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## California Supply Chain Transparency Act

Best Buy expects manufacturers (including manufacturers of Best Buy's private-label products), vendors, and suppliers of new goods that we sell in our retail stores and online (collectively "Suppliers") to meet and maintain fundamental labor and human rights standards. Specifically, we include language in our <u>Supplier Code of Conduct</u> and in our contracts with Suppliers specifying that Suppliers will not use any forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise. Failure by a Supplier to meet our Supplier Code of Conduct or the terms of our contract would subject the Supplier to possible actions by Best Buy, up to and including the termination of Best Buy's contract and business relationship with the Supplier.

Best Buy actively works at industry levels to respond to social and environmental concerns in consumer electronics and retailing. In addition, Best Buy is a member of the <u>Electronic Industry Citizenship Coalition (EICC)</u>, an industry group striving to address human trafficking and slavery in the electronics supply chain, among many other important issues.

Additional details regarding our efforts to ensure a sustainable supply chain include:

### Verification

Best Buy employs a variety of protocols to identify, assess, and manage potential social and environmental risks, including human trafficking and forced labor, in our direct supply chain. Through our membership in the EICC, Best Buy participates in an annual sensing exercise that seeks to identify potential risks throughout the consumer electronics supply chain. In addition, Best Buy conducts an annual risk assessment of suppliers of Best Buy's private-label products to identify high-, medium-, and low-risk suppliers.

# **Supplier Audits**

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Best Buy's Corporate Responsibility & Sustainability (CR&S) Team in Shenzhen, China, invests significant time and resources to audit the factories where our private-label products are assembled and to work with these factories to improve workplace conditions and labor practices. Before a prospective supplier is selected to become a Best Buy private-label manufacturer, they are trained on our Supplier Code of Conduct and must pass a third-party audit. Existing private-label suppliers identified as high and medium risk through our verification process are audited, in some cases by a third party, and in other cases by Best Buy staff. Best Buy typically provides prior notification and scheduling of such audits in an effort to build trust and long-term relationships with our partners.

#### Certification

Through Best Buy's contracts with vendors and our Supplier Code of Conduct, we require our suppliers to maintain records that can certify that they comply with laws regarding slavery and human trafficking in the country in which they are doing business. These records, which include documentation such as proof of age of employees, hour and wage records, and employee contracts, are reviewed during our audits. Gaps in these documents represent a priority violation and must be addressed immediately in order to maintain a business relationship with Best Buy.

## **Internal Accountability and Training**

We maintain standards and procedures for employees in the <u>Best Buy Code of Business Ethics</u>, which encourages employees to report any concerns about potential forced labor. All employees receive training on the Best Buy Code of Business Ethics and our private-label sourcing team receives additional training on our manufacturing partner expectations and our audit program. Failure by an employee to follow the standards set forth in the Code of Business Ethics may subject such employee to disciplinary action up to and including termination of employment.

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