

Statement Against Modern Slavery and Human Trafficking

Broadcom¹ is committed to supporting ethical business conduct, respecting human rights and avoiding complicity in any human rights abuse throughout our company, our operations, our supply chain, and our communities. Our employment 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. In addition, we have established high standards for our suppliers to improve our supply chain and positively impact the world around us. Broadcom is committed to ensuring we act ethically and responsibly to prevent the use of modern slavery² in all our dealings.

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 in their businesses and supply chains.

This Statement Against Modern Slavery and Human Trafficking describes the policies and activities Broadcom has undertaken during FY 2020³ 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. We operate a primarily outsourced manufacturing model, with over 85% of our wafer manufacturing done by third-party foundries and almost all of our assembly and test operations done by third parties. Accordingly, we strive to work with trusted, reputable and responsible supply chain partners that are leaders in the industry and that have the technology, quality and resources needed to support our business. Broadcom had approximately 20,000 employees in more than 85 global locations, including at our four manufacturing sites.

For additional information on our business and operations, see our [Annual Report on Form 10-K for FY 2020](#).

Our Policies on Human Rights

We expect our suppliers to acknowledge and implement Broadcom's [Supplier Environmental and Social Responsibility Code of Conduct](#) ("Supplier Code") and abide by the terms and conditions contained in our contracts and purchase orders, which include prohibiting the use of child labor, forced labor, slavery and human trafficking. Our [Supplier Code](#) is based in part on the International Labour Organization principles and 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

¹ 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.

² 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.

³ Broadcom's fiscal year ended November 1, 2020 is referred to as "FY 2020".

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 [Conflict Minerals Policy](#), supplier onboarding procedures and contract and purchase order terms establish the standards and expectations for our suppliers regarding human rights-related issues. We also comply with the U.S. federal government’s requirements for government contractors to combat trafficking in persons ([Federal Acquisition Regulation 52.222-50 \(Combating Trafficking in Persons\)](#)), as set forth in our internal Broadcom Combating Trafficking in Persons Compliance Plan.

Referenced Documents

- [Code of Ethics and Business Conduct](#)
- [Supplier Environmental and Social Responsibility Code of Conduct](#)
- [Conflict Minerals Policy](#)
- [Conflict Minerals Reports](#)
- [Environmental, Social & Governance 2020 Report](#)
- [Open Door Policy](#)
- [Annual Report on Form 10-K for FY 2020](#)

Our agreements with external recruiters specifically prohibit certain practices (such as 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 takes steps to verify, evaluate and address risks of modern slavery in our business and supply chains. As a primarily outsourced manufacturer, it is challenging to have complete visibility into our multi-tier supply chain. However, we regularly engage with our suppliers on a variety of topics, and in FY 2020, we conducted a survey with significant suppliers for human rights-related issues. We identified 68 suppliers with which we spent over \$1 million in FY 2019⁴ and who operate in the Asia-Pacific region. These suppliers, which represent over 80% of our FY 2019 supplier spend, were asked to complete a questionnaire on core human rights issues, including numerous topics addressed by the [Responsible Business Alliance](#)’s Self-Assessment Questionnaire and Code of Conduct, designed to help us better understand potential and significant risk for incidents of forced labor or human rights abuses in our supply chain. We achieved a 100% survey response rate.

We found no instances of forced labor, child labor, slavery or human trafficking, as a result of this survey. However, we did identify four suppliers who use fines to discipline employees, which are legally permissible in their respective jurisdictions and are part of an escalating disciplinary process, and one supplier that does not permit collective bargaining. No other significant human rights risks were identified during the survey. While these activities are permissible in the suppliers’ respective jurisdictions, they do not align to Broadcom’s expectations, and we intend to actively engage with these particular suppliers on these issues and with our other suppliers, as appropriate, to encourage them to improve their human rights practices and programs. We also intend to make human rights training available to our various suppliers, particularly those who indicated they do not currently provide such training.

⁴ Broadcom’s fiscal year ended November 3, 2019 is referred to as “FY 2019”.

In addition to the supplier survey, in FY 2020, we also audited three of our significant suppliers, including with regard to core human rights issues, and no human rights-related concerns were identified. These audits were performed by Broadcom directly, not third parties, and were scheduled.

Actions Taken to Address Modern Slavery

To further strengthen our human rights program, we undertook several initiatives in FY 2020, including:

- conducting an internal human rights assessment of our operations (during which we found no human rights-related issues);
- updating all of our recruiter agreements, globally, to include provisions related to preventing forced labor, such as prohibiting recruiting fees, deceptive and misleading recruitment practices and destroying, concealing or denying access to employees' identification documents;
- updating our Master Supplier Agreement and purchase order terms to require compliance with all laws and regulations related to slavery, forced labor, child labor and human trafficking and adherence to our [Supplier Code](#) to protect workers' rights;
- updating our supplier onboarding process to increase screening for human rights-related matters; and
- including our significant suppliers in our continuous monitoring program to screen for emerging human rights issues.

Training

We provide mandatory training to all of our employees on Broadcom's [Code of Ethics and Business Conduct](#), which includes our commitment to respecting human rights, avoiding complicity in any human rights abuse in the company, our operations, our supply chain and our communities, and complying with all applicable labor laws, including wage and hour laws.

In addition, as part of our ongoing efforts to manage issues related to human rights, including raising awareness of and preventing modern slavery, relevant employees in our Global Operations, Human Resources, Legal, IT, Procurement and Supply Chain functions and our employees working with our U.S. government customers, participate in combating trafficking in persons training and prevention of forced labor training, as applicable, on an annual basis. We achieved a 100% completion rate for this training in FY 2020.

Internal Accountability

Broadcom's [Code of Ethics and Business Conduct](#) mandates that our employees and contractors comply with all applicable laws, which include laws against modern slavery. Any violation of Broadcom's policies and this Statement 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 [Open Door Policy](#) and will not tolerate retaliation against an employee for reporting a concern in good faith or for cooperating with a compliance investigation.

Broadcom's [Code of Ethics and Business Conduct](#) embodies our commitment to doing business with the highest standards of ethics and integrity. Broadcom believes in the necessity of ending modern slavery and encourages our employees, suppliers and business associates to join Broadcom's commitment to promoting human rights worldwide.

Any conduct that may be in violation of Broadcom's policies and this Statement should be reported to:

- The Broadcom Compliance Officer at Compliance.Officer@Broadcom.com
- The Broadcom Compliance Hotline:
 - By Phone: U.S. and Canada: 1-800-422-3240; all other countries: <https://secure.ethicspoint.com/domain/media/en/gui/41361/index.html>
 - 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](#). In FY 2020, 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, our supply chain and our communities, see [Broadcom Environmental, Social & Governance 2020 Report](#).

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.



Hock E. Tan
Director, President and Chief Executive Officer
March 3, 2021