

# **Statement Against Modern Slavery and Human Trafficking**

Broadcom<sup>1</sup> is committed to supporting ethical business conduct, respecting human rights and avoiding complicity in any human rights abuse throughout our company, our operations and our supply chain. Our employment and supply chain practices and policies support the fundamental human rights principles of freely chosen employment, non-discrimination, the elimination of forced and underage labor and the rights of workers to organize and freely associate, as articulated in the International Labour Organization Conventions.

The California Transparency in Supply Chains Act of 2010 (SB 657), the United Kingdom Modern Slavery Act of 2015 and the Australian Modern Slavery Act of 2018 require certain businesses to disclose their efforts to address the issue or risk of modern slavery<sup>2</sup> in their businesses and supply chains.

This Statement Against Modern Slavery and Human Trafficking (Statement) describes our policies and the activities we have undertaken during FY 2021<sup>3</sup> to assess, address and prevent modern slavery.

## **Our Business and Supply Chain**

Broadcom is a global technology leader that designs, develops and supplies a broad range of semiconductor and infrastructure software solutions. At the end of FY 2021, we had approximately 20,000 employees in more than 87 global locations, including at our ten manufacturing facilities.

Our semiconductor business primarily operates through a fabless production model where we outsource the vast majority of the manufacturing of our semiconductor products to trusted third-party suppliers and foundries. We regularly engage with our suppliers, and we are working towards improving our multitier supply chain visibility.

For additional information on our business and operations, see our <u>Annual Report on Form 10-K for FY</u> 2021.

#### **Our Policies on Human Rights**

Broadcom's <u>Code of Ethics and Business Conduct</u> embodies our commitment to doing business with the highest standards of ethics and integrity, including our commitment to respect human rights and prevent modern slavery. We require our employees to annually certify they have read and understand our Code

<sup>&</sup>lt;sup>1</sup> When we use the terms "Broadcom," "we," "us," "our" and the "company," we mean Broadcom Inc., a Delaware corporation, and its consolidated subsidiaries, taken as a whole, unless the context otherwise indicates.

<sup>&</sup>lt;sup>2</sup> References to "modern slavery" in this Statement includes forced labor, debt bonded labor, indentured labor, child labor, involuntary labor, including prison labor, slavery, servitude and human trafficking.

<sup>&</sup>lt;sup>3</sup> Broadcom's fiscal year ended October 31, 2021 is referred to as "FY 2021".

of Ethics and Business Conduct. We comply with all applicable labor laws, and we expect our business partners to do the same.

Our <u>Supplier Environmental and Social Responsibility Code of Conduct</u> (Supplier Code), which we updated in FY 2021 to reflect the Responsible Business Alliance Code of Conduct, is the foundation of our responsible sourcing practices. Our Supplier Code establishes our expectations regarding workplace standards and business practices for our suppliers and mandates that our suppliers comply with the law and conduct business in an ethical, legal and responsible manner — including with respect to labor and human rights, health and safety, the environment and anti-corruption.

In addition to our Supplier Code, our <u>Conflict Minerals Policy</u>, supplier onboarding procedures and contract and purchase order terms establish the standards and expectations for our suppliers regarding human rights-related issues and responsibly sourcing materials. We also comply with the U.S. federal government's requirements for government contractors to combat trafficking in persons (<u>Federal Acquisition Regulation 52.222-50 (Combating Trafficking in Persons)</u>), as set forth in our internal Broadcom Combating Trafficking in Persons Compliance Plan.

Our agreements with external recruiters specifically prohibit certain practices (including charging recruitment fees, retaining or destroying identification documentation, and the use of fraudulent or misleading recruitment practices) associated with modern slavery.

#### **Human Rights Risks Assessments and Engaging with our Suppliers**

Broadcom regularly takes steps to verify, evaluate and address risks of modern slavery in our business and supply chains. As part of our commitment to human rights, we conduct an annual internal human rights assessment and found no human rights concerns, including forced labor, child labor, slavery and human trafficking, in our operations.

In FY 2021, we conducted our second annual survey of our significant suppliers for human rights-related issues, and achieved a 100% survey response rate on this survey. We identified and surveyed our largest suppliers globally (based on FY 2020<sup>4</sup> supplier spend data) that were not part of our FY 2020 supplier human rights survey. These suppliers, collectively with the suppliers surveyed in FY 2020, represent over 90% of our supply chain (based on FY 2020 supplier spend data).

We found no instances of forced labor, child labor, slavery or human trafficking among Broadcom's suppliers. However, we identified one supplier, who is located in Europe, who may use fines as a method of discipline for its workers. While this practice is legal in the jurisdiction and the supplier has a well-defined written escalating disciplinary process supported by the local trade union, we have actively engaged with this supplier and requested that it discontinues this practice.

<sup>&</sup>lt;sup>4</sup> Broadcom's fiscal year ended November 1, 2020 is referred to as "FY 2020".

In addition to the supplier human rights survey, our Global Operations and Internal Audit teams regularly audit our suppliers to evaluate their operations and compliance with various Broadcom and human rights-related requirements, including compliance with wage and hour labor laws, safe and respectful working conditions, written employment agreements and prohibitions on charging workers recruitment fees. While these audits are typically on-site audits at the supplier location, we adjusted and primarily conducted our audits remotely in FY 2021 due to the COVID-19 pandemic.

#### **Actions Taken to Address Modern Slavery**

We regularly engage with our suppliers on a variety of topics, and in FY 2021, we undertook several initiatives to further strengthen our human rights program within our supply chain, including:

- Becoming a member of Responsible Business Alliance
- Updating our Supplier Code to reflect the Responsible Business Alliance Code of Conduct and translating our Supplier Code into Chinese (Traditional and Simplified Chinese)
- Updating our supplier onboarding process to require screening for human rights-related matters
- Expanding our supplier monitoring program to screen for human rights issues, which includes over 90% of our current supply chain suppliers (based on our FY 2020 supplier spend)
- Sending our first annual supplier expectations communication to reinforce our commitment to a responsible supply chain and provide suppliers with information on our supply chain human rights program, including our updated Supplier Code and access to training
- Conducting an expanded human rights survey of our supply chain suppliers
- Remediating human rights concerns raised in our FY 2020 supplier human rights survey—
  specifically four suppliers who used fines to discipline workers and one supplier who did not
  permit collective bargaining no longer engage in these prohibited practices
- Offering human rights awareness and modern slavery prevention training to our suppliers
- Providing human rights awareness and modern slavery prevention training to our employees
- Requiring our larger manufacturing suppliers to certify adherence to our Supplier Code on an annual basis

## **Training**

We provide mandatory training to all of our employees on Broadcom's Code of Ethics and Business Conduct. In addition, in FY 2021, as part of our ongoing efforts to educate and raise awareness of forced

labor and human trafficking issues, we required human rights awareness and forced labor prevention training for relevant employees in our Global Operations, Human Resources, Legal, Procurement and supply chain functions. Our employees working with our U.S. government customers participate in combating trafficking in persons and prevention of forced labor training on an annual basis. We achieved a 100% completion rate for both of these trainings in FY 2021.

In FY 2021, we also offered human rights awareness and forced labor prevention training to all our supply chain suppliers.

## **Internal Accountability**

If our employees become aware of a potential violation of our Code of Ethics and Business Conduct, other Broadcom policies or applicable laws, it is their responsibility to report it to their manager, Human Resources or the Compliance Officer. We provide a number of avenues to contact our Compliance Team and our Compliance Officer, including:

- Email at: <a href="mailto:compliance.officer@broadcom.com">compliance.officer@broadcom.com</a>
- Broadcom Compliance Hotline:
  - Phone: U.S. and Canada: 1-800-422-3240; all other countries: https://secure.ethicspoint.com/domain/media/en/gui/41361/index.html
  - o Online: www.Broadcom.ethicspoint.com

Any allegations of modern slavery will be taken very seriously, thoroughly investigated by Broadcom's Compliance Officer (under the Audit Committee's direction and oversight) in collaboration with Broadcom's Internal Audit and Human Resources teams as needed, and addressed in a manner consistent with Broadcom's Code of Ethics and Business Conduct.

Any violation of Broadcom's policies by an employee, a contractor or a supplier may be grounds for adverse action, up to and including termination of the employment or business relationship, subject to applicable law. Violation of applicable laws may also result in criminal prosecution of responsible individuals. Broadcom has an <a href="Open Door Policy">Open Door Policy</a> and will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation.

In FY 2021, there were no instances of modern slavery that came to our attention in our business or supply chain. Broadcom regularly reviews and may update its Code of Ethics and Business Conduct as needed, from time to time, and alerts employees to any updates.

# **Public Reporting**

For more information on Broadcom's support of human rights in our company, our operations and our supply chain, see our <u>Environmental</u>, <u>Social & Governance Reports</u>.

# **Approval and Signature**

Broadcom consulted with various internal stakeholders in the collection of data and preparation of this Statement.

In accordance with the United Kingdom Modern Slavery Act of 2015 and the Australian Modern Slavery Act of 2018, this Statement is made by Broadcom Inc. by and on behalf of itself and its consolidated subsidiaries.

This Statement was approved by the Broadcom Inc. Board of Directors on March 2, 2022.

Hock E. Tan

Director, President and Chief Executive Officer

March 2, 2022