

US corporate human rights index: Tracking changes in company commitments to human rights

Dell

Indicator	Finding - 2025	Source	Source Link	Yes/No Change	Change
Policies and commitments					
General					
Human rights policy - UNGPs	Dell respects the human rights of all people as reflected in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work. We will not be complicit in human rights violations, and we hold our suppliers and other business partners to this same standard.	Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf	no change	
Human rights policy - ILO Core Labor Standards	Our policies and practices are grounded in expectations set out in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Responsible Business Conduct. We comply with local laws and regulations wherever we do business. If local law conflicts with the principles in this policy, within the bounds of local laws we seek ways to honor the principles of internationally recognized human rights and See above			no change	
Forced labor & prison labor	Dell prohibits slavery and human trafficking in our operations and supply chain. 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 Dell supplier, or for any other	Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-	no change	
Human rights defenders & civic space	Dell does not tolerate retaliation and is committed to protecting anyone who reports suspected misconduct in good faith.	Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/asset/en-us/solutions/business-	no change	
Gender equality and women's empowerment	We believe in building an inclusive workforce, made up of individuals with varying backgrounds and life experiences. Broadening diversity of backgrounds and experiences in tech is critical to meeting future talent needs and ensuring new perspectives that reflect our global customer base. We are committed to equal employment opportunity and upholding ethics and integrity in all we do, and we will continue to implement inclusive practices and policies...	Webpage - Cultivating inclusion in our workforce	https://www.dell.com/en-in/lp/dt/inclusive-workforce	Yes	Removal of targets. https://www.dell.com/en-us/lp/dt/inclusive-workforce?msocid=0bad4741954d689d147b516194da6976
Indigenous Peoples	Our ambition is that by 2030, 50% of our global workforce and 40% of our global people leaders will be those who identify as women...Our ambition is that by 2030, 25% of our U.S. workforce and 15% of our U.S. people leaders will be those who identify as Black/African American or Hispanic/Latino. [Webpage - Cultivating No evidence				
Natural resources					
Responsible mineral sourcing	Dell supports and respects the protection of internationally proclaimed human rights for all, including the basic human rights of our employees and workers within our supply chain. As part of our global approach to respecting human rights, Dell is committed to the responsible sourcing of materials used in our products. Dell's Responsible Sourcing Policy is referenced in our Supplier Principles, and we require adherence to this policy as well as to the Responsible Business Alliance (RBA) Code of Conduct and all other applicable laws.	Dell Technologies Responsible Sourcing Policy (revised April 2023)	https://l.dell.com/sites/csdocuments/Corporate_corp-Comm_Documents/en/conflict-minerals-policy.pdf	Additional source	Conflict minerals report covering January 1 to December 31, 2025 https://www.delltechnologies.com/asset/link/doc/en-us/dell-technologies-conflictminerals-report-en-d1h3s5-original.pdf
Conflict minerals	Mining is an intensive process, and some mining operations in conflict-affected and high-risk areas have been historically linked to human rights violations including child labor, labor abuses, and environmental degradation. Dell does not purchase minerals directly from mines, smelters or refiners. We collaborate with suppliers, industry peers and other stakeholders to ensure our products do not contain minerals whose mining and/or sales may directly or indirectly contribute to human rights violations. In those regions where conflict and poor labor practices in mining operations are more prevalent, we are committed to supporting Dell buys parts and components which may include 3TG, and we follow the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas ("OECD Guidance") to investigate our supply chain and engage with suppliers. We expect our suppliers to have policies and due diligence practices in place to reasonably assure that products and components supplied to Dell are not sourced from conflict mines. Dell works diligently with our suppliers and other stakeholders to improve the transparency of, and systematically address risks in, the global mineral supply chain. In support of this policy, we: • Conduct due diligence in accordance with the OECD Guidance and request its use by our suppliers • Participate in and support RMI programs • Provide our customers, and expect our suppliers to provide us,	Dell Technologies Responsible Sourcing Policy (revised April 2023)	https://l.dell.com/sites/csdocuments/Corporate_corp-Comm_Documents/en/conflict-minerals-policy.pdf	no change	
No deepsea mining	No evidence				
Land rights	No evidence				
Free, Prior, and Informed Consent (FPIC)	No evidence				
Technology					

Responsible AI	<p>We believe AI should be:</p> <p>Beneficial - AI applications should benefit society now and in the future. Like other disruptive technologies, AI will redefine how humans contribute and thrive in the workplace. We believe in the beneficial nature of this transformation and the importance of quickly defining and creating new jobs emerging in the AI era. This includes reskilling individuals whose roles are impacted by AI, educating users to unlock the technology's full potential, and accelerating AI-driven solutions in critical areas with scarce skills, such as healthcare and cybersecurity. AI should enhance our lives and improve our ability to solve complex problems. It should embody the most current practices of scientific and technical excellence. The broader impacts of AI should be weighed to ensure support of our communities, spur economic growth and foster environmental stewardship.</p> <p>Fair - AI should be honest, fair and respect fundamental human rights in its design, implementation and use. AI should prioritize integrity, ensure accurate outcomes and avoid harmful bias. Humans should have the ability to define the intent and objectives of AI systems to further ensure fairness. Human oversight and intervention can ensure aligned, ethical and trusted outcomes. AI should reflect a commitment to usability, accessibility and safety. It should yield results that meet customer expectations of performance, reliability and security.</p> <p>Transparent - Despite the inherent complexity of AI, we believe that AI systems must be explainable, traceable and transparent in terms of objectives and outputs. Users should be provided appropriate disclosures about their interactions with AI and its use of their data.</p> <p>Responsible - AI should be safe and trustworthy. We should incorporate established core principles of security and privacy in the design, development and use of AI, as well as seek out novel, AI-centric approaches. Users should have appropriate control over how their data is collected, stored and used. Data governance mechanisms must also comply with regulatory requirements, including those concerning data protection and privacy. Using a clear governance framework helps ensure accuracy, reduces bias, promotes transparency and adherence to legal requirements. Fail-safe mechanisms and processes for human We are committed to being transparent about our privacy practices as reflected in our Dell Privacy Statements. We are also committed to respecting our customers' personal data preferences and are actively working to ensure our customers have the latest privacy resources.</p>	Dell Technologies Principles for Ethical Artificial Intelligence	https://www.delltechnologies.com/assets/de-ch/solutions/business-solutions/briefs-summaries/principles-for-ethical-ai.pdf	no change
Human rights policy - freedom of expression and information and privacy		Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/assets/en-us/solutions/business-solutions/briefs-summaries/dell-human-	No Change
Living wage				
Living wage, own operations	<p>Dell has adopted the Responsible Business Alliance (RBA) Code of Conduct for itself and its suppliers." [Human Rights Policy]</p> <p>Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All workers shall receive equal pay for equal work and qualification. Workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law. [RBA Code of Conduct]</p> <p>See above</p>	Human Rights Policy RBA Code of Conduct	https://i.dell.com/sites/csdocuments/Corporate_corp-Comm_Documents/en/human-rights-labor.pdf https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf	No Change
Living wage in supply chain				no change
Human rights due diligence and supply chain				
Process for assessing human rights risks and impacts	<p>While human rights due diligence and assurance practices are implemented and continually monitored by internal organizations and experts across our business, we also periodically engage third-party experts to conduct formal human rights impact assessments. .</p> <p>We undertake due diligence to assess and address risks of modern slavery, and report annually on our actions and progress in our Dell Technologies Statement Against Modern Slavery, Human Trafficking and Child Labor See conflict minerals</p>	Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/assets/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf	No Change
Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs)				no change
Affected stakeholder engagement	<p>We believe unique and diverse perspectives are essential to expand and deepen our understanding of actual and potential impacts, and they help guide our actions to drive meaningful progress and positive outcomes. We value constructive engagements with, and insights from, stakeholders across our business and value chain, including our team members, customers, suppliers and their employees, other business partners and the local communities where we operate.</p> <p>Dell has adopted the Responsible Business Alliance (RBA) Code of Conduct for itself and its suppliers." [Human Rights Policy]</p> <p>The Responsible Business Alliance (RBA) Code of Conduct establishes standards to ensure that working conditions in supply chains are safe, and that business is conducted responsibly, ethically, and with respect for human rights and the environment. . [RBA Code of Conduct]</p>	Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/assets/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf	No change
Human rights requirements in supplier code/requirements		Dell Human Rights Policy (Updated 2025)	https://i.dell.com/sites/csdocuments/Corporate_corp-Comm_Documents/en/human-rights-labor.pdf	No Change
Global Framework Agreement	x		https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf	
Access to remedy				

Grievance mechanism for own employees	Dell has an established grievance mechanism. Speak Up is our reporting system that augments our other efforts to foster a culture of trust, integrity and ethical decision making. Speak Up allows our Global Ethics and Compliance Office line of sight into attempted circumvention of policies and/or controls or other activities that may negatively impact customers and other stakeholders. Anyone can confidentially and anonymously use Speak Up to report suspected violations of the Dell Technologies Code of Conduct, policies or applicable laws. Dell does not tolerate retaliation and is committed to protecting anyone who reports suspected misconduct in good faith. Where we have identified adverse human rights impacts caused or contributed to by our business activities, we are committed to providing for or cooperating in their fair and equitable remediation through legitimate processes. We expect the same of our suppliers and other business partners. Where we have determined Dell is directly linked to adverse impacts through our relationships with suppliers or business partners, we seek to engage and collaborate with them to promote appropriate remediation through their own	Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/assets/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf	No change	
Grievance mechanism for workers - supply chain	See above			no change	
Grievance mechanism for external individuals & communities	See above			no change	
Governance and staffing					
Board and/or C-Suite-level oversight	Dell's Board of Directors, directly and through its standing committees, oversees the establishment and maintenance of our governance, compliance and risk management processes and procedures to promote the conduct of our business with the highest standards of responsibility, ethics and integrity. Our Chief Executive Officer, who is also Chairman of our Board of Directors, approves this Policy.	Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/assets/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf	no change	
Senior level responsibility for human rights	Dell's ESG Steering Committee leads and oversees the execution of our ESG strategy. The Committee includes senior leadership from Dell's corporate sustainability and ESG, diversity and inclusion, human resources, ethics and privacy, supply chain, legal, investor relations, accounting, finance, security, corporate affairs, government affairs, risk management, product, operations, services, and giving and impact organizations. Representatives from our ESG Steering Committee regularly provide updates to the Board of Directors on ESG priorities and progress. We have established a Human Rights Advisory Committee, a cross-functional coalition of executives who lead organizations responsible for managing human rights due diligence and advancing governance of salient risks and impact priorities. This committee supports Dell's human rights strategy and ensures operational accountability for human rights governance and implementation of this Policy across Dell's own operations and value chain. Subject matter experts from these organizations also participate in our Human Rights Working Group which meets throughout the year and is responsible for ensuring cross-organizational awareness, implementation and advancement of human rights related commitments and priorities.	Dell Human Rights Policy (Updated 2025)	https://www.delltechnologies.com/assets/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf	no change	
Reporting and transparency					
Human rights reporting (integrated or stand-alone)	Included in FY24 ESG Report	FY24 ESG Report	https://www.dell.com/en-us/dt/corporate/social-impact/esg-resources/reports/fy24-esg-report.htm#scroll-off	Updated	Included in FY26 Impact by the Numbers https://www.delltechnologies.com/assets/link/doc/en-us/fy26-impact-by-the-numbers-dt117nmn-original.pdf
Transparency Report	No evidence			no change	
Memberships					
RBA	Yes	RBA	https://www.responsiblebusiness.org/about/members/	no change	
RMI	Yes	RMI	https://www.responsiblemineralsinitiative.org/about/members-and-collaborations/	no change	
GNI	No	GNI	https://globalnetworkinitiative.org/who-we-are/members/	no change	
IRMA	No	IRMA	https://responsiblemining.net/members-partners/#irma-member-list	no change	
WEPS (signatory)	No	WEPS	https://www.weps.org/companies	no change	
Lobbying and ethics					
Public statement or endorsement in support of mandatory human rights and environmental due diligence	No evidence			No change	
Anti-bribery and anti-corruption policy	Dell Technologies is committed to winning business only on the merits and integrity of its products and solutions. We do not tolerate bribery or corruption, regardless of where we are located or where we do business." [Code of Conduct, 39]	Code of Conduct	https://www.dell.com/content/dam/delltechnologies/assets/whoweare/resources/Dell%20Technologies%20Code%20of%20Conduct%20-%20English.pdf	No change	

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