SPARC: Human Rights Due Diligence and Responsible Labor Programs

Revised 10/14/2024

This document details the supplier requirements for the Human Rights Due Diligence and Responsible Labor Programs. Please read and understand the details below.

Please note that these requirements are provided as instructional guidelines and Intel Corporation reserves the right to change/modify them as needed. Said changes may arise from items akin to the following: audits, assessments, risk mapping, regulatory changes, due diligence & reporting requirements, or generally any other requirement we deem necessary to meet the both the legal expectations as well as the expanded customer & stakeholder requirements.

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RBA Self-Assessment Questionnaires:

There are two different RBA SAQ types that Intel may require you to complete in RBA Online:

- **Facility Risk SAQ:** If you are requested to complete the Facility Risk SAQ, we ask that you complete and release both the Risk & Control sections for the site we identified.
  - Verification by the RBA of the Facility Risk SAQ is optional but will help you to identify gaps in your compliance before an audit. This does have a $250 added cost.
  - **NOTE:** Failure to complete required Facility Risk SAQ will prevent you from scheduling an RBA VAP audit, likely impact your supplier report card (if applicable) and may prevent you from achieving public recognition from Intel.
- **Responsible Labor SAQ:** If you are requested to complete the Responsible Labor SAQ, we ask that you complete and release both the Risk & Control sections for the site we identified. Go here for additional details and instructions.
  - Verification by the RBA of the Responsible Labor SAQ is required and does have a $250 added cost.

Steps to complete RBA SAQs:

- Step 1: Register for RBA-Online, if not already registered, and create a facility for each site assigned the RBA SAQ deliverable in RBA-Online. Note: You will need to pay a fee to the RBA for each facility. Go here for additional guidance joining RBA Online.
- Step 2: In the RBA-Online tool, request a trading relationship with Intel Corporation (ID: GCO-10003228) for both your corporate and facility(ies), if this is not already done. Go here for additional guidance creating a trading relationship.
- Step 3: Grant Intel Corporation access to view your required RBA SAQs for sites which supply product or services to Intel. Go here for additional guidance adding facilities to RBA Online profile.
- Step 4: Complete your required RBA SAQs prior to the due date and release it in the RBA-Online tool. Make sure that you complete and release both the Risk & Control sections and, if completing the RBA Facility Responsible Labor SAQ, pay for Verification by the RBA.

- **NOTE:** It may take several weeks to complete these RBA SAQs as they may require different experts and levels of management to ensure accurate responses.
- **NOTE:** Intel does not pay for Suppliers' RBA registrations or RBA SAQ costs (including verifications) as the results can be shared with multiples customers.

For additional RBA-Online Help:

- Visit https://www.g360link.com/rba-online.htm or
- Contact the RBA Help Desk Telephone (English): +1 (571) 290-5430 (8AM-5PM ET) or
- Contact the Help Desk via E-mail: helpdesk@responsiblebusiness.org.

Mandatory Human Rights Due Diligence Self-Assessment

The German Supply Chain Act requires all companies operating in Germany to conduct a human rights & environmental risk assessment of its actively contracted suppliers. If you are determined to be in scope as an active supplier to an Intel German legal entity, you will be required to submit a SAQ in Graphite as part of Intel's risk assessment activities. Further instructions will be provided by your Intel contact if you are required to complete this deliverable.

Intel Facility Self-Assessment Questionnaire (Top 50 Assessment)

Intel's Facility Self-Assessment Questionnaires are only applicable for suppliers operating on Intel sites. They are based on the RBA Facility Risk SAQ and cover all five (5) areas of the RBA Code of Conduct: labor, ethics, health and safety, environmental stewardship, and management systems. In-scope suppliers will receive instructions from Intel to complete the Intel Facility Self-Assessment Questionnaire and are expected to comply with the timelines. Please complete the assessment for each Intel site requested. An Intel Target Audit will follow this deliverable.

Steps to Complete the Intel Facility Self-Assessment Questionnaire:

- Step 1: Please request the Intel Facility Self-Assessment Questionnaire from your Intel contact

- Step 2: Read the instructions and complete the assessment (please note: labor agent/sub-supplier detail is applicable if you are use a labor agent to supplement your staffing or contract sub-suppliers for the products/services you provide for Intel)
- Step 3: email completed assessment file to Intel Supplier Assurance Communications Intel.Supplier.Assurance.Communications@intel.com by requested date

Audits

As determined by Intel's assessment of risk, Intel may require site audits of any supplier facilities that provide products and/or services to Intel. These audits are conducted to verify Supplier's conformance to the RBA Code of Conduct, Human Rights Due Diligence, and/or Responsible Labor practices. Intel will send suppliers a direct request for an audit of specific facilities along with timelines for the audits to occur as well as the type of audit.

NOTE: Failure to complete audits as required by Intel and/or to correct and close findings from previous audits will likely impact your supplier report card (if applicable), may prevent you from achieving public recognition from Intel, can lead to public disclosure of non-conformance in Intel's Corporate Social Responsibility report; and/or can lead to the discontinuance of business with Intel.

RBA Audits

If Intel requires your company to have a RBA Validated Assessment Program (VAPs) or RBA Specialty Validated Assessment Program (SVAP) on Forced Labor, those audits will be scheduled and managed by the RBA following successful completion of the RBA Facility Risk SAQ. You are required to contact the RBA. Instructions on self-initiating an audit in RBA-Online.

Steps to complete RBA VAP or RBA SVAP Initial audit:

- Step 1: Request the VAP or SVAP in RBA-Online at least 3 months in advance of the recommended audit timing and work with the RBA Audit Program Manager (APM vap@ResponsibleBusiness.org). You will need to pay a fee to the RBA for each audit. Intel does not pay for these audits as after sharing with Intel, the report is yours to share with any customer of your choosing.
- Step 2: As part of the audit scheduling process with the RBA, complete an Attachment B (Auditee Approved Recipient Distribution List), and ensure Intel has visibility access to audits at the specific facility in RBA-Online.
- Step 3: Support the audit preparation and audit itself, as directed by the RBA and Auditor.
- Step 4: After the audit report is created, create and enter your Corrective Action Plan (CAP) into RBA-Online.
- Step 5: If directed by Intel, schedule a closure audit to verify the findings are closed and the CAP has been completed.

Steps to complete RBA VAP or RBA SVAP CLOSURE audit:

- Step 1: Request the VAP or SVAP in RBA-Online in advance of the required closure audit and work with the RBA Audit Program Manager (APM vap@ResponsibleBusiness.org)

- Step 2: As part of the audit scheduling process with the RBA, complete an Attachment B, and ensure Intel has visibility access to audits at the specific facility in RBA-Online.
- Step 3: Ensure your Corrective Action Plan (CAP) is in RBA-Online and ready for auditor review.
- Step 4: Support the audit preparation and audit itself, as directed by the RBA and Auditor.

- **NOTE:** The RBA will charge a fee for the audit which the supplier is to pay. Intel does not pay for supplier RBA audits.
- **NOTE:** Intel will not accept audits other than RBA VAPs or SVAPs scheduled and managed by the RBA.
- **NOTE:** DO NOT go to audit firms to obtain "RBA-like" audits, they will be rejected by Intel, causing delay and extra expense for your company.

Intel Target Audits

Steps to complete an Intel Target Audit:

- Step 1: Suppliers required to have an Intel Target Audit will be contacted by an Intel representative to begin the scheduling process.
- Step 2: Once a date for the audit has been set, you will receive instructions from the Intel Auditor on audit preparation that will include: (a.) what information is required prior to the audit, (b.) a preliminary audit agenda, (c.) who should be present during the audit from your company and (d.) request for information such as a worker register, working hour data, and samples of some documents such as employment contracts / agreements.
- Step 3: After the audit report is completed, if there are audit findings create and share your Corrective Action Plan (CAP) with Intel and begin to correct the findings.
- Step 4: If directed by Intel, work to agree on the timing of the closure audit to verify the CAP has been completed.

General Code of Conduct Expectations

As a member of the Responsible Business Alliance (RBA), Intel is committed to conformance to the RBA Code of Conduct. This conformance expectation extends to Intel's suppliers & their supply chain. Intel suppliers are required to know and understand how the RBA assesses conformance to the RBA Code of Conduct and to ensure that their own operations as well as those of their suppliers, labor agents, and subcontractors are compliant with the RBA Code of Conduct.*

In alignment with Section E of the RBA Code of Conduct, Intel is required to assess its supplier's RBA Code of Conduct compliance as well as ensure RBA Code of Conduct compliance requirements are passed through the value chain.

*Successful suppliers have robust conformance programs in place to annually survey and to regularly conduct physical assessments of conformance both within their own operations and at the sites of their suppliers. For those Intel suppliers who do not have a robust RBA Code of Conduct assessment program in place & would like to learn more on how to do so, please review the available assets on the RBA website or contact Intel's Supply Chain Responsibility Department.

Helpful Links:

- RBA VAP Standard
- The RBA offers courses to help you prepare for an RBA Code of Conduct Audit through its E-Learning platform. Reach out to Intel Supplier Assurance Communications Intel.Supplier.Assurance.Communications@intel.com for access.

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