



STATEMENT AGAINST MODERN SLAVERY, HUMAN TRAFFICKING, AND CHILD LABOR

Dell Technologies Inc., on behalf of itself, Dell Inc. and its direct or indirect subsidiaries ("Dell"), is committed to social and environmental responsibility. As part of its commitment, Dell prohibits slavery, human trafficking, and child labor in our operations and supply chain, and works to minimize any associated risks. Irrespective of the circumstances, we will not tolerate forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons in any of our own business operations or by any of Dell's suppliers, our supplier's suppliers (collectively, "Suppliers"), or for any other purpose. Dell is a founding member of the [Responsible Business Alliance \(RBA\)](#) and has adopted its Code of Conduct (the "RBA Code"), to which we hold ourselves and our supply chain accountable. The RBA Code prohibits the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, trafficking of persons, and child labor. The RBA Code, amongst other Dell policies, is incorporated into Dell's [Supplier Principles](#), to which all Suppliers are expected to agree as a condition of doing business with Dell, with the understanding that the obligations imposed by Dell may be more onerous than under applicable law. Dell considers each Supplier's conduct vis-a-vis the RBA Code and their adherence to Dell's Supplier Principles when awarding and/or renewing business with the Supplier.

This Statement Against Modern Slavery, Human Trafficking, and Child Labor ("Statement") is made pursuant to the requirements of the California Transparency in Supply Chains Act of 2010, section 54(1) of the U.K. Modern Slavery Act of 2015, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2024, and Part 2 of the Australian Modern Slavery Act of 2018, and constitutes Dell's modern slavery, human trafficking, and child labor statement for the financial year ending February 2, 2024 (and for the financial year ending 31 January 2024 in respect of the Australian Reporting Entity and Dell Bank International Designated Activity Company). For the purposes of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2024, this Statement is made on behalf of Dell Canada Inc. For the purposes of Part 2 of the Australian Modern Slavery Act 2018, this Statement is made on behalf of the applicable reporting entity, Dell Australia Pty Limited ABN 46 003 855 561 (Australian Reporting Entity). The corporate structure of the Australian Reporting Entity is set out in Annexure A of this Statement along with Australian specific details required under Australian law.

For the purposes of section 54(1) of the U.K. Modern Slavery Act 2015, this Statement is made on behalf of reporting entities Dell Corporation Limited (UK company number 02081369), Dell Emerging Markets (EMEA) Limited (UK company number 03266654), Dell Products Unlimited Company (Irish company number 191034), EMC Information Systems International Unlimited Company (Irish company number 461022), EMC Europe Limited (UK company number 00990752), Virtustream Ireland Limited (Irish company number 433356) and Dell Bank International d.a.c. (Irish company number 502362).

Christopher A. Garcia signs this Statement as Assistant Secretary and Senior Vice President on behalf of Dell Inc. and its wholly owned subsidiaries in his capacity as Director or authorized representative of the above-named legal entities.

Structure, operations, and supply chains

Dell Technologies is one of the largest information technology (IT) providers in the world. Our technology and services portfolio spans both traditional infrastructure and multicloud technologies. We design, develop,

manufacture, market, sell, and support a wide range of comprehensive and integrated solutions, products and services.

Dell is a corporation incorporated in the state of Delaware with principal executive offices in Round Rock, Texas. A complete list of Dell's subsidiaries worldwide as of the end of its most recently completed fiscal year can be found at [Exhibit 21.1](#) of the Dell Technologies 10-K, filed with the US Securities and Exchange Commission on March 25, 2024.

We have operations and conduct business in the Americas, Europe, the Middle East, Asia, and other geographic regions. As reported in our most recent 10-K, as of February 2, 2024, we had approximately 120,000 employees worldwide. We also manage responsible business practices in one of the world's largest supply chains. Our own manufacturing facilities are located in the United States, Malaysia, China, Brazil, India, Poland, and Ireland. We also use contract manufacturers throughout the world to manufacture or assemble our products under the Dell Technologies brand. Components used in these manufacturing facilities are sourced primarily from the same locations listed above, and from Japan, South Korea, Mexico, Taiwan, Singapore, Philippines, Thailand, Laos, Germany, Netherlands, Israel, Vietnam, and Indonesia.

Our primary focus in due diligence within our supply chain is on our Suppliers of direct materials, as it represents our largest spend category. [Dell's Public Supplier List](#) identifies the category type and location of our original design manufacturers (ODMs) and final assembly Suppliers. This list represents a snapshot covering at least 95% of Dell's direct material spend during fiscal year 2023. Our second largest spend category includes products and services procured in-country or regionally for customer-facing services, followed by marketing, and global real estate and facilities, respectively.

Identify and assess the risk of modern slavery and child labor

Given the multi-faceted global legal landscape and corresponding labor market fluctuations, the technology sector's biggest risk of modern slavery and human trafficking comes from the utilization of foreign migrant workers (FMWs). Our efforts to verify, assess, and audit internal risks are described below. Dell's efforts also extend to Dell's Suppliers, that may not have sufficient controls in place to fully identify, prevent, correct, or remediate risks of forced labor and child labor. To that end, Dell collaborates with industry peers through the RBA's Responsible Labor Initiative (RLI) to address potential and identified forced labor risks and vulnerabilities in the supply chain, drive Supplier accountability, and implement corrective measures.

Dell participates in the RBA's Responsible Minerals Initiative ("RMI"), which provides tools for conducting due diligence on minerals processing in our supply chain, such as the Conflict Minerals Reporting Template ("CMRT") and oversees the Responsible Minerals Assurance Process ("RMAP"). RMAP is one of three approved third-party audit schemes that verify that sourcing practices of actors at identified points in the supply chain (i.e., 3TG smelters or refiners ("SORs")) and is aligned to the Organization for Economic Cooperation and Development (OECD) framework. Dell's products contain raw materials, including minerals, and we prioritize the identification and assurance of SORs used to process material supplied by mines or mineral agents. This includes an independent, third-party assessment of management systems and sourcing practices to validate conformance with RMAP. To track conformance rates, we require Suppliers that use 3TG (tin, tungsten, tantalum, and gold — known as 3TG), cobalt, and mica to complete the Conflict Minerals Reporting Template or the Extended Minerals Reporting Template to report on SORs within their own supply chains. Dell's suppliers source gold for its circuit boards and tantalum for its capacitors. Some of these minerals are mined in conflict-affected and high-risk areas (CAHRAs). While we do not purchase minerals directly from mines, smelters, or refiners, our

responsible sourcing requirements extend throughout our entire supply chain. We collaborate with our Suppliers to transition away from non-compliant entities according to our risk mitigation strategy. If conformance cannot be achieved, Dell requires the Supplier to take immediate steps to remove non-conformant SORs. More information is available in the Dell Technologies [Conflict Minerals Disclosure Report](#).

As previously noted, the biggest risk of forced labor (based on both our own audits as well as industry data from the RBA and several non-governmental organizations (NGOs)) would include any geographical area or type of Supplier that uses FMWs. In addition to substandard labor conditions, FMWs may be vulnerable to fees at different points during their journey as a potential worker, ranging from home and/or receiving country labor agents, to travel, visa, or health check fees. FMWs may also not be in a position to fully understand or consent to the adverse conditions of work opportunities prior to leaving their home country. For example, Dell has encountered, investigated, and mitigated risks to FMWs in situations involving Onsite Service Providers (OSPs) and in locations where worker fees might be culturally accepted.

Dell's assurance practices are risk-based, with high-risk circumstances and mitigation actions to avoid salient risks such as modern slavery and child labor being highly prioritized. Dell's audit and capability building programs specifically target areas of known, or with the highest potential of, forced labor risk. Dell's risk assessment method incorporates the resources of Dell's internal audit activity, international governments, and NGO information to assign each country a risk score which is heavily weighted by forced labor risks, including for FMWs. The risk scores inform our audit programs, such that we focus resources on locations where we have seen higher risk. For locations that are lower risk and for which we have not seen high risk indications in their in-country or regional supply chains, such as Western Europe, Canada, USA or Australia, we do not divert resources from higher risk locations. Dell takes a balanced approach by responding to new risk information with audits as needed for lower risk locations. The risk assessment is completed annually. As risk levels change, Dell's audit and capability programing adapts to shifting risks.

Dell's published policies 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 value chain, and workers in the global community. [Dell's Human Rights Policy](#), and other policies and principles referenced in this Statement are available online on our [Supply Chain Responsible Labor](#) and [ESG Policies, Positions & Guidelines](#) pages.

Dell's Supply Chain Assurance organization sits within its Global Operations organization and includes a Social and Environmental Responsibility (SER) function that deploys programmatic and operational teams to drive social and environmental standards across the supply chain, including those related to forced labor and child labor. This team works across Global Operations with procurement and manufacturing organizations and includes 19 specialists dedicated to monitoring Supplier performance and building Supplier capabilities around Dell's social and environmental expectations. SER aligns with Dell's internal stakeholders in each applicable group entity to engage for the purposes of preparing this Statement. Representatives from each of the group entities (including the reporting entities) participate in working group meetings and/or receive regular/periodic briefings from SER. The working groups consult with Dell group entities to ensure country-specific risks have been appropriately identified, assessed, and addressed and that the group entities are aware of the actions required to mitigate the risks. Specifically, input is sought and considered prior to the annual publication of this Statement to ensure all group entity requirements are clearly stated.

For more information on our work to remediate forced and child labor risks with our Suppliers, please review the Supply Chain Responsibility section of our annual [Environmental, Social and Governance \(ESG\) Report](#).

Actions taken to address risks of modern slavery and child labor

Dell focuses on the following key criteria to ensure and verify the absence of forced labor, modern slavery, human trafficking of any kind, and child labor within our direct materials supply chain. We have similarly implemented initiatives for Suppliers in key parts of Dell's indirect supply chain, including workers employed by Suppliers known as Onsite Service Providers (OSPs) that provide a range of services, which include but are not limited to janitorial, security, or food and cafeteria management services.

1. VERIFICATION AND RISK ASSESSMENT: Dell's risk-based approach means that the highest risk locations and Supplier types will be in scope for all parts of our programs (risk assessment, audits, corrective actions, capability building, and accountability measures, such as quarterly business reviews), while lower risk locations may not be audited or be in capability building programs. Even if a country represents low risk, Dell will adjust its audit plans if new information related to risk of forced or child labor is found either through Dell's own due diligence or from other credible stakeholder insights. Dell conducts an annual internal assessment of supply chain risk based on the commodity produced and independent research that identifies labor risks associated with geographic locations, spend, past performance, and other targeted risk factors. This risk assessment incorporates data on human trafficking incidence from sources including, but not limited to, the U.S. State Department's annual "Trafficking in Persons Report", The Global Slavery Index, and the U.S. Department of Labor's [Bureau of International Labor Affairs](#). Our risk assessment further considers local risk factors, including human rights risk, country governance, and accountability.

2. AUDITS: Suppliers are selected for audits based on risk. We target to have third-party audits at all high-risk Supplier sites every two years.

As part of the audit process, auditors review documents, observe daily work practices, and interview Supplier management, workers, and contractors independently to assess the implementation of the SER standards in the RBA Code. In FY24, auditors conducted 14,077 confidential feedback interviews as part of the audit process.

Our audits are completed by RBA-certified third-party entities to ensure full RBA Code coverage and consistency of interpretation of requirements. Auditors are qualified by the RBA based upon a combination of RBA-specific training, relevant industry training (i.e., for certain health/safety or environmental disciplines), and minimum threshold levels of field experience under certified RBA lead auditors. Auditors, including those involved in unannounced investigations, monitor Suppliers' adherence to over 40 provisions covered by the RBA Code, including an assessment of Suppliers' policies and practices addressing human trafficking risks and controls. Auditors also assess Supplier management and oversight of sub-tier Suppliers, with a particular emphasis on labor brokers or recruiters. Auditors are re-certified to ensure up-to-date skills and understanding of the Code. Auditors are trained on RBA Code requirements concerning confidentiality, as well as worker interview skills, particularly for forced labor or other labor issues that workers may be reticent to discuss.

Importantly, site audits are conducted in areas where workers' freedom of movement may be restricted or constrained, such as Suppliers' dormitories, canteens, storage, and common areas. Access to these areas may facilitate the identification of specific risks or instances of modern slavery if the audit reveals workers are being denied freedom of movement, are housed in inadequate or substandard housing or are being charged unreasonable fees for food and housing; these are known indicators that modern slavery practices may exist.

Auditors review documents related to the labor provisions of the RBA Code (including documents related to working hours, pay slips with wages, benefits and deductions, among others) and conduct interviews with both

management and the workers to assess conformance to the RBA Code of Conduct. Auditor interviews of workers are key, for example, in identifying expenses or deductions in factory pay slips, which may not reflect the use of a labor recruiter involved in the hiring process. Worker interviews also help identify more severe findings, such as the withholding of identity documents. Auditor interviews are an important assurance step; it is critical to ensure workers can provide information safely and confidentially before, during, or after an audit. Workers selected for interviews during onsite audits are also given a communication card with access to Dell's or RBA's (for audits of a Supplier shared with other RBA members) helpline to provide anonymous feedback outside the factory and outside the audit process, if they prefer.

While helpline usage related to an audit is a critical verification for the audit, Dell's third-party operated supply chain grievance mechanism can be used for any concerns that arise outside the two-year audit cycle. Any issues that meet the defined RBA Code criteria are escalated through established procedures to ensure issues are promptly addressed along with the determination of the root cause.

This third-party operated mechanism targeted at Suppliers is in addition to [Dell Technologies Ethics Helpline](#) options globally available for anyone, including team members, partners, Suppliers, or their employees, or any other internal or external stakeholder to report concerns or issues they believe may violate Dell's Code of Conduct, Dell's Human Rights Policy, or any other related Dell policies or standards or applicable laws. Dell will promptly investigate allegations and take appropriate action, where necessary, to mitigate actual or potential adverse human rights impacts. Dell does not tolerate retaliation against anyone acting in good faith to report a concern, provide information, or otherwise assist in an investigation or proceeding regardless of the helpline a worker chooses to use.

Any allegations of modern slavery or modern slavery risks, or child labor or child labor risks, received through these mechanisms are fully investigated immediately by Dell. Methods to research allegations include unannounced visits by our SER specialists and/or third-party auditors. Depending on the nature of any findings, these specialists work with Suppliers to develop corrective action plans to address modern slavery and child labor risks and/or remediate instances of modern slavery and child labor. In cases of severe (priority and/or major) findings, Suppliers may be required to complete a third-party closure audit to resolve the issue.

In FY24, 100% of our audited Suppliers had helpline mechanisms in place. This is a requirement for RBA Code compliance to enable suppliers to receive worker feedback and create processes to directly address and/or improve issues outside of an audit, including but not limited to forced labor.

All workers within our supply chain fall within the scope of Dell's assurance procedures, including those migrating for work. Dell's SER initiatives apply to workers in final assembly, direct, and sub-tier Suppliers regardless of their form of employment. Whether a worker is directly hired or is in an indirect, contract, dispatch, or temporary employment relationship, the labor protections apply. We use audits to supplement our Supplier Engagement, Capability Building, and Assessment program and internal tracking mechanisms to monitor 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 audits based on the risk assessment described above. Audit findings that indicate potential risks of forced labor, human trafficking, and child labor are immediately addressed and tracked until closed.

Where recruitment fees either to the Supplier or a labor broker have been used, we work with Suppliers to return recruitment fees and pay direct remedies to affected workers. Additional details on these programs and

statistics for the last reporting year are available in the Supply Chain Responsibility section of our annual ESG Report.

3. SUPPLIER CERTIFICATION: Compliance with [Dell's Supplier Principles](#), which includes the [Dell Vulnerable Worker Policy](#), is a contractual obligation for Suppliers. These Principles include requirements to directly address risks of forced labor, human trafficking, and child labor. Compliance with these requirements is evaluated through the mechanisms referenced above. Suppliers are required to conduct a root cause analysis and develop a plan to address issues found during an audit within RBA-specified timelines, including findings associated with forced labor conditions.

Dell develops corrective action plan (CAP) toolkits that provide resources to help Suppliers address audit findings in relation to labor and ethics risk (including forced labor) and enhance Dell's review of CAPs developed by Suppliers. These CAP toolkits help Suppliers address modern slavery risks, particularly in locations that are heavily reliant on internal country migrants and FMWs who frequently work through labor agents. Suppliers are responsible for effectively managing agents as well as bearing the full cost of the recruitment process (i.e., at no point charging workers for recruitment fees). Suppliers cannot delegate the ownership and responsibility of implementing the 'no recruitment fees' policy to labor agents, even as individual tasks are delegated.

This applies for the full journey of the worker from home country to final factory. If employees are found to have been paying recruitment fees to their employer or a third-party labor broker, Dell will work with Suppliers to repay the workers.

Progress in addressing these issues is regularly reported across Dell's procurement organization through monthly reports, executive visibility, and quarterly business reviews with Suppliers. Closure audits are conducted to confirm priority and major findings have been resolved. 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 but not limited to 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 workers and Suppliers meet Dell's supply chain standards. Supplier accountability occurs through mechanisms ranging from audit corrective action procedures (see "AUDITS," Section 2, above) to Dell executive review of Supplier performance and quarterly business reviews to ensure alignment and timely action. Typically, this occurs during Supplier quarterly business reviews, which are attended by key executives to help determine future business awards, Supplier resources and policy, as well as to address progress toward aligned goals. Alternatively, 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 during their quarterly and annual performance scorecards with the audit performance and closure status of RBA audit issues for Suppliers they manage. Procurement executives receive monthly reports on Suppliers with any audit findings that suggest risks of forced labor, human trafficking, and child labor and hold Suppliers accountable to address the risks. Where there is a 'priority' or 'major' Supplier audit finding in relation to forced labor or child labor, this issue is escalated for review at an executive level prior to the Quarterly Business Review (QBR) cycle to ensure timely review by executives.

Dell's SER team works with Suppliers to determine root causes, provide targeted capability-building, and monitor corrective action plans to closure. We also believe some human rights risks and issues can be addressed

most effectively by working in partnership with others. In addition to our standard procedures, where we believe it may accelerate and improve outcomes for affected stakeholders, Dell may collaborate with other RBA members, NGOs, or other stakeholders, as permitted by applicable laws.

The timeliness and completeness of the CAPs are measured by the Suppliers' quarterly business reviews to ensure alignment and timely actions. For more details on how accountability is built into our work with Suppliers, see the Supply Chain Responsibility section of our annual ESG Report.

5. TRAINING: Expectations to comply with laws and ethical business practices, including respecting the fundamental human rights of others, are embedded in Dell's culture and policies, and clearly set out in the [Dell Technologies Code of Conduct](#) (Dell Code). Dell Technologies team members are required to complete annual Dell Code training and adhere to our code and standards, including adherence to the RBA Code, which sets out required protections against forced, bonded, or indentured labor, human trafficking, child labor, and more.

Dell conducts additional RBA Code 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 through a variety of training approaches, from in-person, all-day workshops to online modules. Identification and prevention of human trafficking is a key part of the training. Dell's Global Operations organization has responsibility for implementing and monitoring compliance to all the supply chain activities described above. Our focus on identifying even potential risks of slavery, human trafficking, and child labor is part of a larger effort to encourage business integrity, ethical conduct, and supply chain transparency and accountability.

In FY24, the reach of our capability building program, including forced labor and labor protections training, remained high:

- a. 1,680 unique participants attended our capability building training programs.
- b. 400 unique Supplier factories were represented.
- c. 14,284 hours of capability building training on social and environmental responsibility topics were completed.
- d. 5,971 hours of online training.
- e. 8,313 hours of in-person training sessions and webinars.

In addition, audit scores of Suppliers who have previously attended training are analyzed to improve or clarify training where needed. 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 ESG report.

For more information about our business, see the business description available in the Dell Technologies 10-K.

6. EFFECTIVENESS: Dell measures and monitors the cumulative impact of its various programs and provides transparency into progress in its annual ESG Report. By analyzing relevant performance indicators, we gain insights into the effectiveness of our initiatives. Such initiatives include Supplier trainings on labor rights and the prohibition of recruitment fees, as well as CAP toolkits directed at identifying and addressing potential labor violations, including forced labor.

These programs are also integrated into Supplier performance management and escalation processes such that the total impact is reflected in the audit score improvements or recruitment fees identified and returned to workers.

In FY24, we saw clear improvement in Supplier factory audit performance, with 63% of factories that went through at least their second audit cycle improving their audit scores between cycles. This includes final assembly Suppliers (69%), direct Suppliers (61%) and sub-tier Suppliers (64%).

One area in which we made progress is our Suppliers' target audit score attainment rate. Dell sets target audit scores for Suppliers — at least 180 out of 200 for final assembly factories and 160 out of 200 for other factory tiers. These target audit scores align to high performance based on the RBA Validated Assessment Program.

We made significant progress in increasing the rate of Suppliers who attained our target audit scores. In FY24, our SER specialists worked closely with Suppliers to help identify the root causes of issues and drive improvement. Additionally, we engaged across our procurement organization and directly with Suppliers' senior-level leadership to emphasize our expectations. As a result, 77% of our factories are high performing, meaning they scored at least 180 out of 200 available points for final assembly factories, or 160 out of 200 available points for other factory tiers and had no priority findings.

These mechanisms and indicators are closely monitored and tracked as part of our practices to ensure all Dell products, wherever manufactured or delivered to customers around the world, are made responsibly, without the use of any form of forced labor or child labor.

Signature:



Christopher A. Garcia

Assistant Secretary & Senior Vice President

Dell Inc.

Last revision date: 21-MAY-2024



Dell Structure

