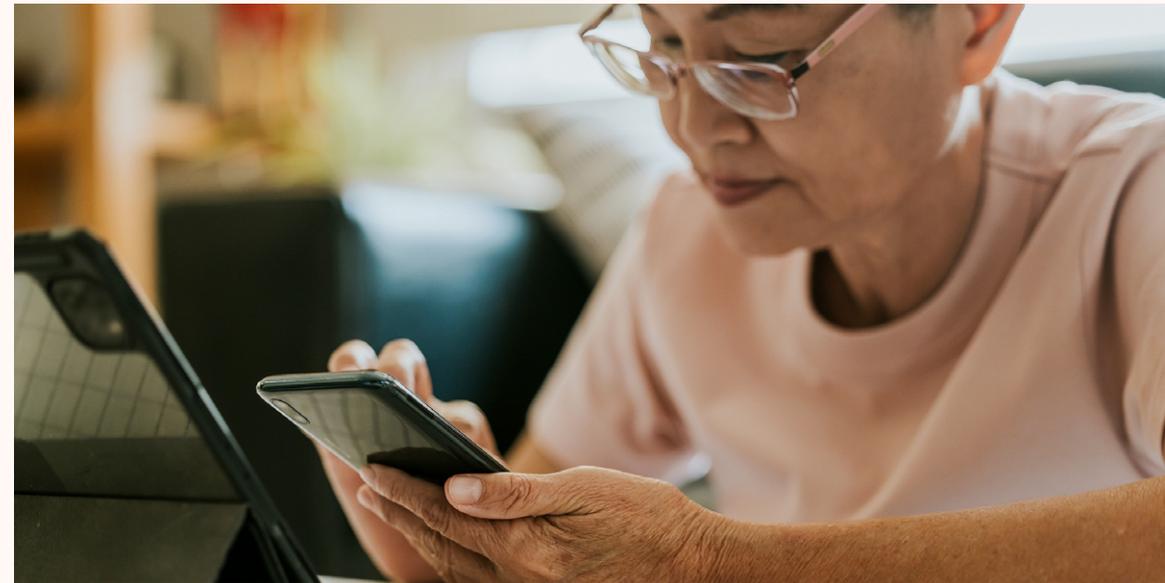
We believe it is important to provide educational resources to help users understand how to use our products in a way that protects their privacy, and to provide educational resources to help users understand online risks and steps they can take to protect themselves, particularly young people as they learn to navigate the online world.

For our young users, Microsoft offers immersive, game-based learning

adventures in Minecraft ("[Cyber Safe: Home Sweet Hmm](#)" and "[Cyber Safe: Good Game](#)") to support students in developing critical online safety and digital citizenship skills. Microsoft also offers an immersive game-based learning adventure, [Privacy Prodigy](#), for students aged 7-18. In this Minecraft game, players learn to protect their data as they encounter scenarios that teach them about personal information sharing and privacy. [Privacy Prodigy](#) is available at no cost in our [Minecraft Education](#) portal and in the [Minecraft Marketplace](#). To further support our young users, we provide resources

including our [Xbox data collection for kids](#) and [privacy for young people](#) pages.

To support families, we also provide resources with guidance on digital parenting, common online safety risks, and how to leverage our family safety tools and other guardrails with the Microsoft [Family Safety Toolkit](#) and the [Xbox Gaming Safety Toolkit](#). We also release annual consumer survey data, intended to help build an understanding of people's experiences and perceptions of risk online, with our [Global Online Safety Survey](#).



Microsoft provides annual privacy and digital safety training to its employees, as well as role-specific training and additional learning resources, including topics related to human rights and freedom of expression. Microsoft also makes available to its enterprise customers a range of resources that provide additional information on privacy, security, and protecting their data:

- [Microsoft Learn](#)  
Provides Microsoft product documentation, training, credentials, Q&A, and more.
- [Microsoft Compliance Manager](#)  
Helps enterprise customers manage and track compliance activities across various regulations and standards.
- [Microsoft Trust Center](#)  
Provides comprehensive information on Microsoft's security, compliance, and privacy commitments.

### Risk management, mitigation, and remediation

We require that all data processing is documented in a Data Protection Impact Assessment, in which we consider risks of the processing and ensure appropriate mitigations for those risks. Microsoft's privacy governance model ensures

customer data confidentiality, detailed in third-party reports like ISO 27001 and 27701, covering data minimization, retention, transfer, and sharing. Microsoft also provides core data subject rights—known as a data subject's rights of access, deletion, correction, portability, restriction of processing, and objection—to data subjects globally. Consumers may use the [Privacy Dashboard](#) to exercise these rights, and Microsoft provides [Privacy Support](#) for any additional privacy questions or concerns.

We address privacy-related risks posed by government requests for user data through an extensive, rights-aware review process, and publish transparency reports on these [requests](#), consistent with our commitments to the GNI.

Our digital safety governance model adheres to internal standards and regulatory requirements, assessing and mitigating digital safety risks, and protecting user rights. Reports like Bing's EU Digital Services Act (DSA) Systemic Risk Assessment and Audit Report are publicly [available](#).



# Responsible AI

Over the past year, there has been a significant increase in the adoption of AI by both organizations and individuals. Continued innovation across multimodal systems and new tech frontiers has led to a renewed emphasis on how AI can help secure societal benefits, while also introducing new challenges and opportunities to advance human rights. We are dedicated to respecting human rights in our development and use of AI technologies.

For nearly a decade, we have invested in operationalizing responsible AI practices, grounded in our commitment to respecting human rights, and we remain dedicated to growing, learning, and evolving our approach. We recognize that the development and deployment of AI technologies must respect and promote the dignity, autonomy, and equality of all individuals. Our approach is shaped by real-world experience, evolving to reflect advances in the state of the art and the diverse perspectives of global stakeholders. We prioritize safety and trust through robust governance, risk management, and continuous improvements to ensure responsible development and deployment that keeps pace with innovation.

In 2018, we commissioned a human rights impact assessment of AI that was foundational to the development of our Responsible AI Program a year later and continues to inform our efforts to embed rights-respecting principles into every stage of the AI lifecycle. In 2024, as part of our continued commitment to respecting human rights, we commissioned a human rights impact assessment of AI to understand how we can better meet our responsibility to respect human rights in the development and deployment of generative AI. An executive summary of that assessment is [available here](#).

## Policies and processes

In 2019, Microsoft established the Office of Responsible AI (ORA) to oversee responsible AI governance company-wide. That same year, we introduced the [Responsible AI Standard](#)—an internal policies and practices playbook and a bedrock of our governance work that aligns with our six AI principles and the AI development lifecycle.

As our governance practices evolve, we believe it is important to share our insights with our stakeholders. Building on stakeholder feedback and rapid industry developments, our [2025 Responsible AI Transparency](#) Report deepens our transparency by detailing advancements in incident response, risk assessment, and regulatory preparedness, including alignment with the EU AI Act.

The 2025 Responsible AI Transparency Report also explores the evolution of our responsible AI tools, risk measurement methodologies, and collaborative initiatives that help us scale AI safely and effectively. By sharing our progress and insights, we aim to help our customers, partners, and other collaborators navigate AI governance challenges with confidence, ensuring AI remains a trusted and transformative force for positive impact worldwide.

We continue to build on and refine our pre-deployment oversight processes. Before deploying generative AI models and systems, teams work with experts across the Responsible AI community to review their risk management approach. These experts provide further recommendations and requirements grounded in our AI policies. Additionally, the Sensitive Uses and Emerging Technology Program, managed by ORA, serves as Microsoft's review and oversight process for high-impact and higher-risk uses of AI—including those that implicate human rights. The Sensitive Uses review process is triggered when Microsoft employees are involved in developing or deploying an AI system, and the foreseeable use or misuse of that AI system could:

- Have a consequential impact on an individual's legal status or life opportunities;
- Present the risk of significant physical or psychological injury; or

- Restrict, infringe upon, or undermine the ability to realize an individual's human rights.

Building on the responsible AI policies, processes, and practices that guide how we develop and deploy AI technologies, we have implemented other mechanisms to promote the responsible use of our technologies by our customers. For example, our enterprise contracts incorporate our [AI Services Code of Conduct](#), which requires our customers to implement responsible practices (such as human oversight and access controls) and prohibits using our AI services in ways that inflict harm on individuals, organizations, or society, or affect individuals in any way that is otherwise prohibited by law.

## Our six AI principles

Microsoft adopted [six AI principles](#) that guide the development and use of AI at Microsoft:

- 1 Fairness
- 2 Reliability and safety
- 3 Privacy and security
- 4 Inclusiveness
- 5 Transparency
- 6 Accountability

## Engagements and memberships

We continue to scale our Responsible AI Program to meet the growing demand for trustworthy AI technologies. Our approach is grounded in research, global collaboration, and inclusive engagement, ensuring that our practices reflect a wide range of perspectives and are responsive to emerging risks.

To deepen our understanding of AI's impact on people's fundamental rights, we launched the [AI & Society Fellows Program](#) in 2023, fostering interdisciplinary research collaborations between Microsoft researchers and external experts. In parallel, our [Accelerating Foundation Models Research](#) (AFMR) initiative has supported over 300 academic publications across 123 institutions in 19 countries, advancing research on AI safety, human-AI interaction, and scientific discovery—across multiple languages and disciplines.

To promote globally informed responsible AI practices, we launched the [Global Perspectives on Responsible AI Fellowship](#) in partnership with the Stimson Center. This program brings together experts from the Global South to examine AI applications and evaluate their impacts in developing countries. Fellows seek to understand how AI-related harms and benefits may manifest in various social, cultural, economic, and environmental

contexts, and identify technological and regulatory solutions that might help mitigate risks and maximize opportunities, contributing to Microsoft's policy development and participation in international governance discussions.

Additionally, it is important that we continue our effort to help build public trust in digital content—especially during a time when content provenance is a critical concern for journalists and human rights defenders who rely on trustworthy information to uphold freedom of expression and safeguard democratic participations. One way in which we aim to address this is through our leadership in the [Coalition for Content Provenance and Authenticity](#) (C2PA), a multistakeholder initiative with civil society organizations and industry partners to develop technical standards to certify the origin and integrity of media. These standards are integrated into Microsoft's AI-generated image services, such as Bing Image Creator, and are helping users responsibly mark their content as AI-generated.

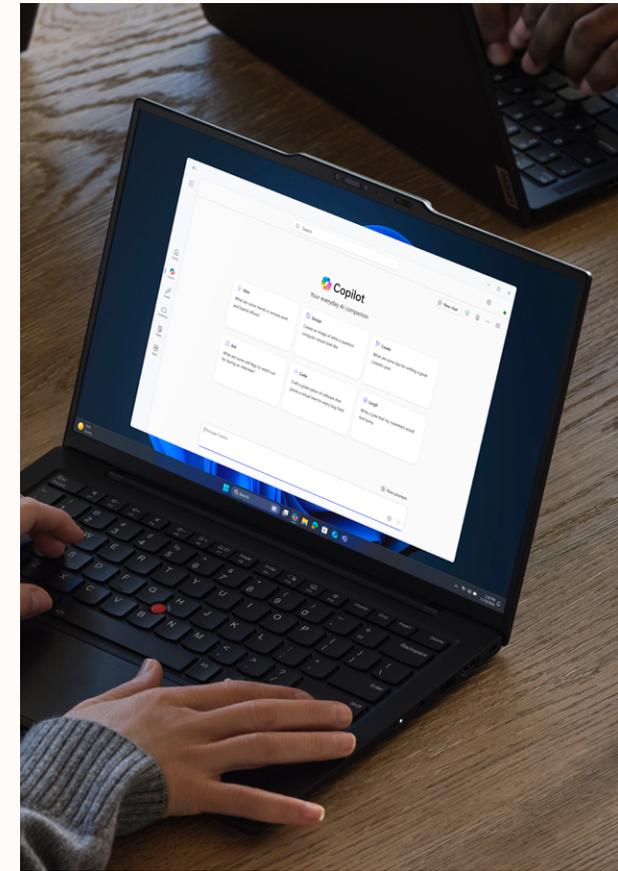
## Internal and external training

Throughout FY25, we continued to advance our commitment to responsible AI through comprehensive internal training and external education initiatives.

All Microsoft employees were required to complete the [Trust Code](#) (Standards of Business Conduct), which included responsible AI training as a foundational component. Building on this baseline, employees had access to additional learning opportunities tailored to varying levels of technical expertise, delivered through both live and self-paced formats. Hackathons and specialized learning events further supported the development of applied skills in responsible AI.

Microsoft also invested in broadening AI literacy for diverse audiences. The Office of Responsible AI published an [AI Literacy Starting Guide](#) for customers and partners, providing role-specific guidance across different levels of expertise. Microsoft Philanthropies launched the [AI Skills Navigator](#), an AI-driven tool that builds personalized learning paths based on individual experience. In July 2024, [Older Adults Technology Services \(OATS\)](#) from AARP introduced a new AI education program for Americans over 50, supported by the Microsoft–OpenAI Societal Resilience Fund. To engage younger learners, [Minecraft Education's AI Foundations Program](#) offered students, educators, and families interactive modules on responsible use, digital citizenship, and real-world problem-solving.

Together, these initiatives underscore Microsoft's commitment to equipping individuals and organizations with the knowledge and tools necessary to use AI responsibly.





## Risk management, mitigation, and remediation

Earning trust in the age of AI requires keeping humans at the center of how we design, develop, and deploy AI—a practice that started in 2016 with the first draft of our AI principles, which we formally adopted in 2018. Year over year, we consistently return to these principles as new AI technologies unlock new capabilities and potential risks. These principles provide us with the contours for establishing new policies, tools, and practices, or refining existing ones. When we develop and deploy new generative AI systems and models, we leverage the AI Risk Management Framework created by the National Institute for Standards and Technology (NIST), which includes four key functions: govern, map, measure, and manage.

Our risk management process follows a multilayered approach to mapping, measuring, and mitigating risks in AI systems. One way in which we help map potential risks is by leveraging AI red teaming, a process that utilizes manual testing and automated measurement pipelines to simulate adversarial user behavior, annotate outputs for harmful or undesirable content, and calculate metrics to guide mitigations.

In addition to implementing risk management processes for our AI systems, we leverage programs like our Sensitive Uses and Emerging Technology Program to help identify high-impact and higher-risk uses of AI that may require mitigation to remediate potential human rights risks. In instances where mitigation may be required, the Responsible Business Practices team may also review the matter as human rights subject matter experts.

As AI technology and regulations continue to rapidly evolve, we are especially attentive to the potential human rights risks in AI deployment and use by our customers. We apply limited access restrictions for some of our AI services, such as our facial recognition technology, the Custom Neural Voice AI-generated speech feature, and full configurability of content safety filters in Azure OpenAI Service. Use of these services is only available to approved customers and partners who meet a combination of controls calibrated to the risks of each service. For example, limited access restrictions require government agencies to meet strict criteria before using facial recognition services and prohibit the use of the Custom Neural Voice feature to impersonate political figures in a way that could mislead the public.

Customers may also be required to re-verify the information they submit to gain access to these limited access services to ensure it remains accurate, complete, and up to date.

In 2024, Microsoft expanded its content provenance pipelines to address election-related information, reproduction of protected materials, and harmful outputs across text, image, and audio modalities. These enhancements—ranging from prompt engineering optimizations to adversarial fine-tuning and new attack strategies—were designed to expose vulnerabilities and strengthen safeguards. Today, as product teams continue to implement content provenance, Microsoft teams are working to improve detection of deceptive AI, expanding our AI literacy work and our [Microsoft Threat Analysis Center](#) (MTAC) is continuing to share insights on how adversaries are using this technology. This is a reflection of our commitment to advance technology and policy in ways that protects the right to participate in society—both in the United States and around the world.

## A responsible approach to datacenter locations

Microsoft takes a responsible approach to where and how we build datacenters and the services we operate in accordance with our commitment to respect human rights. To inform responsible market entry, we conduct extensive due diligence, developing a thorough and nuanced understanding of the applicable market and jurisdiction, including the potential risks to human rights. We use what we learn from this due diligence to inform decision-making, mitigate risks, and develop and refine our policies and practices.

Our datacenter risk mitigation measures typically take any or all of three forms: exclusion of specific types of services (e.g., not offering consumer services that

collect personal data), technologies (e.g., not offering facial recognition technology), and/or specific types of customers (e.g., not serving law enforcement agencies). For example, in certain locations, we serve only enterprise customers and do not store data from our consumer services as a way to mitigate potential risks to the right to privacy and security, or we store data outside of the jurisdiction, rather than on site.

Furthermore, all users of Microsoft online services must comply with our [Acceptable Use Policy](#), which prohibits use of our services to violate the rights of others, among other restrictions, and we have the right to suspend users for violations

## Operating datacenters in countries or regions with human rights challenges

Growing customer demand—particularly from multinational enterprises—combined with the potential of AI to support economic development, engineering limitations, and regulatory requirements, is driving the construction and operation of datacenters in an increasing number of countries. When considering [datacenter siting](#) and provision of services, we are guided by our commitments to respect human rights and the rule of law, and industry best practices enshrined in the [Trusted Cloud Principles](#).

Consistent with our mission to empower every person and every organization on the planet to achieve more, we are deeply committed to the communities that host our datacenters. Our [Global Datacenter Community Pledge](#) informs how we design, build, and operate datacenters to support environmental sustainability, foster inclusive economic and social opportunity, and engage responsibly with local communities. In practice, this means we:

- Work closely with local stakeholders at every stage, engaging with local authorities, residents, and other partners early and often.

- Maintain an open dialogue with the community and consider how we can incorporate feedback into our planning (for example, adapting facility designs to respect local culture or minimize environmental impact).
- Invest in community priorities like digital skills training, environmental projects, and infrastructure improvements.
- Work with local utilities to shift computing workloads to less congested times or regions, helping ensure reliable power access for surrounding communities while advancing our goal of operating entirely on renewable energy.

Through this ongoing engagement and partnership, we work towards datacenters that positively contribute to each community.



## Labor Rights & Employee Wellbeing

Respecting fundamental rights is a commitment that shapes every aspect of our business operations, including the wellbeing of our own employees and their family members. [Microsoft's Global Human Rights Statement](#) recognizes the rights of our employees, including those guided by international frameworks like the [International Labour Organization's \(ILO\) Declaration](#) on Fundamental Principles and Rights at Work: their freedom of association and right to collective bargaining, their rights not to be subject to forced labor, child labor, or discrimination with regard to employment and occupation.

We acknowledge that respecting the rights of our employees is a legal and ethical obligation, and that it is essential to fostering a workplace where employees are treated with dignity and empowered to contribute fully. As such, we integrate human rights considerations into our culture, policies, and business processes, embedding them into our [Trust Code](#) (Standards of Business Conduct) and our responsibility to work toward a sustainable future where everyone has access to the benefits that technology provides.

Within our own operations, Human Resources, Global Occupational Health and Safety (OHS), CELA, and Finance organizations have primary accountability across their respective domain areas to address known or emerging human rights risks and comply with existing and emerging regulations.

### Policies and processes

We have a comprehensive set of internal policies and practices in place to uphold our commitment to protect the wellbeing of our employees. Our employee policies outline a range of expectations for employee conduct, behavior, and practices in the workplace. Several of these policies are referenced in our Global Human Rights Statement, including Microsoft's [Equal Employment Opportunity Policy](#), [Anti-Harassment and Anti-Discrimination Policy](#), and the [Trust Code](#) (Standards of Business Conduct). Employees, including representatives of works councils, have internal access to Microsoft's employee policy statements.

Additionally, we have an established Occupational Health and Safety (OHS) policy that contains requirements for employees to follow Microsoft's procedures to ensure compliance with local legal requirements.

Maintained by the Global OHS team, the OHS policy is a component of a broader, OHS program that will expand on current processes in place to include additional procedures for incident reporting, risk assessment, training, inspections, and change management.

We are committed to fostering a culture of holistic wellbeing for our employees and their families. Through our wide range of [benefits and wellbeing programs](#), Microsoft supports physical, mental,

emotional, and financial health, including comprehensive healthcare, mental health support, financial wellness and planning resources, and flexible work arrangements available for our employees and their families. For example, [Microsoft CARES](#) provides global access to counseling, assistance, referrals, education, and other support for mental and emotional wellbeing. Employees can also access expert help for [childcare](#), [tools for weight management](#), and resources for major life events such as [marriage](#) or [childbirth](#).



At Microsoft, culture is how we create our competitive edge. It's how we attract and grow talent, build skills and capabilities, and deliver results that drive growth—especially in a world shaped by rapid transformation and technological advancement. Our approach is grounded in business outcomes: building a workforce that's agile, skilled, and ready to meet the demands of today—and tomorrow. As part of this commitment, our Inclusion Networks connect employees globally through identity-rooted communities that foster culture, community, and contribution in safe, consistent, and meaningful ways.

### Engagements and memberships

In June 2022, we adopted a set of labor principles affirming employees' rights to organize as appropriate. We continue to maintain strong partnerships with our works councils and external trade unions. Our partnership with the American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), the largest federation of labor unions in the United States representing workers across a wide range of industries, aims to create an open dialogue to discuss how AI must anticipate the needs of workers and include their voices in its development and implementation. Our engagements with similar organizations are part of a broader strategy to foster open dialogue, listen to employee concerns, and ensure that workplace policies reflect evolving expectations and respect workers' rights.

### Internal and external training

We have comprehensive internal training programs to ensure employees are equipped to uphold the company's commitments to human rights, ethical conduct, and workplace safety. At the broadest level, all Microsoft employees are required to complete training on the Trust Code (Standards of Business Conduct), our companywide ethics course which covers workplace conduct, human rights compliance, and responsible AI. As of January 2025, 99% of all employees completed this course. This foundational training reinforces expectations for respectful behavior and ethical decision-making across all roles and geographies.

### Risk management, mitigation, and remediation

Microsoft seeks to mitigate and prevent potential human rights risks in our own operations—including forced labor, child labor, workplace health and safety, discrimination, and low wages—by applying rights-aware decision-making in our business practices and policy development. Responsible groups work in their respective domain areas to review, address, and reduce human rights risks raised by employees, new laws or changes in the law, or as part of the regular course of business operations.



Microsoft provides a variety of channels for employees to share their perspectives and feedback, including regular employee engagement surveys, open forums with leadership, and dedicated internal platforms for ongoing dialogue and feedback. Employees also have access to anonymous grievance reporting tools such as the [Microsoft Integrity Portal](#). This confidential service is available 24/7 and allows employees to report concerns related to compliance, ethics, or workplace behavior without fear of retaliation.

We do not tolerate workplace discrimination or harassment, and we are committed to diversity and inclusion in the workplace. Any complaints of workplace discrimination or harassment are reviewed and acted on as appropriate under Microsoft's policies.



## Occupational health and safety

We take both a decentralized and centralized approach to managing health and safety, which allows us to customize by country and business. In 2020, Microsoft established a centralized center of excellence to provide core health and safety programs globally. This includes incident reporting, training, regulatory monitoring, ergonomics, leadership council and governance. For the past five years we have worked to implement global governance and central programming in partnership with countries and businesses.

While certain businesses and countries have a well-established strategy and programs, the central global OHS function has been focusing on centrally managing outsourced staffing in 25 countries that historically did not have established programming.

Microsoft continues to prioritize prevention of risks for our employees through training in relevant business areas and by implementing risk-based control measures. Our OHS personnel work directly with teams to understand their day-to-day activities and assess the associated risks. Together, they identify the types and levels of risk and determine the most effective mitigation strategies.

Together, they identify the types and levels of risk and determine the most effective mitigation strategies. We're actively developing a plan to implement comprehensive risk assessments across all regions and business units. As part of our ongoing commitment to workplace safety, we regularly evaluate local OHS requirements and engage leadership to raise awareness of health and safety risks and opportunities for investment. We also monitor emerging risks tied to workforce planning and maintain open dialogue with organized labor, including works councils, to ensure our practices remain responsive and aligned with employee needs. We comply with workplace health and safety requirements and prioritize employee safety through appropriate health and safety measures informed by science and public health authorities.

Microsoft recognizes that the wellbeing of all individuals contributing to its operations—including suppliers—is essential to upholding its human rights commitments.

## Suppliers

Microsoft requires its suppliers to provide fair compensation, benefits, and healthy working conditions to their employees. These expectations are embedded in [Microsoft's Supplier Code of Conduct](#) and reinforced through training and annual acknowledgments. For example, Microsoft requires that suppliers provide US-based workers with paid time off and paid parental leave benefits. Supplier requirements are a condition of doing business with Microsoft. External staff (suppliers' employees) are also covered by Microsoft's grievance mechanisms, including the Microsoft Integrity Portal, which is available 24/7 in multiple languages and allows for anonymous reporting of concerns. For more information on grievance mechanisms, see [Section 3: Grievance mechanisms](#) of this report.



Microsoft manages relationships with our supply chains through the following teams (collectively referred to as Supply Chain Teams), which generate goods and services sold by the Reporting Entities listed in [Annex 1](#). We take a risk-based approach to managing supply chain risk, and our supply chains are at various stages of maturity:

#### Procurement

Manages relationships with suppliers providing goods and services to Microsoft business units and corporate operations, including suppliers that operate Microsoft's owned buildings and transportation fleet. This includes Microsoft subsidiaries, GitHub and Nuance, whose procurement activities are fully integrated.

#### Devices

Manages relationships with suppliers manufacturing our Surface and Xbox devices and accessories, and related packaging materials.

#### Cloud Supply Chain & Provisioning (CSCP)

Manages relationships with suppliers manufacturing hardware components and equipment that go into Microsoft datacenters supporting our global cloud infrastructure.

#### Cloud Operations & Innovation (CO+I)

Manages relationships with suppliers supporting our datacenter land acquisitions, construction, and operations.

#### LinkedIn

Manages relationships with suppliers supporting LinkedIn goods and services.

#### Activision Blizzard

With the closing of the Activision Blizzard King (ABK) transaction, we are aligning processes with ABK where appropriate.

Microsoft's Responsible Business Practices (RBP) team coordinates across the enterprise to standardize supply chain due diligence practices. RBP acts as a hub for collaboration on the company's supply chain due diligence strategy, including supply chain governance structures, compliance requirements (covering environment, health and safety, human rights, and ethics), risk identification and mitigation, internal and external training, stakeholder and rightsholder engagement, and reporting practices. The team monitors progress against the company's supply chain due diligence strategy and coordinates regular updates to senior leadership for Supply Chain Teams.



## Policies and processes

Microsoft updates its policies, procedures, and supplier requirements related to responsible sourcing annually, or as needed, to reflect evolving legal and regulatory requirements, input received in consultations with stakeholders, and emerging risk trends. Building on Microsoft's Global Human Rights Statement, Microsoft utilizes the following policies to define our minimum supply chain-specific human rights and environmental commitments:

### [Supply Chain Human Rights Policy Statement](#)

This policy statement outlines how Microsoft applies risk management measures to operationalize our commitments to human rights and the environment in our corporate, business, and subsidiary supply chains, and includes:

- Establishing a risk management system in alignment with the [Organization for Economic Cooperation and Development \(OECD\) Due Diligence Guidance for Responsible Business Conduct](#)
- Developing standards that suppliers must meet and expectations that they work toward implementing their own due diligence systems

- Conducting an annual risk assessment
- Establishing preventive and remedial measures
- Developing grievance mechanisms
- Handling documentation and reporting
- Identifying priority risks
- Conducting effectiveness reviews

The policy statement is communicated to Microsoft employees and external staff responsible for managing supply chain risks, as well as all our directly contracted suppliers.

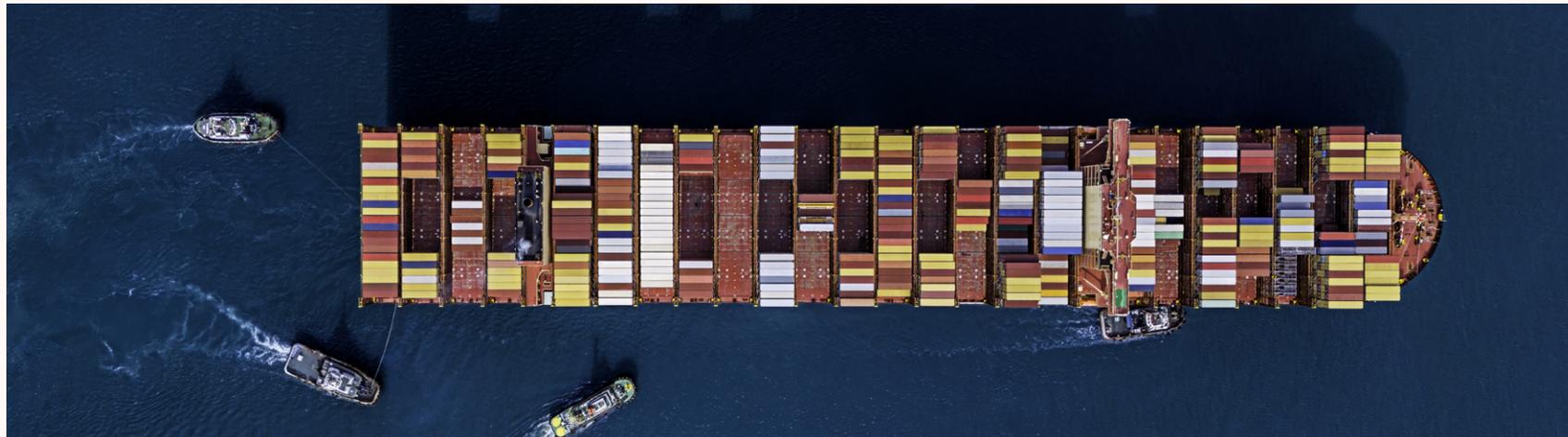
### [Supplier Code of Conduct](#) and [LinkedIn Provider Code of Conduct](#)

These codes define expectations for directly contracted suppliers. Suppliers are required to cascade the environmental and human rights supply chain expectations to sub-tier suppliers and the extended supply chain. Suppliers must review and acknowledge the SCoC, available in several languages, on an annual basis and participate in required training.

### [Partner Code of Conduct \(PCoC\)](#)

The PCoC applies to Microsoft partners who work with us to serve Microsoft customers. The PCoC requires partners to provide a safe and healthy work

environment that complies with all employment, health, and safety laws. Partners are also required to abide by local minimum wage and maximum working hours requirements and are prohibited from using forced labor, child labor, or labor contracts that impose unreasonable limitations on a worker's ability to leave a partner's employment.



The OECD's six-step framework provides a globally recognized approach to responsible business conduct. At Microsoft, we apply these steps to help identify, prevent, and address human rights and environmental risks across our operations and supply chain.

### Step 1

**Embedding fundamental rights strategies** with fundamental rights policies, risk management oversight, and responsibility

### Step 2

**Risk assessments** conducted periodically to identify, weigh, and prioritize human rights and environmental risk

### Step 6

**Communication** through internal and external trainings, accountability to stakeholders, and in reporting

### Step 3

**Risk mitigation** occurring through supplier lifecycle—onboarding, monitoring, offboarding

Six steps of the  
OECD Due  
Diligence Guidance  
for Responsible  
Business Conduct

### Step 5

**Effectiveness** measures reviewed annually and continuously improved, and best practices shared across teams

### Step 4

**Remediation** processes addressing issues documented by investigations and audits

## Engagements and Memberships

Over the past year, Microsoft has both expanded and found new ways to engage with peers and the value chain to collectively address the challenges of supply chain due diligence and traceability, such as alignment on standards, interoperability, and verifiability of data. Microsoft has engaged in a few key partnerships, including the following:

### Tech Against Trafficking

Microsoft has set up a working group on supply chain standards with its peers Amazon and Google to outline a unified vision for supply chain data. This includes identifying emerging and existing technical and due diligence standards that will simplify compliance for suppliers by aligning on data elements and format, mitigating the compliance burden for small and medium enterprises, and sharing joint expectations that create momentum in the industry around improved transparency.

### Responsible Business Alliance (RBA)

Microsoft continues to work closely with the RBA to partner with electronics manufacturers and retailers to improve responsible sourcing efforts. We continue to hold a seat on the board of directors and participate in multiple working groups on topics including supply chain mapping, wages, and the indirect supply chain.

We are also actively supporting the creation of the Responsible Business Transparency Protocol, a high-tech extension of a global standard that proposes a standard format for traceability events, facility identifiers, and conformity documents. A pilot, which kicked off in October 2025, aims to demonstrate creating and passing data end to end in the supply chain.

### Internet Engineering Task Force (IETF)

Microsoft is actively working with peers on critical global standards, including digital signing through CBOR Object Signing and Encryption (COSE), a compact and secure format for signing and encrypting data. We are also working on a globally unique format for identifiers from valid issuers (GLUE), and logging secure supply chain events as verifiable claims (SCITT).

### Linux Foundation

Microsoft is currently working with the Software Package Data Exchange (SPDX) on a hardware bill of materials (HBOM) standard that defines materials, components, and manufacturers in a way that can be linked and nested to a finished good, which is expected to be published August 2025.

## Internal and external training

Microsoft provides the following internal and external training related to supply chain human rights:

### Employee trainings

Representatives from each Supply Chain Team are required to attend training run by RBP on supply chain due diligence requirements. In FY25, we strengthened our approach to supply chain due diligence training by launching an online training module, accessible to anyone within Microsoft, on effective grievance mechanisms, remediation, responsible purchasing practices, and process effectiveness in our central training repository. As of FY25, employees engaged in supply chain and procurement activities are required to participate in training on supply chain human rights due diligence.



## Responsible Minerals Initiative

Microsoft actively collaborates with industry associations like the Responsible Minerals Initiative (RMI) to define standards, identify pinch points, and improve traceability. Our participation in RMI's working groups supports the goal of full Responsible Minerals Assurance Process (RMAP) participation among cobalt refiners. We are on the board of The Initiative for Responsible Mining Assurance (IRMA), working toward improving the process and uptake of their comprehensive mining standard. Additionally, we are working with industry partners to establish a traceability standard that includes data requirements, and implementation guidance, enabling more robust supply chain due diligence.

We have made significant progress in responsibly sourcing 3TG (tantalum, tin, tungsten, and gold) and cobalt in our Devices supply chain, and have expanded our efforts to include critical minerals such as aluminum, copper, nickel, and lithium. In 2025, we initiated a comprehensive supply chain mapping exercise for these materials, increasing our responsiveness from suppliers related to these materials by 13% from 2024.

### Supplier training

Suppliers must complete the [Microsoft SCoC training course](#) and confirm completion on an annual basis. Suppliers are required to train eligible employees and subcontractors working on Microsoft matters on the content of the Microsoft SCoC annually. In addition, all external staff requiring access credentials to the Microsoft corporate network, and/or buildings, are required to complete the Microsoft SCoC training before they obtain their access rights. The training is made available to all LinkedIn Providers.

### Supply chain—specific trainings

Across Microsoft, our supply chain teams have built custom trainings on human rights due diligence and supplier expectations to build the capacity of our internal teams working on responsible sourcing. Some examples from 2025 include a new CSCP sourcing manager training and a new employee human rights training in CO+I. LinkedIn's Global Compliance & Integrity team incorporated responsible sourcing policies and educational content into their annual mandatory Business Integrity training to increase awareness.

## Risk management, mitigation, and remediation

### Risk assessment

Our risk management approach requires our Supply Chain Teams to implement due diligence management systems, which include, as a key component, various measures designed to assess and respond to risk in our directly contracted and extended supply chains.

We conduct an annual Microsoft-wide supply chain risk assessment, focusing on environmental and human rights risks in the geographies where our supply chains operate, and the categories of products we source. We leverage external vendors, including Verisk Maplecroft, and internationally recognized risk indices such as the Environmental Performance Index by the Yale Center for Environmental Law & Policy, Shift's Business Model risk indices, and those of the Institute for Human Rights & Business, to perform the risk assessment. Our Supply Chain Teams use the outcome of the risk assessment to evaluate specific suppliers and determine appropriate actions, including the type and frequency of supplier monitoring needed. These assessments consider factors like the nature and scope of our business activities, our contribution to or link with the impact through a supplier, the severity and probability of the identified impacts, and Microsoft's ability to mitigate such impacts.

For our extended supply chain, in which Microsoft does not have direct contractual relationships, we assess our indirect suppliers using a variety of factors to identify the highest social, environmental, and business risks. For example, through our [Responsible Sourcing of Raw Materials Policy](#), in-scope suppliers are required to implement a raw materials sourcing policy that follows the steps set out by the OECD's Due Diligence Guidance.

Specific to the Devices supply chain:

- We survey our directly contracted suppliers to gather data on how prioritized high-risk materials are sourced. Our due diligence includes several quality assurance steps, including engagement with a third party to review supplier responses for data validation. The scope of our Responsible Sourcing of Raw Materials Policy includes all regulated "conflict minerals", in addition to minerals identified by our annual raw materials risk assessment, and is not limited to specific materials or location. In FY25, in addition to 3TGs, we surveyed our supply chain for the use of cobalt, aluminum, copper, gallium, lithium, nickel, silicon, rare earth elements, germanium, and graphite.

- We also leverage the Responsible Minerals Assurance Program (RMAP), the Responsible Minerals Initiative's industry-level smelter and refiner audit program. We use the RMAP to assess whether critical minerals—including 3TG minerals and cobalt—in our devices are sourced from facilities that meet the requirements of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. When we find 3TG smelters or refiners in our supply chain that do not conform to RMAP standards, we work with our suppliers to conform with RMAP standards or risk removal from our supply chain. More information about mapping, smelters and refiners, and conflict minerals used in Devices supply chains can be found in Microsoft's [Conflict Minerals Report](#).



## Monitoring

Microsoft employs mitigation measures to identify, prevent, and, where necessary, minimize adverse impacts among direct and indirect suppliers, including:

- Integrating environmental and human rights considerations into procurement strategies**  
 Supply Chain Teams review the performance of suppliers, including their compliance with the SCoC, and consider this information when deciding whether to begin or continue working with suppliers. Suppliers with identified SCoC compliance concerns are subject to controls and process-improvement requirements prior to onboarding or for continued engagement; failure to satisfy these controls and implement acceptable improvement risks termination of the relationship with Microsoft as a last resort.
- Evaluating suppliers before contracting**  
 New suppliers are vetted through a prequalification process, which includes a risk assessment. We review results against relevant external benchmarks or metrics, such as industry environment and human rights risk indices, while evaluating a potential supplier's fit for our needs. In some supplier categories, suppliers are required to complete a self-assessment questionnaire. In other high-risk supplier categories, we conduct prequalification assessments, including audits, before engaging.

- Adhering to risk management practices**  
 All suppliers are expected to build management systems to mitigate risks to the standards set by Microsoft in the SCoC and other requirements documents. If suppliers do not meet expectations, they are required to correct their processes within Microsoft-mandated timelines. For example, the [Devices Social and Environmental Accountability Manual](#) requires all Devices suppliers to have a supplier responsibility program with a risk-based management system to manage their own compliance as well as the compliance of their sub-tier suppliers. Through contractual agreements, suppliers agree to be audited and to audit their sub-tier suppliers—a check and balance on the suppliers' system to drive continuous improvement.
- Risk-based monitoring**  
 Supply Chain Teams conduct risk-based monitoring of supplier practices throughout the time we engage with the supplier. Depending on the supplier risk category, monitoring may include reviewing supplier practices through questionnaires, desk-based assessments, and/or on-site assessments. For our electronics suppliers, on-site assessments are primarily conducted by qualified third parties.

## Supplier Worker Sentiment Survey

To gain deeper insights into supplier workers' experiences beyond traditional audits, Microsoft Devices partnered with third-party LRQA to launch an anonymous, mobile-based Worker Sentiment Survey (WSS). The program started in FY24 and extended to FY25. The survey explored key areas such as grievance mechanisms, wages, wellbeing, and management systems, and was supported by training and promotional materials to ensure effective implementation. In FY25, 40 suppliers—including Tier 1 and strategic Tier 2—participated, doubling the number from FY24.

18,305 out of 54,938 supplier workers provided anonymous feedback through the survey, representing 33% of the workforce. With support from LRQA, the data was analyzed and compiled into summary reports for each supplier. Building on the FY24 pilot, a group of suppliers was selected in FY25 for targeted improvement based on the survey findings. These suppliers developed action plans, which were reviewed by third-party consultants, who offered technical guidance to address the identified gaps. As a result, 555 improvement actions were completed during FY25, most of which focused on enhancing worker interests,

and are expected to positively impact their working and living conditions.

By systematically analyzing the survey results, we gain valuable insights from multiple perspectives—such as gender, years of work experience, geographic location, and key areas. These diverse viewpoints help us strengthen our supply chain compliance efforts and inform more targeted planning for the upcoming year.

One of our assembly representatives shared: "Anonymized surveys from customers [Microsoft] encourage employees to share honest feedback, helping us uncover issues that may not surface through traditional channels. From the employees' perspective, knowing that their voices are valued—whether by the customer or the factory—enhances their sense of recognition and contributes to greater job satisfaction."

One of our component supplier representatives shared: "I believe customer-led employee surveys remain essential, as factories tend to prioritize feedback from customers. This often leads to more effective follow-up and greater commitment to addressing the gaps identified."

## Remediation

Remediation is an integral part of the corporate responsibility to respect the environment and human rights, and we are committed to providing effective grievance mechanisms and access to remedies in situations where Microsoft may have caused or contributed to an adverse environmental or human rights impact in the supply chain. We are committed to ongoing collaboration in remediation initiatives across our business activities, including with our suppliers. When suppliers do not abide by our commitment to respect fundamental rights, we take steps to mitigate adverse impacts and correct the issues.

- If we or a third party identifies potential concerns related to our environment and human rights standards, the relevant Supply Chain Team, in alignment with Microsoft's corporate guidance, international due diligence principles, and national or local legal requirements, will assess whether Microsoft is causing, contributing to, or directly linked to an actual or potential adverse human rights or environmental impact.
- In the event of a violation of Microsoft policies, and in line with international standards and applicable law, we work with suppliers to mitigate risks and resolve adverse findings. Supply Chain Teams prioritize the management and closure of nonconformances by

considering numerous factors, including the likelihood of the adverse impact (confirmed, likely, possible, speculative), the severity of the adverse impact (critical, serious, major, minor), our ability to bring about change with the supplier, and whether terminating the relationship would cause adverse consequences for workers. Consistent with the OECD Due Diligence Guidelines and other relevant guidance, corrective actions include remediation plans, closure timeframes based on severity, and a business process for tracking closure.

- If a supplier is unable or unwilling to effectively remediate a nonconformance, supplier engagement may be restricted, suspended, or terminated, and any related products may be removed from the market. Supply Chain Teams also coordinate with each other to consistently implement remediation efforts.
- In addition to our annual policy and procedure updates, we continue to explore opportunities to streamline nonconformance management across Supply Chain Teams, including:

- Documenting how investigations and assessments are conducted.
- Documenting how issues are identified, investigated, mitigated, and resolved.
- Integrating new risk categories identified during investigations and supplier assessments into our annual risk reviews.

See supply chain findings and remediation in Annex 3.



## Enhancing subtier management strategy

In FY25, our Devices team continued to enhance its subtier management strategy by engaging regularly and formally with its Tier 1 suppliers and the suppliers' risk management teams. Devices conduct annual management system audits to evaluate Tier 1 suppliers' risk management systems and reviews supplier performance on a quarterly basis.

## Strengthening human rights due diligence across the supply chain

In FY25, Microsoft's CO+I team piloted on-site human rights audits with select suppliers to strengthen labor and human rights oversight. The initiative began with a targeted risk assessment, identifying high-risk suppliers for onsite engagement. Microsoft partnered with a third-party service provider to conduct onsite audits focused on compliance with Microsoft's labor and human rights standards. Each audit concluded with a corrective action plan to address identified gaps and drive continuous improvement. This pilot marks a proactive step towards strengthening human rights due diligence across the supply chain.

## LinkedIn's purchase categories

In coordination with the Procurement organization, LinkedIn's purchase categories are assessed annually for potential risks related to environmental and human rights. Each purchase category or industry is assigned a risk rating and LinkedIn compares these against the previous fiscal year's spend, purchase region, and supplier segmentation. This segmentation evaluates supplier relationships and supports a more targeted, risk-based approach. This comparison identifies the level of risk exposure based on purchase category, industry, or geographical location. It provides visibility into both the level of risk across specific products and services and the regions that present greater supply chain risk for LinkedIn, based on our business model.



## Section 3

# Grievance mechanisms



We regularly assess our value chain to identify potential issues and have built systems that enable Microsoft employees, partners, supplier workers, and others to raise concerns safely and anonymously. Anyone who seeks to raise a grievance or request remediation from Microsoft regarding our human rights performance may do so in the following confidential ways, available in multiple languages.

### Corporate reporting channel

For over two decades, Microsoft has maintained a corporate integrity hotline to address concerns related to potential misconduct, including grievances. Additionally, Microsoft provides various publicly accessible channels that allow individuals to report concerns regarding possible violations of laws, Microsoft's Codes of Conduct, or company policies. Information about these channels is available on [Microsoft's Integrity Portal](#).

Microsoft's channels are open to all employees, external parties, workers, and worker representatives in our supply chains, communities in the vicinity of Microsoft sites, suppliers, and any other interested stakeholders or persons. They include:

- an international, or in some countries local, toll-free telephone number, which operates all day, every day;

offers support in multiple languages; and can be used anonymously;

- an online portal, which is available in several languages and can be used anonymously; and
- submission by email, fax, or mail, as directed.

Microsoft also encourages our employees and external parties to raise concerns with any member of Microsoft management, local or corporate Human Resources, Finance, or CELA. These groups are trained to relay concerns through the reporting channels noted above. Microsoft's Compliance & Ethics (C&E) team oversees the processing of reports received through these channels. C&E's process provides several safeguards to protect reporter confidentiality, including the availability of anonymous reporting noted above, limitations on persons engaged in grievance reporting to only those with a "need to know," and protections against information disclosure.

## Workers' Voice Hotline

Devices maintains a Workers' Voice Hotline and a complaints resolution protocol that is anchored in the UNGPs and the [RBA Code of Conduct](#).

The Workers' Voice Hotline rules of procedure are communicated to suppliers through training, posters displayed on workplace floors, and information cards distributed to workers in a simple and comprehensible language workers can understand.

Supplier workers can make hotline complaints anonymously. Third-party operators are trained to maintain confidentiality by protecting a reporter's identity. The Devices supply chain team works with suppliers to resolve identified issues. The third-party organization follows up on reports to verify the resolution of the case, ask about workers' satisfaction with the results, and check whether any retaliation has occurred as a result of the complaint. In addition, a worker survey is conducted annually to understand reporters' feedback on the effectiveness of the program. Microsoft program managers monitor the case-handling process to confirm adherence to these principles. In FY25, 100% of Microsoft-assessed factories in China and nine strategic suppliers in Vietnam and Malaysia, including 100% of Tier 1 factories, had access to the Workers'

Voice Hotline, covering 126 hardware final assembly and strategic component manufacturing supplier factories.

## LinkedIn's Helpline

LinkedIn operates an anonymous helpline as a separate grievance mechanism for its business. Employees, suppliers, and the public can submit a complaint at any time. Employees can also make a report through managers, HR Business Partners, the Global Compliance and Integrity inbox, and/or the Employee Relations inbox. LinkedIn's Speak Up policy and other relevant policies are publicly available on its [Customer Portal](#) and its [Supplier Portal](#). Managers are expected to encourage employees to raise concerns, act impartially, respond respectfully to concerns, take reports seriously, and make every effort to maintain the confidentiality of the person reporting so that they are not subject to retaliation or reprisal. LinkedIn provides mandatory training to managers to reinforce these norms.



### Corporate Integrity Hotline

Available in multiple languages to all employees and external parties to call in, email, fax, mail, or submit a report about potential violations of law and policy.



### Devices Workers' Hotline

Allows supplier workers to anonymously report complaints.

Rules of procedure are communicated to suppliers through training, posted on the workplace floors, distributed via information cards, and shared in clear, accessible language of law and policy.



### LinkedIn's Helpline

Provides an anonymous helpline for any employee, supplier, or the general public.

## Section 4

# Looking ahead



Microsoft remains deeply committed to respecting human rights as a foundational element of our mission to empower every person and organization on the planet to achieve more. The progress and commitments reflected in this Human Rights Transparency Report are the daily work of thousands of our employees and external staff and have been immeasurably strengthened by the feedback of other stakeholders and rightsholders. We are profoundly grateful for these collective contributions.

And, at the same time, we know that there are many more opportunities ahead of us and recognize that there are areas where we can improve. As we continue our journey over the next year, we will focus on three areas to progress our commitments:

- 1 We will continue to invest in our human rights due diligence capabilities. The human rights impact assessments that we conducted this year were a vital foundation for developing additional governance and due diligence capabilities. We will build more programs around these mechanisms in key areas, and we will approach our assessments with a mindset of examining where we can continue to improve our processes and practices to align with our core commitments to international human rights law and humanitarian law.

- 2 We will continue to develop effective governance to measure progress on our salient human rights risks across our AI value chain. Building, earning, and keeping trust in AI is a collaborative endeavor that requires our supplier ecosystem, our employees, our partners, and our customers to each contribute to trustworthy design, development, and operations. We will examine how we can strengthen our governance and risk management mechanisms across the stakeholders involved in our value chain. We will also examine how we can leverage our governance to better address the interconnections between our salient human rights risks.

- 3 We are committed to continuing to work with our stakeholders to increase opportunities to expand our transparency and sharing of best practices. We will also continue to explore the use of technology to help advance fundamental rights in collaboration with our stakeholders.

We look forward to hearing your feedback on the progress we have made and opportunities to collaborate on all that is still left to do. Together, we can advance respect for human rights as a fundamental component in the development of emerging technologies.

## Annex 1: Our reporting entities

Microsoft is submitting this Statement on behalf of these Microsoft subsidiaries because they use the same Microsoft corporate policies and processes and utilize the supply chains described in the sections above.

Law	Covered subsidiary
UK Modern Slavery Act	Microsoft Limited
	Microsoft Research Ltd
	MSFT MCIO Ltd
	Metaswitch Networks Ltd
	LinkedIn Technology UK Ltd
	GitHub Software UK Ltd
Australian Modern Slavery Act	Microsoft Pty Ltd
	Microsoft Australia Holdings Pty Ltd
	Microsoft Datacenter (Australia) Pty Ltd
	LinkedIn Singapore Pte Ltd (Australia Branch office)

Law	Covered subsidiary
Canadian Supply Chains Act	Microsoft Corporation (US)
	Microsoft Retail Store Canada Inc
	Microsoft Canada Inc
	3288212 Nova Scotia Ltd
	Microsoft Canada Development Center Co.
	LinkedIn Technology Canada Inc
Norwegian Transparency Act	Microsoft Norge AS
	Microsoft Datacenter Norway AS
	Microsoft Development Center Norway AS

## Annex 2: Mapping of sections to laws

	Norwegian Transparency Act 2022	Australian Modern Slavery Act 2018	UK Modern Slavery Act 2015	Canadian Supply Chains Act
Board of Directors' approval	✓	✓	✓	✓
Overview: About Microsoft	✓	✓	✓	✓
Overview: Human rights across the value chain	✓	✓	✓	✓
Labor Rights & Employee Wellbeing: Policies and processes	✓			
Labor Rights & Employee Wellbeing: Risk management, mitigation, and remediation	✓			
Responsible Sourcing: Supply chain overview	✓	✓	✓	✓
Responsible Sourcing: Policies and processes	✓	✓	✓	✓
Responsible Sourcing: Engagements and memberships	✓	✓	✓	✓
Responsible Sourcing: Internal and external trainings	✓	✓	✓	✓
Responsible Sourcing: Risk assessment	✓	✓	✓	✓
Responsible Sourcing: Monitoring	✓	✓	✓	✓
Responsible Sourcing: Remediation	✓	✓	✓	✓
Grievance mechanisms	✓	✓	✓	✓
Annex 1	✓	✓	✓	✓
Annex 3	✓	✓	✓	✓

## Annex 3: Supplier monitoring and findings

Microsoft conducts rolling supplier monitoring based on risk, prioritizing potential environmental and human rights risks. When risks are identified, third-party auditors and/or Microsoft teams validate supplier Corrective Action Plans. Microsoft collaborates with suppliers to address compliance gaps and suppliers must remediate findings within severity-based timelines.

Aligned with Section 4 of the Supplier Code of Conduct (Human rights and fair labor practices), no forced labor was found in the Devices and Cloud Supply Chain & Provisioning (CSCP) supply chains in FY25, the supplier categories at the highest risk for forced labor. We identified other findings of risk indicators against the Supplier Code of Conduct, including:

Supplier Code of Conduct Category	Total findings identified	Closed	Corrective Action Plans (CAP*)
4.1 Non-discrimination/non-harassment/humane treatment	15	15	0
4.2 Prohibit the use of child labor	15	15	0
4.3 Prohibit the use of forced labor, prison labor, and trafficking in persons	34	33	1
4.4 Ensure workers have access to identity-related and personal documents	0	0	0
4.5 Provide return transportation for foreign migrant workers	13	13	0
4.6 Use appropriately trained recruiters to support compliance	14	14	0
4.7 Make conditions of employment clear when hiring	15	15	0
4.8 Provide written employment contracts or agreements when necessary	8	7	1
4.9 Provide fair compensation	50	46	4
4.10 Treat employees with dignity and respect	5	5	0
4.11 Meet working hours and rest day requirements	75	68	7
4.12 Ensure freedom of association and right to collective bargaining	2	2	0
4.13 Provide effective grievance procedures and work in partnership with Microsoft to remedy any identified human rights violations	6	6	0
4.14 Use of security forces	0	0	0

4.15 Community engagement and indigenous people	7	7	0
4.16 Retaliating against human rights defenders	2	2	0
5.1 Occupational health and safety	58	53	5
5.2 Provide a safe and healthy work environment for all employees at any work location	8	8	0
5.3 Provide safe housing when the Supplier intends to provide accommodation	10	9	1
5.4 Prohibit the use, possession, distribution, or sale of illegal drugs	0	0	0
5.5 Industrial hygiene	19	17	2
5.6 Physically demanding work	3	2	1
5.7 Machine safeguarding	37	35	2
5.8 Health and safety communication	11	11	0
5.9 Emergency preparedness	65	63	2
5.10 Occupational injury and illness	20	20	0
6.1 Comply with all applicable environmental laws, regulations, reporting requirements and international treaties	1	1	0
6.2 Pollution prevention and resource conservation	2	1	1
6.3 Water management	8	6	2
6.4 Air emissions	15	13	2
6.5 Hazardous substances	32	30	2
6.6 Materials restrictions	12	12	0
6.7 Product and packaging	18	18	0
6.8 Environmental permits and reporting	15	13	2
6.9 Waste	19	19	0
6.8 Environmental permits and reporting	0	0	0
6.9 Waste	0	0	0

\*If Supply Chain Teams confirm that mitigation measures are necessary, teams will work with the supplier to develop a Corrective Action Plan (CAP). The CAP outlines the necessary actions and timelines to align with Microsoft's requirements. If the supplier cannot meet the requirements or timelines, as a last resort, Microsoft will take action to restrict new business or end the supplier relationship.

## Annex 4: Respecting human rights through the years

1990-1999

### Laying the foundation for accessibility

Microsoft's journey in accessibility began with a belief that technology should empower everyone. In the early 1990s, the company formalized this vision by establishing the [Accessibility and Disabilities Group](#), followed by a companywide accessibility policy that set the tone for accessible product development. Leadership reinforced the company's commitment by hosting the Accessible Technology Forum, emphasizing the importance of accessibility and laying the groundwork for future innovation.

2010-2014

### Operationalizing human rights for global impact

As the company began integrating human rights considerations into daily operations and supply chain management, Microsoft entered a new era of putting principles into practice. Key milestones include publishing the [Global Human Rights Statement](#), the launch of the [Disability Answer Desk](#), and participation in the [Responsible Minerals Initiative](#). Transparency was strengthened through the [Law Enforcement Requests Report](#) and US National Security Orders Report, while tools like the Devices Worker Voice Hotline and the [Responsible Sourcing Raw Materials Policy](#) amplified worker voices. The creation of a dedicated Human Rights team and Microsoft's first GNI Independent Assessment marked a shift toward stronger accountability.

2000-2009

### Expanding corporate responsibility and respect for human rights

Building on its accessibility progress, Microsoft broadened its commitment to corporate integrity and respect for human rights with the introduction of the [Standards of Business Conduct](#), launch of the [Corporate Integrity Hotline](#), and publication of the [Supplier Code of Conduct](#). As a founding member of the [Responsible Business Alliance](#), Microsoft also helped shape industry standards, while advancing privacy and sourcing through advocacy for federal privacy legislation and the [Devices Responsible Sourcing Program](#). Global partnerships such as the UN [Global Compact](#), [Tech Coalition](#), and [Global Network Initiative](#) reinforced its growing commitment to human rights and digital safety. Meanwhile, [PhotoDNA](#), developed with Dartmouth College, emerged as a key tool for protecting children online.



2015–2019

## Championing a more inclusive and transparent tech future

As operational frameworks solidified, Microsoft turned its focus to innovation that deepened inclusion and transparency, intersecting across accessibility, human rights, and technology. A new wave of inclusive innovation emerged with the [Neurodiversity Hiring Program](#), the [Inclusive Tech Lab](#), and the [Xbox Adaptive Controller](#). Microsoft advanced its human rights commitments by commissioning a corporate Human Rights Impact Assessment, publishing its first [Human Rights Report](#), and creating the Human Rights Advisory Council. An AI Human Rights Impact Assessment laid the foundation for the [Office of Responsible AI](#), the development of six [Responsible AI Principles](#), and the definition of sensitive AI uses. The company also co-founded key global initiatives like the [Partnership on AI](#) and the [Global Internet Forum to Counter Terrorism](#). By extending GDPR rights globally and supporting the [CLOUD Act](#), Microsoft reinforced its dedication to privacy and digital trust, embedding rights-respecting practices into the heart of its technology and operations.

2023–2025

## Advancing AI responsibly with people at the center

Responsible AI took center stage by aligning trust in technology with respect for human rights. Key milestones included the [Responsible AI Transparency Report](#), the launch of the [Microsoft Research AI & Society Fellows Program](#), and the release of [Governing AI: Blueprint for the Future](#), all reflecting a growing focus on responsible AI governance and societal impact. Microsoft advanced global collaboration through initiatives such as the [Rome Call for AI Ethics](#), the [Frontier Model Forum](#), the [Tech Accord to Combat Deceptive Use of AI in Elections](#), and the UN Secretary-General's Advisory Body on AI, while reaffirming privacy commitments across its AI products. The company also expanded its human rights work with assessments of enterprise cloud and law enforcement technologies, conducting a human rights impact assessment to identify the five most salient issues, and publishing its first Human Rights Transparency Report which brings together our human rights due diligence across the entire value chain. Together, these efforts underscore Microsoft's belief that trust in technology must be earned through respect, integrity, and accountability.

2020–2022

## Building trusted technology that respects and advances human dignity

Scaling its efforts on responsible innovation, Microsoft integrated privacy, security, and accessibility directly into its AI and cloud offerings by advancing its responsible AI strategy with tools like the [Responsible AI Dashboard](#) and version 2 of the Responsible AI Standards. Microsoft also reinforced rights-respecting technology use by limiting facial recognition deployments and co-founding initiatives such as the [Coalition for Content Provenance and Authenticity \(C2PA\)](#) and the [Trusted Cloud Principles](#). Accessibility continued its trajectory by releasing Windows 11—the most accessible Windows yet. Microsoft's global human rights, digital safety, and privacy efforts became stronger through its first Digital Safety Content Report, its first [Privacy Report](#), and support for the [EU US Data Privacy framework](#), reinforcing the belief that trust in technology is built through respect for human rights.

