



## STATEMENT AGAINST SLAVERY AND HUMAN TRAFFICKING

Dell is committed to social and environmental responsibility and has zero tolerance for slavery and human trafficking. As part of this commitment, we are a founding member of the Electronic Industry Citizenship Coalition (EICC) and have adopted its Code of Conduct (the "EICC Code"), to which we hold ourselves and our supply chain accountable. The EICC 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-à-vis this Code when awarding and/or renewing business with the supplier.

Dell has also published a number of other policies enforcing 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 under [Policies and Compliance](#).

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 the following. Similar initiatives to those described below are in the process of being implemented for suppliers in Dell's indirect supply chain, which includes workers who may be at greater risk in our direct operations such as service and contract employees.

1. **VERIFICATION AND RISK ASSESSMENT:** Internal assessment of supply chain risk based on international indices, supplier performance (e.g., audit results), and other indicators of supplier-specific risks. 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. More information on our risk assessment methodology is available in our public [Supply Chain Social and Environmental Responsibility Progress Report](#).
2. **AUDITS:** On-site verification of EICC Code conformance through independent, third-party audits that are announced. The third-party audits follow the [EICC standard protocol](#), which includes an assessment of the suppliers' policies and practices with regards to human trafficking risks and controls as well as their management and oversight of their own suppliers, with particular emphasis on any labor brokers. We select supplier sites to audit based on the verification and risk assessment described above. Additional detail and statistics for the last reporting year are available in the [Supply Chain Social and Environmental Responsibility Progress Report](#).
3. **SUPPLIER CERTIFICATION:** Certification from 100% of Dell's Tier 1 and strategic Tier 2 direct suppliers, labor brokers servicing our factory operations, and key logistics suppliers of conformance with our [Supplier Principles](#) (which includes an expectation of conformance with all applicable laws, the [EICC Code of Conduct](#), and related Dell requirements) through executive acknowledgement of the Dell Supply Chain Sustainability Supplier Expectations. These requirements include substantive sections on human trafficking. Compliance with the [Supplier Principles](#) is also part of our standard contract language for all Dell vendors, and evaluated through the mechanisms referenced above.
4. **INTERNAL ACCOUNTABILITY:** Internal accountability standards and procedures to help confirm that employees and suppliers meet Dell standards. This program is intended to ensure that Dell employees and suppliers are aware of and adhere to established standards and processes. 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. For more detail on how accountability is built into our work with suppliers, see the "Protecting the most vulnerable" and "Championing social and environmental responsibility" sections in the [Supply Chain Social and Environmental Responsibility Progress Report](#).

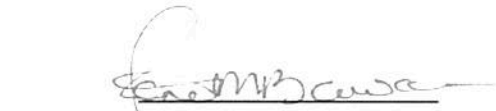
Dell also maintains corporate-wide accountability and grievance mechanisms (e.g., the [Dell Ethics Hotline](#)), which are available to both employees and external parties. For additional information, see the [Dell Code of Conduct](#).

5. **TRAINING:** Training Dell supply chain management professionals on the EICC Code of Conduct. This includes all 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 provided.

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 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](#), as well as Dell's [Supply Chain Social and Environmental Responsibility Progress Report](#). 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 constitutes Dell's slavery and human trafficking statement for the financial year ending 31st January 2017. The term "Dell" as used in this Statement refers to Dell, Inc. and its subsidiaries, including Dell Corporation Limited, Dell Emerging Markets (EMEA) Limited, Dell Products, Dell Bank International Designated Activity Company, EMC Computer Systems (U.K.) Ltd., and EMC Europe Limited and this Statement is signed accordingly on behalf of these entities.



Janet M. Bawcom  
Director

Date: August 16, 2017



Cormac Costelloe  
Director  
For and on behalf of Dell Bank International Designated Activity Company

Date: **October 3, 2017**