

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

Findings as of July 2025

Dell

Indicator	Finding	Source	Source Link
<b>Policies and commitments</b>			
<u><b>General</b></u>			
Human rights policy - UNGPs	<p>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.</p> <p>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 influence progress towards the highest standards.</p>	Dell Human Rights Policy (Updated 2025)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
Human rights policy - ILO Core Labor Standards	See above		
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 purpose.	Dell Human Rights Policy (Updated 2025)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
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)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
Gender equality and women's empowerment	<p>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....</p> <p>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 inclusion in our workforce]</p>	Webpage - Cultivating inclusion in our workforce	<a href="https://www.dell.com/en-in/lp/dt/inclusive-workforce">https://www.dell.com/en-in/lp/dt/inclusive-workforce</a>
Indigenous Peoples	No evidence		
<u><b>Natural resources</b></u>			
Responsible mineral sourcing	<p>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.</p> <p>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 those suppliers who practice responsible sourcing.</p>	Dell Technologies Responsible Sourcing Policy (revised April 2023)	<a href="https://i.dell.com/sites/csdocuments/Corporate_corp-Comm_Documents/en/conflict-minerals-policy.pdf">https://i.dell.com/sites/csdocuments/Corporate_corp-Comm_Documents/en/conflict-minerals-policy.pdf</a>

Conflict minerals	<p>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:</p> <ul style="list-style-type: none"> <li>• Conduct due diligence in accordance with the OECD Guidance and request its use by our suppliers</li> <li>• Participate in and support RMI programs</li> <li>• Provide our customers, and expect our suppliers to provide us, due diligence information on the sourcing of the tin, tantalum, tungsten, and gold in our supply chain</li> </ul>	Dell Technologies Responsible Sourcing Policy (revised April 2023)	<a href="https://i.dell.com/sites/csdocuments/Corporate_Comm_Documents/en/conflict-minerals-policy.pdf">https://i.dell.com/sites/csdocuments/Corporate_Comm_Documents/en/conflict-minerals-policy.pdf</a>
No deepsea mining	No evidence		
Land rights	No evidence		
Free, Prior, and Informed Consent (FPIC)	No evidence		
<b><u>Technology</u></b> Responsible AI	<p>We believe AI should be:</p> <p><b>Beneficial</b> - 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><b>Fair</b> - 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><b>Transparent</b> - 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><b>Responsible</b> - 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 oversight should be used to avoid undesirable outcomes and validate decisions.</p> <p><b>Accountable</b> - The implementation and use of AI should comply with applicable laws and regulations, align with our commonsense standard for responsible conduct and reflect our commitment to business ethics. The development and implementation of AI applications should be periodically reviewed by both internal and external legal, ethics, technical and business professionals to ensure ongoing compliance and transparency.</p>	Dell Technologies Principles for Ethical Artificial Intelligence	<a href="https://www.delltechnologies.com/asset/dellch/solutions/business-solutions/briefs-summaries/principles-for-ethical-ai.pdf">https://www.delltechnologies.com/asset/dellch/solutions/business-solutions/briefs-summaries/principles-for-ethical-ai.pdf</a>
Human rights policy - freedom of expression and information and privacy	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.	Dell Human Rights Policy (Updated 2025)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
<b><u>Living wage</u></b> 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>	Human Rights Policy  RBA Code of Conduct	<a href="https://i.dell.com/sites/csdocuments/Corporate_Comm_Documents/en/human-rights-labor.pdf">https://i.dell.com/sites/csdocuments/Corporate_Comm_Documents/en/human-rights-labor.pdf</a>  <a href="https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf">https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf</a>
Living wage in supply chain	See above		
<b>Human rights due diligence and supply chain</b>			

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.</p>	Dell Human Rights Policy (Updated 2025)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs)	See conflict minerals		
Affected stakeholder engagement	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.	Dell Human Rights Policy (Updated 2025)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
Human rights requirements in supplier code/requirements	<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>	<p>Dell Human Rights Policy (Updated 2025)</p> <p>RBA Code of Conduct</p>	<p><a href="https://i.dell.com/sites/csdocuments/Corporate_corp-Comm_Documents/en/human-rights-labor.pdf">https://i.dell.com/sites/csdocuments/Corporate_corp-Comm_Documents/en/human-rights-labor.pdf</a></p> <p><a href="https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf">https://www.responsiblebusiness.org/media/docs/RBACodeofConduct8.0_English.pdf</a></p>
<b>Access to remedy</b>			
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 grievance management processes.	Dell Human Rights Policy (Updated 2025)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
Grievance mechanism for workers - supply chain	See above		
Grievance mechanism for external individuals & communities	See above		
<b>Governance and staffing</b>			
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)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
Senior level responsibility for human rights	<p>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.</p> <p>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.</p>	Dell Human Rights Policy (Updated 2025)	<a href="https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf">https://www.delltechnologies.com/asset/en-us/solutions/business-solutions/briefs-summaries/dell-human-rights-policy.pdf</a>
<b>Reporting and transparency</b>			

Human rights reporting (integrated or stand-alone)	Included in FY24 ESG Report	FY24 ESG Report	<a href="https://www.dell.com/en-us/dt/corporate/social-impact/esg-resources/reports/fy24-esg-report.html#scroll=off">https://www.dell.com/en-us/dt/corporate/social-impact/esg-resources/reports/fy24-esg-report.html#scroll=off</a>
Transparency Report	No evidence		
<b>Memberships</b>			
RBA	Yes	RBA	<a href="https://www.responsiblebusiness.org/about/members/">https://www.responsiblebusiness.org/about/members/</a>
RMI	Yes	RMI	<a href="https://www.responsiblemineralsinitiative.org/about/members-and-collaborations/">https://www.responsiblemineralsinitiative.org/about/members-and-collaborations/</a>
GNI	No	GNI	<a href="https://globalnetworkinitiative.org/who-we-are/members/">https://globalnetworkinitiative.org/who-we-are/members/</a>
IRMA	No	IRMA	<a href="https://responsiblemining.net/members-partners/#irma-member-list">https://responsiblemining.net/members-partners/#irma-member-list</a>
WEPs (signatory)	No	WEPs	<a href="https://www.weps.org/companies">https://www.weps.org/companies</a>
<b>Lobbying and ethics</b>			
Public statement or endorsement in support of mandatory human rights and environmental due diligence	No evidence		
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	<a href="https://www.dell.com/content/dam/delltechnologies/assets/whoweare/resources/Dell%20Technologies%20Code%20of%20Conduct%20-%20English.pdf">https://www.dell.com/content/dam/delltechnologies/assets/whoweare/resources/Dell%20Technologies%20Code%20of%20Conduct%20-%20English.pdf</a>
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