



## 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 have 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](#) home page.

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 are in the process of implementing similar initiatives for suppliers in key parts of Dell's indirect supply chain, which includes workers who may be at risk in our direct operations such as service and contract employees.

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 and utilizes the Fair Hiring Initiative 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 monitor suppliers' adherence to over 40 areas 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. We use audits to supplement our capability building and the programs and internal systems that monitor a suppliers' performance to our expectations. These audits are part of our overall strategy to responsibly manage our supply chain, identify risks, and interact with workers. We select supplier sites to audit based on the risk assessment described above. Audit findings that indicate potential risks of forced labor or human trafficking are tracked until closed. Over the past two years, Dell has audited 97% of our identified high-risk suppliers.

In addition, in 2018 Dell surveyed suppliers in geographic locations considered high risk for noncompliance with our recruitment fee policy and identified 16 sites where workers had been charged recruitment fees. We worked with suppliers to return \$825,000 USD in recruitment fees to affected workers last year. 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 also part of our standard contract language for all Dell vendors. 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 reported across Dell's procurement organization through the Executive Review Board, as well as through quarterly business reviews with suppliers. Closure audits confirm findings have been resolved; and if a supplier does not remediate 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 its Vulnerable Worker Policy including without limitation the termination or reduction of business, frequent required onsite compliance auditing at Supplier's expense, 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. Procurement executives receive monthly reports on suppliers with any audit findings suggesting risks of forced labor and human trafficking, and hold suppliers accountable to address the risks. 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. For additional information, see the [Dell Code of Conduct](#).

5. TRAINING: Dell conducts training for supply chain management professionals and manufacturing operations teams on the RBA Code of Conduct. This 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 slavery and human trafficking is part of a larger effort to encourage business integrity and ethical conduct, supply chain transparency and accountability. 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 (SB-657) 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, 2019 (and for the financial year ending 31st December 2018 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:



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Robert Potts, Senior Vice President and Assistant Secretary  
Dell Inc.

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