



Dell Slavery and Human Trafficking Policy Statement

In 2010 the California Transparency in Supply Chains Act of 2010 (SB 657) was passed and went into effect January 1, 2012. This law requires large retailers and manufacturers doing business in the state of California and having annual gross worldwide sales of over \$100 million dollars to disclose their efforts to eradicate slavery and human trafficking from their supply chain.

On March 26, 2015, The Modern Slavery Act 2015 was passed into law in the United Kingdom. This law requires all business entities that carry on a business, or part of a business, in any part of the United Kingdom to prepare and publish a slavery and human trafficking statement for each financial year of the organization.

As a member of the Electronic Industry Citizenship Coalition (EICC), we have shown our commitment to environmental and social responsibility. The EICC Code of Conduct establishes standards in treating workers with respect and dignity. Since 2004, the EICC Code of Conduct has prohibited the use of forced, bonded, and indentured labor and involuntary prison labor. Dell audits its suppliers to this code and takes seriously all forms of non-conformance. The EICC also has a Freely Chosen Employment (FCE) task force designed to help identify opportunities to share best practices among EICC members, expand the code of conduct, and make recommendations on available tools and training.

Dell has been participating in the C-TPAT (Customs – Trade Partnership Against Terrorism) voluntary government-business initiative since its inception over 10 year ago. Dell works with its internal partners (logistics, security) as well as its external partners (manufacturers, carriers, brokers) to secure its end to end international supply chain to guard against cargo tampering from terrorist elements. Dell performs an annual review of its security profile with Customs Border Protection (CBP) and approximately every 4 years undergoes a more rigorous re-validation with an onsite review from CBP.

Dell has internal policies and practices that are based on the [EICC Code of Conduct](#) as well as [international labor and human rights standards](#). This focus on slavery and human trafficking is part of a larger effort of supply chain transparency and accountability and respect for human rights. Dell has taken multiple actions to verify the absence of forced labor, slavery and human trafficking in our supply chain, including the following:

- Dell [Human Rights and Labor Policy Statement](#)
- Dell [Vulnerable Worker Policy](#)
- Supplier agreements
- Procurement professionals training
- Internal Audits
- Shared Audits
- Capability Building Programs
- Worker Engagement
- Stakeholder Engagements
- Maintain internal accountability standards
- On site visits

For complete information concerning our supply chain responsibility programs and specific audit findings, please see www.dell.com/supplierresponsibility. This statement was not verified by a third party.