



October 18, 2021

VIA ELECTRONIC MAIL

Office of the Chief Counsel
Division of Corporation Finance
Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549

Re: **Apple Inc. Shareholder Proposal Submitted by Jane M. Saks et al.**

Ladies and Gentlemen:

This letter is submitted pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended. Apple Inc., a California corporation ("**Apple**" or the "**Company**"), has received a shareholder proposal (the "**Proposal**") and related supporting statement (the "**Supporting Statement**") submitted by Jane M. Saks, Mary Hawkins, Neville Austin, Jeff Perk, Stephen Rees, Wendy Brown, and David Adams (together, the "**Proponents**") for inclusion in the Company's proxy statement (the "**Proxy Materials**") for the Company's 2022 Annual Meeting of Shareholders (the "**Annual Meeting**"). A copy of the Proposal and the Supporting Statement, together with other correspondence relating to the Proposal, is attached hereto as [Exhibit A](#). The Company hereby advises the staff of the Division of Corporation Finance (the "**Staff**") that it intends to exclude the Proposal from its Proxy Materials. The Company respectfully requests confirmation that the Staff will not recommend enforcement action to the Securities and Exchange Commission (the "**Commission**") if the Company excludes the Proposal pursuant to Rule 14a-8(i)(10), as the Proposal has been substantially implemented.

By copy of this letter, the Company is advising the Proponents of its intention to exclude the Proposal. In accordance with Rule 14a-8(j)(2) and Staff Legal Bulletin No. 14D, the Company is submitting by electronic mail (i) this letter, which sets forth its reasons for excluding the Proposal; and (ii) the Proponents' letters submitting the Proposal.

Pursuant to Rule 14a-8(j), the Company is submitting this letter not less than 80 days before the Company intends to file its Proxy Materials and is sending a copy of this letter concurrently to the Proponents.

I. The Shareholder Proposal.

The Proposal, in material part, requests that the Company's shareholders approve the following:

"RESOLVED that shareholders of Apple, Inc. ("Apple") ask the Board of Directors to oversee the preparation of a report, at reasonable cost and omitting confidential and proprietary information, on the extent to which Apple's policies and procedures effectively protect workers in its supply chain from forced labor, including the extent to which Apple has identified suppliers and

sub-suppliers that are at significant risk for forced labor violations, the number of suppliers against which Apple has taken corrective action due to such violations, and the availability and use of grievance mechanisms to compensate affected workers. The report should be posted to Apple's website."

II. Basis for Exclusion – The Proposal Has Been Substantially Implemented by the Company in Accordance with Rule 14a-8(i)(10).

The Company requests that the Staff concur in its view that the Company may exclude the Proposal from the Proxy Materials pursuant to Rule 14a-8(i)(10). Based on the Company's existing reports and disclosure, the Company has already substantially implemented the Proposal and, were the Proposal to be voted upon by shareholders at the Annual Meeting and pass, there is nothing further that would need to be included in the report requested by the Proposal.

Apple seeks to uphold the highest standards in the industry across its global supply chain and has teams of experts on the ground working closely with suppliers around the world. Over the past year and a half, despite the restrictions of COVID-19, Apple has conducted over 1,100 audits, including surprise audits, and interviewed more than 57,000 workers to ensure that its strict standards are upheld. Apple found no evidence of forced labor anywhere in its supply chain and will continue its efforts to ensure workers are treated with dignity and respect everywhere the Company works.

Since 2007, Apple has publicly reported on its progress driving its high standards for supplier conduct throughout its global supply chain. As described in greater detail in Section II.B of this letter, the Company's existing public disclosures already report on the extent to which its policies and procedures effectively protect workers in its supply chain from forced labor. Moreover, Apple's existing reports and disclosures specifically describe the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations, the number of suppliers against which Apple has taken corrective action due to such violations, and the availability and use of grievance mechanisms to compensate affected workers. These disclosures include Apple's:

- *Supplier Code of Conduct ("Supplier Code")*¹, *2020 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chain ("2020 Statement")*², *People and Environment in Our Supply Chain: 2021 Annual Progress Report ("2021 Progress Report")*³, and *2020 Supplier Responsibility Progress Report ("2020 Progress Report")*⁴, which publicly report on the extent to which Apple's policies and procedures effectively protect workers in our supply chain from forced labor;

¹ See <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-Code-of-Conduct-and-Supplier-Responsibility-Standards.pdf>

² See <https://www.apple.com/supplier-responsibility/pdf/Apple-Combat-Human-Trafficking-and-Slavery-in-Supply-Chain-2020.pdf>

³ See https://www.apple.com/supplier-responsibility/pdf/Apple_SR_2021_Progress_Report.pdf

⁴ See https://www.apple.com/supplier-responsibility/pdf/Apple_SR_2020_Progress_Report.pdf

- *2021 Progress Report, 2020 Progress Report, 2021 Environmental Social and Governance Report (“2021 ESG Report”)*⁵, and *2020 Statement*, which describe the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations;
- *2021 Progress Report, 2020 Statement, and 2020 Progress Report*, which publicly disclose the number of suppliers against which Apple has taken corrective action due to forced labor violations; and
- *2021 Progress Report, How We Work With Suppliers*⁶, *2020 Statement and Supplier Responsibility Standards (“Supplier Standards”)*⁷, which publicly detail the availability and use of grievance mechanisms to compensate workers affected by forced labor violations.

A. Rule 14a-8(i)(10)

Rule 14a-8(i)(10) provides that a company may exclude a shareholder proposal from its proxy materials if the company has substantially implemented the proposal. In explaining the scope of a predecessor to Rule 14a-8(i)(10), the Commission stated that the exclusion is “designed to avoid the possibility of shareholders having to consider matters which already have been favorably acted upon by the management.” See Exchange Act Release No. 12598 (July 7, 1976) (discussing the rationale for adopting the predecessor to Rule 14a-8(i)(10), which provided as a substantive basis for omitting a shareholder proposal that the proposal “has been rendered moot by the actions of the management”). At one time, the Staff interpreted the predecessor rule narrowly, considering a proposal to be excludable under this provision only if it had been “‘fully’ effected” by the company. See Exchange Act Release No. 19135 at § II.B.5. (Oct. 14, 1982). By 1982, however, the Commission recognized that the Staff’s narrow interpretation of the predecessor rule “may not serve the interests of the issuer’s security holders at large and may lead to an abuse of the security holder proposal process,” in particular by enabling proponents to argue “successfully on numerous occasions that a proposal may not be excluded as moot in cases where the company has taken most but not all of the actions requested by the proposal.” *Id.* Accordingly, the Commission proposed in 1982, and adopted in 1983, a revised interpretation of the rule to permit the omission of proposals that had been “substantially implemented.” See Exchange Act Release No. 20091, at § II.E.6. (Aug. 16, 1983) (the “**1983 Release**”) (indicating that the Staff’s “previous formalistic application of” the predecessor rule “defeated its purpose” because the interpretation allowed proponents to obtain a shareholder vote on an existing company policy by changing only a few words of the policy). The Commission later codified this revised interpretation in Exchange Act Release No. 40018 at n.30 (May 21, 1998). Accordingly, the actions requested by a proposal need not be “fully effected” by the company to be excluded; rather, to be excluded, they need only to have been “substantially implemented” by the company. See the 1983 Release.

Applying this standard, the Staff has noted that “a determination that the [c]ompany has substantially implemented the proposal depends upon whether [the company’s] particular policies, practices and procedures compare favorably with the guidelines of the proposal.”

⁵ See https://s2.q4cdn.com/470004039/files/doc_downloads/2021/08/2021_Apple_ESG_Report.pdf

⁶ See <https://www.apple.com/supplier-responsibility/pdf/How-We-Work-With-Suppliers.pdf>

⁷ See <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-Code-of-Conduct-and-Supplier-Responsibility-Standards.pdf>

Texaco, Inc. (avail. Mar. 28, 1991). Thus, when a company has already taken action to address the underlying concerns and essential objectives of a shareholder proposal, even though the company did not take the exact action requested by the proponent, did not implement the proposal in every detail, or exercised discretion in determining how to implement the proposal, the proposal has been “substantially implemented” and may be excluded. See, e.g., *PPG Industries Inc.* (avail. Jan. 16, 2020); *Bank of New York Mellon Corp.* (avail. Feb. 15, 2019); *Exelon Corp.* (avail. Feb. 26, 2010); *Exxon Mobil Corp.* (Burt) (avail. Mar. 23, 2009); *Anheuser-Busch Companies, Inc.* (avail. Jan. 17, 2007); *ConAgra Foods, Inc.* (avail. Jul. 3, 2006); *Talbots Inc.* (avail. Apr. 5, 2002); *Exxon Mobil Corp.* (avail. Jan. 24, 2001); and *The Gap, Inc.* (avail. Mar. 8, 1996).

The Staff has previously taken the position that a shareholder proposal requesting that a company’s board of directors prepare a report pertaining to environmental, social, or governance issues may be excluded when the company has provided information about the initiative in various public disclosures. See *Apple Inc.* (avail. Dec. 17, 2020) (concurring with the exclusion of a proposal requesting that the board of directors report to shareholders on the Company’s management systems and processes for implementing its human rights policy commitments regarding freedom of expression and access to information where the Company already disclosed the requested information in the Company’s Human Rights Policy, Business Conduct Policy, Transparency Report, Legal Process Guidelines, Supplier Code of Conduct, Supplier Responsibility Standards and 2020 Supplier Responsibility Progress Report, and other disclosures that addressed the requested information); *Apple Inc.* (avail. Dec. 17, 2020) (concurring with the exclusion of a proposal requesting that the board of directors prepare a report providing the board’s perspective whether the Company’s governance and management systems should be altered to fully implement the Business Round Table’s Statement of Purpose, where the Company disclosed governance and management systems consistent with the Statement of Purpose through its Company’s core values, Transparency Report, Supplier Code of Conduct, Supplier Responsibility Standards, Human Rights Policy, Business Conduct Policy, and other disclosures that addressed the requested information, and the Company’s Nominating and Corporate Governance Committee determined there was no need for further action to fully implement the Statement of Purpose); *PPG Industries Inc.* (avail. Jan. 16, 2020) (concurring with the exclusion of a proposal requesting that the board of directors prepare a report on the company’s processes for “implementing human rights commitments within company-owned operations and through business relationships,” where the requested information was already disclosed in the company’s global code of ethics, global supplier code of conduct, supplier sustainability policy, and sustainability report, and other disclosures that addressed the requested information); *The Wendy’s Company* (avail. Apr. 10, 2019) (concurring with the exclusion of a proposal requesting that the board of directors prepare a report “on the [c]ompany’s process for identifying and analyzing potential and actual human rights risks of operations and supply chain,” where the company already had a code of conduct for suppliers, a code of business conduct and ethics, and other policies and public disclosures concerning supply chain practices and other human rights issues that achieved the proposal’s essential objective); *The Dow Chemical Co.* (avail. Mar. 5, 2008) (concurring with the exclusion of a proposal requesting that the board of directors prepare a report discussing how the company’s efforts to ameliorate climate change have affected the global climate, where the company had already made statements about its efforts related to climate change in various corporate documents and disclosures); *Mondelez International, Inc.* (avail. Mar. 7, 2014) (concurring that a proposal urging the board of directors to prepare a report on the company’s process for identifying and analyzing potential and actual human rights risks in its operations and supply

chain was substantially implemented through relevant information on the company’s website); and *The Gap, Inc.* (avail. Mar. 16, 2001) (concurring that a proposal requesting that the board of directors prepare a report on child labor practices of company suppliers was substantially implemented when the company published information on its website with respect to the company’s vendor code and monitoring programs).

B. The Company’s Publicly-Disclosed Policies, Procedures and Reports Substantially Implement the Proposal

Apple is committed to treating everyone with dignity and respect and to protecting the planet we all share. As further described below, Apple provides comprehensive public disclosure across multiple policies and reports describing the extent to which its policies and procedures effectively protect workers in its supply chain from forced labor. As noted in Apple’s Supplier Code and 2020 Statement, Apple has zero tolerance for forced labor and looking for the presence of forced labor is part of every assessment Apple conducts in every country where it does business.⁸ These protections apply to all workers in Apple’s supply chain, regardless of a person’s job, and any violation of Apple’s policies has immediate consequences, including possible business termination. This principle is echoed in the Company’s Supplier Standards and numerous other publicly-disclosed policies. **As a result of these efforts, Apple found no evidence of forced labor in its supply chain in 2020.**

1. The Company Already Reports on the Extent to which its Policies and Procedures Effectively Protect Workers in its Supply Chain From Forced Labor

Proposal Request
Report on “the extent to which Apple’s policies and procedures effectively protect workers in its supply chain from forced labor.”
Key Responsive Disclosures
See 2020 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chain, People and Environment in Our Supply Chain: 2021 Annual Progress Report ,and 2020 Supplier Responsibility Progress Report .

See 2020 Statement at pages 6, 7 and 11. Apple annually reports on the extent to which its policies and procedures effectively protect workers in its supply chain from forced labor. The 2020 Statement is Apple’s most recent annual statement on its efforts to combat human trafficking and slavery in its business and supply chains. The statement describes Apple’s governance structure and internal management system to enforce compliance with its policies to prevent human trafficking and the use of involuntary labor, and to implement supply chain human rights due diligence programs. Most recently, Apple reported in the 2020 Statement in a section entitled “Evaluating the Risk of Forced Labor,” that “[l]ooking for the presence of forced labor is part of every supplier assessment, and any violations of our policies carry immediate consequences, up to and including our termination of our business relationship with a supplier. These protections apply across our supply chain, regardless of a person’s job or location.” Apple disclosed that it had reviewed its worldwide manufacturing supply chain for forced labor risks in

⁸ See <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-Code-of-Conduct-and-Supplier-Responsibility-Standards.pdf> and <https://www.apple.com/supplier-responsibility/pdf/Apple-Combat-Human-Trafficking-and-Slavery-in-Supply-Chain-2020.pdf>.

2020 and was able to conduct independent, third-party assessments at supplier sites in multiple countries, which verified key documentation, investigated hiring practices and conducted extensive interviews with workers in local languages. **Apple reported that there were no findings of forced or debt-bonded labor in Apple’s supply chain in 2020.**

See 2021 Progress Report at pages 89-90 and 2020 Progress Report at page 104.

In the 2021 Progress Report, Apple states that forced labor and debt-bonded labor are examples of Core Violations of Apple’s Supplier Code of Conduct. The 2021 Progress Report disclosed, “[i]n 2020, 9 Core Violations were found ... related to the labor, human rights and environment sections of our assessment protocol. These included 7 instances of working hours or labor data falsification, 1 wastewater violation, and 1 air emissions violation.” Apple found no violations relating to forced or debt-bonded labor in 2020. In the 2020 Progress Report, Apple reported that in 2019 it found 12 Core Violations related to labor and human rights, one of which was a debt-bonded labor violation. Apple found no evidence of any forced labor violations in 2019.

See 2021 Progress Report at pages 18, 33 and 2020 Statement at pages 10-11. As

disclosed in the Company’s 2021 Progress Report, Apple’s findings regarding the Core Violations that occurred in 2020 were the result of: (i) a total of 1,121 assessments, which included 842 Supplier Code and Supplier Standards compliance assessments conducted across manufacturing sites, smelters and refiners and (ii) more than 100 unannounced assessments and investigations where the supplier facility was provided no advance notice. Apple also interviewed over 57,000 supply chain workers, and over 34,000 follow-up phone calls were made to verify zero-retaliation against those workers for participating in interviews during its assessments.

The foregoing public reporting directly addresses the Proposal’s request to report on the extent to which Apple’s policies and procedures effectively protect workers in its supply chain from forced labor.

Apple’s Board of Directors oversees management in the competent and ethical operation of Apple on a day-to-day basis. As part of the Board’s oversight of corporate and product strategy, the Board and its committees review and discuss with management Apple’s strategies and progress relating to the Company’s values, including supplier responsibility and management’s program to implement and monitor compliance with the Supplier Code and the Supplier Standards and report on Apple’s progress.

2. The Company Already Reports on the Extent to which it has Identified Suppliers and Sub-Suppliers that are at Significant Risk for Forced Labor Violations

Proposal Request
Report on “the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations.”
Key Responsive Disclosures
See People and Environment in Our Supply Chain: 2021 Annual Progress Report, 2020 Supplier Responsibility Progress Report, 2021 Environmental Social and Governance Report, and 2020 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chain.

See 2021 Progress Report at pages 9, 19-20, and 100. The process of identifying suppliers and sub-suppliers that are at significant risk for forced labor violations begins before a new supplier is even able to enter into the Company's supply chain. The Company closely evaluates the labor and human rights risks associated with any prospective supplier before entering into a contract with that supplier. Apple selects suppliers for assessment based on a number of factors, including previous audit performance, manufacturing process risks, and planned spending. In 2020, 8 percent of prospective suppliers evaluated for risks related to the Company's Supplier Code of Conduct, including forced labor risks, were prevented from entering Apple's supply chain. The Company also conducts Facility Readiness Assessments, which are designed to help make sure risks to people are mitigated prior to the beginning of production. In 2020, the Company completed 112 Facility Readiness Assessments. Facility Readiness Assessments are designed to help make sure risks to people and the environment are mitigated prior to the beginning of production, including for new suppliers, as well as new facilities run by existing suppliers. With respect to risks related to sourcing of raw materials deeper in the supply chain, the Apple Risk Readiness Assessment, which Apple developed in 2016 to assess risks in its supply chain across social, environmental, and human rights metrics, was adapted by the Responsible Minerals Initiative in 2020, and integrated into their industry-scale Responsible Minerals Assurance Process.

See 2020 Progress Report at pages 18-19 and 2021 Progress Report at pages 37 and 39. Apple has further reported that it identifies suppliers and sub-suppliers that are at significant risk for forced labor violations by mapping the higher-risk migration corridors for foreign contract workers in its supply chain using its own data and information from the International Labor Organization and the U.S. State Department in order to more deeply understand the challenges at the source of labor recruitment. If an Apple supplier uses foreign contract workers, a specialized labor and human rights assessment is conducted in the employees' native language. Apple reported that in 2020, it conducted the most extensive mapping of labor agencies in the industry, mapping 400 of its supplier facilities in 10 countries. As a result, Apple identified more than 470 labor agencies supporting these suppliers. Further, Apple monitored 10 countries of origin and five destination countries for migration risk in order to help identify suppliers at significant risk for forced labor violations. Apple has also partnered with the Responsible Business Alliance ("**RBA**") and the International Organization for Migration to roll out Apple's Responsible Recruitment Due Diligence Toolkit to scale impact across Apple's supply chain and beyond.

See 2021 ESG Report at pages 38 and 55 and 2020 Statement at page 6. In addition, Apple supplements its own assessment protocol with the RBA's Validated Assessment Program, a third-party assessment widely used by the industry. Apple-managed assessments covered a cumulative total of 94% of Apple's direct manufacturing spend based on assessments conducted since 2007.

In addition to the Company's own internal monitoring, risk reports come to the Company from civil society organizations, news outlets, people in the supply chain or supply chain communities, local whistleblower mechanisms, and third-party hotlines. They also come through the reporting mechanisms made available directly to all supplier employees, Apple employees, and the general public. These reports can come to the Company in any language and can be anonymous. When the Company receives a report about an Apple supplier through any of these channels, the Company conducts a thorough investigation and may also dispatch on-site

independent investigation teams. If a violation is discovered, a corrective action plan is immediately put in place, requiring violations to be remediated within 90 days.

See 2020 Statement at pages 5 and 7. In 2020, Apple further expanded its requirements regarding suppliers’ material sourcing and labor recruitment practices which are evaluated in the above-described assessments. Specifically, Apple suppliers may not have manufacturing operations in, recruit labor directly or indirectly from, or source materials, products, or services directly or indirectly from regions where Apple and third-parties cannot access and conduct comprehensive, independent evaluations of their suppliers’ compliance with the Company’s Supplier Code and Supplier Standards.

These comprehensive due diligence practices facilitate the identification of suppliers at risk of forced labor violations. As a result of these efforts, as disclosed in the Company’s 2020 Statement, “[i]n 2020, there were no findings of forced or debt-bonded labor in Apple’s supply chain.”

Accordingly, the Company has already disclosed the extent to which it has identified suppliers and sub-suppliers at risk of forced labor violations and thus Apple has substantially implemented this precise request contained in the Proposal.

3. The Company Already Reports on the Number of Suppliers Against which Apple has Taken Corrective Action Due to Such Violations

Proposal Request
Report on “the number of suppliers against which Apple has taken corrective action due to such violations.”
Key Responsive Disclosures
See People and Environment in Our Supply Chain: 2021 Annual Progress Report, 2020 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chain, and 2020 Supplier Responsibility Progress Report.

See 2021 Progress Report at page 89 and 2020 Statement at page 7. As discussed above, the 2021 Progress Report disclosed, “[i]n 2020, 9 Core Violations were found ... related to the labor, human rights and environment sections of our assessment protocol. These included 7 instances of working hours or labor data falsification, 1 wastewater violation, and 1 air emissions violation.” Apple found no violations relating to forced or debt-bonded labor in 2020. This finding was echoed in the 2020 Statement, in which Apple reported that there were no findings of forced or debt-bonded labor in Apple’s supply chain in 2020. As a result, it was not necessary to take any corrective action toward any suppliers as a result of forced labor violations in 2020.

See 2021 Progress Report at pages 89-90. While there were no findings of forced labor, as an example of how Apple has taken corrective action with respect to a supplier in a different context, the 2021 Progress Report describes how, in 2020, an Apple employee raised concerns about a potential Supplier Code violation at a supplier facility. Apple promptly investigated and found that the supplier had violated the Supplier Code in its administration of a student work-study program. Apple placed the supplier on probation, and the supplier received no new business from Apple until it completed all required corrective actions. Apple then facilitated remedies for the affected individuals.

See 2021 Progress Report at page 21. The 2021 Progress Report also describes how Apple assesses potential new suppliers before they are awarded business, so that compliance issues can be addressed before entering into a business relationship. In one example described in the 2021 Progress Report, this process resulted in nearly \$3.4 million being repaid to 10,570 workers after it was determined that a prospective supplier had been charging fees to foreign contract workers.

See 2020 Progress Report at pages 89 and 104. In the 2020 Progress Report, Apple reported that, in 2019, it found 12 Core Violations related to labor and human rights, one of which was a debt-bonded labor violation. On page 89 of the 2020 Progress Report, Apple stated that “[i]f a violation is discovered, a Corrective Action Plan is immediately put in place, requiring issues to be remedied within 90 days.” As a result, Apple reported that, in 2019, it took corrective action against one supplier due to forced labor violations.

The Company’s foregoing public disclosures already report on the number of suppliers against which it has taken corrective action due to forced labor violations. As a result, the Company has substantially implemented this specific request contained in the Proposal.

4. The Company Already Reports on the Availability and Use of Grievance Mechanisms to Compensate Affected Workers

Proposal Request
Report on “the availability and use of grievance mechanisms to compensate affected workers.”
Key Responsive Disclosures
See People and Environment in Our Supply Chain: 2021 Annual Progress Report , How We Work With Suppliers, 2020 Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chain, Supplier Code of Conduct, and Supplier Responsibility Standards.

Apple’s 2021 Progress Report, How We Work With Suppliers, 2020 Statement, Supplier Code and Supplier Standards describe in detail the availability and use of non-retaliation protections and grievance mechanisms to compensate workers affected by forced labor violations. These existing disclosures provide an extensive description of the resources the Company makes available to workers who have been subject to forced labor violations and demonstrate that Apple has substantially implemented the Proposal’s final request.

See 2021 Progress Report at pages 33-34, 89 and 110. The Company’s Supplier Code and Supplier Standards require non-retaliation protection and feedback channels, including grievance mechanisms at all supplier sites. These include third-party anonymous hotlines and the ability to contact the Apple Environment and Supply Chain Innovation team directly at any time and in any language. Supplier management is required to immediately investigate and to resolve the issue in a timely manner when an issue is raised.

Retaliation in any form is a Core Violation of the Supplier Code — the most serious level of violation — and carries commercial penalties. As noted above, the 9 Core Violations found in 2020 related to the labor, human rights and environment sections of our assessment protocol included 7 instances of working hours or labor data falsification, 1 wastewater violation, and 1 air emissions violation. There were no Core Violations related to retaliation or forced labor in 2020. In 2020, Apple interviewed 57,618 supply chain workers, and over 34,000 follow-up phone calls

were made to verify that those workers who participated in interviews during the Company's assessment were not retaliated against.

See How We Work with Suppliers at page 9 and 2020 Statement at pages 13-14.

If a supplier violates the Supplier Code and engages in forced labor practices, the supplier must not only address the specific core violation; the supplier (i) must also make changes in its management system that address the root causes of the violation, (ii) take and sustain preventative measures to ensure the violation does not reoccur, and (iii) most importantly, provide remedies to affected workers in line with the UN Guiding Principles on Business and Human Rights (as discussed further below).

See Supplier Code at pages 3 and 5, Supplier Standards at pages 44-45, and 2021 Progress Report at page 110. The Company's Supplier Code mandates that all suppliers ensure that workers have an effective mechanism to report grievances and facilitate open timely communication between management and workers.

The Supplier Standards articulate the specific grievance mechanisms that the Company's suppliers must implement in order to conduct business with Apple. Specifically, Apple mandates the following:

- Written Policy: Suppliers must have a written policy that details written procedures that address the grievance system requirements specified in applicable law and regulations as well as the Company's Supplier Code and Supplier Standards. The Supplier Standards underscore that each supplier must comply with its written policies and procedures at all times. Moreover, all suppliers must identify the responsible individual(s) to oversee and enforce the implementation of the grievance system policy and procedures.
- Non-Harassment and Non-Retaliation: No worker or prospective worker at a supplier shall be subject to dismissal, discrimination, harassment, blacklisting, intimidation, retaliation, or other employment decision for raising in good faith any issue, suggestion, complaint, or grievance to a supervisor, management, or participating in any way in the investigation or processing of one. All cases must be investigated, treated confidentially, and assured protection from any form of retaliation. All confirmed cases must be remedied.
- Grievance Systems:
 - Grievance Process: Suppliers must implement effective and accessible grievance processes for all workers. Grievance processes shall be documented and, at a minimum, comprise: (i) step-by-step processes by which complaints are reported, processed, and investigated; (ii) an appeal procedure by which any party that is not satisfied with the resolution may appeal the result of the investigation to a party not involved in the decision being appealed; (iii) multiple channels for workers to raise concerns and provide input to management, including the ability, subject to applicable laws and regulations, to raise concerns confidentially and anonymously without fear of retaliation; and (iv) identification, development, and implementation of plans to respond to broader/systemic issues raised by

workers through the grievance process coupled with metrics-based evaluation of the effectiveness of improvements undertaken.

- Grievance Tracking: Suppliers must maintain a grievance record system that includes, but is not limited to: (i) tracking the types and number of grievances; (ii) channels through which a grievance was reported; (iii) investigation reports including names and titles of persons involved in the investigation process; (iv) associated resolutions and appeals; (v) improvements undertaken; (vi) feedback provided to workers regarding resolutions; (vii) time taken to resolve grievances; (viii) worker satisfaction with resolutions; and (ix) efforts to make information about the grievance and its resolution available to all workers and their representatives in a manner consistent with the policy on confidentiality.
- Topical Grievance Handling: Grievance systems must include, amongst other things, specific channels for resolving issues related to prevention of involuntary labor, foreign contract workers protections, and prevention of underage labor.
- Training and Communication: Suppliers must have a process to communicate to workers, supervisors, and management the requirements with respect to its grievance mechanisms and systems. Furthermore, suppliers must “have documented processes by which to have a dialogue with [its] [w]orkers about concerns, including the design and functioning of the [g]rievance mechanism and specific [g]rievances raised by [its] [w]orkers.”
- Documentation: Suppliers “shall retain documentation related to grievance management” and “all documentation shall be made available to Apple for review upon its request.”

See 2020 Statement at page 14 and 2021 Progress Report at page 37. Apple has also publicly reported on the use of these grievance mechanisms to compensate affected workers for forced labor violations. As discussed on page 14 of the 2020 Statement, when Apple discovers violations of debt-bonded labor, it requires the supplier to provide a direct remedy to affected workers. Since 2008, \$32.4 million in recruitment fees have been repaid to 36,980 foreign contract workers by Apple’s suppliers. The 2021 Progress Report on page 37 further reported that, in 2020, \$177,277 of recruitment fees were repaid to 381 supplier employees. Reimbursement amounts are based on the range of fees identified through worker interviews and cross-verification with applicable labor agencies or the supplier. 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. Finally, Apple conducts verification of all repayments through third-party auditors.

In sum, the Company’s existing disclosures as summarized above detail the availability and use of grievance mechanisms to compensate workers affected by forced labor violations, and therefore the Company has substantially implemented this specific request of the Proposal.

C. Staff Precedent Concurring with the Exclusion of Similar Shareholder Proposals Supports the Company's No-Action Request.

Where a company has demonstrated that it has already taken actions to address the underlying concerns and essential objectives of a shareholder proposal, the Staff has concurred that the proposal has been "substantially implemented" and may be excluded. As discussed in Section II.A of this letter, the Staff has permitted differences between a company's actions and a shareholder proposal if the company's actions sufficiently address the proposal's essential objectives, even when the company did not take the exact action requested by the proponent, did not implement the proposal in every detail or exercised discretion in determining how to implement the proposal. See e.g., *PPG Industries Inc.* (avail. Jan. 16, 2020). This is also the case where a proposal calls for the preparation of a report and where the company's responsive existing disclosures are contained in a number of separate, existing reports and documents. See, e.g., *Apple Inc.* (avail. Dec. 17, 2020).

Here, the underlying concerns and essential objectives of the Proposal are that the Company publicly disclose the extent to which Apple's policies and procedures effectively protect workers in its supply chain from forced labor. As detailed above, Apple has publicly released a number of reports and policies that contain extensive disclosures about the extent to which its policies and procedures effectively protect workers in its supply chain from forced labor. These existing reports and policies include Apple's 2021 Progress Report, 2021 ESG Report, 2020 Progress Report, 2020 Statement, Supplier Code, Supplier Standards, and How We Work With Suppliers. As a result of these existing disclosures, Apple has substantially implemented the Proposal's underlying concerns and essential objectives and, were the Proposal to be voted upon by shareholders at the Annual Meeting and pass, there is nothing further that would need to be included in the report requested by the Proposal.

III. Conclusion.

For the reasons described above, it is the Company's view that it may exclude the Proposal from its Proxy Materials pursuant to Rule 14a-8(i)(10) because it has already substantially implemented the Proposal. We request that the Staff concur or, alternatively, confirm that the Staff will not recommend any enforcement action to the Commission if the Company so excludes the Proposal.

* * * *

If the Staff does not concur with the Company's position, we would appreciate an opportunity to confer with the Staff concerning this matter prior to the determination of the Staff's final position. In addition, the Company requests that the Proponents copy the undersigned on any response they may choose to make to the Staff, pursuant to Rule 14a-8(k).

Please contact the undersigned at (408) 966-1010 or by email at sam_whittington@apple.com to discuss any questions you may have regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'S JUL' followed by a long horizontal flourish.

Sam Whittington
Assistant Secretary

Enclosures

cc: SumOfUs
Jenna Cooper, Latham & Watkins LLP

Exhibit A

Copy of the Proposal and Supporting Statement and Related Correspondence

Copy of the Proposal and Supporting Statement

RESOLVED that shareholders of Apple, Inc. (“Apple”) ask the Board of Directors to oversee the preparation of a report, at reasonable cost and omitting confidential and proprietary information, on the extent to which Apple’s policies and procedures effectively protect workers in its supply chain from forced labor, including the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations, the number of suppliers against which Apple has taken corrective action due to such violations, and the availability and use of grievance mechanisms to compensate affected workers. The report should be posted to Apple’s website.

SUPPORTING STATEMENT

Apple relies on over 200 suppliers¹ globally for product components. These suppliers and sub-suppliers may be at significant risk for forced labor if they have facilities in areas with a high risk of forced labor, or source inputs from such areas.

Apple’s Code of Conduct (2005) lists forced labor as a ‘core violation’ of its policy, with suppliers required to ‘ensure that all work is voluntary’ and prohibited from “traffic[ing] persons or us[ing] any form of slave, forced, bonded, indentured, or prison labor.’ The Code also states suppliers must undertake due diligence and allow Apple access to their facilities to evaluate suppliers and sub-suppliers’ compliance.²

Apple’s Human Rights Policy (2020) states its desire ‘to be a force for good in the lives of people in our supply chain’, and asserts that Apple works ‘hand in hand with our suppliers to ensure that every workplace provides a safe and respectful environment for everyone’.³

It has been reported that at least nine⁴ companies in Apple’s supply chain participate in the government of China’s forced labor program. Reports suggest that Apple severed ties with Ofilm Group over allegations that it’s involved in that program.

Following evidence since 2017 of millions of Uyghurs and other Turkic Muslims being forced into internment camps and related labour programs⁵, the Parliaments of the UK and Canada and the US State Department recognized this as a genocide.⁶

¹ <https://www.investopedia.com/articles/investing/090315/10-major-companies-tied-apple-supply-chain.asp>

² <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-Code-of-Conduct-and-Supplier-Responsibility-Standards.pdf> p9&16

³ https://s2.q4cdn.com/470004039/files/doc_downloads/gov_docs/Apple-Human-Rights-Policy.pdf p2

⁴ <https://appleinsider.com/articles/21/05/10/seven-apple-suppliers-linked-to-chinese-forced-labor-programs>; <https://www.bloomberg.com/news/articles/2021-03-17/shares-of-china-s-ofilm-drop-after-firm-loses-foreign-customer>; <https://www.theverge.com/2020/12/29/22204920/lens-technology-uyghur-forced-labor-xinjiang-amazon-apple-tesla>

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⁶ <https://www.cnn.com/2021/04/22/world/uk-china-uyghur-genocide-motion-gbr-intl/index.html>

US Congress is actively working to pass legislation to create a 'rebuttable presumption' that goods from the Uyghur region are made with forced labor and will be prohibited from entering the US unless 'clear and convincing' evidence can be shown to the contrary.⁷

The proposed report is intended to mitigate this regulatory risk, given Apple's dependence on suppliers operating under a government accused of genocide.

We urge shareholders to vote for this Proposal.

⁷ <https://mcgovern.house.gov/news/documentsingle.aspx?DocumentID=398673>

Copy of Related Correspondence

On Tue, Aug 24, 2021 at 2:07 PM Jane M Hussein Saks <janemsaks@gmail.com> wrote:

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 14a-8, cover letter and proof of ownership. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 415 960 7920.

Best regards,
Jane M. Saks



Jane M. Saks
President & Artistic Director, Project&
773 294.5262
Co-Founder/Co-Artistic Director
Monuments to Movements
M2M: In the House of Radical
Feminist Practices

**Do not be daunted by the
enormity of the world's grief.
Do justly, now. Love mercy,
now. Walk humbly, now. You
are not obligated to complete
the work, but neither are you
free to abandon it.**

-- The Talmud

**"Art urges voyages - and it is
easier to stay at home."**

-- Gwendolyn Brooks

**"Artists are here to disturb
the peace."**

--- James Baldwin

**"...there are only hints and
guesses, hints followed by
guesses..." -- *Four***

***Quartets*, by TS Eliot**

From: Jane M Hussein Saks <janemsaks@gmail.com>

Subject: Re: Shareholder proposal for 2022 annual general meeting of shareholders

Date: August 24, 2021 at 12:09:58 PDT

To: shareholderproposal@apple.com

My apologies, please find the shareholder proposal attached here.

Best

Jane M. Saks

&-

Jane M. Saks
President & Artistic Director, Project&
773 294.5262
Co-Founder/Co-Artistic Director
Monuments to Movements
M2M: In the House of Radical
Feminist Practices

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**"....there are only hints and
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guesses..." -- *Four
Quartets*, by TS Eliot**

**Jane M. Saks
2610 N. Sawyer Ave.
Chicago IL 60647**

August 23, 2021

Via email

Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

Attn: Katherine Adams, Corporate Secretary

Re: Shareholder proposal for 2022 Annual Shareholder Meeting

Dear Ms Adams,

I am submitting the attached proposal (the “Proposal”) pursuant to the Securities and Exchange Commission’s Rule 14a-8 to be included in the proxy statement of Apple Inc (the “Company”) for its 2022 annual meeting of shareholders. I am co-filing the Proposal with lead filer Jane Saks. In her submission letter, Jane Saks will provide dates and times of ability to meet. I designate the lead filer to meet initially with the Company but may join the meeting subject to my availability.

I have continuously beneficially owned, for at least one year as of the date hereof, at least \$25,000 of the Company’s common stock. Verification of this ownership will be sent under separate cover. I intend to continue to hold such shares through the date of the Company’s 2022 annual meeting of shareholders.

Please send future correspondence and communications regarding this proposal to my representative Vicky Wyatt, at vicky@sumofus.org or +1 415 960 7920.

Sincerely,
Jane M. Saks



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⁴ <https://appleinsider.com/articles/21/05/10/seven-apple-suppliers-linked-to-chinese-forced-labor-programs>; <https://www.bloomberg.com/news/articles/2021-03-17/shares-of-china-s-ofilm-drop-after-firm-loses-foreign-customer>; <https://www.theverge.com/2020/12/29/22204920/lens-technology-uyghur-forced-labor-xinjiang-amazon-apple-tesla>

⁵ <https://edition.cnn.com/interactive/2020/02/asia/xinjiang-china-karakax-document-intl-hnk/>

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Katherine Adams, Corporate Secretary Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

August 24, 2021

RE: Verification of Deposit – Standard

Important Notice

This is in response to the Verification of Deposit (VOD) request for the Merrill Lynch account of Jane M. Saks. Details appear below.

Account Type	CMA
Account Number	XXX-XX PII
Value as of Date (Close of Business (COB))	08/23/2021
Total Portfolio Value*	\$25,000

If checked, the portfolio value provided represents an average balance.

*This total is as of COB on the listed date. However, the balance provided is monthly/quarterly as Merrill Lynch does not maintain daily balance records. It includes Money Fund shares/balances, marginable/non-marginable securities, and outstanding loans. If an average balance is requested, it is calculated based upon the monthly/quarterly balance.

Comments

Concerning a shareholder proposal (the "Proposal") submitted to Apple Inc (the "Company") by Jane M. Saks.

As of August 23, 2021, Jane M. Saks beneficially owned, and had beneficially owned continuously for at least one year, shares of Apple Corporation common stock worth at least \$25,000 (the "Shares").

Merrill Lynch is a DTC participant.



Signature of Merrill Lynch Branch Office Management Team (OMT)

Michael Northcott
Printed Name

8-24-21
Date

714-431-4072
Phone Number

Please be advised our cash management account program permits account holders to access the assets in the account by Visa card and checks, which are drawn and processed against a Merrill Lynch account maintained for the customer at Bank of America, N.A. However, the account holder does not maintain a depository balance at that bank. The information provided above may change daily due to activity in the account and/or changes in market value of assets held in the account. This information is provided as a courtesy and Merrill Lynch is not liable or responsible for any decisions made, in whole or in part, on reliance upon this information.

This information is furnished to you in strict confidence in response to your request and is solely for your use for the purposes described in the Verification of Deposit request. If you have any questions, please contact the person whose signature appears above at the phone number provided. This information is provided as a courtesy and Merrill Lynch is not liable or responsible for any decisions made, in whole or part, on reliance upon this information.

L-03-19

Merrill Lynch makes available products and services offered by Merrill Lynch, Pierce, Fenner & Smith Incorporated ("MLPF&S") and other subsidiaries of Bank of America Corporation ("BofA Corp."). Merrill Edge is available through MLPF&S, and consists of the Merrill Edge Advisory Center (investment guidance) and self-directed online investing. MLPF&S is a registered broker-dealer, Member SIPC and a wholly owned subsidiary of BofA Corp.

Banking products are provided by Bank of America, N.A., and affiliated banks, Members FDIC and wholly owned subsidiaries of BofA Corp.

Investment products:

Are Not FDIC Insured	Are Not Bank Guaranteed	May Lose Value
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MLPF&S is a registered broker-dealer, registered investment adviser and Member SIPC.

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From: Jane M Hussein Saks <janemsaks@gmail.com>

Subject: Re: Shareholder proposal for 2022 annual general meeting of shareholders

Date: August 25, 2021 at 10:09:05 PDT

To: shareholderproposal@apple.com

Dear Corporate Secretary,

Please find attached a new proof of ownership that covers the date of submission, 24th August. I'd also like to confirm that I am the lead filer for the Proposal and will be joined by other shareholders as co-filers.

Best

Jane M. Saks

&-

Jane M. Saks
President & Artistic Director, Project&
773 294.5262
Co-Founder/Co-Artistic Director
Monuments to Movements
M2M: In the House of Radical
Feminist Practices

-

**Do not be daunted by the
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neither are you free to
abandon it.
-- The Talmud**

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-- Gwendolyn Brooks**

**"Artists are here to disturb
the peace."
--- James Baldwin**

**"....there are only hints and
guesses, hints followed by
guesses..." -- *Four
Quartets*, by TS Eliot**

On Tue, Aug 24, 2021 at 2:17 PM Jane M Hussein Saks <janemsaks@gmail.com> wrote:

Dear Corporate Secretary,

As a final follow-up. I would be able and willing to meet with you on September 6, 7, or 8th, 2021 between 2-4pm EST.

All the best,
Jane M. Saks

&-
Jane M. Saks
President & Artistic Director, Project
773 294.5262
Co-Founder/Co-Artistic Director
Monuments to Movements
M2M: In the House of Radical
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■

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Quartets*, by TS Eliot**

On Tue, Aug 24, 2021 at 2:09 PM Jane M Hussein Saks <janemsaks@gmail.com> wrote:

From: Mary Hawkins <me@maryhawkins.com>
Subject: Shareholder proposal for 2022 annual general meeting of shareholders
Date: August 26, 2021 at 12:19:06 PDT
To: shareholderproposal@apple.com

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 14a-8 and cover letter. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact my representative, Vicky Wyatt, at vicky@sumofus.org or +1 (415) 960-7920

Best regards,
Mary

--

Mary Hawkins

art director, animator + designer

me@maryhawkins.com • 212.533.5312

maryhawkins.com • marylikespostcards.com

pronouns: she/her

Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

4.9.2021

Attn: Katherine Adams, Corporate Secretary

Re: Shareholder proposal for 2022 Annual Shareholder Meeting

Dear Ms Adams,

I am submitting the attached proposal (the "Proposal") pursuant to the Securities and Exchange Commission's Rule 14a-8 to be included in the proxy statement of Apple Inc (the "Company") for its 2022 annual meeting of shareholders. I am co-filing the Proposal with lead filer Jane M. Saks. In her submission letter, Jane Saks will provide dates and times of ability to meet. I designate the lead filer to meet initially with the Company but may join the meeting subject to my availability.

I have continuously beneficially owned, for at least two years as of the date hereof, at least 500 shares of the Company's common stock. Verification of this ownership will be sent under separate cover. I intend to continue to hold such shares through the date of the Company's 2022 annual meeting of shareholders.

Please send future correspondence and communications regarding this proposal to my representative Vicky Wyatt, at vicky@sumofus.org or +1 (415) 960-7920.

Sincerely,
Mary Hawkins



Mary Hawkins
33-39 80th Street Apt 2
Jackson Heights, NY 11372

RESOLVED that shareholders of Apple, Inc. (“Apple”) ask the Board of Directors to oversee the preparation of a report, at reasonable cost and omitting confidential and proprietary information, on the extent to which Apple’s policies and procedures effectively protect workers in its supply chain from forced labor, including the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations, the number of suppliers against which Apple has taken corrective action due to such violations, and the availability and use of grievance mechanisms to compensate affected workers. The report should be posted to Apple’s website.

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It has been reported that at least nine⁴ companies in Apple’s supply chain participate in the government of China’s forced labor program. Reports suggest that Apple severed ties with Ofilm Group over allegations that it’s involved in that program.

Following evidence since 2017 of millions of Uyghurs and other Turkic Muslims being forced into internment camps and related labour programs⁵, the Parliaments of the UK and Canada and the US State Department recognized this as a genocide.⁶

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US Congress is actively working to pass legislation to create a 'rebuttable presumption' that goods from the Uyghur region are made with forced labor and will be prohibited from entering the US unless 'clear and convincing' evidence can be shown to the contrary.⁷

The proposed report is intended to mitigate this regulatory risk, given Apple's dependence on suppliers operating under a government accused of genocide.

We urge shareholders to vote for this Proposal.

⁷ <https://mcgovern.house.gov/news/documentsingle.aspx?DocumentID=398673>

From: "neville.austin neville.austin" [REDACTED] PII
Date: August 27, 2021 at 12:17:22 PDT
To: shareholderproposal <shareholderproposal@apple.com>
Cc: vicky <vicky@sumofus.org>
Subject: Shareholder proposal for 2022 annual general meeting of shareholders
Reply-To: "neville.austin neville.austin" [REDACTED] PII

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 14a-8 and cover letter. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920.

Best regards,

Neville Austin

Neville Austin
PII



August 27, 2021

Via email

Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

Attn: Katherine Adams, Corporate Secretary

Re: Shareholder proposal for 2022 Annual Shareholder Meeting

Dear Ms Adams,

I am submitting the attached proposal (the “Proposal”) pursuant to the Securities and Exchange Commission’s Rule 14a-8 to be included in the proxy statement of Apple Inc. (the “Company”) for its 2022 annual meeting of shareholders. I am co-filing the Proposal with lead filer Jane M. Saks. In her submission letter, Jane Saks will provide dates and times of ability to meet. I designate the lead filer to meet initially with the Company but may join the meeting subject to my availability.

I have continuously beneficially owned, for at least one year as of the date hereof, at least \$25,000 worth of the Company’s common stock. Verification of this ownership will be sent under separate cover. I intend to continue to hold such shares through the date of the Company’s 2022 annual meeting of shareholders.

Please send future correspondence and communications regarding this proposal to my representative Vicky Wyatt, at vicky@sumofus.org or +1 (415) 960-7920.

Sincerely,

Neville Austin

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From: Mary Hawkins <me@maryhawkins.com>
Date: August 30, 2021 at 06:46:20 PDT
To: SHAREHOLDERPROPOSAL@apple.com
Subject: Re: Shareholder proposal for 2022 annual general meeting of shareholders

Dear Corporate Secretary,

Please find attached a letter of proof of ownership of my shares in Apple Inc. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920

Best regards,
Mary

On Thu, Aug 26, 2021 at 3:19 PM Mary Hawkins <me@maryhawkins.com> wrote:

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 14a-8 and cover letter. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact my representative, Vicky Wyatt, at vicky@sumofus.org or +1 (415) 960-7920

Best regards,
Mary

--

Mary Hawkins
art director, animator + designer

me@maryhawkins.com • 212.533.5312
maryhawkins.com • marylikespostcards.com
pronouns: she/her

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Mary Hawkins
art director, animator + designer

me@maryhawkins.com • 212.533.5312
maryhawkins.com • marylikespostcards.com
pronouns: she/her



08/27/2021

Mary Hawkins
3339 80th St Apt 2
Jackson Heights, NY 11372

Katherine Adams
Corporate Secretary
Apple Inc.
One Apple Park WayMS 169-5GC
Cupertino, CA 95014

Re: Shareholder proposal for Mary Hawkins TD Ameritrade Account Ending **PII**

Dear Mary Hawkins,

Thank you for allowing me to assist you today. I am writing concerning a shareholder proposal for Mary Hawkins to be submitted to Apple Inc. As of the start of business on August 26th, 2021, Mary Hawkins had owned 500 shares of AAPL stock since the close of business on November 27th, 2020. As of the close of business on August 26th, 2021, the shares were valued at approximately \$73,700.00.

If we can be of any further assistance, please let us know. Just log in to your account and go to Client Services > Message Center to write us. You can also call Client Services at 800-669-3900. We're available 24 hours a day, seven days a week.

Sincerely,

A handwritten signature in black ink that reads 'Alyssia Gustafson'.

Alyssia Gustafson
Resource Specialist
TD Ameritrade

This information is furnished as part of a general information service and TD Ameritrade shall not be liable for any damages arising out of any inaccuracy in the information. Because this information may differ from your TD Ameritrade monthly statement, you should rely only on the TD Ameritrade monthly statement as the official record of your TD Ameritrade account.

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TDA 101516 02/21

From: Jeff Perk [REDACTED] PII
Subject: Shareholder proposal for 2022 annual general meeting of shareholders
Date: August 31, 2021 at 10:51:42 PDT
To: shareholderproposal@apple.com
Cc: Vicky Wyatt <vicky@sumofus.org>

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 14a-8 and cover letter. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920

Sincerely yours,

Jeff Perk
Apple shareholder since 1996

Jeff Perk

PII

Via email

Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

Attn: Katherine Adams, Corporate Secretary

Re: Shareholder proposal for 2022 Annual Shareholder Meeting

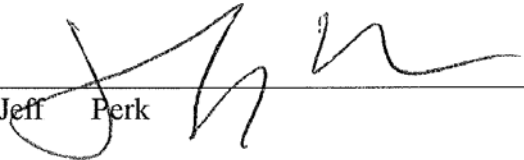
Dear Ms. Adams,

I am submitting the attached proposal (the "Proposal") pursuant to the Securities and Exchange Commission's Rule 14a-8 to be included in the proxy statement of Apple Inc (the "Company") for its 2022 annual meeting of shareholders. I am co-filing the Proposal with lead filer Jane M. Saks. In her submission letter, Jane Saks will provide dates and times of ability to meet. I designate the lead filer to meet initially with the Company but may join the meeting subject to my availability.

I have continuously beneficially owned, for at least **one year** as of the date hereof, at least **\$25,000 worth** of the Company's common stock. Verification of this ownership will be sent under separate cover. I intend to continue to hold such shares through the date of the Company's 2022 annual meeting of shareholders.

Please send future correspondence and communications regarding this proposal to my representative Vicky Wyatt, at vicky@sumofus.org or +1 (415) 960-7920.

Sincerely,


Jeff Perk

RESOLVED that shareholders of Apple, Inc. (“Apple”) ask the Board of Directors to oversee the preparation of a report, at reasonable cost and omitting confidential and proprietary information, on the extent to which Apple’s policies and procedures effectively protect workers in its supply chain from forced labor, including the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations, the number of suppliers against which Apple has taken corrective action due to such violations, and the availability and use of grievance mechanisms to compensate affected workers. The report should be posted to Apple’s website.

SUPPORTING STATEMENT

Apple relies on over 200 suppliers¹ globally for product components. These suppliers and sub-suppliers may be at significant risk for forced labor if they have facilities in areas with a high risk of forced labor, or source inputs from such areas.

Apple’s Code of Conduct (2005) lists forced labor as a ‘core violation’ of its policy, with suppliers required to ‘ensure that all work is voluntary’ and prohibited from ‘traffic[ing] persons or us[ing] any form of slave, forced, bonded, indentured, or prison labor.’ The Code also states suppliers must undertake due diligence and allow Apple access to their facilities to evaluate suppliers and sub-suppliers’ compliance.²

Apple’s Human Rights Policy (2020) states its desire ‘to be a force for good in the lives of people in our supply chain’, and asserts that Apple works ‘hand in hand with our suppliers to ensure that every workplace provides a safe and respectful environment for everyone’.³

It has been reported that at least nine⁴ companies in Apple’s supply chain participate in the government of China’s forced labor program. Reports suggest that Apple severed ties with Ofilm Group over allegations that it’s involved in that program.

Following evidence since 2017 of millions of Uyghurs and other Turkic Muslims being forced into internment camps and related labour programs⁵, the Parliaments of the UK and Canada and the US State Department recognized this as a genocide.⁶

¹ <https://www.investopedia.com/articles/investing/090315/10-major-companies-tied-apple-supply-chain.asp>

² <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-Code-of-Conduct-and-Supplier-Responsibility-Standards.pdf> p9&16

³ https://s2.q4cdn.com/470004039/files/doc_downloads/gov_docs/Apple-Human-Rights-Policy.pdf p2

⁴ <https://appleinsider.com/articles/21/05/10/seven-apple-suppliers-linked-to-chinese-forced-labor-programs>; <https://www.bloomberg.com/news/articles/2021-03-17/shares-of-china-s-ofilm-drop-after-firm-loses-foreign-customer>; <https://www.theverge.com/2020/12/29/22204920/lens-technology-uyghur-forced-labor-xinjiang-amazon-apple-tesla>

⁵ <https://edition.cnn.com/interactive/2020/02/asia/xinjiang-china-karakax-document-intl-hnk/>

⁶ <https://www.cnn.com/2021/04/22/world/uk-china-uyghur-genocide-motion-gbr-intl/index.html>

US Congress is actively working to pass legislation to create a 'rebuttable presumption' that goods from the Uyghur region are made with forced labor and will be prohibited from entering the US unless 'clear and convincing' evidence can be shown to the contrary.⁷

The proposed report is intended to mitigate this regulatory risk, given Apple's dependence on suppliers operating under a government accused of genocide.

We urge shareholders to vote for this Proposal.

⁷ <https://mcgovern.house.gov/news/documentsingle.aspx?DocumentID=398673>

From: Stephen Rees [REDACTED] PII
Subject: Shareholder proposal for 2022 annual general meeting of shareholders
Date: August 31, 2021 at 11:01:36 PDT
To: shareholderproposal@apple.com

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 14a-8 and cover letter. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920

Best regards,

Stephen Rees

Stephen Rees

PII

August 31, 2021

Via email

Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

Attn: Katherine Adams, Corporate Secretary

Re: Shareholder proposal for 2022 Annual Shareholder Meeting

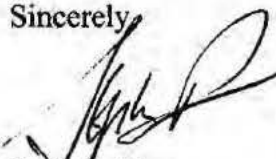
Dear Ms Adams,

I am submitting the attached proposal (the "Proposal") pursuant to the Securities and Exchange Commission's Rule 14a-8 to be included in the proxy statement of Apple Inc (the "Company") for its 2022 annual meeting of shareholders. I am co-filing the Proposal with lead filer Jane M. Saks. In her submission letter, Jane Saks will provide dates and times of ability to meet. I designate the lead filer to meet initially with the Company but may join the meeting subject to my availability.

I have continuously beneficially owned, for at least **five years** as of the date hereof, at least **\$44,580 worth** of the Company's common stock. Verification of this ownership will be sent under separate cover. I intend to continue to hold such shares through the date of the Company's 2022 annual meeting of shareholders.

Please send future correspondence and communications regarding this proposal to my representative Vicky Wyatt, at vicky@sumofus.org or +1 (415) 960-7920.

Sincerely,



Stephen Rees

RESOLVED that shareholders of Apple, Inc. (“Apple”) ask the Board of Directors to oversee the preparation of a report, at reasonable cost and omitting confidential and proprietary information, on the extent to which Apple’s policies and procedures effectively protect workers in its supply chain from forced labor, including the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations, the number of suppliers against which Apple has taken corrective action due to such violations, and the availability and use of grievance mechanisms to compensate affected workers. The report should be posted to Apple’s website.

SUPPORTING STATEMENT

Apple relies on over 200 suppliers¹ globally for product components. These suppliers and sub-suppliers may be at significant risk for forced labor if they have facilities in areas with a high risk of forced labor, or source inputs from such areas.

Apple’s Code of Conduct (2005) lists forced labor as a ‘core violation’ of its policy, with suppliers required to ‘ensure that all work is voluntary’ and prohibited from ‘traffic[ing] persons or us[ing] any form of slave, forced, bonded, indentured, or prison labor.’ The Code also states suppliers must undertake due diligence and allow Apple access to their facilities to evaluate suppliers and sub-suppliers’ compliance.²

Apple’s Human Rights Policy (2020) states its desire ‘to be a force for good in the lives of people in our supply chain’, and asserts that Apple works ‘hand in hand with our suppliers to ensure that every workplace provides a safe and respectful environment for everyone’.³

It has been reported that at least nine⁴ companies in Apple’s supply chain participate in the government of China’s forced labor program. Reports suggest that Apple severed ties with Ofilm Group over allegations that it’s involved in that program.

Following evidence since 2017 of millions of Uyghurs and other Turkic Muslims being forced into internment camps and related labour programs⁵, the Parliaments of the UK and Canada and the US State Department recognized this as a genocide.⁶

¹ <https://www.investopedia.com/articles/investing/090315/10-major-companies-tied-apple-supply-chain.asp>

² <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-Code-of-Conduct-and-Supplier-Responsibility-Standards.pdf> p9&16

³ https://s2.q4cdn.com/470004039/files/doc_downloads/gov_docs/Apple-Human-Rights-Policy.pdf p2

⁴ <https://appleinsider.com/articles/21/05/10/seven-apple-suppliers-linked-to-chinese-forced-labor-programs>; <https://www.bloomberg.com/news/articles/2021-03-17/shares-of-china-s-ofilm-drop-after-firm-loses-foreign-customer>; <https://www.theverge.com/2020/12/29/22204920/lens-technology-uyghur-forced-labor-xinjiang-amazon-apple-tesla>

⁵ <https://edition.cnn.com/interactive/2020/02/asia/xinjiang-china-karakax-document-intl-hnk/>

⁶ <https://www.cnn.com/2021/04/22/world/uk-china-uyghur-genocide-motion-gbr-intl/index.html>

US Congress is actively working to pass legislation to create a 'rebuttable presumption' that goods from the Uyghur region are made with forced labor and will be prohibited from entering the US unless 'clear and convincing' evidence can be shown to the contrary.⁷

The proposed report is intended to mitigate this regulatory risk, given Apple's dependence on suppliers operating under a government accused of genocide.

We urge shareholders to vote for this Proposal.

⁷ <https://mcgovern.house.gov/news/documentsingle.aspx?DocumentID=398673>

From: Wendy Brown <wendy@underscorecreative.com>
Subject: Shareholder proposal for 2022 annual general meeting of shareholders
Date: August 31, 2021 at 12:22:50 PDT
To: shareholderproposal@apple.com
Cc: vicky@sumofus.org

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 14a-8 and cover letter. Please confirm receipt of this communication. Should you have any questions or wish to discuss concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1(415)960-7920.

Best regards,

Wendy Brown

Wendy Brown

PII

August 31, 2021

Via email

Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

Attn: Katherine Adams, Corporate Secretary

Re: Shareholder proposal for 2022 Annual Shareholder Meeting

Dear Ms Adams,

I am submitting the attached proposal (the "Proposal") pursuant to the Securities and Exchange Commission's Rule 14a-8 to be included in the proxy statement of Apple Inc (the "Company") for its 2022 annual meeting of shareholders. I am co-filing the Proposal with lead filer Jane M. Saks. In her submission letter, Jane Saks will provide dates and times of ability to meet. I designate the lead filer to meet initially with the Company but may join the meeting subject to my availability.

I have continuously beneficially owned, for at least ten years, as of the date hereof, at least **\$34,000 worth** of the Company's common stock. Verification of this ownership will be sent under separate cover. I intend to continue to hold such shares through the date of the Company's 2022 annual meeting of shareholders.

Please send future correspondence and communications regarding this proposal to my representative Vicky Wyatt, at vicky@sumofus.org or +1 (415) 960-7920.

Sincerely,



Wendy Brown

RESOLVED that shareholders of Apple, Inc. (“Apple”) ask the Board of Directors to oversee the preparation of a report, at reasonable cost and omitting confidential and proprietary information, on the extent to which Apple’s policies and procedures effectively protect workers in its supply chain from forced labor, including the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations, the number of suppliers against which Apple has taken corrective action due to such violations, and the availability and use of grievance mechanisms to compensate affected workers. The report should be posted to Apple’s website.

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² <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-Code-of-Conduct-and-Supplier-Responsibility-Standards.pdf> p9&16

³ https://s2.q4cdn.com/470004039/files/doc_downloads/gov_docs/Apple-Human-Rights-Policy.pdf p2

⁴ <https://appleinsider.com/articles/21/05/10/seven-apple-suppliers-linked-to-chinese-forced-labor-programs>; <https://www.bloomberg.com/news/articles/2021-03-17/shares-of-china-s-ofilm-drop-after-firm-loses-foreign-customer>; <https://www.theverge.com/2020/12/29/22204920/lens-technology-uyghur-forced-labor-xinjiang-amazon-apple-tesla>

⁵ <https://edition.cnn.com/interactive/2020/02/asia/xinjiang-china-karakax-document-intl-hnk/>

⁶ <https://www.cnn.com/2021/04/22/world/uk-china-uyghur-genocide-motion-gbr-intl/index.html>

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We urge shareholders to vote for this Proposal.

⁷ <https://mcgovern.house.gov/news/documentsingle.aspx?DocumentID=398673>

From: Stephen Rees [REDACTED] PII
Subject: Shareholder proposal for 2022 annual general meeting of shareholders
Date: August 31, 2021 at 12:50:16 PDT
To: shareholderproposal@apple.com

Dear Corporate Secretary,

Please find attached a proof of ownership of my shares in Apple Inc.

There are two PDF files attached showing my current holdings and the date of original purchase

Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920

Best regards,

Stephen Rees



PORTFOLIO EVALUATION (USD)

As of August 30, 2021

MR STEPHEN REES PII

Cash
Advisor Managed Account - Portfolio Partner
Your Investment Advisor: R. Thomas Hasker

5811 Cooney Rd.
Suite 606, Pacific Bus. Centre
Richmond BC
CANADA V6X 3M1

Last Purchase	Quantity	Description	Unit Cost	Book Value	Market Price	Market Value	% of Total	Accrued Int./Div.	Annual Income	Cost	Current	Market	YIELD		To Date	Mod. Dur.	G/L (%)
													Cost	Market			
US EQUITY																	
Common Stocks																	
11/16/2015	300	APPLE INC	29.085	8,725.50	153.120	45,936.00	100.00		264.00	1.62	3.03	0.57			426.46		426.46
Total				\$ 8,725.50		\$ 45,936.00			\$ 264.00			0.57 %					426.46 %
Accrued Interest:																	
Declared and Unpaid Dividends:																	
Total Portfolio Value:						\$ 45,936											

** Where applicable, Unrealized G/L includes accumulated interest. Accumulated interest is included in the "Unit Cost" / "Invested Cost" and in the "Book Value" / "Invested Capital" columns.

This report is not an official record. The information contained in this report is to assist you in managing your investment portfolio recordkeeping and cannot be guaranteed as accurate for income tax purposes. In the event of a discrepancy between this report and your client statement or tax slips, the client statement or tax slip should be considered the official record of your account(s). Please consult your tax advisor for further information. Information contained herein is obtained from sources believed to be reliable, but is not guaranteed. Some positions may be held at other institutions not covered by the Canadian Investor Protection Fund (CIPF). Refer to your official statements to determine which positions are eligible for CIPF protection or held in segregation. Calculations/projections are based on a number of assumptions; actual results may differ. Yields/rates are as of the date of this report unless otherwise noted. Benchmark totals on performance reports do not include dividend values unless the benchmark is a Total Return Index, denoted with a reference to 'TR' or 'Total Return'. CIBC Private Wealth Management consists of services provided by CIBC and certain of its subsidiaries, including CIBC Wood Gundy, a division of CIBC World Markets Inc.



TRANSACTIONS REPORT (USD)

Period from January 1, 2015 to August 30, 2021

MR STEPHEN REES PII

Cash
Advisor Managed Account - Portfolio Partner
Your Investment Advisor: R. Thomas Hasker

5811 Cooney Rd.
Suite 606, Pacific Bus. Centre
Richmond BC
CANADA V6X 3M1

Transaction Date	Settlement Date	Type	Quantity	Description	Unit Price	Transaction Total	Accrued Interest
APPLE INC							
11/11/2015	11/16/2015	Buy	75	APPLE INC SOLICITED	116.340	-8,725.50	
02/11/2016	02/11/2016	Fees		APPLE INC CASH DIV ON 75 SHS REC 02/08/16 PAY 02/11/16 NON-RES TAX WITHHELD		-5.85	
02/11/2016	02/11/2016	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 02/08/16 PAY 02/11/16 NON-RES TAX WITHHELD		39.00	
05/12/2016	05/12/2016	Fees		APPLE INC CASH DIV ON 75 SHS REC 05/09/16 PAY 05/12/16 NON-RES TAX WITHHELD		-6.41	
05/12/2016	05/12/2016	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 05/09/16 PAY 05/12/16 NON-RES TAX WITHHELD		42.75	
08/11/2016	08/11/2016	Fees		APPLE INC CASH DIV ON 75 SHS REC 08/08/16 PAY 08/11/16 NON-RES TAX WITHHELD		-6.41	
08/11/2016	08/11/2016	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 08/08/16 PAY 08/11/16 NON-RES TAX WITHHELD		42.75	
11/10/2016	11/10/2016	Fees		APPLE INC CASH DIV ON 75 SHS REC 11/07/16 PAY 11/10/16 NON-RES TAX WITHHELD		-6.41	
11/10/2016	11/10/2016	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 11/07/16 PAY 11/10/16 NON-RES TAX WITHHELD		42.75	
02/16/2017	02/16/2017	Fees		APPLE INC CASH DIV ON 75 SHS REC 02/13/17 PAY 02/16/17 NON-RES TAX WITHHELD		-6.41	
02/16/2017	02/16/2017	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 02/13/17 PAY 02/16/17 NON-RES TAX WITHHELD		42.75	

This report is not an official record. The information contained in this report is to assist you in managing your investment portfolio recordkeeping and cannot be guaranteed as accurate for income tax purposes. In the event of a discrepancy between this report and your client statement or tax slips, the client statement or tax slip should be considered the official record of your account(s). Please consult your tax advisor for further information. Information contained herein is obtained from sources believed to be reliable, but is not guaranteed. Some positions may be held at other institutions not covered by the Canadian Investor Protection Fund (CIPF). Refer to your official statements to determine which positions are eligible for CIPF protection or held in segregation. Calculations/projections are based on a number of assumptions; actual results may differ. Yields/rates are as of the date of this report unless otherwise noted. Benchmark totals on performance reports do not include dividend values unless the benchmark is a Total Return Index, denoted with a reference to 'TR' or 'Total Return'. CIBC Private Wealth Management consists of services provided by CIBC and certain of its subsidiaries, including CIBC Wood Gundy, a division of CIBC World Markets Inc.



TRANSACTIONS REPORT (USD)

Period from January 1, 2015 to August 30, 2021

MR STEPHEN REES PII

Cash

Advisor Managed Account - Portfolio Partner

Your Investment Advisor: R. Thomas Hasker

5811 Cooney Rd.
Suite 606, Pacific Bus. Centre
Richmond BC
CANADA V6X 3M1

Transaction Date	Settlement Date	Type	Quantity	Description	Unit Price	Transaction Total	Accrued Interest
05/18/2017	05/18/2017	Fees		APPLE INC CASH DIV ON 75 SHS REC 05/15/17 PAY 05/18/17 NON-RES TAX WITHHELD		-7.08	
05/18/2017	05/18/2017	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 05/15/17 PAY 05/18/17 NON-RES TAX WITHHELD		47.25	
08/17/2017	08/17/2017	Fees		APPLE INC CASH DIV ON 75 SHS REC 08/14/17 PAY 08/17/17 NON-RES TAX WITHHELD		-7.08	
08/17/2017	08/17/2017	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 08/14/17 PAY 08/17/17 NON-RES TAX WITHHELD		47.25	
11/16/2017	11/16/2017	Fees		APPLE INC CASH DIV ON 75 SHS REC 11/13/17 PAY 11/16/17 NON-RES TAX WITHHELD		-7.08	
11/16/2017	11/16/2017	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 11/13/17 PAY 11/16/17 NON-RES TAX WITHHELD		47.25	
02/15/2018	02/15/2018	Fees		APPLE INC CASH DIV ON 75 SHS REC 02/12/18 PAY 02/15/18 NON-RES TAX WITHHELD		-7.08	
02/15/2018	02/15/2018	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 02/12/18 PAY 02/15/18 NON-RES TAX WITHHELD		47.25	
05/17/2018	05/17/2018	Fees		APPLE INC CASH DIV ON 75 SHS REC 05/14/18 PAY 05/17/18 NON-RES TAX WITHHELD		-8.21	
05/17/2018	05/17/2018	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 05/14/18 PAY 05/17/18 NON-RES TAX WITHHELD		54.75	
08/16/2018	08/16/2018	Fees		APPLE INC CASH DIV ON 75 SHS REC 08/13/18 PAY 08/16/18 NON-RES TAX WITHHELD		-8.21	



TRANSACTIONS REPORT (USD)

Period from January 1, 2015 to August 30, 2021

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Suite 606, Pacific Bus. Centre
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CANADA V6X 3M1

Transaction Date	Settlement Date	Type	Quantity	Description	Unit Price	Transaction Total	Accrued Interest
08/16/2018	08/16/2018	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 08/13/18 PAY 08/16/18 NON-RES TAX WITHHELD		54.75	
11/15/2018	11/15/2018	Fees		APPLE INC CASH DIV ON 75 SHS REC 11/12/18 PAY 11/15/18 NON-RES TAX WITHHELD		-8.21	
11/15/2018	11/15/2018	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 11/12/18 PAY 11/15/18 NON-RES TAX WITHHELD		54.75	
02/14/2019	02/14/2019	Fees		APPLE INC CASH DIV ON 75 SHS REC 02/11/19 PAY 02/14/19 NON-RES TAX WITHHELD		-8.21	
02/14/2019	02/14/2019	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 02/11/19 PAY 02/14/19 NON-RES TAX WITHHELD		54.75	
05/16/2019	05/16/2019	Fees		APPLE INC CASH DIV ON 75 SHS REC 05/13/19 PAY 05/16/19 NON-RES TAX WITHHELD		-8.66	
05/16/2019	05/16/2019	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 05/13/19 PAY 05/16/19 NON-RES TAX WITHHELD		57.75	
08/15/2019	08/15/2019	Fees		APPLE INC CASH DIV ON 75 SHS REC 08/12/19 PAY 08/15/19 NON-RES TAX WITHHELD		-8.66	
08/15/2019	08/15/2019	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 08/12/19 PAY 08/15/19 NON-RES TAX WITHHELD		57.75	
11/14/2019	11/14/2019	Fees		APPLE INC CASH DIV ON 75 SHS REC 11/11/19 PAY 11/14/19 NON-RES TAX WITHHELD		-8.66	
11/14/2019	11/14/2019	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 11/11/19 PAY 11/14/19 NON-RES TAX WITHHELD		57.75	



TRANSACTIONS REPORT (USD)

Period from January 1, 2015 to August 30, 2021

MR STEPHEN REES PII

Cash
Advisor Managed Account - Portfolio Partner
Your Investment Advisor: R. Thomas Hasker

5811 Cooney Rd.
Suite 606, Pacific Bus. Centre
Richmond BC
CANADA V6X 3M1

Transaction Date	Settlement Date	Type	Quantity	Description	Unit Price	Transaction Total	Accrued Interest
02/13/2020	02/13/2020	Fees		APPLE INC CASH DIV ON 75 SHS REC 02/10/20 PAY 02/13/20 NON-RES TAX WITHHELD		-8.66	
02/13/2020	02/13/2020	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 02/10/20 PAY 02/13/20 NON-RES TAX WITHHELD		57.75	
05/14/2020	05/14/2020	Non-Resident tax		APPLE INC CASH DIV ON 75 SHS REC 05/11/20 PAY 05/14/20 NON-RES TAX WITHHELD		-9.22	
05/14/2020	05/14/2020	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 05/11/20 PAY 05/14/20 NON-RES TAX WITHHELD		61.50	
08/13/2020	08/13/2020	Non-Resident tax		APPLE INC CASH DIV ON 75 SHS REC 08/10/20 PAY 08/13/20 NON-RES TAX WITHHELD		-9.22	
08/13/2020	08/13/2020	Dividends	75	APPLE INC CASH DIV ON 75 SHS REC 08/10/20 PAY 08/13/20 NON-RES TAX WITHHELD		61.50	
09/02/2020	09/02/2020	Split	225	APPLE INC STK SPLIT ON 75 SHS REC 09/01/20 PAY 09/01/20			
11/12/2020	11/12/2020	Non-Resident tax		APPLE INC CASH DIV ON 300 SHS REC 11/09/20 PAY 11/12/20 NON-RES TAX WITHHELD		-9.22	
11/12/2020	11/12/2020	Dividends	300	APPLE INC CASH DIV ON 300 SHS REC 11/09/20 PAY 11/12/20 NON-RES TAX WITHHELD		61.50	
02/11/2021	02/11/2021	Non-Resident tax		APPLE INC CASH DIV ON 300 SHS REC 02/08/21 PAY 02/11/21 NON-RES TAX WITHHELD		-9.22	
02/11/2021	02/11/2021	Dividends	300	APPLE INC CASH DIV ON 300 SHS REC 02/08/21 PAY 02/11/21 NON-RES TAX WITHHELD		61.50	
05/13/2021	05/13/2021	Non-Resident tax		APPLE INC CASH DIV ON 300 SHS REC 05/10/21 PAY 05/13/21 NON-RES TAX WITHHELD		-9.90	

This report is not an official record. The information contained in this report is to assist you in managing your investment portfolio recordkeeping and cannot be guaranteed as accurate for income tax purposes. In the event of a discrepancy between this report and your client statement or tax slips, the client statement or tax slip should be considered the official record of your account(s). Please consult your tax advisor for further information. Information contained herein is obtained from sources believed to be reliable, but is not guaranteed. Some positions may be held at other institutions not covered by the Canadian Investor Protection Fund (CIPF). Refer to your official statements to determine which positions are eligible for CIPF protection or held in segregation. Calculations/projections are based on a number of assumptions; actual results may differ. Yields/rates are as of the date of this report unless otherwise noted. Benchmark totals on performance reports do not include dividend values unless the benchmark is a Total Return Index, denoted with a reference to 'TR' or 'Total Return'. CIBC Private Wealth Management consists of services provided by CIBC and certain of its subsidiaries, including CIBC Wood Gundy, a division of CIBC World Markets Inc.



TRANSACTIONS REPORT (USD)

Period from January 1, 2015 to August 30, 2021

MR STEPHEN REES PII

Cash
Advisor Managed Account - Portfolio Partner
Your Investment Advisor: R. Thomas Hasker

5811 Cooney Rd.
Suite 606, Pacific Bus. Centre
Richmond BC
CANADA V6X 3M1

Transaction Date	Settlement Date	Type	Quantity	Description	Unit Price	Transaction Total	Accrued Interest
05/13/2021	05/13/2021	Dividends	300	APPLE INC CASH DIV ON 300 SHS NON-RES TAX WITHHELD	REC 05/10/21 PAY 05/13/21	66.00	
08/12/2021	08/12/2021	Non-Resident tax		APPLE INC CASH DIV ON 300 SHS NON-RES TAX WITHHELD	REC 08/09/21 PAY 08/12/21	-9.90	
08/12/2021	08/12/2021	Dividends	300	APPLE INC CASH DIV ON 300 SHS NON-RES TAX WITHHELD	REC 08/09/21 PAY 08/12/21	66.00	
Total APPLE INC Transactions						-7,682.47	
Total						-7,682.47	

Number of Transactions Performed: 48

From: "neville.austin neville.austin" [REDACTED] PII
Date: September 2, 2021 at 08:42:08 PDT
To: shareholderproposal <shareholderproposal@apple.com>
Cc: vicky <vicky@sumofus.org>, sondhya <sondhya@sumofus.org>
Subject: Shareholder proposal for 2022 annual general meeting of shareholders
Reply-To: "neville.austin neville.austin" [REDACTED] PII

Dear Corporate Secretary,

With respect to my previous e-mail dated August 27th on the above-mentioned matter, please find attached a letter of proof of ownership of my shares in Apple Inc.

Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920

Best regards,

Neville Austin

BMO Investorline
First Canadian Place
100 King St. West, Floor B1
Toronto, Ontario, Canada M5X1A3

September 2, 2021

Katherine Adams, Corporate Secretary
Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

Re: Shareholder proposal submitted by Neville Austin

Dear Ms. Adams,

I write concerning a shareholder proposal (the "Proposal") submitted to Apple Inc. (the "Company") by Neville Austin.

As of September 2nd, 2021, Neville Austin had beneficially owned continuously for at least one year, shares of the Company's common stock worth at least \$25,000 (the "Shares").

BMO InvestorLine has acted as record holder of the Shares and is a DTC participant.

If you require any additional information, please do not hesitate to contact me at Mathieu.drolet@bmo.com

Very truly yours,



Mathieu Drolet
Assistant Manager – BMO InvestorLine

From: Marren, Katie (NY)
Sent: Friday, September 3, 2021 1:20 PM
To: vicky@sumofus.org
Cc: Cooper, Jenna (NY)
Subject: Apple Shareholder Proposal
Attachments: 14a-8 - Apple - Deficiency Letter (Saks - Sept. 3, 2021)_126175911_4_0.PDF; 14a-8 - Apple - Deficiency Letter (Hawkins - Sept. 3, 2021)_126210150_4_0.PDF; 14a-8 - Apple - Deficiency Letter (Austin - Sept. 3, 2021)_126210146_5_0.PDF; 14a-8 - Apple - Deficiency Letter (Brown - Sept. 3, 2021)_126246108_3_0.PDF; 14a-8 - Apple - Deficiency Letter (Rees - Sept. 3, 2021)_126246265_3_0.PDF; 14a-8 - Apple - Deficiency Letter (Perk - Sept. 3, 2021)_126246183_3_0.PDF

Ms. Wyatt,

Please find attached letters on behalf of Apple Inc. in reference to a shareholder proposal submitted by each of Jane M. Saks (on August 24, 2021), Mary Hawkins (on August 26, 2021), Neville Austin (on August 27, 2021), Wendy Brown (on August 31, 2021), Stephen Rees (on August 31, 2021) and Jeff Perk (on August 31, 2021), each of which designated you as the respective proponent's representative for further communications. A hard copy of each of these letters has also been sent to you via Fed Ex.

Regards,

Katherine Macrae Marren

LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020
Direct Dial: +1.212.906.2980
Email: katie.marren@lw.com
<https://www.lw.com>

Jenna Cooper
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www.lw.com

LATHAM & WATKINS LLP

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Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

September 3, 2021

BY FEDEX AND ELECTRONIC MAIL

SumOfUs
Attn: Vicky Wyatt
2443 Fillmore St. #380-1279
San Francisco, CA 94115
vicky@sumofus.org

Re: Shareholder Proposal to Apple Inc.

Dear Ms. Wyatt,

On August 24, 2021, Apple Inc. (the “Company”) received correspondence from Jane M. Saks (the “Proponent”) purportedly submitting a shareholder proposal and an accompanying supporting statement (the “Proposal”) for inclusion in the Company’s proxy statement for its 2022 annual meeting of shareholders and designating you as the Proponent’s representative for future correspondence and communications. The correspondence from the Proponent indicates that the Proponent intended for the Proposal to meet the requirements of Rule 14a-8 of the Securities Exchange Act of 1934, as amended (“Rule 14a-8”), including providing proof of the continuous ownership of the required share value of the Company’s securities for an applicable period as provided in Rule 14a-8(b)(1)(i) and providing a written statement that the Proponent is able to meet with the Company in person or via teleconference no less than 10 calendar days, nor more than 30 calendar days, after submission of the Proposal, including providing business days and specific times within the regular business hours of the Company’s principal executive offices that the Proponent is available to discuss the proposal with the Company.

This notice is to inform you that the Company has not received proper verification of the Proponent’s share ownership. In addition, although the Proponent indicated that she is “able and willing to meet with [the Company] on September 6, 7, or 8th, 2021 between 2-4pm EST,” the Proponent has not indicated whether she is available to meet with the Company in person or via teleconference during the proposed times and September 6, 2021 is a holiday, not a business day. As a result, the Proponent has not demonstrated that she is eligible to submit the Proposal under Rule 14a-8. In order for the Proposal to be properly submitted, you must remedy these procedural deficiencies no later than 14 calendar days from the date you receive this notice.

I. PROOF OF SHARE OWNERSHIP.

A. Proof of Ownership Requirement

Rule 14a-8(b)(1)(i) provides that, in order to be eligible to submit a proposal to the Company, the Proponent must have continuously held as of the submission date:

- at least \$2,000 in market value of the Company's securities entitled to vote on the Proposal for at least three years; or
- at least \$15,000 in market value of the Company's securities entitled to vote on the Proposal for at least two years; or
- at least \$25,000 in market value of the Company's securities entitled to vote on the Proposal for at least one year.

In addition, Rules 14a-8(b)(1)(i) and (b)(3) also provide that, for annual or special meetings to be held prior to January 1, 2023, the Proponent can satisfy the proof of ownership requirement by demonstrating that the Proponent continuously held at least \$2,000 of the Company's securities entitled to vote on the Proposal for at least one year as of January 4, 2021, so long as the Proponent continuously held at least \$2,000 of such securities from January 4, 2021 through the date the Proposal was submitted to the Company, which was August 24, 2021.

In order to establish the Proponent's eligibility to submit the Proposal under Rule 14a-8, the Proponent is required to provide the Company with documentation regarding the Proponent's ownership of Company securities, or the Proponent must direct her broker or bank to send such documentation to the Company. Rule 14a-8(b) provides that the Proponent may demonstrate her eligibility to the Company in two ways. You or the Proponent may either submit:

- a written statement from the "record" holder of the Proponent's securities (usually a broker or bank) verifying that, at the time the Proponent submitted the Proposal, which was on August 24, 2021, the Proponent continuously held the required share value for an applicable period of time as determined in accordance with Rule 14a-8(b)(1)(i); or
- a copy of a Schedule 13D, Schedule 13G, Form 3, Form 4, Form 5, or amendments to those documents or updated forms, reflecting the Proponent's ownership of the required share value as of or before the date on which the applicable eligibility period under Rule 14a-8(b)(1)(i) began.

To help shareholders comply with the requirement to prove ownership by providing a written statement from the "record" holder of the shares, the staff of the SEC's Division of Corporation Finance (the "SEC Staff") published Staff Legal Bulletin No. 14F ("SLB 14F"). In SLB 14F, the SEC Staff stated that only brokers or banks that are Depository Trust Company ("DTC") participants will be viewed as "record" holders for the purposes of Rule 14a-8. Thus,

shareholders must obtain the required written statement from the DTC participant through which their shares are held.

If you or the Proponent are not certain whether the Proponent's broker or bank is a DTC participant, you may check the DTC's participant list, which is currently available on the Internet at:

<http://www.dtcc.com/~media/Files/Downloads/client-center/DTC/alpha.ashx>

If the Proponent's broker or bank is not on the DTC's participant list, the Proponent will need to obtain proof of ownership from the DTC participant through which the Proponent's securities are held. The Proponent should be able to find out who the DTC participant is by asking her broker or bank. If the DTC participant knows of the holdings of the Proponent's broker or bank, but does not know the Proponent's holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 24, 2021, the required value of securities was continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent's ownership, and the other statement from the DTC participant confirming the broker or bank's ownership. Please see the enclosed copy of SLB 14F for further information.

Please note that the documentation must establish the Proponent's ownership of the required share value for at least the minimum period required by Rule 14a-8(b)(1)(i) by the date the Proponent submitted the Proposal, which was August 24, 2021.

B. Proponent's Proof of Ownership Submission

In her correspondence with the Company, the Proponent provided a statement from Merrill Lynch (the "Merrill Statement") stating that she has held shares of "'Apple Corporation' common stock worth at least \$25,000" "continuously for at least one year" and that "Merrill Lynch is a DTC participant."

There are three deficiencies with the proof of ownership provided by the Proponent. First, "Apple Corporation" is not the name of the Company; the name of the Company is Apple Inc. Thus, the Proponent has not demonstrated that she is a shareholder of the Company as required by Rule 14a-8(b)(i). Therefore, you or the Proponent must submit a new proof of ownership demonstrating that the Proponent is a shareholder of the Company, not Apple Corporation.

Second, the Merrill Statement fails to demonstrate that the Proponent held the requisite value of the Company's shares continuously for at least one year as of August 24, 2021. While the Merrill Statement states that, as of August 24, 2021 the Proponent "had beneficially owned [\$25,000 worth of securities] continuously for at least one year," we note that the footnote to the "Total Portfolio Value" as of August 24, 2021 states:

**This total is as of COB on the listed date. However, the balance provided is monthly/quarterly as Merrill Lynch does not maintain daily balance records. It includes Money Fund shares/balances, marginable/non-marginable securities, and outstanding loans [emphasis added].*

In light of the statement that Merrill Lynch does not maintain daily balance records, and instead the \$25,000 security value is based on monthly or quarterly value, the Proponent has not demonstrated that she has owned the requisite value of common stock *continuously* for at least one year as of August 24, 2021, despite the purported representation. Therefore, new proof of ownership must be provided that either indicates (i) the number of shares of the Company's common stock, or (ii) the value of the Company's common stock calculated on a *continuous* basis (and not a monthly or quarterly basis), in either case that the Proponent has beneficially owned continuously for at least one year as of August 24, 2021 in accordance with Rule 14a-8(b)(1)(i).

Third, "Merrill Lynch" does not appear on DTC's participant list. Therefore, new proof of ownership from the DTC participant through which the Proponent's securities are held must be provided and such DTC participant's name must match the name of the participant as it appears in the DTC's participant list. As noted above in Section I.A of this notice, in accordance with SLB 14F, if the DTC participant knows of the holdings of the Proponent's broker or bank, but does not know the Proponent's holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 24, 2021, the required amount of securities were continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent's ownership, and the other statement from the DTC participant confirming the broker or bank's ownership. Again, the name of the DTC participant in the statement must match the name of the participant as it appears in DTC's participant list in order for the Company to verify the assertion that the proof of ownership is being provided by the holder of record as required by SLB 14F.

II. STATEMENT OF AVAILABILITY.

A. Statement of Availability Requirement

In order to establish the Proponent's eligibility to submit the Proposal under Rule 14a-8, the Proponent is also required to provide a written statement that the Proponent is able to meet with the Company in person or via teleconference no less than 10 calendar days, nor more than 30 calendar days, after submission of the Proposal (see Rule 14a-8(b)(1)(iii)). The statement must include the Proponent's contact information and provide business days and specific times within the regular business hours of the Company's principal executive offices that the Proponent is available to discuss the proposal with the Company.

B. Proponent's Statement of Availability

In her correspondence with the Company, the Proponent has indicated that she is "able and willing to meet with [the Company] on September 6, 7, or 8th, 2021 between 2-4pm EST" (the "Statement of Availability").

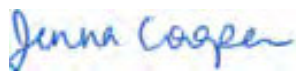
There are two deficiencies with the Statement of Availability provided by the Proponent. First, the Proponent has not indicated whether she is available to meet with the Company in person or via teleconference during the proposed times, as required by Rule 14a-8(b)(1)(iii). Second, September 6, 2021 is a holiday (Labor Day) and not a business day. In order to meet the requirements of Rule 14a-8(b)(1)(iii), the Proponent will need to provide a statement of whether she is available to meet with the Company in person or via teleconference at the proposed times and, in light of the fact that September 6, 2021 is not a business day, propose any alternative dates or times no less than 10 calendar days, nor more than 30 calendar days, after submission of the Proposal that the Proponent would be available to discuss the Proposal with the Company.

* * *

In order for the Proposal to be properly submitted, you or the Proponent must respond to this letter with the proper verification of the Proponent's share ownership as described above and an updated statement of the Proponent's availability to discuss the Proposal with the Company. The response must be postmarked or transmitted no later than 14 calendar days from the date you receive this notice. For your information, we have attached a copy of Rule 14a-8 regarding shareholder proposals.

Please note that the Company has made no inquiry as to whether or not the Proposal, if properly submitted, may be excluded pursuant to Rule 14a-8(i) or for any other reason. The Company will make such a determination once the Proposal has been properly submitted.

Sincerely,



Jenna B. Cooper
of LATHAM & WATKINS LLP

Enclosures

cc: Sam Whittington, Apple Inc.
Brian Miller, Latham & Watkins LLP

Jenna Cooper
Direct Dial: 212.906.1324
Jenna.Cooper@lw.com

1271 Avenue of the Americas
New York, New York 10020-1401
Tel: +1.212.906.1200 Fax: +1.212.751.4864
www.lw.com

LATHAM & WATKINS LLP

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London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

September 3, 2021

BY FEDEX AND ELECTRONIC MAIL

SumOfUs
Attn: Vicky Wyatt
2443 Fillmore St. #380-1279
San Francisco, CA 94115
vicky@sumofus.org

Re: Shareholder Proposal to Apple Inc.

Dear Ms. Wyatt,

On August 26, 2021, Apple Inc. (the “Company”) received correspondence from Mary Hawkins (the “Proponent”) purportedly submitting a shareholder proposal and an accompanying supporting statement (the “Proposal”) for inclusion in the Company’s proxy statement for its 2022 annual meeting of shareholders and designating you as the Proponent’s representative for future correspondence and communications and Jane M. Saks as the lead filer for the Proposal. The correspondence from the Proponent indicates that the Proponent intended for the Proposal to meet the requirements of Rule 14a-8 of the Securities Exchange Act of 1934, as amended (“Rule 14a-8”), including providing proof of the continuous ownership of the required share value of the Company’s securities for an applicable period as provided in Rule 14a-8(b)(1)(i).

This notice is to inform you that the Company has not received proper verification of the Proponent’s share ownership. As a result, the Proponent has not demonstrated that she is eligible to submit the Proposal under Rule 14a-8. In order for the Proposal to be properly submitted, you must remedy this procedural deficiency no later than 14 calendar days from the date you receive this notice.

I. PROOF OF SHARE OWNERSHIP.

A. Proof of Ownership Requirement

Rule 14a-8(b)(1)(i) provides that, in order to be eligible to submit a proposal to the Company, the Proponent must have continuously held as of the submission date:

- at least \$2,000 in market value of the Company's securities entitled to vote on the Proposal for at least three years; or
- at least \$15,000 in market value of the Company's securities entitled to vote on the Proposal for at least two years; or
- at least \$25,000 in market value of the Company's securities entitled to vote on the Proposal for at least one year.

In addition, Rules 14a-8(b)(1)(i) and (b)(3) also provide that, for annual or special meetings to be held prior to January 1, 2023, the Proponent can satisfy the proof of ownership requirement by demonstrating that the Proponent continuously held at least \$2,000 of the Company's securities entitled to vote on the Proposal for at least one year as of January 4, 2021, so long as the Proponent continuously held at least \$2,000 of such securities from January 4, 2021 through the date the Proposal was submitted to the Company, which was August 26, 2021.

In order to establish the Proponent's eligibility to submit the Proposal under Rule 14a-8, the Proponent is required to provide the Company with documentation regarding the Proponent's ownership of Company securities, or the Proponent must direct her broker or bank to send such documentation to the Company. Rule 14a-8(b) provides that the Proponent may demonstrate her eligibility to the Company in two ways. You or the Proponent may either submit:

- a written statement from the "record" holder of the Proponent's securities (usually a broker or bank) verifying that, at the time the Proponent submitted the Proposal, which was on August 26, 2021, the Proponent continuously held the required share value for an applicable period of time as determined in accordance with Rule 14a-8(b)(1)(i); or
- a copy of a Schedule 13D, Schedule 13G, Form 3, Form 4, Form 5, or amendments to those documents or updated forms, reflecting the Proponent's ownership of the required share value as of or before the date on which the applicable eligibility period under Rule 14a-8(b)(1)(i) began.

To help shareholders comply with the requirement to prove ownership by providing a written statement from the "record" holder of the shares, the staff of the SEC's Division of Corporation Finance (the "SEC Staff") published Staff Legal Bulletin No. 14F ("SLB 14F"). In SLB 14F, the SEC Staff stated that only brokers or banks that are Depository Trust Company ("DTC") participants will be viewed as "record" holders for the purposes of Rule 14a-8. Thus, shareholders must obtain the required written statement from the DTC participant through which their shares are held.

If you or the Proponent are not certain whether the Proponent's broker or bank is a DTC participant, you may check the DTC's participant list, which is currently available on the Internet at:

<http://www.dtcc.com/~media/Files/Downloads/client-center/DTC/alpha.ashx>

If the Proponent's broker or bank is not on the DTC's participant list, the Proponent will need to obtain proof of ownership from the DTC participant through which the Proponent's securities are held. The Proponent should be able to find out who the DTC participant is by asking her broker or bank. If the DTC participant knows of the holdings of the Proponent's broker or bank, but does not know the Proponent's holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 26, 2021, the required value of securities was continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent's ownership, and the other statement from the DTC participant confirming the broker or bank's ownership. Please see the enclosed copy of SLB 14F for further information.

Please note that the documentation must establish the Proponent's ownership of the required share value for at least the minimum period required by Rule 14a-8(b)(1)(i) by the date the Proponent submitted the Proposal, which was August 26, 2021.

B. Proponent's Proof of Ownership Submission

In her initial correspondence with the Company, dated April 9, 2021 and received by the Company on August 26, 2021, the Proponent stated that she has "continuously beneficially owned, for at least two years as of the date hereof, at least 500 shares of the Company's common stock." The Proponent subsequently provided a statement from TD Ameritrade (the "TD Statement") stating that she has held 500 shares of the Company's stock since the close of business on November 27, 2020. There are two deficiencies with the proof of ownership provided by the Proponent.

First, the TD Statement fails to demonstrate that the Proponent held the requisite value of the Company's shares continuously *for an applicable time period* under Rule 14a-8(b)(1)(i), because the TD Statement only purports to confirm the Proponent's ownership since November 27, 2020, which is less than one year prior to August 26, 2021, the date the Proposal was submitted to the Company. One year prior to the date of submission of the Proposal is the minimum time period during which the Proponent must have held the Company's common stock to be eligible to submit a proposal for the 2022 annual meeting of shareholders.

As described in Section I.A. of this notice, in order to be eligible to submit the Proposal, the Proponent must submit new proof of ownership demonstrating that she continuously beneficially owned, as of August 26, 2021, at least (a) \$2,000 in market value of the Company's common stock for at least three years, (b) \$15,000 in market value of the Company's common stock for at least two years, or (c) \$25,000 in market value of the Company's common stock for at least one year. Alternatively, the Proponent may instead demonstrate that she continuously beneficially owned at least \$2,000 in market value of the Company's common stock for at least one year as of January 4, 2021 and that she continuously maintained this minimum investment

from January 4, 2021 through the date of submission of the Proposal, which was August 26, 2021.

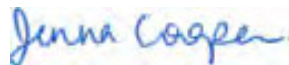
Second, “TD Ameritrade” does not appear on DTC’s participant list. Therefore, new proof of ownership from the DTC participant through which the Proponent’s securities are held must be provided and such DTC participant’s name must match the name of the participant as it appears in the DTC’s participant list. As noted above in Section I.A of this notice, in accordance with SLB 14F, if the DTC participant knows of the holdings of the Proponent’s broker or bank, but does not know the Proponent’s holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 26, 2021, the required amount of securities were continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent’s ownership, and the other statement from the DTC participant confirming the broker or bank’s ownership. Again, the name of the DTC participant in the statement must match the name of the participant as it appears in DTC’s participant list in order for the Company to verify the assertion that the proof of ownership is being provided by the holder of record as required by SLB 14F.

* * *

In order for the Proposal to be properly submitted, you or the Proponent must respond to this letter with the proper verification of the Proponent’s share ownership as described above. The response must be postmarked or transmitted no later than 14 calendar days from the date you receive this notice. For your information, we have attached a copy of Rule 14a-8 regarding shareholder proposals.

Please note that the Company has made no inquiry as to whether or not the Proposal, if properly submitted, may be excluded pursuant to Rule 14a-8(i) or for any other reason. The Company will make such a determination once the Proposal has been properly submitted.

Sincerely,



Jenna B. Cooper
of LATHAM & WATKINS LLP

Enclosures

cc: Sam Whittington, Apple Inc.
Brian Miller, Latham & Watkins LLP

LATHAM & WATKINS LLP

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Hong Kong	Shanghai
Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

September 3, 2021

BY FEDEX AND ELECTRONIC MAIL

SumOfUs
Attn: Vicky Wyatt
2443 Fillmore St. #380-1279
San Francisco, CA 94115
vicky@sumofus.org

Re: Shareholder Proposal to Apple Inc.

Dear Ms. Wyatt,

On August 27, 2021, Apple Inc. (the “Company”) received correspondence from Neville Austin (the “Proponent”) purportedly submitting a shareholder proposal and an accompanying supporting statement (the “Proposal”) for inclusion in the Company’s proxy statement for its 2022 annual meeting of shareholders and designating you as the Proponent’s representative for future correspondence and communications and Jane M. Saks as the lead filer for the Proposal. The correspondence from the Proponent indicates that the Proponent intended for the Proposal to meet the requirements of Rule 14a-8 of the Securities Exchange Act of 1934, as amended (“Rule 14a-8”), including providing proof of the continuous ownership of the required share value of the Company’s securities for an applicable period as provided in Rule 14a-8(b)(1)(i).

This notice is to inform you that the Company has not received proper verification of the Proponent’s share ownership. As a result, the Proponent has not demonstrated that he is eligible to submit the Proposal under Rule 14a-8. In order for the Proposal to be properly submitted, you must remedy this procedural deficiency no later than 14 calendar days from the date you receive this notice.

I. PROOF OF SHARE OWNERSHIP.

A. Proof of Ownership Requirement

Rule 14a-8(b)(1)(i) provides that, in order to be eligible to submit a proposal to the Company, the Proponent must have continuously held as of the submission date:

- at least \$2,000 in market value of the Company's securities entitled to vote on the Proposal for at least three years; or
- at least \$15,000 in market value of the Company's securities entitled to vote on the Proposal for at least two years; or
- at least \$25,000 in market value of the Company's securities entitled to vote on the Proposal for at least one year.

In addition, Rules 14a-8(b)(1)(i) and (b)(3) also provide that, for annual or special meetings to be held prior to January 1, 2023, the Proponent can satisfy the proof of ownership requirement by demonstrating that the Proponent continuously held at least \$2,000 of the Company's securities entitled to vote on the Proposal for at least one year as of January 4, 2021, so long as the Proponent continuously held at least \$2,000 of such securities from January 4, 2021 through the date the Proposal was submitted to the Company, which was August 27, 2021.

In order to establish the Proponent's eligibility to submit the Proposal under Rule 14a-8, the Proponent is required to provide the Company with documentation regarding the Proponent's ownership of Company securities, or the Proponent must direct his broker or bank to send such documentation to the Company. Rule 14a-8(b) provides that the Proponent may demonstrate his eligibility to the Company in two ways. You or the Proponent may either submit:

- a written statement from the "record" holder of the Proponent's securities (usually a broker or bank) verifying that, at the time the Proponent submitted the Proposal, which was on August 27, 2021, the Proponent continuously held the required share value for an applicable period of time as determined in accordance with Rule 14a-8(b)(1)(i); or
- a copy of a Schedule 13D, Schedule 13G, Form 3, Form 4, Form 5, or amendments to those documents or updated forms, reflecting the Proponent's ownership of the required share value as of or before the date on which the applicable eligibility period under Rule 14a-8(b)(1)(i) began.

To help shareholders comply with the requirement to prove ownership by providing a written statement from the "record" holder of the shares, the staff of the SEC's Division of Corporation Finance (the "SEC Staff") published Staff Legal Bulletin No. 14F ("SLB 14F"). In SLB 14F, the SEC Staff stated that only brokers or banks that are Depository Trust Company ("DTC") participants will be viewed as "record" holders for the purposes of Rule 14a-8. Thus, shareholders must obtain the required written statement from the DTC participant through which their shares are held.

If you or the Proponent are not certain whether the Proponent's broker or bank is a DTC participant, you may check the DTC's participant list, which is currently available on the Internet at:

<http://www.dtcc.com/~media/Files/Downloads/client-center/DTC/alpha.ashx>

If the Proponent's broker or bank is not on the DTC's participant list, the Proponent will need to obtain proof of ownership from the DTC participant through which the Proponent's securities are held. The Proponent should be able to find out who the DTC participant is by asking his broker or bank. If the DTC participant knows of the holdings of the Proponent's broker or bank, but does not know the Proponent's holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 27, 2021, the required value of securities was continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent's ownership, and the other statement from the DTC participant confirming the broker or bank's ownership. Please see the enclosed copy of SLB 14F for further information.

Please note that the documentation must establish the Proponent's ownership of the required share value for at least the minimum period required by Rule 14a-8(b)(1)(i) by the date the Proponent submitted the Proposal, which was August 27, 2021.

B. Proponent's Proof of Ownership Submission

In his correspondence with the Company, the Proponent provided a statement from BMO InvestorLine (the "BMO Statement") stating that, "[a]s of September 2, 2021, [he] had beneficially owned continuously for at least one year, shares of the Company's common stock worth at least \$25,000" and that "BMO InvestorLine" has acted as record holder of such shares and is a DTC participant. There are two deficiencies with this proof of ownership.

First, "BMO InvestorLine" does not appear on the Company's books and records as a shareholder of the Company and is not on DTC's participant list. Therefore, new proof of ownership from the DTC participant through which the Proponent's securities are held must be provided and such DTC participant's name must match the name of the participant as it appears in the DTC's participant list. As noted above in Section I.A of this notice, in accordance with SLB 14F, if the DTC participant knows of the holdings of the Proponent's broker or bank, but does not know the Proponent's holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 27, 2021, the required amount of securities were continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent's ownership, and the other statement from the DTC participant confirming the broker or bank's ownership. Again, the name of the DTC participant in the statement must match the name of the participant as it appears in DTC's participant list in order for the Company to verify the assertion that the proof of ownership is being provided by the holder of record as required by SLB 14F.

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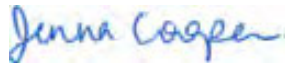
Second, the BMO Statement provides the Proponent's ownership as of September 2, 2021 and for "at least one year" preceding that date, however, the Proposal was submitted on *August 27, 2021*. Accordingly, the BMO Statement does not demonstrate that the Proponent held the requisite share value continuously since *August 27, 2020* (one year prior to the date the proposal was submitted), as required by Rule 14a-8(b)(1)(i)(C).

* * *

In order for the Proposal to be properly submitted, you or the Proponent must respond to this letter with the proper verification of the Proponent's share ownership for the requisite period as described above. The response must be postmarked or transmitted no later than 14 calendar days from the date you receive this notice. For your information, we have attached a copy of Rule 14a-8 regarding shareholder proposals.

Please note that the Company has made no inquiry as to whether or not the Proposal, if properly submitted, may be excluded pursuant to Rule 14a-8(i) or for any other reason. The Company will make such a determination once the Proposal has been properly submitted.

Sincerely,



Jenna B. Cooper
of LATHAM & WATKINS LLP

Enclosures

cc: Sam Whittington, Apple Inc.
Brian Miller, Latham & Watkins LLP

Jenna Cooper
Direct Dial: 212.906.1324
Jenna.Cooper@lw.com

1271 Avenue of the Americas
New York, New York 10020-1401
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LATHAM & WATKINS LLP

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September 3, 2021

BY FEDEX AND ELECTRONIC MAIL

SumOfUs
Attn: Vicky Wyatt
2443 Fillmore St. #380-1279
San Francisco, CA 94115
vicky@sumofus.org

Re: Shareholder Proposal to Apple Inc.

Dear Ms. Wyatt,

On August 31, 2021, Apple Inc. (the “Company”) received correspondence from Wendy Brown (the “Proponent”) purportedly submitting a shareholder proposal and an accompanying supporting statement (the “Proposal”) for inclusion in the Company’s proxy statement for its 2022 annual meeting of shareholders and designating you as the Proponent’s representative for future correspondence and communications and Jane M. Saks as the lead filer for the Proposal. The correspondence from the Proponent indicates that the Proponent intended for the Proposal to meet the requirements of Rule 14a-8 of the Securities Exchange Act of 1934, as amended (“Rule 14a-8”), including providing proof of the continuous ownership of the required share value of the Company’s securities for an applicable period as provided in Rule 14a-8(b)(1)(i).

This notice is to inform you that the Company has not received proper verification of the Proponent’s share ownership. As a result, the Proponent has not demonstrated that she is eligible to submit the Proposal under Rule 14a-8. In order for the Proposal to be properly submitted, you must remedy this procedural deficiency no later than 14 calendar days from the date you receive this notice.

I. PROOF OF SHARE OWNERSHIP.

Rule 14a-8(b)(1)(i) provides that, in order to be eligible to submit a proposal to the Company, the Proponent must have continuously held as of the submission date:

- at least \$2,000 in market value of the Company's securities entitled to vote on the Proposal for at least three years; or
- at least \$15,000 in market value of the Company's securities entitled to vote on the Proposal for at least two years; or
- at least \$25,000 in market value of the Company's securities entitled to vote on the Proposal for at least one year.

In addition, Rules 14a-8(b)(1)(i) and (b)(3) also provide that, for annual or special meetings to be held prior to January 1, 2023, the Proponent can satisfy the proof of ownership requirement by demonstrating that the Proponent continuously held at least \$2,000 of the Company's securities entitled to vote on the Proposal for at least one year as of January 4, 2021, so long as the Proponent continuously held at least \$2,000 of such securities from January 4, 2021 through the date the Proposal was submitted to the Company, which was August 31, 2021.

In her correspondence with the Company, the Proponent stated that she had beneficially owned for at least ten years as of August 31, 2021, at least \$34,000 worth of the Company's common stock. However, the Proponent does not appear on the Company's books and records as a shareholder of the Company and the Proponent has not provided other evidence of her ownership.

In order to establish the Proponent's eligibility to submit the Proposal under Rule 14a-8, the Proponent is required to provide the Company with documentation regarding the Proponent's ownership of Company securities, or the Proponent must direct her broker or bank to send such documentation to the Company. Rule 14a-8(b) provides that the Proponent may demonstrate her eligibility to the Company in two ways. You or the Proponent may either submit:

- a written statement from the "record" holder of the Proponent's securities (usually a broker or bank) verifying that, at the time the Proponent submitted the Proposal, which was on August 31, 2021, the Proponent continuously held the required share value for an applicable period of time as determined in accordance with Rule 14a-8(b)(1)(i); or
- a copy of a Schedule 13D, Schedule 13G, Form 3, Form 4, Form 5, or amendments to those documents or updated forms, reflecting the Proponent's ownership of the required share value as of or before the date on which the applicable eligibility period under Rule 14a-8(b)(1)(i) began.

To help shareholders comply with the requirement to prove ownership by providing a written statement from the "record" holder of the shares, the staff of the SEC's Division of Corporation Finance (the "SEC Staff") published Staff Legal Bulletin No. 14F ("SLB 14F"). In SLB 14F, the SEC Staff stated that only brokers or banks that are Depository Trust Company ("DTC") participants will be viewed as "record" holders for the purposes of Rule 14a-8. Thus, shareholders must obtain the required written statement from the DTC participant through which their shares are held.

If you or the Proponent are not certain whether the Proponent's broker or bank is a DTC participant, you may check the DTC's participant list, which is currently available on the Internet at:

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If the Proponent's broker or bank is not on the DTC's participant list, the Proponent will need to obtain proof of ownership from the DTC participant through which the Proponent's securities are held. The Proponent should be able to find out who the DTC participant is by asking her broker or bank. If the DTC participant knows of the holdings of the Proponent's broker or bank, but does not know the Proponent's holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 31, 2021, the required value of securities was continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent's ownership, and the other statement from the DTC participant confirming the broker or bank's ownership. Please see the enclosed copy of SLB 14F for further information.

Please note that the documentation must establish the Proponent's ownership of the required share value for at least the minimum period required by Rule 14a-8(b)(1)(i) by the date the Proponent submitted the Proposal, which was August 31, 2021.

* * *

In order for the Proposal to be properly submitted, you or the Proponent must respond to this letter with the proper verification of the Proponent's share ownership as described above. The response must be postmarked or transmitted no later than 14 calendar days from the date you receive this notice. For your information, we have attached a copy of Rule 14a-8 regarding shareholder proposals.

Please note that the Company has made no inquiry as to whether or not the Proposal, if properly submitted, may be excluded pursuant to Rule 14a-8(i) or for any other reason. The Company will make such a determination once the Proposal has been properly submitted.

Sincerely,



Jenna B. Cooper
of LATHAM & WATKINS LLP

LATHAM & WATKINS LLP

Enclosures

cc: Sam Whittington, Apple Inc.
Brian Miller, Latham & Watkins LLP

LATHAM & WATKINS LLP

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Houston	Silicon Valley
London	Singapore
Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

September 3, 2021

BY FEDEX AND ELECTRONIC MAIL

SumOfUs
Attn: Vicky Wyatt
2443 Fillmore St. #380-1279
San Francisco, CA 94115
vicky@sumofus.org

Re: Shareholder Proposal to Apple Inc.

Dear Ms. Wyatt,

On August 31, 2021, Apple Inc. (the “Company”) received correspondence from Stephen Rees (the “Proponent”) purportedly submitting a shareholder proposal and an accompanying supporting statement (the “Proposal”) for inclusion in the Company’s proxy statement for its 2022 annual meeting of shareholders and designating you as the Proponent’s representative for future correspondence and communications and Jane M. Saks as the lead filer for the Proposal. The correspondence from the Proponent indicates that the Proponent intended for the Proposal to meet the requirements of Rule 14a-8 of the Securities Exchange Act of 1934, as amended (“Rule 14a-8”), including providing proof of the continuous ownership of the required share value of the Company’s securities for an applicable period as provided in Rule 14a-8(b)(1)(i).

This notice is to inform you that the Company has not received proper verification of the Proponent’s share ownership. As a result, the Proponent has not demonstrated that he is eligible to submit the Proposal under Rule 14a-8. In order for the Proposal to be properly submitted, you must remedy this procedural deficiency no later than 14 calendar days from the date you receive this notice.

I. PROOF OF SHARE OWNERSHIP.

A. Proof of Ownership Requirement

Rule 14a-8(b)(1)(i) provides that, in order to be eligible to submit a proposal to the Company, the Proponent must have continuously held as of the submission date:

- at least \$2,000 in market value of the Company's securities entitled to vote on the Proposal for at least three years; or
- at least \$15,000 in market value of the Company's securities entitled to vote on the Proposal for at least two years; or
- at least \$25,000 in market value of the Company's securities entitled to vote on the Proposal for at least one year.

In addition, Rules 14a-8(b)(1)(i) and (b)(3) also provide that, for annual or special meetings to be held prior to January 1, 2023, the Proponent can satisfy the proof of ownership requirement by demonstrating that the Proponent continuously held at least \$2,000 of the Company's securities entitled to vote on the Proposal for at least one year as of January 4, 2021, so long as the Proponent continuously held at least \$2,000 of such securities from January 4, 2021 through the date the Proposal was submitted to the Company, which was August 31, 2021.

In order to establish the Proponent's eligibility to submit the Proposal under Rule 14a-8, the Proponent is required to provide the Company with documentation regarding the Proponent's ownership of Company securities, or the Proponent must direct his broker or bank to send such documentation to the Company. Rule 14a-8(b) provides that the Proponent may demonstrate his eligibility to the Company in two ways. You or the Proponent may either submit:

- a written statement from the "record" holder of the Proponent's securities (usually a broker or bank) verifying that, at the time the Proponent submitted the Proposal, which was on August 31, 2021, the Proponent continuously held the required share value for an applicable period of time as determined in accordance with Rule 14a-8(b)(1)(i); or
- a copy of a Schedule 13D, Schedule 13G, Form 3, Form 4, Form 5, or amendments to those documents or updated forms, reflecting the Proponent's ownership of the required share value as of or before the date on which the applicable eligibility period under Rule 14a-8(b)(1)(i) began.

To help shareholders comply with the requirement to prove ownership by providing a written statement from the "record" holder of the shares, the staff of the SEC's Division of Corporation Finance (the "SEC Staff") published Staff Legal Bulletin No. 14F ("SLB 14F"). In SLB 14F, the SEC Staff stated that only brokers or banks that are Depository Trust Company ("DTC") participants will be viewed as "record" holders for the purposes of Rule 14a-8. Thus, shareholders must obtain the required written statement from the DTC participant through which their shares are held.

If you or the Proponent are not certain whether the Proponent's broker or bank is a DTC participant, you may check the DTC's participant list, which is currently available on the Internet at:

<http://www.dtcc.com/~media/Files/Downloads/client-center/DTC/alpha.ashx>

If the Proponent's broker or bank is not on the DTC's participant list, the Proponent will need to obtain proof of ownership from the DTC participant through which the Proponent's securities are held. The Proponent should be able to find out who the DTC participant is by asking his broker or bank. If the DTC participant knows of the holdings of the Proponent's broker or bank, but does not know the Proponent's holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 31, 2021, the required value of securities was continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent's ownership, and the other statement from the DTC participant confirming the broker or bank's ownership. Please see the enclosed copy of SLB 14F for further information.

Please note that the documentation must establish the Proponent's ownership of the required share value for at least the minimum period required by Rule 14a-8(b)(1)(i) by the date the Proponent submitted the Proposal, which was August 31, 2021.

B. Proponent's Proof of Ownership Submission

In his correspondence with the Company, the Proponent stated that he has "continuously beneficially owned, for at least five years as of the date hereof, at least \$44,580 worth of the Company's common stock." The Proponent subsequently provided a statement from CIBC Private Wealth Management indicating that he has held such shares of the Company's stock since November 2015.

This proof of ownership provided by the Proponent is deficient because "CIBC Private Wealth Management" does not appear on DTC's participant list. Therefore, new proof of ownership from the DTC participant through which the Proponent's securities are held must be provided and such DTC participant's name must match the name of the participant as it appears in the DTC's participant list. As noted above in Section I.A of this notice, in accordance with SLB 14F, if the DTC participant knows of the holdings of the Proponent's broker or bank, but does not know the Proponent's holdings, you or the Proponent may satisfy the proof of ownership requirement by obtaining and submitting two proof of ownership statements verifying that, at the time the Proposal was submitted, which was on August 31, 2021, the required amount of securities were continuously held by the Proponent for the applicable period of time as provided in Rule 14a-8(b)(1)(i) – with one statement from the broker or bank confirming the Proponent's ownership, and the other statement from the DTC participant confirming the broker or bank's ownership. Again, the name of the DTC participant in the statement must match the name of the participant as it appears in DTC's participant list in order for the Company to verify the assertion that the proof of ownership is being provided by the holder of record as required by SLB 14F.

* * *

In order for the Proposal to be properly submitted, you or the Proponent must respond to this letter with the proper verification of the Proponent's share ownership as described above. The response must be postmarked or transmitted no later than 14 calendar days from the date you receive this notice. For your information, we have attached a copy of Rule 14a-8 regarding shareholder proposals.

Please note that the Company has made no inquiry as to whether or not the Proposal, if properly submitted, may be excluded pursuant to Rule 14a-8(i) or for any other reason. The Company will make such a determination once the Proposal has been properly submitted.

Sincerely,



Jenna B. Cooper
of LATHAM & WATKINS LLP

Enclosures

cc: Sam Whittington, Apple Inc.
Brian Miller, Latham & Watkins LLP

Jenna Cooper
Direct Dial: 212.906.1324
Jenna.Cooper@lw.com

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New York, New York 10020-1401
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Milan	

September 3, 2021

BY FEDEX AND ELECTRONIC MAIL

SumOfUs
Attn: Vicky Wyatt
2443 Fillmore St. #380-1279
San Francisco, CA 94115
vicky@sumofus.org

Re: Shareholder Proposal to Apple Inc.

Dear Ms. Wyatt,

On August 31, 2021, Apple Inc. (the “Company”) received correspondence from Jeff Perk (the “Proponent”) purportedly submitting a shareholder proposal and an accompanying supporting statement (the “Proposal”) for inclusion in the Company’s proxy statement for its 2022 annual meeting of shareholders and designating you as the Proponent’s representative for future correspondence and communications and Jane M. Saks as the lead filer for the Proposal. The correspondence from the Proponent indicates that the Proponent intended for the Proposal to meet the requirements of Rule 14a-8 of the Securities Exchange Act of 1934, as amended (“Rule 14a-8”), including providing proof of the continuous ownership of the required share value of the Company’s securities for an applicable period as provided in Rule 14a-8(b)(1)(i).

This notice is to inform you that the Company has not received proper verification of the Proponent’s share ownership. As a result, the Proponent has not demonstrated that he is eligible to submit the Proposal under Rule 14a-8. In order for the Proposal to be properly submitted, you must remedy this procedural deficiency no later than 14 calendar days from the date you receive this notice.

I. PROOF OF SHARE OWNERSHIP.

Rule 14a-8(b)(1)(i) provides that, in order to be eligible to submit a proposal to the Company, the Proponent must have continuously held as of the submission date:

- at least \$2,000 in market value of the Company's securities entitled to vote on the Proposal for at least three years; or
- at least \$15,000 in market value of the Company's securities entitled to vote on the Proposal for at least two years; or
- at least \$25,000 in market value of the Company's securities entitled to vote on the Proposal for at least one year.

In addition, Rules 14a-8(b)(1)(i) and (b)(3) also provide that, for annual or special meetings to be held prior to January 1, 2023, the Proponent can satisfy the proof of ownership requirement by demonstrating that the Proponent continuously held at least \$2,000 of the Company's securities entitled to vote on the Proposal for at least one year as of January 4, 2021, so long as the Proponent continuously held at least \$2,000 of such securities from January 4, 2021 through the date the Proposal was submitted to the Company, which was August 31, 2021.

In his correspondence with the Company, the Proponent stated that he had beneficially owned for at least one year as of August 31, 2021, at least \$25,000 worth of the Company's common stock. However, the Proponent does not appear on the Company's books and records as a shareholder of the Company and the Proponent has not provided other evidence of his ownership.

In order to establish the Proponent's eligibility to submit the Proposal under Rule 14a-8, the Proponent is required to provide the Company with documentation regarding the Proponent's ownership of Company securities, or the Proponent must direct his broker or bank to send such documentation to the Company. Rule 14a-8(b) provides that the Proponent may demonstrate his eligibility to the Company in two ways. You or the Proponent may either submit:

- a written statement from the "record" holder of the Proponent's securities (usually a broker or bank) verifying that, at the time the Proponent submitted the Proposal, which was on August 31, 2021, the Proponent continuously held the required share value for an applicable period of time as determined in accordance with Rule 14a-8(b)(1)(i); or
- a copy of a Schedule 13D, Schedule 13G, Form 3, Form 4, Form 5, or amendments to those documents or updated forms, reflecting the Proponent's ownership of the required share value as of or before the date on which the applicable eligibility period under Rule 14a-8(b)(1)(i) began.

To help shareholders comply with the requirement to prove ownership by providing a written statement from the "record" holder of the shares, the staff of the SEC's Division of Corporation Finance (the "SEC Staff") published Staff Legal Bulletin No. 14F ("SLB 14F"). In SLB 14F, the SEC Staff stated that only brokers or banks that are Depository Trust Company ("DTC") participants will be viewed as "record" holders for the purposes of Rule 14a-8. Thus, shareholders must obtain the required written statement from the DTC participant through which their shares are held.

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Please note that the documentation must establish the Proponent's ownership of the required share value for at least the minimum period required by Rule 14a-8(b)(1)(i) by the date the Proponent submitted the Proposal, which was August 31, 2021.

* * *

In order for the Proposal to be properly submitted, you or the Proponent must respond to this letter with the proper verification of the Proponent's share ownership as described above. The response must be postmarked or transmitted no later than 14 calendar days from the date you receive this notice. For your information, we have attached a copy of Rule 14a-8 regarding shareholder proposals.

Please note that the Company has made no inquiry as to whether or not the Proposal, if properly submitted, may be excluded pursuant to Rule 14a-8(i) or for any other reason. The Company will make such a determination once the Proposal has been properly submitted.

Sincerely,



Jenna B. Cooper
of LATHAM & WATKINS LLP

Enclosures

LATHAM & WATKINS LLP

cc: Sam Whittington, Apple Inc.
Brian Miller, Latham & Watkins LLP

From: Jeff Perk [REDACTED] PII
Subject: Re: Shareholder proposal for 2022 annual general meeting of shareholders
Date: September 4, 2021 at 10:54:00 PDT
To: shareholderproposal@apple.com
Cc: Vicky Wyatt <vicky@sumofus.org>

Dear Corporate Secretary,

As promised in my shareholder proposal submission of August 31, please find attached a letter of proof of ownership of my shares in Apple Inc. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920.

Sincerely yours,

Jeff Perk

On Tue, Aug 31, 2021 at 1:51 PM Jeff Perk [REDACTED] PII wrote:

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 14a-8 and cover letter. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920

Sincerely yours,

Jeff Perk
Apple shareholder since 1996



September 2, 2021

Jeff Perk

PII

Re: Your Account Information Request

Dear Jeff Perk,

Thank you for your inquiry. As you requested, this letter is to confirm that as of the start of business on September 2, 2021 in your TD Ameritrade account ending in PII you held 564.651 shares of AAPL: APPLE INC COM. These shares were originally purchased on December 6, 1996 and have been included in our dividend reinvestment program since May 15, 2020 in your above referenced account.

If we can be of any further assistance, please let us know. Just log in to your account and go to the Message Center to write us. You can also call Client Services at 800-669-3900. We're available 24 hours a day, seven days a week.

Sincerely,

Melissa Dale
Resource Specialist
TD Ameritrade

This information is furnished as part of a general information service and TD Ameritrade shall not be liable for any damages arising out of any inaccuracy in the information. Because this information may differ from your TD Ameritrade monthly statement, you should rely only on the TD Ameritrade monthly statement as the official record of your TD Ameritrade account.

Market volatility, volume, and system availability may delay account access and trade executions.

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TDA 101516 02/21

From: [REDACTED] PII
Subject: Shareholder proposal for 2022 annual general meeting of shareholders
Date: September 5, 2021 at 17:08:46 PDT
To: shareholderproposal@apple.com

Dear Corporate Secretary,

Please find attached a shareholder proposal submitted pursuant to Rule 114a-8 and cover letter. Please confirm receipt of this communication.

Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 (415) 960-7920.

Sincerely,

David Adams

David Adams

PII

September 4, 2021

Via email

Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

Attn: Katherine Adams, Corporate Secretary

Re: Shareholder proposal for 2022 Annual Shareholder Meeting

Dear Ms Adams,

I am submitting the attached proposal (the "Proposal") pursuant to the Securities and Exchange Commission's Rule 14a-8 to be included in the proxy statement of Apple Inc (the "Company") for its 2022 annual meeting of shareholders. I am co-filing the Proposal with lead filer Jane M. Saks. In her submission letter, Jane Saks will provide dates and times of ability to meet. I designate the lead filer to meet initially with the Company but may join the meeting subject to my availability.

I have continuously beneficially owned, for at least 4 years as of the date hereof, at least \$30,300 worth of the Company's common stock (current value). Verification of this ownership will be sent under separate cover. I intend to continue to hold such shares through the date of the Company's 2022 annual meeting of shareholders.

Please send future correspondence and communications regarding this proposal to my representative Vicky Wyatt, at vicky@sumofus.org or +1 (415) 960-7920.

Sincerely,

David Adams

David Adams

RESOLVED that shareholders of Apple, Inc. (“Apple”) ask the Board of Directors to oversee the preparation of a report, at reasonable cost and omitting confidential and proprietary information, on the extent to which Apple’s policies and procedures effectively protect workers in its supply chain from forced labor, including the extent to which Apple has identified suppliers and sub-suppliers that are at significant risk for forced labor violations, the number of suppliers against which Apple has taken corrective action due to such violations, and the availability and use of grievance mechanisms to compensate affected workers. The report should be posted to Apple’s website.

SUPPORTING STATEMENT

Apple relies on over 200 suppliers¹ globally for product components. These suppliers and sub-suppliers may be at significant risk for forced labor if they have facilities in areas with a high risk of forced labor, or source inputs from such areas.

Apple’s Code of Conduct (2005) lists forced labor as a ‘core violation’ of its policy, with suppliers required to ‘ensure that all work is voluntary’ and prohibited from ‘traffic[ing] persons or us[ing] any form of slave, forced, bonded, indentured, or prison labor.’ The Code also states suppliers must undertake due diligence and allow Apple access to their facilities to evaluate suppliers and sub-suppliers’ compliance.²

Apple’s Human Rights Policy (2020) states its desire ‘to be a force for good in the lives of people in our supply chain’, and asserts that Apple works ‘hand in hand with our suppliers to ensure that every workplace provides a safe and respectful environment for everyone’.³

It has been reported that at least nine⁴ companies in Apple’s supply chain participate in the government of China’s forced labor program. Reports suggest that Apple severed ties with Ofilm Group over allegations that it’s involved in that program.

Following evidence since 2017 of millions of Uyghurs and other Turkic Muslims being forced into internment camps and related labour programs⁵, the Parliaments of the UK and Canada and the US State Department recognized this as a genocide.⁶

¹ <https://www.investopedia.com/articles/investing/090315/10-major-companies-tied-apple-supply-chain.asp>

² <https://www.apple.com/supplier-responsibility/pdf/Apple-Supplier-Code-of-Conduct-and-Supplier-Responsibility-Standards.pdf> p9&16

³ https://s2.q4cdn.com/470004039/files/doc_downloads/gov_docs/Apple-Human-Rights-Policy.pdf p2

⁴ <https://appleinsider.com/articles/21/05/10/seven-apple-suppliers-linked-to-chinese-forced-labor-programs>; <https://www.bloomberg.com/news/articles/2021-03-17/shares-of-china-s-ofilm-drop-after-firm-loses-foreign-customer>; <https://www.theverge.com/2020/12/29/22204920/lens-technology-uyghur-forced-labor-xinjiang-amazon-apple-tesla>

⁵ <https://edition.cnn.com/interactive/2020/02/asia/xinjiang-china-karakax-document-intl-hnk/>

⁶ <https://www.cnn.com/2021/04/22/world/uk-china-uyghur-genocide-motion-gbr-intl/index.html>

US Congress is actively working to pass legislation to create a 'rebuttable presumption' that goods from the Uyghur region are made with forced labor and will be prohibited from entering the US unless 'clear and convincing' evidence can be shown to the contrary.⁷

The proposed report is intended to mitigate this regulatory risk, given Apple's dependence on suppliers operating under a government accused of genocide.

We urge shareholders to vote for this Proposal.

⁷ <https://mcgovern.house.gov/news/documentsingle.aspx?DocumentID=398673>

From: [REDACTED] PII

Subject: FOr 2020 Annual General Meeting of Shareholders

Date: September 8, 2021 at 15:25:25 PDT

To: shareholderproposal@apple.com

Dear Corporate Secretary,

Please find attached a letter of proof of ownership of my shares in Apple, Inc., as a follow-up to my previously submitted (by email) shareholder proposal and cover letter.

Should you have any questions or wish to discuss the concerns raised in that proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1(415) 960-7920.

Sincerely,

David Adams

[REDACTED] PII



UBS Financial Services Inc.
200 E. Main Street, Suite 900
P.O. Box 2515
Fort Wayne, IN 46801-2515
Tel. 260-424-3020
Toll Free 800-552-0774

www.ubs.com

September 8, 2021

Katherine Adams, Corporate Secretary
Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

Re: Shareholder proposal submitted by David Adams

Dear Ms. Adams,

I write concerning a shareholder proposal (the "Proposal") submitted to Apple Inc (the "Company") by David Adams.

As of **September 4, 2021**, David Adams had beneficially owned continuously for at least three years shares of the Company's common stock worth at least \$25,000 (the "Shares").

NOTE:

UBS Financial Services has acted as record holder of the Shares and is a DTC participant.

If you require any additional information, please do not hesitate to contact me at 260-421-3122 or my email is jennifer.reid@ubs.com .

Very truly yours,

A handwritten signature in cursive script that reads "Jennifer Reid".

Jennifer Reid, CFP®, CIMA®, CRPC®
Vice President - Wealth Management
Tel. 260-421-3122
Toll Free 800-552-0774
Fax 855-768-8777
Jennifer.reid@ubs.com

From: Jane M Hussein Saks <janemsaks@gmail.com>
Sent: Friday, September 10, 2021 10:11 AM
To: shareholderproposal@apple.com
Cc: Cooper, Jenna (NY) <Jenna.Cooper@lw.com>
Subject: Proof of ownership

Dear Corporate Secretary,

In response to your letter of September 3rd, please find attached a new proof of ownership letter in reference to the shareholder proposal I submitted on August 24th 2021.

I can meet at the following dates and times by teleconference.- Monday, September 13th, 2pm - 3pm EST; Friday, September 17th, 11am - 1pm EST; Monday, September 20th, 11am-1pm EST.

Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1 415 960 7920.

Best regards,
Jane M. Saks

&-

Jane M. Saks
President & Artistic Director, Project&
773 294.5262

■ Co-Founder/Co-Artistic Director
Monuments to Movements
M2M: In the House of Radical
Feminist Practices

**Do not be daunted by the
enormity of the world's grief.
Do justly, now. Love mercy,
now. Walk humbly, now. You
are not obligated to complete
the work, but neither are
you free to abandon it.
-- The Talmud**

**"Art urges voyages - and it is
easier to stay at home."
-- Gwendolyn Brooks**

**"Artists are here to disturb
the peace."
--- James Baldwin**

“....there are only hints and guesses, hints followed by guesses...” -- *Four Quartets*, by TS Eliot

Katherine Adams, Corporate Secretary Apple Inc.
One Apple Park Way, MS 169-5GC
Cupertino, CA 95014

September 8, 2021

RE: Verification of Deposit – Standard

Important Notice

This is in response to the Verification of Deposit (VOD) request for the Merrill Lynch account of Jane M. Saks. Details appear below.

Account Type	CMA
Account Number	XXX-XX PII
Value as of Date (Close of Business (COB))	08/24/2021
Total Portfolio Value*	1,271 shares

If checked, the portfolio value provided represents an average balance.

*This total is as of COB on the listed date. However, the balance provided is monthly/quarterly as Merrill Lynch does not maintain daily balance records. It includes Money Fund shares/balances, marginable/non-marginable securities, and outstanding loans. If an average balance is requested, it is calculated based upon the monthly/quarterly balance.


Comments

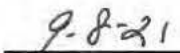
Concerning a shareholder proposal (the "Proposal") submitted to Apple Inc (the "Company") by Jane M. Saks.

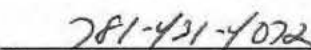
As of August 24, 2021, Jane M. Saks beneficially owned, and had beneficially owned continuously for at least one year, 1,271 shares of Apple Inc. common stock (the "Shares").

Merrill Lynch, Pierce, Fenner & Smith Incorporated is a DTC participant.


Signature of Merrill Lynch Branch Office Management Team (OMT)


Printed Name


Date


Phone Number



Please be advised our cash management account program permits account holders to access the assets in the account by Visa card and checks, which are drawn and processed against a Merrill Lynch account maintained for the customer at Bank of America, N.A. However, the account holder does not maintain a depository balance at that bank. The information provided above may change daily due to activity in the account and/or changes in market value of assets held in the account. This information is provided as a courtesy and Merrill Lynch is not liable or responsible for any decisions made, in whole or in part, on reliance upon this information.

This information is furnished to you in strict confidence in response to your request and is solely for your use for the purposes described in the Verification of Deposit request. If you have any questions, please contact the person whose signature appears above at the phone number provided. This information is provided as a courtesy and Merrill Lynch is not liable or responsible for any decisions made, in whole or part, on reliance upon this information.

L-03-19

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Investment products:

Are Not FDIC Insured	Are Not Bank Guaranteed	May Lose Value
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From: Wendy Brown <wendy@underscorecreative.com>

Subject: Proof of ownership for shareholder proposal for 2022 annual meeting.

Date: September 14, 2021 at 12:13:19 PDT

To: shareholderproposal@apple.com

Reply-To: vicky@sumofus.org

Dear Corporate Secretary,

Please find attached a letter of proof of ownership of my shares in Apple Inc. Please confirm receipt of this communication. Should you have any questions or wish to discuss the concerns raised in the proposal, please do not hesitate to contact Vicky Wyatt at vicky@sumofus.org or +1(415)960-7920.

Best regards,

Wendy Brown



September 13, 2021

Account #: ****-PII
Questions: +1 800-378-0685 x47414

Wendy Brown
PII

US

Apple Inc. Share Ownership.

Dear Wendy Brown,

I am writing in regards to the request for confirmation of Apple Inc. (CUSIP 037833100) in the above referenced account.

As of 31 August 2021, Wendy Brown had beneficially owned continuously 228 shares of Apple Inc. common stock for at least one year. Schwab has acted as record holder of the shares and is a DTC participant.

Please note: This letter is for informational purposes only and is not an official record of the account.

Thank you for investing with Schwab. We appreciate your business and look forward to serving you in the future. If you have any questions or if we can help in any other way, please call me or any Client Service Specialist at +1 800-378-0685 x47414, Monday through Friday, from 9:00 a.m. to 7:00 p.m. ET.

Sincerely,

Tyler Krushensky
Sr Specialist, Partner Support
tyler.krushensky@schwab.com
+1 800-378-0685 x47414
9800 Schwab Way
LONE TREE, CO 80124