



## STATEMENT AGAINST SLAVERY AND HUMAN TRAFFICKING

Dell is committed to social and environmental responsibility. As part of this commitment, Dell prohibits slavery and human trafficking in our operations and supply chain and works to minimize any associated risks. Dell is a founding member of the [Responsible Business Alliance \(RBA\)](#), formerly known as the Electronics Industry Citizenship Coalition (EICC), and has adopted its Code of Conduct (the "RBA Code"), to which we hold ourselves and our supply chain accountable. The [RBA Code of Conduct](#) prohibits the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. Dell considers each supplier's conduct vis-a-vis this Code when awarding and/or renewing business with the supplier.

Dell has also published policies to define our commitment to international labor and human rights standards. These principles reinforce and strengthen our commitment to the rights of our employees, workers in our supply chain, and workers in the global community. Our policies are available online on our [Supply Chain Sustainability, Human Rights and Social Impact Policies and Positions](#) home pages.

The Sustainability, Risk, and Tools Governance organization within Dell's Global Operations organization has a Social and Environmental Responsibility (SER) function, which consists of programs and operations teams responsible for driving social and environmental standards across the supply chain, including those related to forced labor. The teams work across Global Operations—including with our procurement and manufacturing organization—and include specialists dedicated to monitoring and training suppliers.

Dell has taken a variety of actions to verify the absence of forced labor, slavery, and human trafficking in our direct materials supply chain, including those described below. We have implemented similar initiatives for suppliers in key parts of Dell's indirect supply chain, which includes workers who are typically employed by suppliers known as Onsite Service Providers (OSPs), who provide services ranging from janitorial to security to food management. We will continue to expand these initiatives into other parts of our indirect supply chain outside of our facilities.

**1. VERIFICATION AND RISK ASSESSMENT:** Internal assessment of supply chain risk based on commodity produced, independent research that identifies labor risks associated with geographic locations, spend, past performance, and other targeted risk factors. This risk assessment is conducted annually and incorporates data on human trafficking incidence from the U.S. State Department's annual "Trafficking in Persons Report," as well as other risk factors including human rights risk and country governance and accountability. Dell also collaborates with our industry peers through the Responsible Labor Initiative (RLI, a sub-group initiative to the RBA) to address identified risks in the supply chain to drive accountability and corrective actions with suppliers. For more information on our work to remediate forced labor risks with our suppliers, please review our [Supply Chain Sustainability Progress Report](#).

**2. AUDITS:** Audits (including unannounced investigations) monitor suppliers' adherence to over 40 provisions covered by the [RBA Code of Conduct](#), including an assessment of suppliers' policies and practices with regards to human trafficking risks and controls and their management and oversight of their own suppliers, with a particular emphasis on labor brokers. Our audits are completed by RBA-certified third-party entities to ensure full code coverage and consistency of interpretation of requirements even in countries where local law is not as strict as RBA. Auditors are qualified by RBA based upon a combination of RBA-specific training, specific relevant industry training (i.e. for certain health/safety or environmental disciplines) and minimum levels of field experience under certified RBA lead auditors. Re-certification is required to ensure up-to-date skills and interpretations. Auditors are not only trained on code requirements, but also in worker interview skills, particularly for forced labor or other labor issues that workers may be reticent to discuss.

The auditors review documents related to the full labor section of the code (including working hours, pay slips with wages, benefits and deductions), and conduct interviews with both management and the workers themselves to assess conformance to the code. Worker interviews are key in identifying expenses or deductions, which may not be reflected in the factory pay slip if a labor recruiter was involved in the process.

The interviews are an important assurance step; therefore, it is critical to ensure workers can provide information safely and confidentially—before, during or after an audit. Dell contracts an independent third-party service provider to run a helpline to ensure workers' rights and safety are respected and to enhance the well-being of worker communities through tripartite communications. The helpline is independent and acts as both a grievance mechanism for the worker (covering grievance and information on common psychological issues and conflict resolution) and as an alert mechanism for Dell to understand issues impacting workers. Many issues can be addressed or improved directly by the supplier in question. Any cases that meet defined criteria will be escalated through established channels to ensure they are addressed, with the root cause understood.

All workers are in scope, including those migrating for work. Workers engaged for interviews during onsite audits are provided with a communication card to enable access to the helpline, to provide feedback outside the factory and outside the audit process, as they prefer.

We use audits to supplement our capability-building programs and internal tracking mechanisms that monitor a suppliers' performance to our requirements. These audits are part of our overall strategy to responsibly manage our supply chain, identify risks, and interact with workers. We select supplier sites for audit based on the risk assessment described above. Audit findings that indicate potential risks of forced labor or human trafficking are tracked until closed.

We also work with suppliers to return recruitment fees to affected workers. Additional detail on these programs and statistics for the last reporting year are available in our [Supply Chain Sustainability Progress Report](#).

3. SUPPLIER CERTIFICATION: Compliance with [Dell's Supplier Principles](#) is part of our contract language for suppliers. These Principles include requirements to address risks of forced labor and human trafficking. Compliance to these requirements are evaluated through the audit mechanisms referenced above. Suppliers are required to conduct a root cause analysis and develop a plan to address any issues found during an audit within RBA-specified timelines, including any findings associated with forced labor conditions. Progress in addressing these issues is regularly reported across Dell's procurement organization through monthly reports, Executive Review Board communications, as well as through quarterly business reviews with suppliers. Closure audits confirm findings have been resolved; and if a supplier does not remediate or correct an issue Dell may reduce or suspend business with the supplier. Dell reserves the right to take any and all available actions against suppliers for violations of Dell's Vulnerable Worker Policy including without limitation the reduction of business, frequent required onsite compliance auditing at Supplier's expense (including dormitories, canteens, storage and common areas), employee compensation at Supplier's expense, and/or termination of Dell's contract with the Supplier.

4. INTERNAL ACCOUNTABILITY: Internal accountability standards and procedures help confirm that employees and suppliers meet Dell standards. Supplier accountability occurs through mechanisms ranging from audit corrective actions (see "AUDITS," above) to Dell executive review of supplier performance and supplier quarterly business reviews to ensure alignment and timely action. Typically, it is the quarterly business review, but meetings may be accelerated depending on the type of finding. Dell maintains an internal tracking system of RBA audit findings that allows for monitoring and regular reporting on open issues and due dates. Commodity teams are measured in their quarterly and annual performance scorecards with the audit performance and closure status of RBA audit issues. Procurement executives receive monthly reports on suppliers with any audit findings that suggest risks of forced labor and human trafficking and hold suppliers accountable to address the risks.

The SER teams work with the suppliers to determine the root cause, provide targeted capability-building and monitor corrective action plans to closure. If Dell believes cooperating with other RBA members or


NGOs, like Fair Hiring Initiative, will produce a more effective, efficient approach to closing an issue, Dell will engage beyond its standard approach. The timeliness and completeness of the corrective action plans are measured by the supplier's quarterly business reviews to ensure alignment and timely action. For more detail on how accountability is built into our work with suppliers, see our [Supply Chain Sustainability Progress Report](#).

Dell also maintains corporate-wide accountability and grievance mechanisms (e.g., the [Dell Ethics Hotline](#)), which are available to both employees and external parties. Dell team members are required to complete annual ethics and compliance training. For additional information, see the [Dell Code of Conduct](#).

5. TRAINING: Dell conducts RBA Code of Conduct training for supply chain management professionals and manufacturing operations teams. This training includes engagement with global commodity managers, as well as other key relationship owners, and is conducted regularly through a variety of training approaches, from in-person, all-day workshops to online modules. Human trafficking is consistently covered as part of the training. Dell's Global Operations organization has responsibility for implementing and monitoring compliance to all of the supply chain activities described above. Our focus on identifying even potential risks of slavery and human trafficking is part of a larger effort to encourage business integrity, ethical conduct, and supply chain transparency and accountability. In 2019, we worked with a civil society organization to provide training around recruitment fees to supplier factories in Taiwan. This helped suppliers better understand forced labor issues and best practices around recruitment. We will not tolerate forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons by any Dell supplier or for any other purpose. For additional information describing the structure of Dell's direct materials supply chain and our supply chain responsibility program, see the supply chain sections of Dell's sustainability reporting. For more information about our business, see the business description available in the Dell Technologies 10K.

This statement is made pursuant to the requirements of the California Transparency in Supply Chains Act (SB657) and section 54(1) of the UK Modern Slavery Act 2015, and Part 2 of the Australian Modern Slavery Act 2018, and constitutes Dell's slavery and human trafficking statement for the financial year ending 1st of February, 2020 (and for the financial year ending 31st December 2019 in respect of Dell Bank International Designated Activity Company). The term "Dell" as used in this Statement refers to Dell Inc. and its wholly owned subsidiaries.

Signature:



Robert Potts, Senior Vice President and Assistant Secretary

Dell Inc.

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