



Dell Human Rights Policy

Updated December 2021

Respect for Human Rights

At Dell Technologies, upholding and advancing respect for the fundamental human rights of all people is core to our business strategy, purpose, and commitments to drive human progress and create a positive and lasting social impact. We believe everyone deserves to be treated equally with dignity and respect and we are committed to responsible, ethical, inclusive and sustainable business practices.

This Human Rights Policy position is intended to reflect the company's global commitment to respect the rights of all our stakeholders - including all Dell team members, our suppliers, contractors and subcontractors at any tier, partners and resellers, and other people impacted by our value chain.

Our Commitment

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 are committed to making certain that we are not complicit in any human rights violations, and we hold our suppliers and other business partners to this same standard.

We strive to align our approach and actions to fulfill this commitment with the UN Guiding Principles on Business and Human Rights, and the Principles of the United Nations Global Compact, to which Dell is a Signatory.

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.

Our Approach

To demonstrate and implement our commitment to respect human rights, we have formalized this and other policies, processes and governance protocols. We conduct due diligence to identify, prevent or mitigate adverse human rights impacts to people across our business and value chain, avoid complicity in adverse impacts caused by others, and account for how impacts are addressed.

Expectations to comply with laws and ethical business practices, including acting with integrity and respecting the fundamental human rights of others, are embedded in Dell's culture and policies and clearly set out in the [Dell Technologies Code of Conduct](#). Dell Technologies team members are required to complete annual Code of Conduct training and adhere to our Code and the policies, including this policy, and standards which flow from it. We also expect our suppliers and business partners to uphold and assure respect for human rights as reflected in the [Dell Supplier Principles](#) and [Dell Technologies Code of Conduct for Partners](#).

While human rights due diligence and assurance practices are implemented and continually monitored by organizations and experts across our business, we also periodically engage third-party experts to conduct formal human rights impact assessments. Insights from these cross-functional assessments enhance our awareness of actual and emerging salient human rights risks, inform our mitigation priorities and help identify strategic opportunities for creating a positive social impact.

Training, operational policies, compliance requirements and assurance protocols are embedded throughout our organization and incorporated into business relationship agreements to further address and govern human rights risks and impact priorities.

Areas of Focus

Diversity, Equity and Inclusion

We believe a company dedicated to continued growth and innovation must be equally committed to equality and inclusion, and we seek to build and develop a workforce that reflects the diversity of our stakeholders around the world. As set out in [Dell's Diversity and Equal Employment Opportunity Policy](#), we are committed to the principle of equal employment opportunity for all team members and to providing team members with a work environment free of discrimination and harassment. All employment decisions at Dell are based on business needs, job requirements and individual qualifications, without regard to race, color, religion or belief, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, HIV status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information, family or parental status, or any other status protected by the laws or regulations in the locations where we operate. Dell will not tolerate discrimination or harassment based on any of these characteristics.

Health and Safety

We are committed to operating our businesses in a manner that protects the health and safety of our team members, contractors, visitors and neighbors, while maintaining full compliance with applicable laws, regulations and voluntary obligations. When our own requirements are more stringent, we will operate to these higher standards. We will provide safe and healthy working conditions and require the same of business partners and contractors working on behalf of Dell Technologies as set out in our [Global Occupational Health and Safety Policy](#).

Worker Protections

Dell has adopted the [Responsible Business Alliance \(RBA\) Code of Conduct](#) for itself and its suppliers. The RBA Code establishes standards to ensure working conditions in global electronics and related supply chains are safe and workers are treated with respect and dignity. Dell policies in each of its locations serve to ensure protection of workers consistent with the Code, including but not limited to protections against forced, bonded or indentured labor and human trafficking; child labor; inhumane treatment; discrimination and harassment; and provisions for workplace health and safety, fair payment of wages, hours and benefits, freedom of association, effective grievance mechanisms, and more. As a condition of doing business with us, Dell suppliers must comply with the [Dell Supplier Principles](#), which include adherence to the RBA Code, [Dell Responsible Sourcing Policy](#), and other embedded standards, policies and requirements.

Forced Labor and Human Trafficking

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. 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 Slavery and Human Trafficking](#).

Child Labor

Dell prohibits the use of child labor in our operations or at any stage in our supply chain. The use of legitimate workplace apprenticeship or intern programs that comply with all laws and regulations, and with the specific young worker provisions in the [RBA Code of Conduct](#) if those provisions are stricter, are permitted and supported.

Responsible Sourcing

Dell is committed to the responsible sourcing of materials used in our products, and we expect the same of our suppliers. We require adherence to this and other policies and standards as detailed in the [Dell Responsible Sourcing Policy](#), and our [Dell Supplier Principles](#).

Privacy

Dell considers upholding individuals' privacy to be a fundamental right. 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 actively working to ensure our customers have the latest privacy resources.

Environmental Responsibility

Dell recognizes that interactions with the environment impact people. As described in the [Dell Global Environmental Policy](#), we are a sustainability-focused company that operates in a manner that protects the environment and prevents pollution. This includes driving improvements beyond our own operations and seeking to develop environmentally-friendly technologies that help our customers meet their own sustainability goals.

Bribery and Corruption

Bribery and corruption undermine respect for human rights and hurt the very communities we are committed to helping grow and thrive. Dell is committed to winning business only on the merits and integrity of its products and solutions. We do not tolerate bribery or corruption in any form, regardless of where we are located or where we do business.

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.

We also believe some human rights issues can be addressed most effectively by working in partnership with others. To advance progress on complex human rights challenges we engage and participate in collaborative initiatives with suppliers, business partners, customers, industry and cross-sector alliances and working groups, civil society organizations, governmental authorities, and others.

Grievances and Remediation

Dell has an established third-party operated grievance mechanism. [Dell Technologies Ethics Helpline](#) options are available for anyone, including team members, partners or any other internal or external stakeholder to report concerns or issues they believe may violate Dell's Code of Conduct, this policy or any other related Dell policy or standard. Dell will promptly investigate allegations and take appropriate action, where necessary, to mitigate actual or potential adverse human rights impacts. Dell does not tolerate retaliation against anyone acting in good faith to report a concern, provide information, or otherwise assist in an investigation or proceeding.

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 believe 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.

Accountability and Governance

Dell's Board of Directors 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's Environmental, Social and Governance (ESG) Steering Committee leads and oversees the programs and policies to uphold these standards and to advance Dell's ESG strategy. The Committee includes senior leadership from Dell's corporate sustainability, diversity and inclusion, human resources, ethics and privacy, supply chain, legal, investor relations, accounting, security, corporate affairs, government affairs, giving and social innovation organizations. We provide regular reporting to the Board on ESG priorities and progress.

We have also established an internal ESG Interlock Team which meets throughout the year and is responsible for ensuring cross organizational awareness and engagement on relevant priorities and policies, and an integrated approach to fulfilment of our related commitments.

Moving Forward

We recognize that human rights risks and opportunities can evolve rapidly. While our ongoing due diligence and governance practices ensure we maintain momentum and focus on our current human rights risks and impacts, we continually monitor for emerging risks, evolving conditions and opportunities to improve our practices and accelerate positive outcomes for people.

We [publicly report](#) on our social impact commitments, priorities and performance on an annual basis. This, and other supporting [policies and positions](#), are available on Dell Technologies' website.