



# **2025 Statement on Efforts to Combat Human Trafficking and Modern Slavery in Our Business and Supply Chains**

**United Kingdom**



# **2025 Statement of Apple Europe Limited, Apple (UK) Limited, Apple Retail UK Limited and Apple Studios UK Limited**

**1. Introduction →**

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**2. UNGP Mapping Report →**

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**3. Apple's Anti-Modern Slavery Policies and Programs →**

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**4. UK Companies' Business Structure →**

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**5. Signature →**

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# 1. Introduction

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The UK Modern Slavery Act 2015 (the “**Act**”) requires certain entities to report on the steps, if any, they took during their previous financial year to ensure that slavery and human trafficking is not taking place in the entity’s supply chain or in any part of their own business.

For the purposes of the Act, this statement of Apple Europe Limited, Apple (UK) Limited, Apple Retail UK Limited, and Apple Studios UK Limited (together, the “**UK Companies**”), read in conjunction with Apple’s United Nations Guiding Principles on Business and Human Rights Mapping of the Apple Supply Chain 2026 Edition attached hereto as Annex 1 (the “**UNGP Mapping Report**”), comprises the UK Companies’ 2025 Statement on Efforts to Combat Human Trafficking and Modern Slavery in Our Business and Supply Chains (the “**2025 UK Modern Slavery Statement**”). The 2025 UK Modern Slavery Statement is made on behalf of the UK Companies, whose financial years ended on 27 September 2025.

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\* The term "Apple" as used in this statement refers collectively to Apple Inc. and its subsidiaries and branches, including Apple Europe Limited, Apple (UK) Limited, Apple Retail UK Limited, and Apple Studios UK Limited.



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## 2. UNGP Mapping Report

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The UNGP Mapping Report outlines the policies, programs, and activities (including training) that Apple undertakes to identify, mitigate, and remediate salient human rights risks in its supply chain in alignment with the United Nations Guiding Principles on Business and Human Rights.



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## 3. Apple's Anti-Modern Slavery Policies and Programs

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Read more about Apple's anti-modern slavery policies and programs, such as those listed below, at [apple.com/compliance](https://apple.com/compliance) and [apple.com/supply-chain](https://apple.com/supply-chain).

- [Apple's Human Rights Policy](#)
- [Apple's Business Conduct Policy](#)
- [Third-Party Code of Conduct](#)
- [Apple's Supplier Code of Conduct and Supplier Responsibility Standards](#)
- [Apple's People and Environment in Our Supply Chain Annual Update](#)
- [Apple's SEC Conflict Minerals Filing](#)



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# 4. UK Companies' Business Structure

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The UK Companies are wholly owned indirect subsidiaries of Apple Inc.



# 5. Signature

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In accordance with the Act, the 2025 UK Modern Slavery Statement was approved on 29 May 2026 by the UK Companies and has been signed by the undersigned director for and on behalf of each of the UK Companies to the extent that the 2025 UK Modern Slavery Statement relates to the activities of those respective entities.



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Full Name: Jamie Wong

Title: Director

Date: 29 May 2026

Apple Europe Limited

Apple (UK) Limited

Apple Retail UK Limited

Apple Studios UK Limited



Annex 1

# **The United Nations Guiding Principles on Business and Human Rights Mapping of the Apple Supply Chain**

2026 Edition



**I. Human rights governance →**

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**II. Management of salient human rights risks →**

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**III. Access to remedy for rights-holders →**

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**IV. Our commitment to human rights in action →**

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**V. Materials annex →**

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**VI. Endnotes →**

# Introduction

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The following report outlines the policies, programs, and activities Apple undertakes to identify, mitigate, and remediate salient human rights risks in our supply chain in alignment with the United Nations Guiding Principles on Business and Human Rights (UNGPs). A summary of this report is available in the [2026 People and Environment in Our Supply Chain Annual Update](#).

All people across our supply chain deserve to be treated with dignity and respect. Respect for human rights is at the foundation of our business and guides how we make decisions. This includes working directly with our suppliers and their employees to help ensure people feel safe on the job, are aware of their rights, and know how to speak up if their rights are not being respected.

We conduct human rights and environmental due diligence, and work to respect internationally recognized human rights across our business and supply chain.

# I. Human rights governance

## 1. What do we say publicly about our commitment to respect human rights?

We share our commitment to respect human rights in our Human Rights Policy; as part of public statements and letters, such as the one included each year in our [People and Environment in Our Supply Chain Annual Update](#); as well as in this UNGP Mapping.

## 2. Embedding respect for human rights into our business

### 2.1 Who is responsible for overseeing and implementing our human rights commitment?

Our corporate governance is designed to facilitate principled actions, effective decision-making, and appropriate monitoring of both compliance and performance. Responsibility for upholding human rights is embedded across our business, with broad collaboration driving standards and programs to support the people in our supply chain.

Apple's Board of Directors (Board) oversees the Chief Executive Officer (CEO) and other senior management in the competent and ethical operation of the company, including supply chain matters. Our Board adopted the Apple Human Rights Policy and is responsible for overseeing and periodically reviewing it, while Apple's senior vice president and general counsel is responsible for its ongoing implementation, reporting to the Board and its committees on our progress and any significant issues.

Teams across Apple conduct risk-based human rights, environmental, legal, and regulatory due diligence in our supply chain, including but not limited to: Legal, Global Security, Compliance and Business Conduct, and Environment and Supply Chain Innovation (ESCI). The ESCI team, part of Apple's Worldwide Operations organization, coordinates human rights and environmental due diligence across Apple's supply chain in line with our Apple Supplier Code of Conduct (Code) and Supplier Responsibility Standards (Standards) and our Human Rights Policy. Apple's Compliance and Business Conduct organization monitors suppliers and other entities for human rights and environmental risks. Our Chief Compliance Officer provides regular updates to the Audit and Finance Committee of the Board.

\* Learn more about our policies and standards on [page 7](#).

### 2.2 How do we communicate our commitment to human rights to our employees and business partners?

#### Communicating to Apple employees

All employees are required to complete annual Business Conduct training, which covers topics such as workplace behavior, conflicts of interest, gifts, confidentiality, anti-corruption, competition, privacy, and Apple's Human Rights Policy. Each year, as part of our Business Conduct Policy and associated training, Apple employees are provided with information on our Code and Standards, as well as the process for reporting concerns. Employees are responsible for reporting anything that might be considered a violation of any law or Apple policy, including those related to human rights,

per our Business Conduct Policy. Employees are reminded of this responsibility during their annual training.

Since 2023, we have also offered a human rights fundamentals course through Apple University, Apple's internal education and training organization. The course gives Apple employees an additional opportunity to dive deeper into the philosophy, history, and practice of human rights, as well as Apple's commitment and work to respect human rights.

#### Communicating to suppliers

Our Code and Standards are updated regularly, published on our website and SupplierCare (our supplier communication platform), and communicated in 18 languages to our suppliers.

Before we start working with a new supplier, we take extensive measures to raise their awareness of the requirements outlined in our Code and Standards. We provide existing suppliers with ongoing training and capability building focused on the best practices needed to continually meet our high standards. This includes virtual learning materials, and access to Apple subject matter experts (SMEs) who share their knowledge and tools through tailored coaching.

\* Learn more about supplier capability building on [page 6](#) and new Code of Conduct training on [page 22](#).

#### Reporting publicly

In addition to this UNGP mapping, we publish a number of resources that support our commitment to respect human rights, including all of the policy documents mentioned in this report. Some of these resources include:

- **People and Environment in Our Supply Chain Annual Update:** an overview of our supply chain programs and processes, as well as a summary of our suppliers' performance in meeting our requirements for the previous fiscal year.
- **Environmental Progress Report:** an annual update on the progress that has been made on our environmental goals and initiatives.
- **Apple Supplier List:** a list of the suppliers representing 98 percent of our direct spend for materials, manufacturing, and assembly of our products worldwide.

As part of our responsible materials sourcing efforts, we also publish a number of resources outlining our strategy, standards, and our progress:

- **Material Impact Profiles:** detail how we have prioritized the materials in our products based on their environmental, social, and supply chain impacts. The prioritized list of materials represents those that we first aim to transition to recycled or renewable content, driving toward our goal of using 100 percent recycled or renewable materials in our products.
- **Regulated Substances Specification (RSS):** outlines our requirements and restrictions on the use of certain chemicals in our products, packaging, and manufacturing processes.
- **Smelter and Refiner List:** identifies smelters and refiners of tin, tantalum, tungsten, and gold (3TG), lithium, and cobalt in our supply chain (included as an annex to this document).
- **Apple's Paper and Packaging Strategy:** describes our approach for responsibly sourcing paper for packaging.



- **Responsible Fiber Specification:** describes Apple’s requirements for fibers used in product packaging components and printed materials, such as wood, bamboo, and recycled sources.
- **Longevity, by Design:** describes how we extend the longevity of Apple devices through thoughtful design, manufacturing approaches, technologies, ongoing software support, and expanded access to repair services.
- **Expanding Access to Service and Repairs:** describes our approach to supporting customers’ access to safe and reliable service and repairs to extend the life of their Apple devices.
- **Conflict Minerals Filing:** describes our work to responsibly source 3TG materials in line with U.S. Securities and Exchange Commission (SEC) requirements.

### 2.3 How do we embed respect for human rights in our relationships with suppliers?

By contractual obligation, suppliers must adhere to the requirements outlined in our Code and Standards in order to do business with Apple. These cover areas of labor and human rights, health and safety, environment, responsible materials sourcing, community and rights-holder engagement, and business conduct. Suppliers are required to operate in accordance with our Code and Standards, and in compliance with all applicable laws and regulations. Suppliers must also apply our requirements to their subcontractors, sub-tier suppliers, and third-party employment agencies (TPEAs) throughout all levels of our supply chain. We verify compliance through third-party assessments and other engagement mechanisms as outlined in the following section.

#### Early engagement and due diligence

We perform global, risk-based due diligence and monitoring of prospective suppliers, as well as new facilities belonging to existing suppliers, to check for potential violations of our Code and Standards. This process covers risks to people and the environment across the value chain, and includes conducting

a third-party assessment through a leading compliance management platform. Suppliers must provide and commit to a remediation plan for all issues identified during this process as a condition of their business award.

We also require prospective suppliers to complete mandatory training as part of their onboarding. The training covers key topics, such as our health and safety requirements, as well as our Responsible Labor Recruitment Due Diligence Toolkit, which guides suppliers on how to mitigate any potential risks associated with labor recruitment.

\* Learn more about responsible labor recruitment on [page 10](#).

#### Pre-Facility Readiness Assessments

The Pre-Facility Readiness Assessment (PFRA) is a top-to-bottom assessment conducted by accredited third-party auditors of manufacturing supplier facilities before business is awarded. If we find risks or instances of noncompliance with our standards, we work with the prospective supplier to fully address and correct them before entering into a business relationship.

In 2025, we assessed 155 new or expanding supplier facilities. This resulted in identifying and requiring the suppliers to correct issues related to fire safety systems, electrical safety, environmental permits, and proper waste disposal, all of which were addressed before the new suppliers or sites entered our supply chain. Of those facilities, 100 percent were able to meet our requirements after going through the PFRA process — demonstrating the effectiveness of our early engagement process.

#### Facility Readiness Assessments

After a supplier completes the PFRA process and is awarded business, we conduct Facility Readiness Assessments (FRAs) of every facility that will be used for Apple production. FRAs are meant to continue to strengthen new suppliers’ awareness of our Code and Standards, and identify risks prior to beginning the mass production of Apple products.

We then follow suppliers through preproduction, or prior to the beginning of mass production, to confirm they are continuing to meet our standards and requirements, paying special attention to those suppliers that posed — and then corrected — risks during the earlier PFRA process. In 2025, of the 106 supplier facilities that participated in FRAs, all identified risks were successfully addressed, and 99 percent of those suppliers later demonstrated improvement during their initial Code of Conduct assessments.

#### Monitoring compliance throughout peak production

As hiring increases during cyclical production peaks — which is typical across many industries — we review key suppliers’ labor hiring plans; re-confirm the presence and monitor the implementation of strong labor and human rights policies and procedures; evaluate the quality of their employee training; and confirm the implementation of effective grievance systems. We also support suppliers with production planning and forecasting to help them fulfill their production needs.

In 2025, we monitored over 70 priority supplier facilities as they ramped up production, through 579 onsite visits and 10,300 worker interviews, as well as 152 specialized assessments conducted at key facilities. We also collected worker feedback via anonymous surveys during peak production periods to identify compliance and operational risks.

\* Learn more about specialized assessments on [page 6](#) and worker voice programs on [page 8](#).

#### Code of Conduct assessments

Supplier Code of Conduct assessments are assessments of established suppliers that help us identify risks and gaps in compliance with our Code and Standards. We select suppliers for these assessments based on a number of factors, including geographic location; the materials and processes they use; previous assessment performance; planned spend with the supplier; and workforce demographics.

Code of Conduct assessments are conducted by third-party auditing firms that are accredited to meet international auditing standards. Many of the firms that conduct our assessments are also certified to meet the industry-wide standards of the Responsible Business Alliance (RBA), the world’s largest industry coalition dedicated to responsible business conduct in global supply chains. While third-party firms conduct these assessments, Apple employees are available to provide onsite support to auditors to verify that our protocol is being followed and the auditors do not experience interference. In 2025, auditors did not report any experiences of interference from supplier management, local officials, or any other entities.

Assessments include a thorough review of supplier operations — from workplace conditions to proper safety practices and many other criteria — via worker and management interviews, site walk-throughs, and detailed reviews of documentation such as employee records, payroll information, contracts, and policies. We prohibit interference of any kind in our assessment process, and require that interviews conducted as part of assessments take place in confidential places with no managers or cameras present. Apple partners with auditing firms that provide local auditors with native language capabilities to eliminate any language barriers between the supplier employee and the auditor.

Retaliation in any form is a Core Violation<sup>1</sup> of our Code and Standards, the most serious level of violation. Last year, more than 42,000 follow-up phone calls were made to verify that supplier employees who participated in interviews did not experience retaliation as a result. We also provide anonymous hotlines where supplier employees can contact Apple directly, accessible at any time and in any language, should they experience retaliation or have other concerns about their workplace experience.



In 2025, we conducted 895 third-party assessments that focused on the requirements of our Code and Standards.

These assessments included:

- **Unannounced assessments and investigations:** Every year, we conduct unannounced assessments, investigations, and onsite visits to investigate supplier employees' concerns, reports from non-governmental organizations (NGOs), media, and civil society, and to verify potential risks. We may also conduct unannounced assessments to confirm that necessary changes have been made following the discovery of violations of our Code and Standards. In 2025, 216 unannounced assessments — where the supplier facility was given no advanced notice of our arrival — were conducted globally.
- **Industry-validated assessments:** In addition to assessments of our own production lines, we require many of our suppliers to undergo the RBA's Validated Assessment Program (VAP), a facility-wide, third-party assessment widely used by the industry. VAP assessments evaluate a facility's entire operations, including — but also beyond — Apple production lines. VAPs help confirm that our standards are being upheld across the entirety of a supplier's facility and operations, and provide insight on opportunities for overall improvement. Last year, more than 100 VAP assessments were completed at Apple supplier sites.

\* Learn more about our Corrective Action Plan and Corrective Action Verification processes on [page 9](#).

### Material processor audits

While Apple does not source primary material directly from mine sites, we maintain strict standards for the responsible sourcing of the materials in our products, whether primary or recycled. 100 percent of 3TG, cobalt, and lithium smelters and refiners identified in Apple's supply chain are required to participate in an independent third-party audit annually. If smelters/refiners are unable or unwilling to meet our

standards, we take necessary actions, through our suppliers, to terminate the applicable business relationships.<sup>2</sup> This helps identify social, environmental, human rights, and governance risks deeper in our supply chain, aligned with the Organization for Economic Cooperation and Development's (OECD) Due Diligence Guidance Five-Step Framework.

We also verify our recycling suppliers' compliance with our Code and Standards through third-party assessments. All of our recyclers in North America are certified by either e-Stewards® or R2, the electronics industry's leading certifications for assessing the environmental, worker health, and security practices of entities managing used electronics.

\* Learn more about our approach to the responsible sourcing of materials on [page 16](#).

### Specialized assessments

In addition to our annual Code of Conduct assessments, our suppliers, their labor agencies, and other sub-tier suppliers may receive specialized assessments with a focus on a particular issue or risk factor. This may include assessments conducted in response to an allegation or to look at recent changes to a facility's operations, such as adjustments to production cycles, demand changes, significant workforce expansions, or updates to production areas and processes. Most of these assessments are unannounced, meaning a supplier is given no prior notice ahead of our arrival.

While annual Code of Conduct assessments cover a wide range of compliance categories, specialized assessments provide a deeper review of particular areas, during which we are able to target specific risks, such as wages, working hours, machine safety, fire safety, and wastewater treatment. Auditors work with individuals that have expertise in areas such as specialized equipment, technical procedures, new technologies, and responsible labor recruitment practices.

In 2025, 152 specialized assessments resulted in more than 1,100 findings being identified and mitigated, including

recruitment fee payments by TPEAs, issues related to wages and benefits, and fire safety measures.

### 2.3.1 Capability building

We are dedicated to supporting our suppliers in their continued development and improvement of their capability as it relates to upholding our standards. This includes remediation processes, where we provide suppliers with the tools and expertise they need to resolve issues quickly. We also invest in ongoing support, including on-demand digital training, to help suppliers continually improve their management systems and ability to meet our increasingly high standards. We identify opportunities for ongoing training and other capability-building efforts by looking at assessment results; input from workers via surveys, interviews, and grievance mechanisms; feedback from expert stakeholders on emerging issues; and evolving industry best practices.

Apple also provides onsite support through subject matter experts that can help suppliers address both management and technical issues across 13 specific topics. In 2025, more than 25 supplier sites received customized support from experts who helped the suppliers improve their overall performance and their management systems across a number of topics, including worker engagement, grievance management, and TPEA management.

### 2.3.2 Management of sub-tier suppliers

Our Code and Standards apply not only to our suppliers, but also to any of their subsidiaries and affiliates, subcontractors, and sub-tier suppliers providing goods or services to Apple, or for use in or with Apple products.

We require our suppliers to perform periodic evaluations of their suppliers' facilities and operations, as well as the facilities and operations of their subcontractors and sub-tier suppliers to confirm that they are complying with our Code and Standards, as well as any applicable laws and regulations.

We regularly verify that our suppliers have policies, management systems, and audit protocols in place for their suppliers, and we regularly evaluate the quality of these systems and policies. We review our suppliers' audit reports to spot-check their findings, and verify they have corrected any compliance issues. If we receive grievances related to sub-tier suppliers, we work with our suppliers to investigate and correct any findings.

Suppliers are not permitted to have manufacturing operations in, recruit labor directly or indirectly from, or source materials, products, or services directly or indirectly from regions where comprehensive, third-party evaluations cannot be conducted to verify compliance with our Code and Standards.

# II. Management of salient human rights risks

We identify and manage salient human rights risks generally associated with electronics supply chains, which may include:

- Forced labor
- Freedom of association and collective bargaining
- Anti-discrimination in hiring and employment
- Underage labor
- Workplace health and safety
- Fair wages and working hours
- Sexual harassment
- Environmental rights
- Sourcing of materials

## 1. How do we identify our salient human rights risks?

### Mapping our supply chain

We have worked for many years to map our supply chain as a first step in identifying risks. We use this information to help guide our business decisions, including which suppliers we choose to work with and which materials we use in our products and manufacturing processes, as well as to identify opportunities to continually improve our programs and policies.

### Leveraging data

Our assessment processes and participation in industry-level, third-party assessments also support our human rights due diligence efforts. We leverage predictive analytics, years of assessment data and insights, reports and guidance from internal and external experts, plus supplier employee feedback from third-party hotlines, surveys, and interviews with workers, to identify potential issues. We also focus on higher-risk suppliers, such as those with previous violations,

helping to maximize the impact of our risk identification and mitigation efforts.

### Conducting human rights risk assessments

In 2023, building on our own due diligence programs, we worked with third-party human rights experts at The Remedy Project to conduct a human rights risk assessment (HRRA) of our hardware manufacturing supply chain. We continue to utilize the findings to help improve our policies and human rights due diligence processes.

### Engaging stakeholders

Identifying and mitigating risks in our supply chain requires input from a broad range of stakeholders. In addition to our work to engage rights-holders, we identify and address salient risks through consultations with human rights, labor, and environmental experts, including those from governments and UN agencies; expert groups we convene on specialized and emerging human rights topics; discussions with supplier management teams; and reports received from our partners and the public around the world.

\* Learn more about rights-holder engagement on [page 8](#).

## 2. What policies and standards do we have in place to address these risks?

### Human Rights Policy

Our human rights policy governs how we treat everyone — from our customers and teams, to our business partners and communities, and to people at every level of our supply chain. The policy, which was approved by Apple's Board and CEO, outlines our commitment to respect internationally recognized

human rights in our business operations, as set out in the Universal Declaration of Human Rights; the International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights (together, the "International Bill of Human Rights"); and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. Our approach to implementing our Human Rights Policy is based on the UNGPs.

### Business Conduct Policy

Our Business Conduct Policy outlines the principles that guide Apple's business practices, including honesty, respect, confidentiality, and compliance with applicable laws, regulations, and internationally recognized human rights frameworks, such as the UNGPs. Apple expects its suppliers, contractors, consultants, and other business partners to follow these principles when providing goods and services to Apple or acting on our behalf.

### Anti-Modern Slavery Policy

Apple's Anti-Modern Slavery Policy covers our strict prohibition against any form of modern slavery, including forced labor and human trafficking, in our supply chain, third-party channels, and business operations. This applies to all persons working for Apple and its subsidiaries and affiliates, including all directors, officers, and employees of Apple entities. It requires all third parties to abide by Apple's Supplier Code of Conduct. Apple also complies with applicable U.S. Federal Acquisition Regulations.

### Global Whistleblowing Policy

Apple's Global Whistleblowing Policy applies to individuals who have a business relationship with Apple and have concerns

about possible wrongdoing that involves Apple. The policy, as well as Apple's external compliance website, provides detailed information on how both employees and third parties can report potential concerns related to our business or supply chain. This includes Apple's external reporting platform, EthicsPoint, which provides the option of anonymous reporting, where permissible under applicable laws. Employees are expected and encouraged to raise concerns about violations of Apple's Business Conduct Policy, other Apple policies, and legal and regulatory requirements.

### Supplier Code of Conduct and Supplier Responsibility Standards

Developed in 2005, the Apple Code and Standards outline our strict requirements — in the areas of labor and human rights, health and safety, environment, responsible materials sourcing, community and rights-holder engagement, and business conduct — that suppliers must contractually adhere to in order to do business with Apple. Suppliers are required to operate in accordance with our Code and Standards, and in compliance with all applicable laws and regulations. They must also apply our requirements to their subcontractors, sub-tier suppliers, and third-party employment agencies throughout all levels of our supply chain.

\* Learn more about how we drive standards and accountability with sub-tier suppliers on [page 6](#).

The Code and Standards align with internationally recognized frameworks and standards on human rights, environment, and ethical conduct. This includes the UNGPs, the OECD Guidelines for Multinational Enterprises on Responsible



Business Conduct (OECD Guidelines), and the ILO’s Declaration on Fundamental Principles and Rights at Work. Our Code and Standards also draw from other industry and internationally accepted standards and principles, including the UN’s International Bill of Human Rights, the RBA Code of Conduct, and the ILO’s Code of Practice on Safety and Health. The protections they provide apply equally to all workers, regardless of a person’s job, their geographic location, or how they were hired.

The Standards explain, in detail, the actions our suppliers must take to maintain compliance with the Code. They include broad coverage of human rights topics, including anti-discrimination and abuse, prevention of forced and underage labor, working hours management, wages, benefits, contracts, compliance with all laws regarding freedom of association and collective bargaining, and the responsible sourcing of materials. Our Code and Standards also require our suppliers to take extensive measures to reduce their environmental impact and resource consumption.

We evaluate and update our Code and Standards regularly, incorporating feedback from rights-holders and other stakeholders to reflect emerging risks, legal developments, industry best practices, and the evolving needs of workers in a dynamic operating environment. In 2025, we undertook an extensive exercise to further strengthen our Code and Standards.

\* Learn more about updates we made to our Code of Conduct on [page 22](#).

### 3. What is our approach to engaging with stakeholders?

We proactively listen to rights-holders and stakeholders, and invest in channels that support people in speaking up if their rights are not being respected. We require our suppliers to implement systems to collect feedback from their employees. Suppliers must take appropriate action to respond

to employee feedback and communicate regularly on the progress of actions taken. Supplier employees are also able to report concerns and share feedback directly with Apple.

### 3.1 Engagement with rights-holders

#### Worker rights awareness

We require suppliers to train their employees on workplace rights — including those related to all of our salient human rights risks — whether they were hired directly by one of our suppliers or through other channels, such as a labor agency. The training must cover labor laws; environmental, health, and safety (EHS) standards; the prevention of forced labor; how to access grievance mechanisms; and all other labor and human rights protections required by our Code and Standards. We review and assess the training our suppliers provide to verify they meet all necessary criteria. Since 2008, more than 33 million people have been trained by our suppliers on their workplace rights.

We continue to develop and scale learning tools to support supplier employees in being even better educated on their rights. These tools, which were created with input from supplier employees, enable more direct engagement with supplier employees through learning apps available on their mobile devices. The platforms also allow for the customization of content based on local languages and cultural context to support increased comprehension and retention of the information.

We are also utilizing these tools to more effectively provide training on specialized topics identified through supplier assessments. In 2025, as part of our project with the International Organization for Migration (IOM) to deploy Mobile Worker Resource Centers for supplier employees and communities, we utilized these learning platforms to deliver training on topics such as health and wellness, transportation safety, and the prevention of sexual harassment.

We also work with leading international organizations to support training focused on the issues most relevant to suppliers and workers at a local level. We continued to partner with the ILO to train supplier employees and their managers on workplace rights. In 2025, we also launched a new partnership with the ILO to train workers and managers on the prevention and resolution of labor issues, effective grievance systems, and gender inclusion. This initiative supports the objectives outlined in India’s national Decent Work Country Programme, which was developed jointly with the ILO.

#### Worker voice

Through interviews, workplace satisfaction surveys, grievance channels maintained by Apple and our suppliers, and upstream accountability mechanisms, we engage with supplier employees, community members, and other rights-holders across every level of our supply chain. We then work with suppliers to analyze the feedback we receive through each of these channels to develop action plans to address any concerns. This allows us to better identify and manage emerging labor and human rights risks throughout our supply chain, and to improve worker satisfaction.

#### Worker interviews

We conduct tens of thousands of voluntary, confidential interviews each year as part of our supplier assessment process. Interviewees are selected through a sampling methodology that seeks broad representation across the employee population. Conversations are conducted by accredited third-party auditing firms in employees’ native languages, and without management or cameras present. In 2025, we interviewed more than 72,000 supplier employees as part of supplier assessments. Apple team members may also conduct additional surprise interviews when they visit supplier facilities. These interviews are conducted with no management present, and are completely voluntary and confidential.

With their consent, over 42,000 follow-up phone calls were made last year to confirm interviewees did not experience any retaliation as a result of their participation. No cases of retaliation were found in 2025. All interviewed employees are also provided with ways to contact anonymous third-party hotlines to report any retaliation or other issue.

\* Learn more about Core Violations on [page 9](#).

#### Workplace satisfaction surveys

We proactively engage supplier employees through anonymous surveys to help understand and improve their overall workplace satisfaction. These surveys cover six categories, including employee relations and retention, wages, health and safety, mental health, and workplace amenities.

In 2025, we surveyed more than 582,000 employees at over 330 supplier facilities. Over 6,900 improvements were made by suppliers in response to survey feedback, including the addition of daily safety announcements; grievance response training for managers; improved onboarding materials for new supplier employees; and additional mental health and wellness initiatives.

\* Learn more about our health education programs on [page 14](#) and impact measurement on [page 18](#).

#### Grievance reports

We review reports from civil society organizations, media, people in our supply chain, supply chain communities, upstream whistleblower and accountability mechanisms, and third-party hotlines. Reports of potential issues also come through the grievance mechanisms we make available to all supply chain workers, Apple employees, and the general public. This includes EthicsPoint, Apple’s external helpline which is available for both employees and external parties to report concerns, providing the option of anonymous reporting where permissible. The external helpline is available 24/7, and provides a multilingual reporting service with local, toll-free numbers.



Last year, we received 441 grievance reports, all of which were promptly addressed. These included discrepancies between TPEAs and suppliers around communicated wages, unpaid signing bonuses, working hours, management and administrative issues, and workplace safety.

**Worker sentiment**

Measuring anonymized worker sentiment can help identify emerging risks, allowing us to remedy issues before they escalate. In 2025, we continued to invest in tools powered by AI technologies to help us more quickly understand worker sentiment. We conducted weekly reviews of this information for over 140 priority supplier sites and more than 1.2 million supplier employees. As a result, suppliers implemented a number of changes to improve their workplaces, including working to reduce wait times at security entrances and improving transportation options.

\* Learn more about supplier accountability and remedy on [page 21](#).

**3.2 Engagement with external experts and industry partners**

**External experts**

We share our approach and progress with stakeholders, and solicit input based on their distinct areas of expertise to inform our ongoing decision-making and the continuous improvement of our programs. As we do each year, we convened leading labor, human rights, and other experts in 2025 to share their insights on emerging risks and areas of opportunity, and to provide input on our reporting and programs. This included focused discussions on responsible materials sourcing and supply chain education programs to enable more in-depth conversations on these specific topics.

Insights from these consultations directly influenced the extensive updates we made to our Code and Standards, including more explicit references to our alignment with the UNGPs and other internationally recognized frameworks, as

well as updated requirements related to traceability as part of our updated Responsible Sourcing of Primary, Recycled, and Renewable Materials Standard.

**Industry engagement and advocacy**

We engage with industry associations, expert organizations, and NGOs to provide our expertise and leadership to influence collective advocacy for policies and initiatives that can have far-reaching impact. This includes developing tools and resources that can be scaled beyond our supply chain, such as our Responsible Labor Recruitment Due Diligence Toolkit, which we developed with the International Organization for Migration (IOM).

We also work with partners to develop and pilot innovative solutions within our supply chain, and then make these solutions broadly available to the industry in order to reduce barriers and scale solutions more quickly.

Working with organizations such as the RBA and the U.S. Council for International Business (USCIB), we also work to advance policies that support suppliers in upholding our high standards. For example, for more than 15 years, we have been a leading voice working to eliminate the charging of recruitment fees for people seeking jobs by prohibiting the practice in our supply chain and working with industry groups to demonstrate the effectiveness of these requirements.

We also support human rights and environmental defenders working at the local and national levels to advance policies that support fundamental labor and human rights through our partnership with organizations like the Fund for Global Human Rights.

\* Learn more about our work on responsible labor recruitment on [page 10](#), and our support of human rights and environmental defenders on [page 17](#).

**4. How do we take action to address salient risks in our supply chain?**

**4.1 Addressing violations of our standards**

Across our supply chain, our primary focus is on preventing and mitigating potential risks before incidents occur. If we discover violations of our standards, we take swift action to hold suppliers accountable and confirm effective remedy is provided to rights-holders — and that steps are taken to identify the root cause and prevent the problem from happening again.

We promptly investigate any allegations we receive, and when necessary, Apple experts are typically onsite within 24–48 hours. We verify directly with the affected rights-holders that they received timely, effective remedy.

The following are the standard definitions for violations of our supplier requirements we use to consistently evaluate our suppliers’ ability to uphold our standards.

**Administrative Noncompliance:** Denotes policy-, procedure-, training-, or communication-related findings. Examples of administrative noncompliance include:

- Inadequate record-keeping
- Inadequate documentation of policies or procedures
- Insufficient training on policies

**Violation:** Denotes noncompliance with our Code and Standards. Examples of violations could include:

- Insufficient provision of benefits
- Inadequate pre-placement, on-job, or post-employment occupational health exams
- Inadequate environmental permits

**Core Violation:** The most serious violation of our Code and Standards. When a Core Violation is identified, the supplier’s CEO is notified, and the supplier is immediately placed on probation. Probation is the period beginning when a Core Violation is discovered by Apple, and ending when

Apple determines the supplier has completed all necessary corrective actions. Examples of consequences resulting from probation include receiving no new projects or new business, and the termination of existing business with Apple.

Core Violations include:

- Abuse
- Underage labor
- Debt-bonded labor
- Forced labor
- Falsification of data
- Retaliation
- Obstruction of an assessment
- Bribery
- Inadequate safety leadership resulting in systemic failures in safety management
- Unsafe or unhealthy environment provided to workers that may cause imminent, significant risk of serious injury, illness, property damage, or any form of loss
- Defeated safety devices or impaired loss-control system without additional controls to prevent serious incident
- Inadequate maintenance or intentional circumvention that demonstrates the failure of an environmental abatement system
- Lack of required environmental approvals or controls
- Use of prohibited substances
- Illegal disposal of hazardous waste

**Taking corrective actions**

When violations of our Code and Standards are discovered, we require suppliers to promptly implement a plan to correct the problem and provide remedy to affected rights-holders. Once the plan has been implemented, we verify that all corrective actions have been completed to our standards.

As part of our Corrective Action Plan (CAP) process, the supplier is notified of the issue(s), required to identify the root cause, and directed to develop corrective actions. During this time, Apple experts provide suppliers with training on industry best practices and guidance on resolving the identified issues,

as well as support to strengthen their management systems and practices to prevent the issue from reoccurring. We require 30-, 60-, and 90-day check-ins to confirm progress is being made, the supplier's questions are being addressed, and training is provided where needed. Some suppliers are required to complete more frequent check-ins if deemed necessary by Apple. We then conduct our Corrective Action Verification (CAV) process to verify that all corrective actions have been successfully implemented, and that management systems have been appropriately strengthened to prevent a reoccurrence.

When violations occur, our goal is to work hand-in-hand with suppliers to support affected workers and help suppliers improve their operations, rather than remove the supplier from our supply chain. If a supplier is unwilling or unable to remedy violations and improve their operations to meet our requirements, they risk removal from our supply chain. Since 2009, we have directed the removal of 25 manufacturing supplier facilities, as well as 232 smelters and refiners, from our supply chain.<sup>3</sup>

## 4.2 Prevention of forced labor

Apple does not tolerate forced labor. Our Code and Standards detail our anti-modern slavery-related requirements for suppliers, collectively known as our "Prevention of Modern Slavery Standards." These include provisions related to the prevention of involuntary labor, TPEAs, and protections for Foreign Contract Workers. They apply to all suppliers and sub-tier suppliers, including any private, public, or government agencies that work with our suppliers to recruit workers.

We found no instances where people were forced to work in our supply chain in 2025.

### Labor recruitment mapping

Our comprehensive approach to preventing forced labor, as defined by the ILO, starts with understanding how and where workers are recruited.

In 2018, we started mapping higher-risk migration corridors using our own data, as well as publicly available information from the ILO and the U.S. State Department's "Trafficking in Persons Report." Higher-risk migration corridors are those countries of origin and destination that present particular risks to Foreign Contract Workers — people who travel between countries to work — due to geopolitical, socio-economic, or other factors.

Since 2020, we've continued to expand this work by conducting extensive mapping of the labor agencies in our supply chain to further understand all channels through which our suppliers recruit labor. Any company that wants to work with Apple is required to complete labor agency mapping as part of our supplier selection due diligence process. This has given us greater visibility, and enables us to mitigate forced labor risks right at the source, through increased engagement with our suppliers, their labor agents, and prospective workers.

Foreign Contract Workers have been a key focus for us for many years. While they make up only approximately one percent of the people in our supply chain, Foreign Contract Workers face heightened human rights risks, such as forced labor, as they cross international and regional borders to work. However, we recognize the need to also further support the specific needs and challenges facing people migrating within their respective countries to work.

Workers that migrate domestically still face potential challenges when moving to a new city or region, including different languages and new cultural norms. To better support these workers, we partnered with the IOM to create Mobile Worker Resource Centers to deliver training, information, and resources directly to workers and community members. Trained facilitators provide visitors with information on how to set up local bank accounts and pay bills; step-by-step instructions for obtaining and updating government-issued IDs; information about public transit options; and training

on topics ranging from health and wellness to personal and professional development.

\* Learn more about our Mobile Worker Resource Centers on [page 23](#).

### Debt-bonded labor

Apple does not tolerate debt-bonded labor, which the ILO defines as a person "working for little or no wages because their earnings are retained in part or full to repay an outstanding loan." Following the completion of rigorous assessments and investigations across 60 countries and regions, we found no instances of debt-bonded labor in our supply chain in 2025.

We were among the first companies to align to international best practices to prohibit suppliers from charging fees to workers connected to their recruitment or employment, even if such fees are legal in the supplier's country of operation or the employee's home country. In 2025, we updated our Code and Standards to further clarify that our zero-fees policy extends to all workers.

If we discover that any worker has paid recruitment fees to an Apple supplier or a supplier's labor agency at any point during their employment journey, this is considered a Core Violation<sup>1</sup> of our Code and Standards, the most serious level of violation. We require the supplier to promptly repay the affected workers, and verify full and timely repayment through a third-party auditor. Since 2008, over \$34.5 million in recruitment fees have been repaid to more than 37,700 workers by our suppliers as a result of our zero-fees policy.

In their July 2025 report, the UN Working Group on Business and Human Rights recognized the importance of effective remedy for debt-bonded labor through the repayment of fees charged to migrant workers, noting the millions of dollars Apple suppliers have repaid to thousands of workers in our supply chain over the past 15 years.

### Looking for evidence of forced and debt-bonded labor

We require our third-party assessments to verify that no one in our supply chain is forced to work, and that people's rights are respected throughout their employment journey — regardless of their job, their geographic location, or how they were hired.

We look for any evidence of debt-bonded and forced labor, as outlined by the ILO Indicators of Forced Labour, in every supplier assessment we conduct. These include detailed reviews of employment records and private interviews with suppliers, their labor agencies, and employees (in their native languages). If we suspect forced or debt-bonded labor at a supplier or their contracted labor agencies, we conduct targeted investigations into their hiring processes.

We carry out additional specialized assessments at facilities where Foreign Contract Workers are employed, and those located in higher-risk areas. In 2025, 43 specialized assessments in 5 countries and regions were conducted at supplier facilities employing Foreign Contract Workers, including specialized facility-wide VAP audits conducted by the RBA. Each specialized assessment includes verification of documents from suppliers and their labor agents, as well as interviews with labor agents and Foreign Contract Workers.

### Recruitment due diligence tools and resources

We build tools, resources, and partnerships to help drive our high standards deeper into our supply chain, so everyone can take an active role in safeguarding labor and human rights during hiring.

To accelerate this effort, we worked with IOM to develop the Apple Responsible Labor Recruitment Due Diligence Toolkit (Recruitment Toolkit), which draws upon the ILO Indicators of Forced Labour and the OECD Due Diligence Guidance for Responsible Business Conduct (Guidance). We train our suppliers to use the suite of tools and templates in the Recruitment Toolkit to complete each step of the OECD Due Diligence Guidance process. This includes:



- Sample language to help develop responsible recruitment policies
- A risk assessment questionnaire to help identify recruitment-related risks
- A Corrective Action Plan template to correct any identified noncompliance
- A self-assessment checklist for confirming completion of each step

In 2025, we again partnered with IOM to develop a supplementary guide to help suppliers conduct effective, confidential interviews with Foreign Contract Workers in their facilities as part of their due diligence process.

Every year, we solicit feedback from suppliers, labor agents, and other stakeholders to continually strengthen and evolve the Recruitment Toolkit. We also map the content against updated Apple Supplier Code and Standards, best practices, new and emerging laws and regulatory requirements, and stakeholder feedback collected through partners and industry associations.

We work with leading global organizations to scale our Recruitment Toolkit beyond our own supply chain — and beyond the electronics manufacturing industry. This has included partnering with IOM and RBA to scale their versions of the Recruitment Toolkit to other industries and even governments. The Recruitment Toolkit has enabled these governments' efforts to train relevant government employees on responsible labor recruitment best practices, and support capability building of companies with which they work.

**Training and capability building**

We use the information we gather from our supply chain mapping to engage directly with the entities involved in a worker's employment journey. This includes delivering industry-leading training and capability building to suppliers, their labor agencies, and even workers themselves on responsible labor recruitment. Last year, we expanded this training to sub-tier suppliers that recruit Foreign Contract Workers and

provide onsite services to our suppliers, such as security and food services.

We provide customized training to labor agents in our supply chain based on their specific risks and needs. Easy-to-use tools and customized training are unique and critical parts of our work to mitigate human rights risks at the earliest stages of labor recruitment. Many labor agencies are small- or medium-sized businesses that often lack access to the knowledge and resources required to identify and address these risks. In 2025, we delivered Recruitment Toolkit training sessions to more than 140 supplier facilities, and 130 labor agencies in 12 countries and regions. Since launch, these trainings have reached facilities employing over 1.7 million workers and managers globally, including many people who do not work directly on Apple business, thereby furthering the reach of this effort beyond our supply chain.

We require our suppliers to provide all of their employees training on their rights as they pertain to prevention of forced labor. For Foreign Contract Workers, our Code and Standards require that they receive pre-departure training in their country of origin, onboarding training upon arrival in their destination country, and regular refresher training. This training includes requirements around fees and expenses related to recruitment and ongoing employment, relevant laws and regulations, and other protections provided under our Code and Standards. In addition, our Code and Standards require TPEAs in our supply chain to understand and verify that the onboarding experience and processes for the workers they employ meet Apple's standards.

\* Learn more about worker rights awareness on [page 8](#).

**4.3 Freedom of association and collective bargaining**

In alignment with the ILO's Declaration on Fundamental Principles and Rights at Work, our Code and Standards outline our requirements for suppliers in relation to the rights of employees to form and join — or refrain from

joining — organizations of their choice, and to bargain collectively through their chosen representatives without interference, discrimination, retaliation, or harassment. We look for evidence of discrimination or retaliation related to freedom of association and collective bargaining as part of every assessment we conduct. These include confidential interviews with supplier employees.

In 2025, over 400 facilities in 27 countries and regions employed unionized workers, and more than 340 sites had negotiated collective bargaining agreements with their employees.

Suppliers are required to have written policies on freedom of association, and to accommodate workers should they express a desire for a grievance mechanism in addition to formal representation. Suppliers are also required to honor, in good faith, the terms of any signed collective bargaining agreement for the duration of that agreement. Even where freedom of association and collective bargaining are restricted under law, suppliers are prohibited from obstructing alternative legal means for their employees to associate and bargain collectively, such as worker committees.

Our Code and Standards also require suppliers to implement training programs and mechanisms to build the capacity of their managers to engage with workers in a constructive, professional, and transparent manner. This includes having documented processes to communicate with workers, or their elected representatives, during labor recruitment and onboarding, in relation to health and safety management in the workplace, and in the design and development of grievance mechanisms.

We require all suppliers to train their employees on their rights, including freedom of association and collective bargaining through chosen representatives, and we continue to raise awareness of these requirements through our digital rights-training tools. We also continued to partner with the ILO to train supplier employees, managers, and labor officials

on topics related to freedom of association and collective bargaining.

\* Learn more about worker rights awareness on [page 8](#), and employee-management communication on [page 22](#).

**4.4 Prevention of discrimination in hiring and employment**

Our Code and Standards prohibit discrimination in hiring and other employment practices against any employee based on age, disability, ethnicity, gender, marital status, national origin, political affiliation, race, religion, caste, sexual orientation, gender identity, union membership, or any other status protected by applicable national or local law.

We look for evidence of discrimination in job postings, hiring practices, management practices, and the accessibility of workplaces. If evidence of discriminatory practices is found, suppliers are required to promptly remediate the findings and take action to prevent the issue from happening again.

In 2025, we added a provision to our Code and Standards to explicitly prohibit any discrimination as a result of security policies and procedures at supplier facilities. For example, suppliers must allow employees who wear customary religious jewelry to do so even if they work in a facility that prohibits the wearing of metal for security reasons. We've also prohibited compulsory pre-employment medical testing during the hiring process, unless required by applicable laws and regulations. This is meant to address any potential discrimination based on a worker's general health, pregnancy status, or mental health status.

**Supporting workers with disabilities**

In 2025, building upon our existing protections for workers with disabilities, we outlined more specific requirements in our Code and Standards related to reasonable accommodations, adequate job assignments, and the accessibility of supplier facilities.

Our Vocational Education for Persons with Disabilities program also works with suppliers to provide employment and professional development opportunities in our supply chain for people with disabilities, as well as to improve safety, accessibility, and inclusivity practices in supplier facilities.

The program supports suppliers in recruiting, retaining, and providing advancement opportunities for people with disabilities through job mapping, accessibility assessments, inclusion training, and professional development.

#### 4.5 Prevention of underage labor

We require our suppliers to implement age documentation and verification systems that are applied across their operations and to third-party labor agencies. Our suppliers must also provide training on these systems to all recruitment staff, including labor agencies. We review these systems as part of third-party assessments, and if signs of underage labor are discovered, specialized third-party assessors are brought in for additional in-depth reviews.

\* Learn more about how we address violations of our Code and Standards on [page 9](#), and our remediation processes on [page 21](#).

#### 4.6 Workplace health and safety

We take steps to minimize occupational health and safety risks before production begins, starting with setting strict health and safety requirements through our Code and Standards and Regulated Substances Specification (RSS). We communicate our requirements to supplier teams through our SupplierCare platform, and invest heavily in building suppliers' capabilities through ongoing training, resources, and expert guidance.

\* Learn more about our policies and standards on [page 7](#) and early engagement with suppliers on [page 5](#).

##### Building a culture of safety

In 2025, we rolled out a new safety leadership program, which evaluates supplier facilities using our safety leadership

scorecard. The scorecard looks across a number of criteria, including adequate staffing of trained safety personnel and allocation of safety resources, as well as a demonstrated commitment to safety advocacy and the presence of effective cross-functional safety committees.

In 2025, more than 80 key supplier facilities — including major final product assembly and enclosure sites — were assessed using the safety leadership scorecard. One supplier facility, while still meeting our basic health and safety requirements, scored in the bottom five percent of suppliers that were assessed, with the scorecard identifying several opportunities to improve safety leadership at their facility. Over the course of six months, the supplier made significant improvements based on this assessment, including hiring and training more than 40 additional EHS personnel, increasing their budget for health and safety resourcing, and implementing monthly safety inspections by managers and department leaders.

To further reinforce the importance of safety as a leadership priority, we also expanded our list of Core Violations<sup>1</sup> to include findings of any inadequate safety leadership at a facility that may result in severe incidents or systemic failures in safety management.

\* Learn more about Core Violations on [page 9](#) and capability building on [page 6](#).

##### Transportation safety

As our supply chain expands into new regions and cities, we continue to identify and address any potential new risks. This includes safety risks associated with supplier-provided transportation.

In 2025, we conducted focused assessments across more than 20 supplier sites to identify any issues related to vehicle safety and management systems. In addition, assessments were conducted of nearly 550 shuttle routes. Of the more than 1,800 buses that were assessed as part of this program, all of them implemented a number of safety improvements,

including the installation of seat belts, security systems, dash and reverse cameras, and GPS tracking systems.

In addition to shuttle bus improvements, more than 2,600 drivers received regular defensive driving training in 2025, covering topics such as fatigue management, hazard awareness, emergency response, and passenger safety. We also implemented a safe driver incentive program to promote and sustain safe driving behaviors. Drivers are evaluated based on their safety performance, punctuality, passenger satisfaction, and vehicle maintenance, with monthly and quarterly incentives awarded by suppliers based on their performance.

Cumulatively, these collective efforts resulted in a 50 percent reduction in transportation-related incidents, despite a 30 percent increase in the total number of shuttle buses operating during the same period.

##### Fire safety

Our Code and Standards require suppliers to develop and implement a program to increase fire safety during property design, construction, renovation, utilization, and decommissioning, and to perform fire risk assessments with proper emergency response plans to mitigate the risk of harm to life, environment, and property.

In addition, we've taken extra steps to address activities at our supplier facilities that require a higher level of fire safety controls. One such process is anodizing, which is widely used for coating and coloring metal surfaces, such as the enclosures or housing of a number of our products. We take extensive measures to train suppliers who utilize this process on our standards and best practices, and to identify and mitigate risks before incidents occur.

##### Machine safety

Our strict safety requirements extend from the procurement of machinery — helping to ensure newly purchased equipment prioritizes adequate safety features — to the proper usage,

maintenance, and safety measures required to help keep the people who operate manufacturing equipment safe on the job.

##### Machine safety training

We provide training for safety managers and cross-functional leaders at supplier sites that covers the use of safety devices, inspection basics, and hazards associated with moving parts. Since 2022, over 970 supplier facilities across China mainland, India, Indonesia, Japan, Malaysia, New Zealand, Singapore, South Korea, Taiwan, Thailand, the United States, and Vietnam have completed our online machine safety training, including 57 new sites in 2025. In addition to this training for managers at supplier sites, we also made machine safety training available directly to more than 1.2 million line workers in countries including China mainland, India, and Vietnam.

In 2025, we hosted a Machine Safety Forum for nearly 1,000 Apple employees, including engineers and manufacturing design professionals, to raise awareness around machine safety and how to better integrate safeguards into the design of our manufacturing processes.

##### Machine safety inspections

We conduct regular onsite inspections to evaluate supplier facilities' safety procedures and to identify risks and opportunities for continuous improvement. These inspections include assessments of machine guarding, electrical safety precautions, and catastrophic incident prevention systems, among many other safety engineering measures. In 2025, we completed onsite safety inspections of more than 60 supplier sites, focusing on new or expanding supplier facilities to identify any emerging risks.

In total, suppliers that completed these onsite inspections used the learnings to further inspect more than 14,000 machines at their facilities in 2025.

\* Learn more about supplier assessments on [page 5](#).

### Chemical safety

Our approach to minimizing workers' exposure to chemical hazards follows the hierarchy of controls, which prioritizes elimination and substitution first. For any chemicals that pose a potential concern and cannot be fully removed from a manufacturing process, or if there is no adequate substitution available, other safety measures — such as personal protective equipment (PPE) or engineering controls such as ventilation systems — are implemented. We intentionally design our products and manufacturing processes to align with this approach, providing our suppliers with access to the information and resources they need to identify and select safer chemicals from the start.

#### Driving high standards and demonstrating impact

To help define safe materials for our suppliers, we first set strict material safety requirements via our Code and Standards and the RSS. These guidelines are derived from — and often go beyond — international laws or directives, regulatory agencies, eco-label requirements, and environmental standards to protect human health and the environment.

Guided by the ILO's Chemicals Convention, we require and provide mechanisms for suppliers to disclose information about the chemicals used at their facilities, including how each is stored and handled. Through our Full Material Disclosure and Chemical Safety Disclosure programs, our suppliers provide data that we use to both verify compliance with our standards, and to find opportunities to substitute safer substances for those that carry increased risk — either due to the substance's composition, or the frequency or volume at which they are used by workers.

This data has helped us identify process chemicals, such as cleaners and degreasers, as some of the most used materials by volume at our product final assembly sites — which have the largest employee populations in our supply chain. The use of safer cleaners, as outlined in our RSS, is required for all product final assembly sites, helping to keep workers

safe from potential chemical hazards. As suppliers shift their approach to safer alternatives, they are applying their capabilities to their operations beyond Apple's supply chain. Many final product assembly suppliers, for instance, in making changes to meet our safer cleaners requirement, have applied these changes to improve their overall chemical management systems. This includes checking that any new materials they use outside of Apple production also comply with these strict requirements, raising the bar for the supplier's entire operation.

Building on our progress over the past decade, we are now driving the adoption of safer chemical alternatives beyond our final assembly sites to component manufacturers, such as those producing enclosures. Cleaners are widely used across the industry, so this work has also given us the opportunity to demonstrate the feasibility of driving the use of safer alternatives, supporting broader action beyond our supply chain.

#### Driving industry change

We work with others to help make the use of safer materials the industry norm. We collaborate with standard-setting bodies, trade associations, and NGOs to develop tools, standards, and mechanisms that drive the identification and adoption of safer chemicals. We then share our learnings and best practices — from the criteria we've set for chemicals to the tools we've developed for our own suppliers — to support industry-wide change.

- **Developing tools to drive adoption of safer alternatives across the chemical industry:** We have partnered with ChemFORWARD for 5 years to develop a number of public tools and resources to accelerate the adoption of safer chemical alternatives.

In 2024, we worked with ChemFORWARD to develop an open-access, online platform called ChemWorks. This platform supports the adoption of safer cleaners and degreasers by giving formulators the ability to screen and optimize their products with verified safer chemicals. Building on the impact of this resource, in 2025, we

once again partnered with ChemFORWARD to launch a dedicated app to help formulators replace high-risk chemicals found in cleaners and degreasers with safer, verified alternatives, thereby helping reduce potential impacts to workers.

- **Supporting industry-wide commitment to eliminate workers' exposure to chemical hazards:** We continue to support and serve on the Design Team for the Clean Electronics Production Network (CEPN), a multistakeholder initiative working to improve chemical safety in electronics supply chains. We are a founding signatory of the organization's Toward Zero Exposure program, a public platform for companies across the industry to commit to and report on their efforts to eliminate workers' exposure to hazardous chemicals in manufacturing. We also worked with CEPN to support the expansion of its chemical safety training program into Thailand and Malaysia for workers and managers working across the electronic industries in those countries.

- **Improving industry-wide chemical management leadership and capabilities:** As a member of the RBA Chemical Leadership Advisory Committee, in 2024, we supported the launch of the RBA Chemical Management Leadership Program (CMLP). CMLP is a risk-based, voluntary program to harmonize chemical management due diligence efforts aligned with the OECD Due Diligence Guidance for Responsible Business Conduct and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. In 2025, Apple publicly committed to participate at the program's highest level, known as "catalyst," and companies began implementing the CMLP with the help of the "Practical Guide to Chemical Management Due Diligence in Supply Chains," which we also helped to develop in order to scale and embed the program across the industry. The guide is also helping to facilitate RBA's engagement with intergovernmental

organizations as they work to build more global alignment around safer chemical management.

Since 2023, we've supported RBA's Specialty Validated Assessment Program on Chemical Management (SVAP-CM) to help companies verify that their manufacturing suppliers are using best-in-class chemical management systems, controls, and administrative structures that respect human rights. In 2025, we worked with RBA to support the training of additional qualified auditors to make the SVAP-CM program available to more companies in more countries. As a result, RBA was able to add local SVAP-CM auditor presence in eight countries, which significantly improved overall capacity and potential for scale of the program.

- \* For more information about our smarter chemistry work, refer to our [2026 Environmental Progress Report](#) and [Environment website](#).

#### Worker living accommodations

We set high standards for living accommodations provided by a supplier or third party, as well as any other amenities provided to workers, such as food services or recreation facilities.

We verify suppliers' compliance with our standards related to workers' living conditions as part of every Code of Conduct assessment we conduct, and proactively work with suppliers to address their employees' concerns and feedback as part of our workplace satisfaction surveys.

In 2025, we updated our standards to require suppliers to periodically conduct self-evaluations of their dormitories and dining facilities, and to make improvements based on the findings and feedback from their employees. To support suppliers in this effort, we rolled out a new living accommodations scorecard that helps define how facilities compare against best-in-class practices. The scorecard — which was used to assess accommodations for more than

765,000 supplier employees in its first year — outlines criteria across seven key categories, including building infrastructure quality and sustainability; comfort and quality of living conditions; dining services; amenities, such as laundry and onsite medical services; and access to smart home technology (e.g., smart locks, digital maintenance requests, etc.).

We also developed the Apple Dormitory and Dining Management Guidance to support suppliers in identifying and implementing best practices against these criteria for their facilities, as well as a living accommodations readiness checklist. Suppliers must use the checklist to verify all required permits, licenses, dormitory infrastructure, and management systems are in place, as required by our Code and Standards and any applicable laws and regulations. Worker living accommodations must successfully meet all readiness criteria to obtain approval for occupancy.

### Health education and support

For many supplier employees, their position at an Apple supplier facility may be their first experience working in a manufacturing environment, away from friends and family, and living and working with many different people. Through our supplemental health education programs, we are supporting supplier employees in navigating these environments in a way that promotes their overall health and wellness, and improves their workplace satisfaction.

Since 2017, through new employee orientation sessions, Apple Education Hub programs, monthly health awareness campaigns, and other specialized training opportunities, we've helped make health education and resources available to more than eight million people on topics such as nutrition, mental well-being, first aid, reproductive health, and early disease detection.

Our health education initiatives are tailored to meet the needs of local supplier employee populations, equipping them with important information and skills to help them improve their health and well-being, and share this information with their

communities to multiply the impact. We use the results from our worker satisfaction surveys to identify facilities that could benefit from specific programs and to measure the impact of these programs after they have been implemented at a facility.

### Mental health support

We work to provide our suppliers the resources they need to support their employees' mental health, including training, toolkits, and support from leading experts. One area of particular focus is on resources for managers and line leaders (supervisors). Supporting managers in improving their own mental well-being can help amplify the impact of these programs, creating a more positive work environment for everyone. More than 55,000 line leaders and managers across 137 supplier sites completed a four-week mindfulness and positive management training course in 2025.

We also encourage our suppliers to set up mental health volunteer systems that promote peer-to-peer mental health support. Volunteers are trained on basic mental health knowledge, provided with skills to identify signs that fellow employees may be experiencing mental health challenges, and equipped the volunteers to provide support. In 2025, more than 5,000 supplier employees took part in this program across China mainland, India, and Vietnam.

To support the scaling of these programs, we developed a mental health management toolkit, which includes guidance on setting up workplace mental health management and volunteer operations, selecting employee assistance programs, and guidance on how best to support people in moments of crisis. Last year, we expanded and customized the toolkit for use in India and Vietnam, developing supplementary content and training modules to further support the adoption of these materials.

\* Learn more about our worker satisfaction surveys on [page 8](#) and our Apple Education Hubs by reading our [People and Environment in Our Supply Chain Annual Update](#).

## 4.7 Fair wages and working hours

We take extensive steps to confirm fair and legal compensation of wages and bonuses based on accurate measures of time worked. Suppliers must pay at least the legal minimum wage in their place of operation, and provide any benefits required by applicable law and contract. Suppliers are also required to clearly and accurately describe an employee's work, provide a clear account of wages and benefits (including leave), and information on Apple's zero-fees policy in the contracts provided to their employees prior to the start of work.

Allowing adequate time for rest is important for physical and mental health and well-being. Our Code and Standards restrict the workweek for supplier employees to 60 hours (including overtime), and at least one day off every seven days. In addition, all overtime must be voluntary and paid at a premium rate, in line with applicable laws and regulations. In 2025, we further strengthened our requirements that supplier employees be provided with adequate break times throughout the day. These include guaranteed breaks for meals; unrestricted breaks for restroom use and hydration; ergonomic breaks to stretch and reposition during repetitive tasks; and breaks for religious observances.

### Monitoring working hours

We review suppliers' data on employee working hours throughout the year as part of our Code of Conduct assessments. Select suppliers are required to report this data to us on a weekly basis. In 2025, we received weekly data on working hours for more than 1.4 million workers in our supply chain. This included a significant expansion of our program in India and Vietnam, with working hours being monitored for more than 490,000 supplier employees in those countries. In 2025, our monitoring showed compliance with our working hours standards 96 percent of the time.

Suppliers may request exceptions to our working hours limits. Exceptions require prior authorization from Apple

management, and are considered only after all other means of filling gaps in labor are exhausted, including additional hiring and shift adjustments. Even when exceptions are made, any overtime must still be voluntary and paid at a premium rate.

### Assessing wages in our supply chain

Since 2023, we've worked with external partners and experts — such as Anker Research Institute, Fair Wage Network, ILO, RBA, and Social Accountability International — to collect and analyze wage data from more than 50 supplier sites in Brazil, China mainland, India, Thailand, and Vietnam. Our Code and Standards mandate that all wages paid by suppliers must meet local legal requirements and be paid on time. Additionally, we recognize the ILO's adoption of an internationally known definition of a "living wage" in 2024 as an important step in advancing the global conversation on this topic.

In 2025, we continued to work with these partners to pilot different models, such as third-party assessments aligned with different living wage benchmarks. We also engaged with workers to understand how different compensation components, such as food or housing benefits, factor into workers' satisfaction with their wages. The insights we've gleaned over the past three years have helped us understand what is needed to embed and scale our work on wages across our supply chain and to continue to advance the conversation in the broader industry. These learnings include:

- **Building supplier capabilities:** In order to effectively integrate living wage criteria into their ongoing management systems, suppliers need to have access to tools, knowledge, and resources.
- **Building capacity of external partners:** Progress in this space requires the availability of credible and relevant benchmarks, as well as third-party auditors with expertise to assess living wage indicators. We are working with external partners to support the training of third-party compliance auditors on living wage criteria, as well as research to further strengthen living wage benchmarks.



- **Working to build industry alignment and engagement:** Like many global supply chain challenges, building a critical mass of engagement is essential to drive meaningful impact across the industry and to minimize any incongruence in implementation at the facility-level (e.g., workers in similar roles at the same facility being paid different wages due to different companies' calculation methodologies).

While our work on this issue is complex, we are working with our partners to build a foundation and ecosystem that can support sustainable, continuous progress for workers across — and beyond — our supply chain.

#### 4.8 Prevention of sexual harassment

Our Code and Standards require that our suppliers provide a workplace free of harassment and abuse, including sexual harassment. This includes the establishment of clear policies and procedures on the prohibition of sexual harassment, as well as mandatory training on harassment and abuse prevention for all workers, supervisors, and managers.

Supplier employees are able to report any incidents of sexual harassment through the anonymous grievance channels we make publicly available, including upstream accountability mechanisms, third-party hotlines, EthicsPoint, or by contacting Apple directly at any time and in any major language via email or the form on our public website. Apple does not tolerate retaliation in any form for raising concerns. Should retaliation be discovered, our Core Violation process would apply (see [page 9](#)).

##### Remediation of sexual harassment

Any cases of sexual harassment are promptly investigated by our team, including a thorough review of the reported details, interviews with facility management, and a review of the facility's management systems and practices related to harassment prevention and response.

We also validate that suppliers take comprehensive actions to address harassment cases. This may entail immediate dismissal and the involvement of authorities, as necessary; enhanced refresher training for all supplier employees to increase awareness and encourage reporting; as well as direct remedy to affected workers, including re-arrangement of workstations, and psychological counseling and support. We are also working with external experts to develop a comprehensive toolkit to help suppliers prevent and respond to workplace violence and harassment. The toolkit will be made available to suppliers and will cover topics related to workplace conflict, sexual harassment and gender-based violence, as well as grievance management and remedy for victims.

\* Learn more about supplier engagement and assessments on [page 5](#), engagement with rights-holders on [page 8](#), and supplier accountability and remedy on [page 9](#) and [page 21](#).

##### Training and capability building to prevent sexual harassment

Given the nature of sexual harassment risks, engaging managers, as well as workers, in the identification, prevention, and remedy of these risks is critical to cultivating safe and respectful workplaces. This is why we have invested in further strengthening our worker voice programs and workplace rights training related to this issue. In 2025, we began rolling out additional online training on the prevention of sexual harassment to 33 key supplier sites. The training, which was also delivered as part of our work with IOM through Mobile Worker Resource Centers, covered topics such as defining the behaviors and situations that constitute sexual harassment, and steps individuals can take if they witness or experience sexual harassment.

Given specific risks associated with harassment of women in the workplace, we have taken extra steps to provide support for female workers, and to build awareness and sensitivity around this issue. In 2025, we began rolling out training to workers and

managers in key countries aimed at creating awareness around workplace harassment and violence against women. We also include prevention of sexual harassment training as part of our vocational education program to help cultivate awareness and sensitivity among future managers and supervisors.

#### 4.9 Environmental rights as human rights

As we transition to more low-carbon and lower resource-intensive business models to meet our Apple 2030 goals, we remain committed to doing so in a way that respects and benefits people and communities across our supply chain.

##### Decarbonization

We are committed to respecting the rights and dignity of the communities impacted by the projects and investments we undertake in pursuit of our environmental goals. In 2025, we updated our Code and Standards to include a Facility Siting, Energy, and Environmental Investments Standard, which outlines our expectations for suppliers that provide investment management services, siting, and similar services for energy and environmental projects. The standard requires suppliers to conduct continual stakeholder engagement as part of their projects with Apple; to demonstrate full respect for Indigenous Peoples, including their right to Free, Prior and Informed Consent (FPIC); and to ensure projects and investments do not contribute to deforestation or the displacement of people, among other requirements.

We are also committed to one day using only recycled or renewable materials in our products as part of our roadmap to Apple 2030. As we progress toward this goal, we continue to strengthen our Responsible Sourcing of Primary, Recycled, and Renewable Materials Standard by requiring the identification of risks related to Indigenous Peoples' rights, as well as potential retaliation against human rights and environmental defenders.

##### Water

Our comprehensive approach to water stewardship respects and prioritizes the fundamental human right to clean, safe water for workers and the communities where our suppliers operate. As outlined in our requirements, we work with our suppliers to confirm they have robust policies and systems in place to reduce their overall consumption of freshwater, and to responsibly manage wastewater and stormwater to reduce the impact on local communities. Suppliers are also required to provide access to potable water and clean restroom facilities for their employees, and to regularly test for safety and quality. We verify performance against these requirements during Code of Conduct assessments, as well as assessments specifically focused on water stewardship.

We work with our suppliers to advance global water stewardship standards, and encourage them to take steps to implement projects that create positive impact beyond their facilities to improve water quality and access for the broader communities where they operate. In 2025, we conducted a new training on eco-design for more than 30 suppliers, which included a visit to local wetlands to demonstrate how nature-based solutions can be used to address water challenges. One supplier that took part in the program applied their learnings to address flooding issues at their facility. Many surfaces in manufacturing facilities are paved with impermeable material, such as cement, leaving rainwater to run off and creating the risk of flooding in and around the supplier site. The supplier replaced several paved areas with green spaces, where rainwater can be absorbed back into the watershed. These green spaces are also open to supplier employees, providing a natural environment for workers to enjoy during breaks to support improved mental health, well-being, and workplace satisfaction.

Since 2018, 32 of our supplier sites have achieved certification for meeting the Alliance for Water Stewardship (AWS) Standard — a global framework to measure responsible water stewardship across social, cultural, environmental, and

economic criteria. Of these certified facilities, 22 suppliers achieved a Platinum rating — the highest score achievable within the AWS framework.

### Community resilience

Since 2023, we've partnered with IOM to pilot a climate resilience program in two communities in the Philippines. These communities, which are home to migrant workers hired through our suppliers' labor agencies, are increasingly being affected by natural disasters, such as typhoons. The program aims to improve the communities' resilience against climate change-induced migration by upskilling members of the community in masonry and carpentry, so they can maintain typhoon-resilient shelters. The new skills they learn also provide additional economic development opportunities. In 2025, the training was expanded to additional community members. The program also supported the repair and operationalization of two water refill stations, which provide access to fresh drinking water for more than 900 households, almost 5,000 people per year. With our support, in 2025 IOM launched a community resilience framework based on the learnings from this pilot to help facilitate the development of similar programs in other communities.

In 2025, we supported our long-time strategic partner, the Fund for Global Human Rights, in implementing a new climate justice strategy. This has included funding 28 grantees working in five countries on issues including Indigenous Peoples' rights, resource rights, and addressing the community impact of pollution and mining activities.

\* To learn more about our comprehensive environmental strategy and progress, see our [2026 Environmental Progress Report](#) and our [Environment website](#).

## 4.10 Sourcing of materials

Although Apple does not source primary material directly from mine sites, our responsible materials sourcing program includes requirements that apply to all levels of Apple's supply chain. Our goal is to one day use only recycled or renewable materials in our products and packaging. As we make progress toward this ambitious goal, we continue our work to responsibly source all materials that go into our products and packaging, while supporting local organizations that do vital work in and around mining communities.

We conduct human rights and environmental due diligence of primary and recycled materials in alignment with the OECD Due Diligence Guidance and the UNGPs, and are committed to meeting and exceeding the expectations for responsible sourcing of primary and recycled materials outlined in OECD Due Diligence Guidance. Our Responsible Sourcing of Primary, Recycled, and Renewable Materials Standard, part of our Code and Standards, requires suppliers, smelters, refiners, and recyclers in our supply chain to identify and assess a broad range of risks, including social, environmental, and human rights risks. These standards are based on industry best practices and internationally accepted principles, including the UNGPs, the ILO's Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines.

These requirements apply to all levels of our supply chain, including traders, suppliers, sub-suppliers, mining companies, and operators of collection points for recycled materials used in Apple products. Suppliers are also required to review reported incidents and public allegations linked to their smelters and refiners, and to participate in traceability and accredited third-party audit programs to mitigate identified risks.

In response to reports of escalating regional conflict, as well as smuggling and illegal taxation, in June 2024, Apple issued a notification to its suppliers to cease the sourcing, directly or indirectly, of 3TG for Apple parts and products from the DRC

and Rwanda. Apple will consider, on a case-by-case basis, exemptions for particular mines, smelters, and refiners if the supplier can demonstrate full-scale traceability and evidence of the highest responsible sourcing standards prior to material entering into Apple's supply chain.

### Mapping our materials supply chain

In 2025, we strengthened our Responsible Sourcing of Primary, Recycled, and Renewable Materials Standard, requiring suppliers to expand the use of existing traceability systems that enable the collection of data for materials they use in Apple products back to the material's origin.

To drive our high standards deep into our supply chain, we map the smelters and refiners that provide materials to suppliers. We publish a list of all identified 3TG, cobalt, and lithium smelters and refiners in our supply chain. In 2016, we became the first electronics company to publish a list of cobalt refiners in our supply chain, and in 2020, we were the first to publish a list of lithium refiners. We also map the smelters and refiners our suppliers use for other materials in our products — such as mica, copper, graphite, and nickel — and we evaluate suppliers' supply chain due diligence for compliance with our requirements.

We require all suppliers that use certain high-risk minerals in Apple parts and products to submit industry-standard reports developed by the Responsible Minerals Initiative. All suppliers that utilize 3TG for Apple parts and/or products must submit to Apple an industry-standard Conflict Minerals Reporting Template (CMRT). Suppliers that use cobalt and mica are required to submit an Extended Minerals Reporting Template (EMRT). We collect and process data provided by suppliers through their completion of the CMRT and EMRT to map our supply chain to the smelter and refiner level and, to the extent available, to the mining level.

\* Learn more by reading our Smelter and Refiner List on [page 28](#).

### Applying our standards to recycled and renewable materials

In 2025, we achieved our ambitious targets of making all Apple-designed batteries using 100 percent recycled cobalt; all magnets in Apple products using 100 percent recycled rare earth elements; and all Apple-designed printed circuit boards using 100 percent recycled tin solder and gold plating.<sup>4</sup>

Recycled or renewable materials, while typically more environmentally beneficial than mined materials, still pose certain human rights risks. In recycled materials supply chains, for instance, risks can arise from the presence of informal labor during the collection or recovery of materials for recycling. The recycling of certain materials require additional health and safety measures, such as increased fire safeguards when working with batteries to recycle certain minerals, including cobalt and lithium.

We evaluate each material used in our supply chain individually, and apply the same rigorous responsible sourcing standards, regardless of whether the material is from primary, recycled, or renewable sources. All suppliers, as well as their materials processors, are required to conduct due diligence in accordance with the OECD Due Diligence Guidance and other applicable international standards for all recycled or renewable materials back to the point of origin. Additionally, we may also require specific audits for certain higher-risk smelters or refiners or materials, such as recycled gold. In 2025, 100 percent of gold refiners that provided recycled gold participated in third-party audits.<sup>2</sup> We require validation from the RMI's Responsible Minerals Assurance Process (RMAP) or the London Bullion Market Association's (LBMA) Responsible Sourcing Programme (RSP), which includes the Responsible Gold Guidance (RGG), for gold refiners in our supply chain.

### Third-party responsible sourcing audits

Our Code and Standards, including our Responsible Sourcing of Primary, Recycled, and Renewable Materials Standard, require our suppliers to review reported incidents and public



allegations involving their materials' supply chains, and to mitigate identified risks. In addition, suppliers must only use or source key materials in our supply chain from smelters, refiners, and recyclers who have completed, or demonstrated progress towards completion of, responsible sourcing audits.

If we discover our standards are not being met, we provide support to help suppliers complete a corrective action plan, in line with the OECD Due Diligence Guidance framework of progressive improvement, to meet and exceed our requirements within the timeline identified as a result of the assessment. Timelines for corrective actions typically range between 30 and 90 days.

For the past decade, all of the identified 3TG and cobalt smelters and refiners in our supply chain have participated in third-party assessments, as required by our Responsible Sourcing of Primary, Recycled, and Renewable Materials Standard.<sup>1</sup> All identified lithium refiners also continue to meet our requirements each year. If smelters or refiners are unable or unwilling to meet our standards, we take necessary actions,

### Apple-designed batteries

We responsibly source all of the key materials that go into Apple-designed batteries, whether primary or recycled. Apple-designed batteries are those that are custom-designed by Apple for inclusion in our products. These include the primary batteries in Apple Watch, iPad, iPhone, Mac, and Vision Pro. Last year, we achieved the goal of Apple-designed batteries using 100 percent recycled cobalt.

\* For more information about our progress on the use of recycled and renewable materials, refer to our [2026 Environmental Progress Report](#) and [Environment website](#).

through our suppliers, to terminate the applicable business relationships. Since 2009, Apple has directed the removal of 206 3TG, 17 cobalt, and 9 lithium smelters and refiners from our supply chain.<sup>3</sup>

Along with conducting our own supply chain due diligence, we work closely with third-party audit programs — in particular, those operated by the RMI and LBMA — as well as upstream due diligence and monitoring programs. When identifying risks at the smelter, refiner, and mining levels, we defer to the highest standard. In 2025, we joined the Initiative for Responsible Mining Assurance (IRMA). IRMA is a multi-sector initiative that is equally governed by representatives of mining stakeholder and rights-holder groups. IRMA transparently and independently assesses social and environmental performance at mine sites using an internationally recognized standard that has been developed in public consultation with rights-holders and stakeholders.

### Due diligence tools, resources, and training

We annually communicate our materials sourcing requirements to our suppliers, and work with them throughout the year to train and provide guidance on our standards and best practices. This includes conducting annual due diligence training with suppliers, and providing access to online training materials that focus on Apple's due diligence expectations and requirements.

We innovate, develop, and scale tools to strengthen risk management processes deeper in our supply chain. This includes the Risk Readiness Assessment (RRA), which we developed in 2016 and which the RMI has integrated into their audit protocol. The RMI's approved, third-party assessment firms assess hundreds of companies across industries using the RRA to assess risks in companies' global supply chains.

We also utilize the RMI's Material Insights Platform, an online industry solution that helps actors in material supply chains strengthen due diligence and facilitate joint efforts to address sourcing risks. It is designed to promote learning, collaboration, and improve environmental, social, and governance

management in mineral supply chains, and has recently been updated to include recycled materials.

For the past five years, we have worked with the NGO IMPACT to support the development of solutions to measure and track supply chain activities in artisanal and small-scale mining (ASM) communities. This includes Bloom by IMPACT, a monitoring and evaluation tool that enables users to track their due diligence measurements in alignment with broader reporting targets and sustainability goals. In 2025, Bloom by IMPACT was rolled out to three organizations that are using it as a tool to measure the progress and impact of seven projects across 15 countries in Africa and Latin America.

### Supporting upstream rights-holders

Supporting local communities and elevating independent voices at the mining level is critical to assessing and remedying risks deeper in our supply chain, as well as respecting the rights and well-being of the people most impacted by mining activities.

- **Accountability mechanisms:** We utilize industry platforms and support grassroots organizations that enable rights-holders to monitor and voice concerns at the mining level. This includes the [RBA Voices platform](#) where allegations concerning minerals supply chains can be anonymously submitted by NGOs, companies, or the public. In addition, we continue to support local organizations that work directly with rights-holders to identify any emerging risks and issues in mining communities.
- **Supporting mining communities:** For nearly a decade, we have supported the NGO Pact in developing a program to deliver rights awareness training, vocational education, and financial access and literacy in mining communities in the DRC. In the past year, we worked with Pact to transition these programs to local stakeholders to continue to evolve and meet the needs of the community. The transition included developing an educational guide based on the learnings from our partnership to enable other companies and organizations to create similar, community-led programs.

- **Supporting vulnerable populations in the DRC:** In 2025, we supported the Panzi Hospital and Foundation, which provides holistic care for survivors of sexual violence in the DRC. The organization also aims to reduce the prevalence of gender-based violence through community outreach and advocacy.
- **Supporting human rights and environmental defenders:** For the past eight years, we've supported human rights and environmental defenders working around the world through our partnership with the Fund for Global Human Rights. Defenders work to promote the economic and social rights of mining communities, inclusive economic growth, judicial advocacy, environmental justice, and the rule of law. We continue to support the implementation of the Fund's new climate justice strategy, which provides support for organizations working on issues such as resource rights and the rights of Indigenous Peoples.
- **Restoration and community investment:** For more than eight years, we've partnered with the sustainability nonprofit RESOLVE to fund restoration projects that address the impact of legacy mining operations in the Yukon, Alaska, and British Columbia. Our primary focus has been Regeneration, which is an expansion of an earlier project called Salmon Gold. Both projects focus on re-mining and processing waste material from legacy mines. This results in fewer new mines, while increasing access to critical minerals and helping to restore rivers, streams, and ecosystems that are economically and culturally significant to local communities and Indigenous Peoples.

## 5. How do we measure our performance and integrate findings into programs and processes?

We work to regularly evaluate our programs to assess their effectiveness in addressing any salient human rights risks. We also require our suppliers to set their own improvement objectives, targets, and action plans for regular performance monitoring and continuous improvement.

Our ongoing engagement with suppliers throughout the year, including every assessment we conduct, provides us with valuable data about our suppliers' performance in meeting our standards. This information, combined with insights from internal and external experts, highlights trends and larger opportunities for improvement. We address these opportunities through regular updates to our Code and Standards, as well as the development and delivery of targeted training and capability-building efforts.

In addition to our assessment programs, many of our focused labor and human rights initiatives provide us with regular streams of information that highlight opportunities to improve our programs' impact and effectiveness. For example, the digital worker rights education tools we've developed with our partners provide real-time information about knowledge gaps among workers at specific supplier facilities, allowing us to identify areas for supplier capability building.

Our worker voice programs and platforms also provide a continuous connection to sentiment across the supply chain that enables us to better understand the workplace experience, and to identify where additional support may be needed. This includes leveraging the feedback we receive from hundreds of thousands of supplier employees through our workplace satisfaction surveys to improve our programs, continually strengthen our requirements, and improve the training we develop for supplier employees and management. In 2025, we continued to leverage the feedback we received

through these surveys to better identify new priority sites for our mental health program, the ILO's SCORE Academy, and health and safety training. We also utilize worker satisfaction surveys to measure the effectiveness of these programs, as well as the impact that improvements made have on worker satisfaction.

\* Learn more about SCORE Academy on [page 23](#).

### Connecting the dots between compliance and worker satisfaction

Last year, we set out to further explore the connection between worker satisfaction and compliance with our standards — giving us another channel for identifying and mitigating risks in our supply chain. In 2025, we analyzed data from more than 450 facilities in 28 countries and regions to compare assessment scores with worker satisfaction survey results. We found that facilities with top worker satisfaction scores averaged 25 percent fewer violations of our Code and Standards. We also found a connection between sites with lower worker satisfaction scores tending to have more severe violations of our requirements.

The analysis also demonstrated the effectiveness of our early engagement with suppliers. Through this analysis, initial FRAs — assessments conducted of new suppliers or facilities after business award, but before mass production — were found to result in 140 percent more violations than repeat assessments, suggesting the effectiveness of our engagement through our Corrective Action Process. We plan to build on these learnings to further invest in measurement and evaluation of our programs in the coming year.

\* Learn more about our worker voice programs on [page 8](#) and early supplier engagement on [page 5](#).

# How assessments contribute to continuous improvement

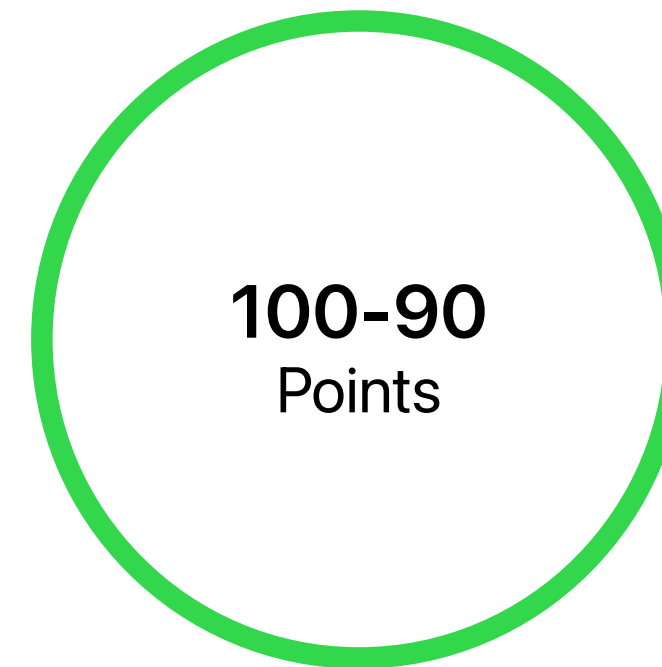
Our assessment process is an important part of how we identify and manage salient human rights risks. Assessments play an important role in how we evaluate the maturity of our suppliers and the effectiveness of our due diligence process. They also provide us with an additional opportunity to engage directly with workers, and to contextualize all of the information we receive from various stakeholders and due diligence processes.

We evaluate suppliers against more than 500 criteria to verify their compliance with our requirements and identify areas for improvement. Once assessed, each supplier facility is ranked on a 100-point scale across three categories: labor and human rights, health and safety, and environment. The average number of points received is the facility's composite score for the year, which determines if the supplier falls into the high-, medium-, or low-assessment score category. These categories reflect

both the frequency and the severity of any issues found during the assessment process, and indicate what type of support or oversight the supplier may need in the coming year.

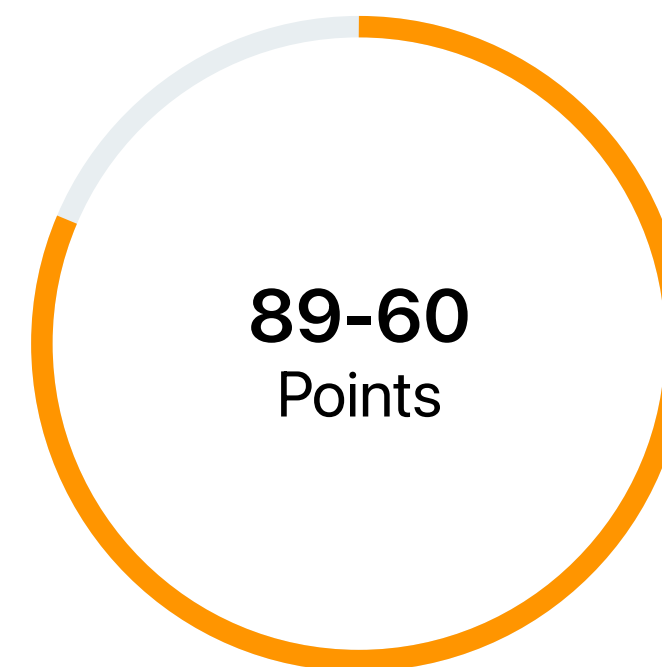
Assessments alone are not an adequate due diligence system. Rather, they serve as an indicator of a supplier's overall maturity and ability to meet our high standards, including those related to any salient human rights risks. Assessments help us prioritize our efforts and provide us with metrics for evaluating whether our programs, processes, and interventions are having an impact. For example, based in part on these findings, we can determine which suppliers require additional assessments or engagement over the year (e.g., specialized audits or training); if there are major trends that require a new process or set of requirements; or if certain capability-building programs are successful.

## Our 100-point scale for supplier assessment scores



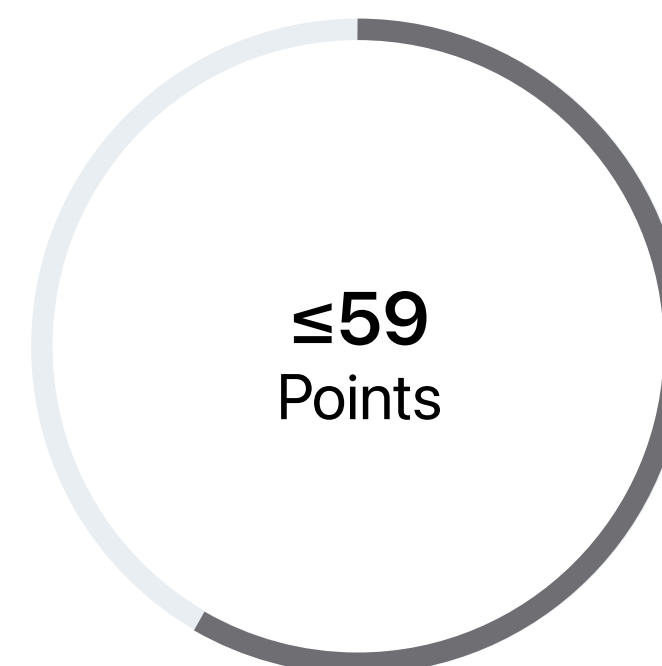
### High assessment score

- 100-90
- Indicates mature management systems and consistent implementation
- Findings include minor and isolated Code violations



### Medium assessment score

- 89-60
- Indicates some management systems may be underdeveloped or implemented inconsistently
- Findings may include major, isolated Code violations and/or numerous minor violations
- May require additional assessments, specialized training and/or capability building



### Low assessment score

- ≤59
- Severely underdeveloped management systems
- Major violations found across a number of Code categories
- Requires additional assessments, training, and/or capability building
- Any supplier found to have a Core Violation of our Code, whether during an assessment or at another time during the year, is automatically placed in this category

# Supplier performance in 2025

We work closely with our suppliers to prevent violations of our standards, but if they do occur, we take prompt action to address the violations and support affected workers. Findings can range from administrative noncompliance, such as inadequate record-keeping, to more severe issues, which we call Core Violations, which result in immediate and serious consequences for the involved supplier, up to and including ending our business relationship.

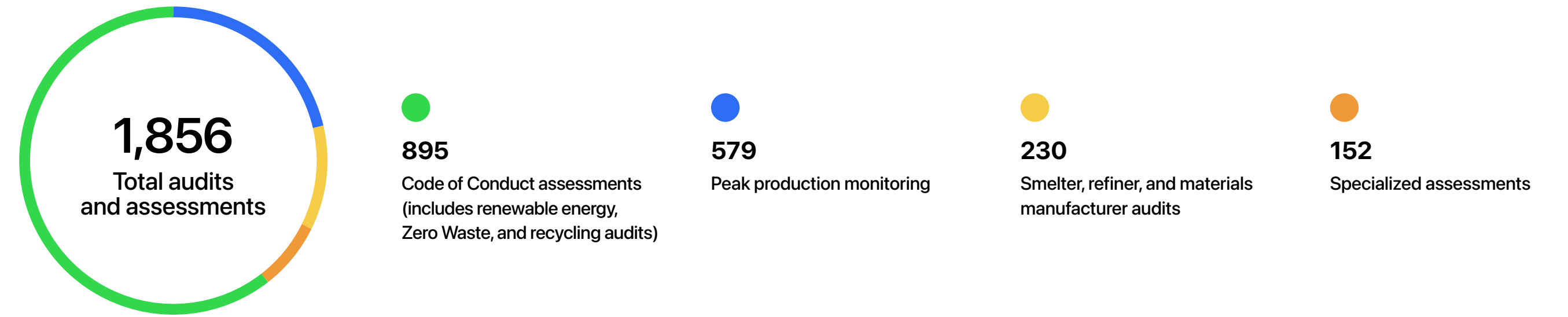
Due to consistent engagement with our suppliers, Core Violations are becoming less frequent, with three facilities found to have Core Violations in 2025.

This included two instances of working hours falsification, after which the suppliers involved were placed on probation and required to remediate the cause of the violations. We also had a finding deeper in our manufacturing supply chain. A sub-tier product enclosure vendor (our supplier's supplier) failed to meet the local working age requirement for two individuals, relatives of a long-term employee at the site, who were a few months short of the local age requirement of 16. The violation was discovered during a facility readiness audit conducted before production began and was immediately corrected and remediated. Per our strict process, the two individuals were immediately escorted back home,

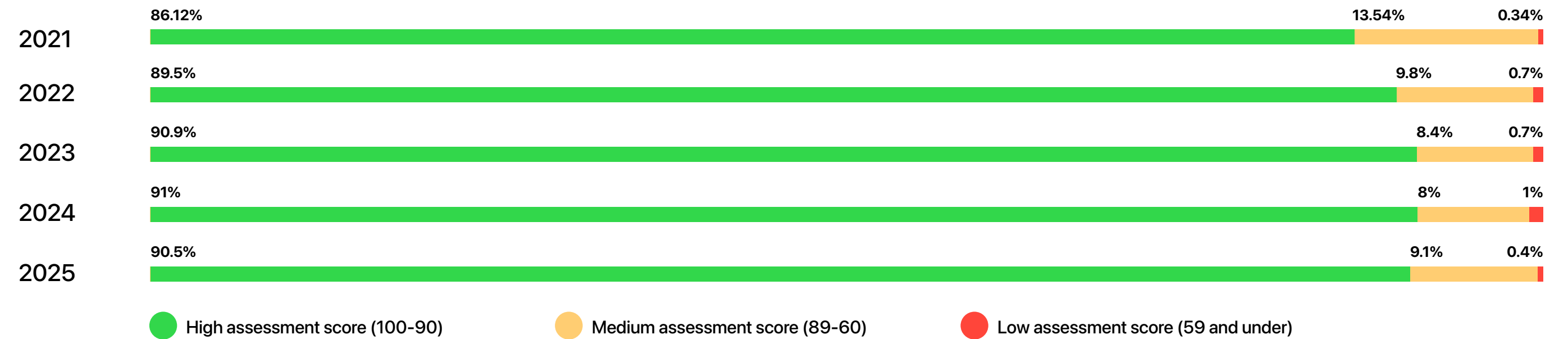
paid all due wages, and enrolled in school. As part of the remediation process, their monthly living and education expenses were paid by our supplier, and an independent third-party organization was engaged to facilitate the remediation process and to regularly monitor their academic and living conditions through calls, and school and home visits. In line with our Core Violation process, we also notified our supplier's executive leadership immediately and placed the supplier on probation. We worked with both our supplier and the sub-tier vendor to identify the root cause of the issue and develop a Corrective Action Plan to remediate the incident and prevent a reoccurrence. This included requiring our supplier to send a communication to all of their sub-tier vendors articulating the consequences of failing to meet working age requirements; to conduct a training on hiring standards with their managers; and to develop a work plan for improving their hiring management systems. In addition, our supplier received a significant financial penalty from Apple, and ended their relationship with the sub-tier vendor after appropriate remediation occurred.

As a result of increasing our threshold for strong supplier performance, in 2025, we saw a slight decrease in the number of suppliers achieving high-performer status.

## Audits and assessments in our supply chain



## Year-over-year Code of Conduct assessment scores



## Our supply chain's average Code of Conduct assessment scores in 2025, by evaluation category

### Labor and human rights

94 ●

### Health and safety

95 ●

### Environment

97 ●

# III. Access to remedy for rights-holders

## 1. How do we enable effective remedy to people impacted by issues related to our human rights risks?

If violations of our standards are discovered, working with suppliers to provide affected workers with prompt access to effective remedy is a critical part of our accountability and remediation process. As part of our CAP process — or in direct response to complaints received from workers or third-parties — we require our suppliers to provide remedy to any person in our supply chain who has been negatively impacted by the supplier’s failure to comply with our Code and Standards. Remedy for affected rights-holders can include a formal apology, financial compensation, and rectifying working or living conditions.

The following outlines the remediation processes we’ve refined over many years for specific violations of our Code and Standards. We require suppliers to provide remedy to rights-holders, in alignment with the UNGPs, whether or not the violation has a specific remediation process:

- **Payment of recruitment fees:** If we discover that workers have paid recruitment fees to an Apple supplier or labor agency at any point during their employment journey, we require the supplier to promptly submit a worker repayment plan for our approval — even if such fees are legal in the supplier’s operating country or the worker’s home country. Once approved, the supplier directly repays affected workers for all fees paid during the process of obtaining a job, and we verify full and timely repayment through an accredited third-party auditor. Reimbursement amounts

are determined based on the range of fees identified through interviews with workers and cross-verification with applicable supplier labor agencies. If there is a dispute on the fee scope, amount, or date of repayment, Apple engages directly with the supplier to address the discrepancy and enforce repayment to impacted workers. Since 2008, over \$34.5 million in recruitment fees have been repaid to more than 37,700 workers by our suppliers.

- **Working hours and wages:** If we discover a supplier has misrepresented employee hours or pay, the supplier is required to revise all records to reflect an accurate accounting of hours worked, provide payment for any hours or overtime previously unaccounted for, and/or provide days of rest that affected employees are entitled to. The supplier is also required to undergo additional assessments to confirm that remedy to affected workers has been completed, and that changes have been implemented to the supplier’s policies and management systems to prevent future violations.
- **Underage labor:** If underage labor is discovered, specialized third-party auditors are brought in for an in-depth review, and the supplier is required to immediately return the employee to their home safely. The supplier must also present educational opportunities to the underage employee and their guardians, and is required to pay all tuition and educational fees, as well as the individual’s wages that would have been earned at the supplier facility until they reach legal working age. Follow-ups are conducted to verify the individual’s overall well-being, both at school and home. The supplier is also required to offer

the underage individual employment once they reach legal working age.

- **Sexual harassment:** Suppliers are required to provide necessary support and assistance to any victims of physical or sexual assault, sexual harassment, or repeated bullying. This can include involvement by police and immediate dismissal of the offending party, as relevant; enhanced refresher training for all supplier employees to increase awareness and encourage reporting; direct remedy to affected workers, including re-arrangement of workstations, and psychological counseling and support; as well as taking disciplinary action against the offending party.

## 2. Examples of remedy in 2025

Below are examples of remedy provided last year, resulting from allegations or grievances lodged by supplier employees, or as part of the corrective actions taken following an assessment.

- **Health and safety:** Contract workers at a supplier facility reported that damaged safety shoes were not being replaced promptly. A new system was implemented requiring the supplier’s TPEAs to replace the damaged shoes and obtain signatures from the contracted employees upon receipt. The supplier also set up a system to further track the issuing of all necessary PPE, and began keeping extra safety shoes onsite for immediate use, as needed.
- **Sexual harassment:** A female worker reported verbal and physical harassment by a coworker. The issue was promptly investigated and the offending party’s employment was terminated. The supplier reinforced their anti-harassment

policy with their employees and managers through digital messages and posters displayed around their facility. The worker who experienced harassment was offered support, including psychological counseling.

- **Payment of wages:** A worker reported that a supplier’s TPEA had promised a signing bonus that went unpaid. The supplier immediately responded by requiring the TPEA to pay the worker the full amount owed, and followed up with the worker to confirm payment. The supplier also took measures to reiterate their policies related to wages with all of their TPEAs.
- **Transportation safety:** A shuttle bus transporting workers to a supplier facility was involved in a non-fatal collision due to the driver not maintaining a safe distance. All workers were evaluated and treated for any injuries, and all medical expenses were covered by the supplier, including any necessary medical leave. The driver was terminated, and the shuttle bus vendor was removed by the supplier. All bus drivers received refresher defensive driving training, and supplier employees were also retrained on transportation safety, including reminders to wear seat belts at all times during their commutes.
- **Harassment:** A supplier employee reported that their supervisor used disrespectful language toward them. We worked with the supplier to facilitate support for the worker, and required that the supervisor apologize and retake training on employee-management communications. When we followed up with the supplier employee, they expressed satisfaction at the outcome and the prioritization of their well-being as a result of these actions.

# IV. Our commitment to human rights in action

**Respect for human rights is deeply embedded in every part of our business, from the decisions we make to the actions we take to support people reached by our supply chain. We also go far beyond this commitment to broadly uphold Apple values across our supply chain, and create opportunities that can enrich people's lives and communities.**

The following section contains case examples from across our supply chain of how we honored our commitment to respect human rights in 2025.

## Continuing to set the bar with our supplier standards

2025 marked 20 years since we launched the Apple Supplier Code of Conduct — the document that outlines our supplier requirements for labor and human rights, health and safety, environment, responsible materials sourcing, community and rights-holder engagement, and business conduct. Since its introduction, our business has experienced growth and transformation which has driven a significant expansion of our global supply chain.

During this time, the global landscape for human rights and environmental due diligence has also matured. The focus has shifted from compliance-based auditing to a more proactive

approach centered on rights-holders — one that prioritizes identifying and mitigating risks to people and the planet before they occur, and providing comprehensive remedy should impacts arise.

### Listening to learn

We consulted hundreds of stakeholders, both inside and outside Apple, to collect input and lessons from two decades of supplier engagement to help inform our vision for the future.

A group of internal Apple experts from across a spectrum of expertise areas, including labor and human rights, environment, and materials, analyzed the repository of data we've collected over the years from across our due diligence programs, including assessment results, worker feedback, and grievances to distill insights. We also gathered teams from across Apple to inform the enhancements needed to make our requirements applicable across the many work environments across our supply chain — from final product assembly facilities to AppleCare call centers, and everything in between.

We also surveyed more than a hundred suppliers in 12 countries and regions, and conducted extensive conversations with strategic suppliers. These engagements elicited feedback on the organization and navigability of the Code and Standards document itself; ongoing communications and training support for suppliers; the applicability of our requirements to suppliers that support Apple Services; as well as feedback on specific standards, including those related to working and living conditions, health and safety, and materials sourcing.

Finally, we worked with leading civil society organizations and industry experts to review our policies, programs, and the results

of our most recent human rights risk assessment to benchmark against global best practices.

### A Code of Conduct fit for the future

In November 2025, we published the refreshed Apple Supplier Code of Conduct and Supplier Responsibility Standards, reflecting the learnings and input gathered throughout the review process. Key updates include:

- **Expanded scope, including a new standard on energy investments:** We further clarified the applicability of our standards to third parties that provide goods or services to Apple. To that end, we introduced a Facility Siting, Energy, and Environmental Investments Standard to help ensure respect for human rights is embedded in procurement, purchasing, and investment decisions related to renewable energy projects.
- **Updated Responsible Sourcing of Materials Standard:** We updated our existing Standard to help ensure the clear applicability of our requirements to the sourcing of all materials. The update included language to better outline our existing requirements related to traceability, requiring suppliers to identify the origins of all materials they use, and to be prepared to provide evidence to Apple upon request.
- **Audits beyond Apple production lines:** We expanded our existing provision that Apple reserves the right to assess or audit any supplier to ensure compliance, to include the ability for Apple to require a facility-wide assessment across all customer areas. One example of this type of assessment is the RBA Validated Assessment Program (VAP) audit, which provides visibility into the supplier's operations beyond those areas designated for Apple business.

- **Expanded health and safety requirements:** We added, expanded upon, or clarified a number of requirements related to health and safety, including new requirements on conducting risk assessments for anodizing and plating processes; battery and electrical safety; and requiring suppliers to form health and safety worker committees at their facilities.

### Providing resources for capability building

To support suppliers in embedding our standards into their businesses, in alignment with the UN Guiding Principles on Business and Human Rights (UNGPs), we developed a suite of tools, training, and resources for our suppliers. The Code and Standards document was redesigned to make it easier to navigate, and we launched a refreshed landing page on SupplierCare, our supplier communications platform, for suppliers to access all of our Code-related documents and training resources in one place. We also developed a new series of online training courses for suppliers on the fundamentals of our labor and human rights, health and safety, and environmental requirements, as well as collections of deeper trainings on a range of technical topics. Improving these resources helps ensure suppliers always have access to the tools, information, and resources they need to comply with our standards.

As we move forward, we will continue to improve and strengthen our supplier requirements, raising the bar for our suppliers and the industry in taking care of the people and places that are part of our global supply chain.

## Empowering supplier employees to create workplace solutions

Engaging supplier employees directly in providing input on solutions to workplace challenges fosters more resilient workplaces and improves overall job satisfaction. Since 2021, Apple has partnered with the Sustaining Competitive and Responsible Enterprises (SCORE) Academy. SCORE works with supplier facilities — mostly small- to medium-sized companies — to support employee participation in workplace solutions and improvements, including those related to health and safety best practices, grievance and communication systems, working conditions, worker-manager relationships, and benefits.

SCORE Academy trains managers and employees on effective communication and workplace cooperation tailored to the outcomes of an initial facility assessment. Facilities then establish cross-functional Enterprise Improvement Teams made up of both managers and employee representatives to solicit and take action on feedback from workers on day-to-day issues.

Feedback raised by employees at one participating supplier facility ranged from improvements to health and safety practices to ideas for workplace efficiency, to suggestions for improvements to shared spaces like cafeterias and living spaces. SCORE representatives supported the improvement teams in evaluating and prioritizing these issues, which resulted in significant facility enhancements, including a dedicated rest space for pregnant workers, replacing handwritten forms with digital versions, and upgrading personal lockers with electronic locks for improved security. In 2025, SCORE expanded to 10 additional supplier sites in our supply chain, reaching more than 6,300 supplier employees and managers at 24 supplier sites. As a result, more than 3,200 worker-led improvements were successfully implemented.

As we continue to expand SCORE's footprint, we are also leveraging the lessons learned from the program to inform best practices shared with other suppliers globally.

## Leveraging artificial intelligence (AI) to improve the workplace experience

We know that listening to and acting on feedback from the people in our supply chain is one of the most important things we can do to improve their workplace experience. Our Worker Voice Dashboard supports these efforts by providing insights — powered in part by AI tools — into anonymized worker sentiment collected through supplier grievance channels and social media platforms.

In 2025, the Dashboard captured and analyzed more than 900,000 anonymized worker-generated messages. These messages were then screened using AI and human verification to identify more than 4,500 validated insights across nine main categories and 50 sub-categories, covering topics such as compensation, working hours, and workplace conditions.

One example of an issue identified by the Dashboard in 2025 was an employment agency advertising pay rates for positions at an Apple supplier that were higher than what the positions would actually pay. This triggered an investigation by our team, which identified four workers that had been promised a bonus rate upon hiring that was higher than what the supplier was actually offering.

We took immediate action to remedy this issue, including full payment of the originally quoted bonus to the affected workers and enhanced monitoring of the involved agency. The supplier also took additional measures to encourage their employees to report any pay discrepancies through the supplier's internal feedback and grievance mechanisms. We shared lessons learned with other suppliers, and continue to monitor for any reoccurrence of the issue.

## Addressing allegations beyond Apple production lines

Our supply chain has an extensive global reach that includes thousands of supplier sites. Many of these facilities are shared, conducting business for multiple companies in addition to Apple. When allegations arise in supplier facilities beyond our production

lines, we still take action when possible, including partnering at the industry level to influence change.

In 2025, a number of workers contacted Apple and posted to social media raising concerns related to labor practices at a component manufacturer. The workers alleged the supplier was requiring unpaid overtime and deducting previously earned wages in retaliation for refusing overtime hours. Our Code and Standards require all overtime to be voluntary and paid at a premium rate, in line with applicable laws and regulations. Retaliation in any form is also strictly prohibited by our Code and Standards.

The supplier in question operates several facilities supporting many different companies, which initially made it difficult to identify the location of the allegations. We took immediate action and investigated all of the supplier's facilities that produce components for Apple. While our investigation found no violations on Apple production lines, we required the supplier to work with third-party auditors to conduct thorough audits of all of their facilities and operations against industry standards outlined by the Responsible Business Alliance (RBA) Code of Conduct.

Through this process, a number of violations were discovered, substantiating aspects of the original allegations. We worked to hold the supplier accountable for correcting these issues even though they were beyond our production lines. This included the payment of nearly \$225,000 in unpaid wages to over 8,000 of the supplier's employees. We further partnered with the supplier to influence changes to their policies and build their capabilities to prevent the reoccurrence of similar issues. This included providing responsible labor recruitment training for all of their sites and labor agencies, even those that don't support Apple business, creating a positive impact well beyond our immediate reach.

## Support that meets workers where they are

Navigating a new job, city, and even a new language can present unique challenges for many supply chain workers — particularly people traveling long distances from their homes. In 2025, we

partnered with the International Organization for Migration (IOM) in India to create Mobile Worker Resource Centers — a new way to offer more direct, efficient, real-time support. These centers are heavily customized vans that are designed to deliver training, information, and critical resources to workers and community members right where they live, work, and gather.

Stakeholders were involved in the design of these centers from the very beginning to help make sure that they are delivering resources people need, at the times they're most needed. Interviews and focus groups were conducted with suppliers, their employees, and local NGOs and community experts to shape the program.

To date, the Mobile Worker Resource Centers have reached over 12,000 people, delivering services that include:

- **Access to government services:** guidance on applying for and updating official, government-issued IDs, as well as benefits, such as scholarships for higher education
- **Health and wellness education:** training on nutrition, sleep, exercise, and mental health
- **“Know your city” guides:** maps and public transit information and tips to help workers navigate their new city
- **Financial services and literacy:** support with opening bank accounts and paying bills, as well as training on budgeting, savings, and secure digital payment systems
- **Personal and professional skill development:** tools and soft skills training, including resume writing and interpersonal communication skills
- **Prevention of sexual harassment:** awareness raising and training on how to prevent and report sexual harassment in the workplace

Based on the learnings from this initial rollout, IOM is planning to deploy additional vans and expand their list of offerings. IOM is also working with other organizations and companies to explore opportunities to further scale the reach and support of the Mobile Worker Resource Centers for people across our supply chain, and beyond.



## Boosting worker satisfaction through workplace investment

At select supplier facilities around the world, particularly in those places where people travel from their homes for jobs in manufacturing hubs, suppliers provide onsite living accommodations for their employees.

Our Code and Standards require that supplier-provided accommodations be clean, safe, and offer adequate living space, and every Code of Conduct assessment we conduct includes inspections of these areas, where relevant, to verify compliance with our standards. Years of supplier employee feedback has also told us that the quality of onsite accommodations are one of the most important factors in overall workplace satisfaction, so last year we undertook an effort to push the bar even higher.

In 2025, we piloted a new living accommodations scorecard initiative with more than 50 key supplier sites in China mainland, India, and Vietnam to evaluate, beyond our requirements, the quality of the accommodations and dining they provide to their employees. The scorecard's creation was also informed by worker input gathered via our Worker Voice Dashboard, powered by AI technologies. The scorecard defines supplier-provided accommodations ranging from compliance-level to best-in-class across seven key categories, including building infrastructure quality and sustainability; comfort and quality of living conditions; dining services; amenities, such as laundry and onsite medical services; and access to smart home technology (e.g., smart locks, digital maintenance requests, etc.).

One supplier, after participating in the scorecard evaluation, discovered that six of their sites were only scoring at the compliance level. This prompted the supplier to take immediate action, including a nearly \$58 million commitment to renovate and improve more than 25,000 accommodations over two years. This significant investment, which will benefit more than 70,000 supplier employees, includes upgrades to bathroom facilities, additional square footage dedicated to each employee's space, and amenity improvements, such as better Wi-Fi access and

improved storage units for belongings. Through this exercise, the supplier is also engaging Apple's Vocational Education for Persons with Disabilities program to improve the accessibility of accommodations for workers with disabilities.

As these and subsequent improvements are implemented, we will continue to collect feedback to look for further improvement opportunities, and create a roadmap for other suppliers to follow.

## Supporting community resilience for a just climate transition

Environmental rights are human rights. As we make progress toward our environmental goals, we continue to do so in a way that respects the rights and dignity of people at every level of our supply chain.

For nearly a decade, we've partnered with the NGO Pact to support programs in artisanal and small-scale mining communities in the Democratic Republic of the Congo. The main focus of these programs has been to raise the level of rights awareness and provide alternative solutions for community members as they diversify their household income.

In 2016, the program began by providing rights awareness training on a range of human rights issues, with a heavy focus on prevention of child labor. Over the years, with input and active participation from community members, the program evolved by providing vocational education programs that enabled participants to build the skills necessary to pursue opportunities outside of the mining industry. Since the program began, more than 700 people have benefited from the vocational education program, with more than 96 percent of apprentices completing their training in trades such as hairdressing, auto mechanics, and welding.

Through our ongoing engagement with local stakeholders, we also identified access to financial literacy and resources as a need to help strengthen community members' economic security. The partnership evolved to address the need by integrating the WORTH program, which brings together small groups of

local community members to build savings, receive financial training, and access financial capital. More than 600 people have participated in the WORTH program, and more than \$300,000 in loans have been disbursed to participants to start their own businesses or further their education.

Over the course of the program, more than 300,000 people, including mine workers, youth, and community officials were reached by program activities. Last year, we worked with Pact to transition these programs to local stakeholders to continue to evolve, scale, and meet the needs of the community. We've also worked with Pact to develop an educational guide based on the learnings from our partnership to enable other companies and organizations to create similar, community-led programs, helping to multiply the impact of our work together.

## V. Materials annex

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**Our goal is to one day make all of our products using only recycled or renewable materials. We've prioritized 15 materials for recycled and renewable transition based on a broad range of environmental, social, and supply chain impacts. Apple does not source primary materials directly from mine sites. We work diligently to responsibly source all materials — whether primary or recycled — that go into our products. Supplier and third-party audit data, as well as firsthand data, where available, derived from due diligence conducted by Apple enables our comprehensive approach to responsible sourcing.**

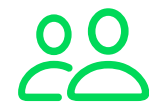
**The following section includes information on our materials supply chain.**

# How we source materials responsibly

Apple works with suppliers to responsibly source all materials — whether from primary or recycled sources — used in Apple products.

## Apple Responsible Sourcing Toolbox

-  Innovate in materials sourcing
-  Map the supply chain and establish strict requirements
-  Understand risks by using supply chain tools such as the Risk Readiness Assessment
-  Conduct third-party audits of primary and recycled materials processors
-  Address risks that are found
-  Publish smelter and refiner list annually
-  Increase recycled and renewable content
-  Support local communities
-  Engage with civil society and support local human rights and environmental defenders
-  Strengthen industry traceability systems to increase transparency
-  Develop and drive common industry standards
-  Provide training to supply chain actors to strengthen due diligence



### We set high standards.

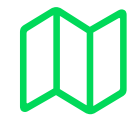
Our requirements and human rights due diligence practices are aligned with international standards and frameworks, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

#### Identifying risks.

We require our suppliers to identify and assess a broad range of risks, including social, environmental, and human rights risks for materials used in Apple products. We support this work by training suppliers, and working with partners, to develop and scale tools to support risk management across global supply chains.

#### Strengthening industry standards.

In addition to setting our own rigorous standards, we support the development of industry-wide standards. We participate and serve in leadership capacities across multiple industry associations and initiatives. This includes the Responsible Business Alliance (RBA) — where we previously served on the board of directors and continue to actively participate in working groups and task forces — as well as the Responsible Minerals Initiative (RMI), where we currently serve on the steering committee.



### We map and prioritize materials.

Our goal is to one day use only recycled or renewable materials for our products and packaging. We use data to understand the environmental, social, and supply chain impacts of materials used in our supply chain. We also work to map the origin of those materials to guide our responsible sourcing strategy.

#### We prioritize materials for transition to recycled or renewables.

Looking across commonly used mined materials, and weighting them against the amount of each Apple uses, we’ve identified 15 priority materials that represent the biggest opportunities for impact across environmental, social, and supply chain criteria: aluminum, cobalt, copper, glass, gold, lithium, paper, plastics, rare earth elements, steel, tantalum, tin, titanium, tungsten, and zinc. These materials accounted for more than 85 percent of the total product weight shipped to our customers in 2025. Each is outlined in detail in our [Material Impact Profiles](#) white paper.<sup>5</sup>

#### We work to identify the origin of materials used in our products.

We work to map our supply chain to the smelter and refiner level and, to the extent available, to the mining level. Through this process, we identify smelters and refiners that provide tin, tantalum, tungsten, and gold (3TG), cobalt, and lithium to our suppliers, as well as other materials — such as mica, copper, graphite, and nickel. Our suppliers are required to identify the origins of all materials they use, whether that be a recycler, smelter, refiner, or, in the case of biological materials, a farm.

#### Responsibly sourcing primary materials.

Although Apple does not source primary material directly from mine sites, our responsible materials sourcing program includes requirements that apply to all suppliers’ sourcing across the supply chain.



### We verify and report.

Every year, we publish a list of all identified 3TG, cobalt, and lithium smelters and refiners in our supply chain. In 2016, we became the first electronics company to publish a list of cobalt refiners in our supply chain, and in 2020, we were the first to publish a list of lithium refiners.

#### Conducting third-party audits.

Suppliers are only permitted to use or source key materials for Apple products from smelters, refiners, and recyclers who have completed, or demonstrated progress towards completion of, responsible sourcing audits. We also work closely with third-party audit programs, such as those operated by RMI and the London Bullion Market Association.

For the past decade, all of the identified 3TG and cobalt smelters and refiners in our supply chain have participated in assessments conducted by accredited third-party auditors, as required by our Responsible Sourcing of Primary, Recycled, and Renewable Materials Standard. All identified lithium refiners also continue to meet our requirements each year. If smelters or refiners are unable or unwilling to meet our standards, we take necessary actions, through our suppliers, to terminate the applicable business relationships. Since 2009, Apple has directed the removal of 206 3TG, 17 cobalt, and 9 lithium smelters and refiners from our supply chain.<sup>3</sup>

#### Addressing allegations.

We take allegations related to our supply chain very seriously — and we expect our suppliers to do the same. We require our suppliers to review and address any incidents reported to them involving their materials supply chains. We provide support to help suppliers complete corrective actions in line with OECD Due Diligence Guidance.



### We empower independent voices and local communities.

We support industry platforms, such as the RBA Voices platform, and grassroots organizations that enable people living and working in and around mining communities to voice concerns. And as we pursue our goal to one day use only recycled or renewable materials in our products, we partner with international development organizations to support communities as they transition away from mining activities.

#### We support communities in their transition from mining.

For nearly a decade, Apple supported the NGO Pact in developing a localized program to deliver rights awareness training, vocational education, and financial access and literacy to mining communities in the Democratic Republic of the Congo (DRC). This also included support for communities as they transition away from participation in mining activities.

#### We support vulnerable populations in the DRC.

In 2025, we supported Panzi Hospital and Foundation, which provides holistic care for survivors of sexual violence in the DRC.

#### We support human rights and environmental defenders.

Since 2017, we’ve partnered with the Fund for Global Human Rights to deliver flexible funding and support to human rights and environmental defenders working in mining communities.

#### We invest in environmental restoration and communities.

Since 2017, we’ve worked with the nonprofit RESOLVE on projects aimed at restoring and rehabilitating ecosystems that have been affected by legacy mining operations. This includes Regeneration, a project focused on re-mining and processing waste material from legacy mines to further restore natural environments and promote biodiversity.







# Progress across our 15 priority materials

We've prioritized 15 materials for recycled and renewable transition based on a broad range of environmental, social, and supply chain impacts.

The following highlights our progress across these materials, which include aluminum, cobalt, copper, glass, gold, lithium, paper, plastics, rare earth elements, steel, tantalum, tin, titanium, tungsten, and zinc.

For more information, please see our Material Impact Profiles and our [2026 Environmental Progress Report](#).

## Challenges

-  Technical properties
-  Availability and access
-  Traceability
-  Scale
-  Regulatory barriers
-  Supply chains



### Aluminum

In 2025, more than 70 percent of the aluminum we shipped in products to customers came from recycled sources.



### Gold

We accomplished our goal to use 100 percent recycled gold plating in Apple-designed printed circuit boards.



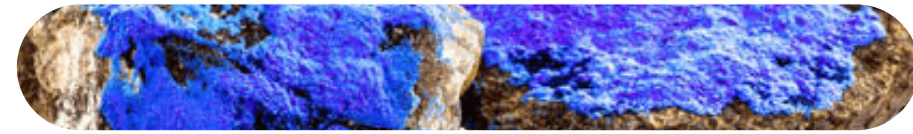
### Rare earth elements (REE)

We met our goal to use 100 percent recycled rare earth elements in all magnets, bringing our total use of recycled REE to 95 percent across all products shipped in 2025.



### Titanium

In 2025, we introduced Apple Watch Series 11 and Apple Watch Ultra 3, which contain 100 percent recycled titanium in their cases.



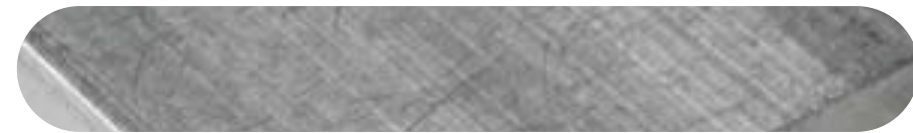
### Cobalt

We accomplished our goal to use 100 percent recycled cobalt in Apple-designed batteries, bringing our total use of recycled cobalt to 95 percent across all products shipped in 2025.



### Lithium

In 2025, more than 90 percent of the lithium we shipped in products to customers came from recycled sources.



### Steel

In 2025, more than 20 percent of the steel we shipped in products to customers came from recycled sources.



### Tungsten

In 2025, more than 95 percent of the tungsten we shipped in products to customers came from recycled sources.



### Copper

In 2025, more than 20 percent of the copper we shipped in products to customers came from recycled sources.



### Paper

We accomplished our goal to remove plastics from our packaging by the end of 2025 and now ship all new products in 100 percent fiber-based packaging.



### Tantalum

We continue our efforts to source 100 percent recycled tantalum and are actively investigating recovery solutions from end-of-life electronics to expand the availability of recycled tantalum.



### Zinc

Mac Studio contains 100 percent recycled zinc in the prongs of the power cord and AC inlet prongs.



### Glass

We used 40 percent recycled glass in the display glass of Apple Watch Series 11 and Apple Watch SE 3 recovered from post-industrial material, including iPhone scrap.



### Plastics

We used 65 percent recycled plastic in the MagSafe Charging Case of AirPods Pro 3.



### Tin

We accomplished our goal to use 100 percent recycled tin solder in Apple-designed printed circuit boards.



# Smelter and refiner list

This list contains the smelters and refiners identified in Apple’s supply chain as of December 31, 2025 for tin, tantalum, tungsten, and gold (3TG), cobalt, and lithium.

For more details, as well as the most current status of each 3TG and cobalt smelter or refiner, please refer to the information provided by the RMI’s Responsible Minerals Assurance Process and the LBMA’s Good Delivery List.

## Cobalt

Smelter or refiner name	Country or region
Ganzhou Highpower Technology Co., Ltd.	China mainland
Ganzhou Tengyuan Cobalt New Material Co., Ltd.	China mainland
Ganzhou Yi Hao Umicore Industry Co., Ltd.	China mainland
Gem (Jiangsu) Cobalt Industry Co., Ltd.	China mainland
Hunan CNGR New Energy Science & Technology Co., Ltd.	China mainland
Jingmen GEM Co., Ltd.	China mainland
Quzhou Huayou Cobalt New Material Co., Ltd.	China mainland
Umicore Finland Oy	Finland
Umicore Olen	Belgium
XTC New Energy Material (Xiamen) Co., Ltd.	China mainland
Zhejiang Huayou Cobalt Co., Ltd.	China mainland
Zhejiang New Era Zhongneng Technology Co., Ltd.	China mainland

## Lithium

Smelter or refiner name	Country or region
Albemarle (Salar de Atacama)	Chile
General Lithium Corporation	China mainland
Huizhou Hengchuang Ruineng Environmental Protection Technology Co., Ltd.	China mainland
Hunan Yongshan Lithium Co., Ltd.	China mainland
Ningdu Ganfeng Lithium Co., Ltd.	China mainland
Qinghai Dongtai Jinear Lithium Resources Co., Ltd.	China mainland
Quzhou Huayou Resource Recycling Technology Company Limited.	China mainland
SQM Salar S.A. (De Atacama Plant)	Chile
Tianqi Lithium (Shehong) Co., Ltd.	China mainland

## Gold

Smelter or refiner name	Country or region
Abington Reldan Metals, LLC	United States
Advanced Chemical Company	United States
Agosi AG	Germany
Aida Chemical Industries Co., Ltd.	Japan
Almalyk Mining and Metallurgical Complex (AMMC)	Uzbekistan
AngloGold Ashanti Corrego do Sitio Mineracao	Brazil
Argor-Heraeus S.A.	Switzerland
ASAHI METALFINE, Inc.	Japan
Asahi Refining Canada Ltd.	Canada
Asahi Refining USA Inc.	United States
Asaka Riken Co., Ltd.	Japan
Aurubis AG, Hamburg	Germany
Bangalore Refinery	India
Bangko Sentral ng Pilipinas (Central Bank of the Philippines)	Philippines
Boliden Mineral AB (Ronnskar)	Sweden
C. Hafner GmbH + Co. KG	Germany
Chimet S.p.A.	Italy
Chugai Mining	Japan
Coimpa Industrial LTDA	Brazil
Dowa	Japan

Smelter or refiner name	Country or region
DSC (Do Sung Corporation)	South Korea
Eco-System Recycling Co., Ltd. East Plant	Japan
Eco-System Recycling Co., Ltd. North Plant	Japan
Eco-System Recycling Co., Ltd. West Plant	Japan
Elite Industech Co., Ltd.	Taiwan
GG Refinery Ltd.	Tanzania
Glencore Canada Corporation - CCR Refinery	Canada
Gold by Gold Colombia	Colombia
Gold Corporation - The Perth Mint	Australia
Heimerle + Meule GmbH	Germany
Heraeus Germany GmbH Co. KG	Germany
Heraeus Metals Hong Kong Ltd.	China mainland
Impala Platinum - Platinum Metals Refinery (PMR)	South Africa
Inner Mongolia Qiankun Gold and Silver Refinery Share Co., Ltd.	China mainland
Ishifuku Metal Industry Co., Ltd.	Japan
Istanbul Gold Refinery	Turkey
Italpreziosi	Italy
Japan Mint	Japan
Jiangxi Copper Co., Ltd.	China mainland
JX Advanced Metals Corporation	Japan



## Gold continued

Smelter or refiner name	Country or region
Kazzinc Ltd	Kazakhstan
Kennecott Utah Copper LLC	United States
KGHM Polska Miedz Spolka Akcyjna	Poland
Kojima Chemicals Co., Ltd.	Japan
Korea Zinc Co., Ltd.	South Korea
LS MnM Inc.	South Korea
LT Metal Ltd.	South Korea
Materion	United States
Matsuda Sangyo Co., Ltd.	Japan
Metal Concentrators SA (Pty) Ltd.	South Africa
Metalor Technologies (Hong Kong) Ltd.	China mainland
Metalor Technologies (Singapore) Pte., Ltd.	Singapore
Metalor Technologies (Suzhou) Ltd.	China mainland
Metalor Technologies S.A.	Switzerland
Metalor USA Refining Corporation	United States
Metalurgica Met-Mex Penoles S.A. De C.V.	Mexico
Mitsubishi Materials Corporation	Japan
Mitsui Mining and Smelting Co., Ltd.	Japan
MKS PAMP SA	Switzerland
MMTC-PAMP India Pvt., Ltd.	India

Smelter or refiner name	Country or region
Nadir Metal Rafineri San. Ve Tic. A.S.	Turkey
Navoi Mining and Metallurgical Combinat	Uzbekistan
NH Recytech Company	South Korea
Nihon Material Co., Ltd.	Japan
Oegussa Oesterreichische Gold- und Silber-Scheideanstalt Gesm.b.H.	Austria
Ohura Precious Metal Industry Co., Ltd.	Japan
Planta Recuperadora de Metales SpA	Chile
PT Aneka Tambang (Persero) Tbk	Indonesia
PX Precinox S.A.	Switzerland
Rand Refinery (Pty) Ltd.	South Africa
REMONDIS PMR B.V.	Netherlands
Royal Canadian Mint	Canada
SAFINA A.S.	Czechia
SEMPSA Joyeria Plateria S.A.	Spain
Shandong Gold Smelting Co., Ltd.	China mainland
Shandong Zhaojin Gold & Silver Refinery Co., Ltd.	China mainland
Sichuan Tianze Precious Metals Co., Ltd.	China mainland
Solar Applied Materials Technology Corp.	Taiwan
Sumitomo Metal Mining Co., Ltd.	Japan

## Gold continued

Smelter or refiner name	Country or region
SungEel HiMetal Co., Ltd.	South Korea
T.C.A S.p.A	Italy
Tanaka Kikinzoku Kogyo K.K.	Japan
Tokuriki Honten Co., Ltd.	Japan
TOO Tau-Ken-Altyn	Kazakhstan
Umicore S.A. Business Unit Precious Metals Refining	Belgium
United Precious Metal Refining, Inc.	United States
Valcambi S.A.	Switzerland
WIELAND Edelmetalle GmbH	Germany
Yamakin Co., Ltd.	Japan
Yokohama Metal Co., Ltd.	Japan
Zhongyuan Gold Smelter of Zhongjin Gold Corporation	China mainland
Zijin Mining Group Gold Smelting Co. Ltd.	China mainland

## Tantalum

Smelter or refiner name	Country or region
AMG Brasil	Brazil
D Block Metals, LLC	United States
F&X Electro-Materials Ltd.	China mainland
FIR Metals & Resource Ltd.	China mainland
Global Advanced Metals Aizu	Japan
Global Advanced Metals Boyertown	United States
Guangdong Rising Rare Metals-EO Materials Ltd.	China mainland
Hengyang King Xing Lifeng New Materials Co., Ltd.	China mainland
Jiangxi Dinghai Tantalum & Niobium Co., Ltd.	China mainland
Jiangxi Tuohong New Raw Material	China mainland
JiuJiang JinXin Nonferrous Metals Co., Ltd.	China mainland
Jiujiang Tanbre Co., Ltd.	China mainland
Jiujiang Zhongao Tantalum & Niobium Co., Ltd.	China mainland
KEMET de Mexico	Mexico
Materion Newton Inc.	United States
Metallurgical Products India Pvt., Ltd.	India
Mineracao Taboca S.A.	Brazil
Mitsui Kinzoku Company, Limited	Japan
Ningxia Orient Tantalum Industry Co., Ltd.	China mainland
NPM Silmet AS	Estonia

## Tantalum continued

Smelter or refiner name	Country or region
PowerX Ltd.	Rwanda
Resind Industria e Comercio Ltda.	Brazil
Taki Chemical Co., Ltd.	Japan
TANIOBIS Co., Ltd.	Thailand
TANIOBIS GmbH	Germany
TANIOBIS Japan Co., Ltd.	Japan
TANIOBIS Smelting GmbH & Co. KG	Germany
Telex Metals	United States
Ulba Metallurgical Plant JSC	Kazakhstan
XIMEI RESOURCES (GUANGDONG) LIMITED	China mainland
XinXing HaoRong Electronic Material Co., Ltd.	China mainland
Yanling Jincheng Tantalum & Niobium Co., Ltd.	China mainland

## Tin

Smelter or refiner name	Country or region
Alpha Assembly Solutions Inc	United States
Aurubis Beerse	Belgium
Aurubis Berango	Spain
Chenzhou Yunxiang Mining and Metallurgy Co., Ltd.	China mainland
Chifeng Dajingzi Tin Industry Co., Ltd.	China mainland
China mainland Tin Group Co., Ltd.	China mainland
CRM Synergies EMEA, S.L.U.	Spain
CV Ayi Jaya	Indonesia
Dongguan Best Alloys Co., Ltd.	China mainland
Dowa	Japan
EM Vinto	Bolivia
Estanho de Rondonia S.A.	Brazil
Fabrica Auricchio Industria e Comercio Ltda.	Brazil
Fenix Metals	Poland
Gejiu Non-Ferrous Metal Processing Co., Ltd.	China mainland
Global Advanced Metals Greenbushes Pty Ltd.	Australia
Guangdong Hanhe Non-Ferrous Metal Co., Ltd.	China mainland
HuiChang Hill Tin Industry Co., Ltd.	China mainland
Luna Smelter, Ltd.	Rwanda
Magnu's Minerais Metais e Ligas Ltda.	Brazil

## Tin continued

Smelter or refiner name	Country or region
Malaysia Smelting Corporation (MSC)	Malaysia
Malaysia Smelting Corporation Berhad (Port Klang)	Malaysia
Metallic Resources, Inc.	United States
Mineracao Taboca S.A.	Brazil
Mining Minerals Resources SARL	Democratic Republic of the Congo
Minsur	Peru
Mitsubishi Materials Corporation	Japan
O.M. Manufacturing (Thailand) Co., Ltd.	Thailand
O.M. Manufacturing Philippines, Inc.	Philippines
Operaciones Metalurgicas S.A.	Bolivia
PT Arsed Indonesia	Indonesia
PT ATD Makmur Mandiri Jaya	Indonesia
PT Bangka Prima Tin	Indonesia
PT Cipta Persada Mulia	Indonesia
PT Mitra Stania Prima	Indonesia
PT Mitra Sukses Globalindo	Indonesia
PT Premium Tin Indonesia	Indonesia
PT Prima Timah Utama	Indonesia
PT Putera Sarana Shakti (PT PSS)	Indonesia
PT Rajehan Ariq	Indonesia

Smelter or refiner name	Country or region
PT Timah Tbk Kundur	Indonesia
PT Timah Tbk Mentok	Indonesia
Resind Industria e Comercio Ltda.	Brazil
Rui Da Hung	Taiwan
Super Ligas	Brazil
Takehara PVD Materials Plant / PVD Materials Division of MITSUI MINING & SMELTING CO., LTD.	Japan
Thaisarco	Thailand
Tin Smelting Branch of Yunnan Tin Co., Ltd.	China mainland
Tin Technology & Refining	United States
White Solder Metalurgia e Mineracao Ltda.	Brazil
Woodcross Smelting Company Limited	Uganda
Yunnan Yunfan Non-ferrous Metals Co., Ltd.	China mainland

## Tungsten

Smelter or refiner name	Country or region
A.L.M.T. Corp.	Japan
Asia Tungsten Products Vietnam Ltd.	Vietnam
China mainland Molybdenum Tungsten Co., Ltd.	China mainland
Chongyi Zhangyuan Tungsten Co., Ltd.	China mainland
Cronimet Brasil Ltda	Brazil
Fujian Xinlu Tungsten Co., Ltd.	China mainland
Ganzhou Jiangwu Ferrotungsten Co., Ltd.	China mainland
Ganzhou Seadragon W & Mo Co., Ltd.	China mainland
Global Tungsten & Powders LLC	United States
Guangdong Xianglu Tungsten Co., Ltd.	China mainland
H.C. Starck Tungsten GmbH	Germany
Hubei Green Tungsten Co., Ltd.	China mainland
Japan New Metals Co., Ltd.	Japan
Jiangwu H.C. Starck Tungsten Products Co., Ltd.	China mainland
Jiangxi Gan Bei Tungsten Co., Ltd.	China mainland
Jiangxi Xinsheng Tungsten Industry Co., Ltd.	China mainland
Jiangxi Yaosheng Tungsten Co., Ltd.	China mainland
Jing Yuan Tungsten Technology Co., Ltd.	Taiwan
KENEE MINING VIETNAM COMPANY LIMITED	Vietnam
Kennametal Fallon	United States

Smelter or refiner name	Country or region
Kennametal Huntsville	United States
Lianyou Metals Co., Ltd.	Taiwan
Lianyou Resources Co., Ltd.	Taiwan
Malipo Haiyu Tungsten Co., Ltd.	China mainland
Masan High-Tech Materials	Vietnam
Niagara Refining LLC	United States
Philippine Bonway Manufacturing Industrial Corporation	Philippines
Shinwon Tungsten (Fujian Shanghang) Co., Ltd.	China mainland
TANIOBIS Smelting GmbH & Co. KG	Germany
Tungsten Vietnam Joint Stock Company	Vietnam
Wolfram Bergbau und Hutten AG	Austria
Xiamen Tungsten (H.C.) Co., Ltd.	China mainland
Xiamen Tungsten Co., Ltd.	China mainland

# Origin of primary materials: 3TG, cobalt, and lithium

The list below represents the countries of origin for materials processed by identified smelters and refiners in Apple’s supply chain, as reported to us through third-party audit information obtained from industry associations like the Responsible Minerals Initiative (RMI) and the London Bullion Market Association (LBMA). Apple conducts additional due diligence on the reported countries to identify and mitigate sourcing-related risks. As smelters and refiners report their country of origin information at an aggregate level for all primary material processed by them on behalf of all of their customers, and not specifically for primary material used or processed for Apple’s supply chain, Apple cannot always determine the countries of origin of the materials actually contained in our specific parts and product.

Argentina	Fiji	Morocco	Suriname
Australia	Finland	Mozambique	Sweden
Austria	France	Myanmar	Tajikistan
Azerbaijan	French Guiana	Namibia	Tanzania
Bolivia	Georgia	New Zealand	Thailand
Brazil	Ghana	Nicaragua	Turkey
Bulgaria	Guatemala	Nigeria	Uganda
Burkina Faso	Guinea	Norway	Ukraine
Burundi	Guyana	Papua New Guinea	United Kingdom
Canada	Honduras	Peru	United States
Chile	Indonesia	Philippines	Uzbekistan
China	Japan	Poland	Vietnam
Colombia	Kazakhstan	Portugal	Zambia
Congo, Democratic Republic of the *	Kenya	Russia **	
Costa Rica	Lao People’s Democratic Republic	Rwanda *	
Côte d’Ivoire	Liberia	Saudi Arabia	
Dominican Republic	Malaysia	Senegal	
Ecuador	Mali	Sierra Leone	
Egypt	Mauritania	Slovakia	
Eswatini	Mexico	South Africa	
Ethiopia	Mongolia	Spain	

\* As of June 2024, Apple issued a notification to its suppliers to cease the sourcing, directly or indirectly, of 3TG for Apple parts and products from the DRC and Rwanda.  
 \*\* Any minerals are in the global supply chain in accordance with applicable sanctions laws as confirmed by third-party audits.

# VI. Endnotes

## Forward-looking statements

The information covered by the report contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995, including statements regarding our goals, targets, commitments, and strategies and related business and stakeholder impacts. These statements involve risks and uncertainties, and actual results may differ materially from any future results expressed or implied by the forward-looking statements, including any failure to meet stated goals and commitments, and execute our strategies in the timeframe expected or at all, as a result of many factors, including changing government regulations or stakeholder expectations, and our expansion into new products, services, technologies, and geographic regions. Forward-looking statements can also be identified by words such as “future,” “anticipates,” “believes,” “estimates,” “expects,” “intends,” “plans,” “predicts,” “will,” “would,” “could,” “can,” “may,” and similar terms. More information on risks, uncertainties, and other potential factors that could affect our business and performance is included in our filings with the SEC, including in the “Risk Factors” and “Management’s Discussion and Analysis of Financial Condition and Results of Operations” sections of the company’s most recently filed periodic reports on Form 10-K and Form 10-Q and subsequent filings. We assume no obligation to update any statements, which speak only as of the date they are made.

## Information in this report

This report does not cover all information about our business. References in this report to information should not be interpreted as an indication of the materiality of such information to Apple’s financial results or for purposes of U.S. securities laws, or any other laws or requirements. Additionally, certain terminology used in this report, such as “value chain,” “impacts,” “risks,” “opportunities,” and “targets” may differ from the terminology used in legal reporting frameworks. Also, any reference in this report to sustainable activities should not be interpreted as an indication of the classification of such activity under any legal classification framework which could be subject to specific criteria and requirements that may differ from the general references in this report.

## Reporting year

We track our progress based on Apple’s fiscal year. All references to a year throughout the report refer to Apple’s fiscal years, unless “calendar year” is specified. Apple’s fiscal year is the 52- or 53-week period that ends on the last Saturday of September.

- 1 Core Violations are the most serious level of violation of our Code and Standards. Learn more about Core Violations on [page 9](#).
- 2 Apple reports 3TG smelter and refiner audit information on a calendar year.
- 3 The total number of 3TG smelters and refiners directed to be removed from Apple’s supply chain since 2009 represents a cumulative count with smelters and refiners only counted once, when first removed from Apple’s supply chain. 3TG smelters and refiners may subsequently re-enter the supply chain if they meet Apple’s Code and Responsible Sourcing of Primary, Recycled, and Renewable Materials Standard and other 3TG mineral requirements.
- 4 We accomplished our goal to use 100 percent recycled cobalt in all Apple designed batteries, 100 percent recycled tin soldering and 100 percent recycled gold plating in all Apple-designed rigid and flexible printed circuit boards, and 100 percent recycled rare earth elements in all magnets. This accomplishment excludes inventory for replacement and repair, as well as excess inventory purchased prior to year-end currently being consumed and representing less than 0.1% of total material usage.
- 5 Since publishing the “Material Impact Profiles” white paper, we’ve expanded our analysis to include biodiversity factors.

