This document details the supplier requirements for the Responsible Business Alliance (RBA) Code of Conduct Conformance & Human Rights Program. Please read and understand the details below.

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

Table of Contents:
- General Code of Conduct Expectations
- RBA Self-Assessment Questionnaire (SAQ)
- Intel Facility Self-Assessment Questionnaire (Top50)
- RBA Code of Conduct Audits (RBA VAPs and SVAPs, Closure, Intel Target)
- Risk Training and Attestation

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

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

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

One aspect of Intel’s RBA Code Risk Assessment Process is measuring a supplier’s conformance to the RBA Code of Conduct to proactively identify where improvement might be needed. The RBA Facility Self-Assessment Questionnaire (SAQ) covers the RBA Code of Conduct: labor, ethics, health and safety, environmental stewardship, and management systems. Intel uses the RBA Facility SAQ results to determine if any gap closure action is needed. Having it online allows a supplier to complete it once and share with RBA Member Customers such as Intel. NOTE: Failure to complete required Self Assessments will prevent you from scheduling an RBA audit, likely impact your supplier report card for sustainability, and may prevent you from achieving public recognition from Intel. Intel does not pay for Suppliers RBA registrations and RBA SAQ Verifications as the results can be shared with multiples customers.

There are 5 different RBA SAQs - it may take several weeks to complete as there can be different experts and levels of management you may need to contact to ensure accurate responses. Please watch for publication of the 2023 RBA SAQ release in the RBA-Online system and ensure that your annual registration is paid,

- **RBA Facility SAQ 2023** (Self-Assessment Questionnaire) managed by the RBA and completed online. $250/facility fee the supplier is to pay. SAQ can be shared with other customers. If you complete the **Facility Risk SAQ 2023 (not required in 2023)**, you must complete both the Risk and Controls sections for each facility requested in order to fulfil the requirement. Verification by the RBA of the Facility Risk SAQ is optional but will help you to identify gaps in your compliance before an audit but does have a $250 added cost.

- **Verified RBA Facility Responsible Labor SAQ 2023**: If you are requested to complete the Facility Responsible Labor SAQ, we ask that you complete and release both the Risk & Control section and Verification by the RBA Required which will have an extra cost of $250 the supplier is to pay.

- **RBA Indirect Facility SAQ 2023**: If you are requested to complete the Indirect SAQ you must have a trading relationship with Intel and a facility setup in RBA Online. You will receive a request from Intel to complete the Indirect SAQ via the RBA Online tool.

- **RBA Corporate SAQ 2023**: contains higher level information and is completed for your overall company. While Intel does not currently require suppliers to complete it, other RBA Member Customers may require it.

As you fill out the SAQs, please keep in mind that it is a live document and once you submit it, you can always go back and update your answers as changes in your business occur.

- **Step 1**: Register for RBA-Online, if not already registered, and create each of your facilities in RBA-Online. Note: You will need to pay a fee to the RBA for each facility.

- **Step 2**: In the RBA-Online tool, request a trading relationship with Intel Corporation (ID G-CO-10003228) for both your corporate and facility(ies), if this is not already done.

- **Step 3**: Grant Intel Corporation access to view your RBA Facility SAQs and RBA Validated Assessment Program Audit Reports (VARs) for sites which supply product or services to Intel.
• **Step 4:** Complete your RBA Facility SAQs at the earliest availability (Q1 to allow begin RBA audit scheduling otherwise by the requested date) and Release them in the RBA-Online tool.
• For additional RBA-Online Help visit: [https://www.g360link.com/rba-online.htm](https://www.g360link.com/rba-online.htm) or contact the RBA Help Desk Telephone (English): +1 (571) 290-5430 (8AM-5PM ET) or contact the Help Desk via E-mail: helpdesk@responsiblebusiness.org.
• For help on the RBA SAQs see: [https://www.responsiblebusiness.org/tools/saq-faqs/](https://www.responsiblebusiness.org/tools/saq-faqs/).

**Intel Facility Self-Assessment Questionnaire (Top50)**

Intel’s Top 50 supplier surveys are based on the RBA Self-Assessment Questionnaire (SAQ) and covers the five (5) areas of the RBA Code of Conduct: labor, ethics, health and safety, environmental stewardship, and management systems. The Top 50 surveys are available in multiple languages.

In-scope suppliers will receive instructions from Intel to complete the Intel Facility SAQ Top 50 and are expected to complete all requirements by the requested date. Please complete the applicable Top 50 assessment for each of your facilities that produce products and/or services for Intel.

• **Step 1:** download the Top50 assessment file from [this SPARC Code Conformance page](https://www.responsiblebusiness.org/tools/saq-faqs/) (For English and non-English language versions available)
• **Step 2:** Read the instructions and complete the assessment (please note: labor agent/sub-supplier detail is applicable if you are use a labor agent to supplement your staffing or contract sub-suppliers for the products/services you provide for Intel).
• **Step 3:** email completed assessment file to Intel Supplier Assurance Communications Intel.Supplier.Assurance.Communications@intel.com by requested date

**RBA Code of Conduct Audits (RBA VAPs and SVAPs, Closure, Intel Target)**

As determined by Intel’s assessment of risk, current open audit findings, and/or time since prior audits, Intel may require RBA Code of Conduct site audits of any supplier facilities that provide products and/or services to Intel, to verify Supplier’s conformance to the RBA Code of Conduct.

Intel will send suppliers a request for audit of specific facilities and timelines for the audits to occur. As directed by Intel, suppliers will be required to either complete an RBA Validated Assessment Program (VAP) audit, RBA Supplemental VAP (SVAP), or an Intel Target audit. Required Closure audits are determined by initial supplier audit results and the scope and nature of any audit findings.

If Intel requires your company to have an RBA VAP or SVAP that is scheduled and managed by the RBA, you are required to contact the RBA. The RBA will charge a fee for the audit which the supplier is to pay. Intel will not accept audits other than RBA VAPs or SVAPs scheduled and managed by the RBA. **DO NOT go to audit firms to obtain “RBA-like” audits, they will be rejected by Intel, causing delay and extra expense for your company.**
NOTE: Failure to complete audits as required by Intel and/or to correct and close findings from previous audits will likely impact your supplier report card for sustainability, may prevent you from achieving public recognition from Intel, can lead to public disclosure of non-conformance in Intel’s Corporate Social Responsibility report; and/or can lead to the discontinuance of business with Intel. Intel does not pay for Suppliers RBA Audits.

Steps to complete an RBA VAP or RBA SVAP audit:

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

For an introduction on the RBA VAP or RBA SVAP or to find more information at http://www.responsiblebusiness.org/standards/vap/ or http://www.responsiblebusiness.org/vap/svap-on-forced-labor/. The RBA offers courses to help you prepare for an RBA Code of Conduct Audit through its E-Learning platform.

Steps to complete an RBA VAP or RBA SVAP CLOSURE audit:

- **Step 1:** Request the VAP or SVAP in RBA-Online in advance of the required closure audit and work with the RBA Audit Program Manager (APM vap@ResponsibleBusiness.org)
- **Step 2:** As part of the audit scheduling process with the RBA, complete an Attachment B, and ensure Intel has visibility access to audits at the specific facility in RBA-Online.
- **Step 3:** Ensure your Corrective Action Plan (CAP) is in RBA-Online and ready for auditor review.
- **Step 4:** Support the audit preparation and audit itself, as directed by the RBA and Auditor.

Steps to complete an Intel Target Audit:

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

## Risk Training and Attestation

Intel expects all suppliers to conduct business in compliance with the RBA Code of Conduct. One aspect of our process is providing suppliers with training on expectations to ensure respect for the human rights of workers in the supply chain.

Intel has teamed up with the RBA to create a short eLearning curriculum customized to provide a high-level overview of the following topics:

- Introduction to Human Rights
- RBA Introduction
- RBA Code of Conduct (Labor module only)

Questions and names of your representatives to attend the training should be sent to Intel.Supplier.Assurance.Communications@intel.com.

If a supplier declines to take the above training by the assigned deadline, the alternative is for an authorized individual to sign an attestation certifying that they will remain in compliance with all applicable laws and Intel Policies. The statement is as follows:

Supplier certifies that Supplier is and will remain in compliance with all applicable laws and Intel Policies (including Intel’s Human Rights Principles [here](#), Intel’s Code of Conduct [here](#) and the Responsible Business Alliance Code of Conduct [here](#)) (Intel Policies). Supplier further certifies that it will ensure its suppliers also adhere to Intel Policies.

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