

Dell Technologies Responsible Sourcing Policy

(revised April 2023)

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.

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.

Recognizing the complexity of this issue, Dell appreciates the need for broad collaboration to reach our responsible sourcing objectives. We actively engage with our suppliers, industry peers, and other stakeholders to promote the responsible sourcing of minerals through the Responsible Minerals Initiative (RMI).

Conflict Minerals (3TG)

The term "conflict minerals," as defined in Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, refers to columbite-tantalite (coltan), cassiterite, gold, wolframite, and their derivatives – which include tantalum, tin, and tungsten – or any other mineral or its derivatives determined by the U.S. State Department to be financing conflict in the DRC or an adjoining country. These minerals and their extracts are referred to as "3TG".

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, due diligence information on the sourcing of the tin, tantalum, tungsten, and gold in our supply chain

For more information regarding Dell's work with Conflict Minerals, visit our [website](#).

Beyond Conflict Minerals

Dell is committed to continuing to develop our due diligence systems to apply to the sourcing of minerals beyond 3TG. As a first step, we have broadened our responsible material management system to include cobalt, which is used in the production of lithium-ion batteries, and mica, which can be found in some electronics components. We are implementing the OECD Guidance using RMI tools and programs to perform our due diligence. We require suppliers to follow this same framework and to participate in cobalt due diligence processes and capability building efforts around responsible minerals sourcing.

Dell is a member of multiple workgroups within the RMI, including the Cobalt Working Group. Through these industry-coordinated approaches, we are building the requisite infrastructure to map the cobalt supply chain, to inculcate smelters and mining companies with the right due diligence practices, and to certify smelters and mining companies that have demonstrated the aforementioned practices, and to safeguard against child labor and other human rights violations. Participating in these multi-stakeholder initiatives also enables us to contribute to efforts to address risks and challenges on the ground, through partnerships with local governments, and Non-Governmental Organizations (NGOs).