

Electronics Disposition	Document #	ED-01
	Revision #	A02
	Revision Date	5/8/09

Dell Electronics Disposition Policy

INTRODUCTION

Dell's vision is to ensure that electronic products generated both from customers as well as through Dell's sales, service and manufacturing operations are appropriately managed from assessment prior to potential reuse through final disposition. It is the responsibility of Dell employees, suppliers, and sub-contractors to support and implement this policy.

SCOPE

This Policy applies to all Dell employees, employees of a Dell subsidiary, non employees working for/at Dell (i.e. consultants, independent contractors, outsource service providers, general services suppliers, vendor funded heads, and assigned worker/agency temp), and any third parties acting on Dell's behalf who perform Dell disposition activities. This policy also applies to Dell Environmental Partners (e.g., partners providing disposition, refurbishment and reuse services). Compliance is mandatory. This policy pertains to all Electronic Waste generated by Dell's global operations and programs, including, but not limited to, corporate e-waste/equipment, takeback and returns programs, and manufacturing/assembly waste.

POLICY STATEMENT

The following Electronics Disposition policy objectives have been established to achieve our vision:

1. Maximize Reuse Opportunities (Prevent Pollution)

- Dell shall endeavor to maximize re-use opportunities.
- Dell Environmental Partners shall provide dispositioning services to include refurbishing, reuse, and recycle in alignment with Dell's Reuse Hierarchy.
- Products that meet standard Minimum Technology Specifications and are able to be refurbished and placed back on the secondary market whether for profit or not for profit, shall be a priority.
- Dell Environmental Partners shall provide refurbishment and reuse services that adhere to Dell's Reuse Hierarchy.
- Dell Environmental Partners providing refurbishment and reuse services shall have in place a comprehensive environmental and safety management system.
- Dell Environmental Partners shall ensure that the entire disposition channel, including downstream intermediaries, meet or exceed all applicable environmental, transportation and health and safety regulations.

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2. On-board Environmental Partners Providing Electronic Materials Sorting Services (Apply Globally Consistent Supplier Standards)

- All Dell Environmental Partners who operate with the initial step of sorting equipment for testing for reuse or recycling/disposal purposes shall be on-boarded through Dell's on-boarding process which includes a comprehensive environmental, health, safety, security, logistics, downstream channel, and data destruction audit using Dell's prescribed audit protocol. All recycling, refurbishment and processing vendors shall be audited at least annually to ensure conformity with Dell's Electronics Disposition Policy¹ and Environmental Partner Performance Standards².
- Dell Environmental Partners shall track and document refurbished and end-of-life electronics throughout the product disposition channels. Tracking information shall show the final disposition of all recyclable materials and wastes. Refurbished electronics will be tracked to first point of reuse over which Dell has had direct oversight.
- Dell shall contractually obligate Dell Environmental Partners to comply with this policy and to require the compliance of their downstream vendors.
- No prison or child labor will be utilized for any handling of Electronic Waste.

3. Functionality Test Equipment for Reuse (Be a Responsible Neighbor)

- All equipment with potential reuse capacity shall be fully tested, and functional when marketed or distributed as a refurbished product.
- Products that are non-functional shall not be marketed or distributed as refurbished for reuse and shipped either domestically or internationally.
- Data on refurbished equipment shall be responsibly handled by refurbishers through the use of Dell's Data Destruction standard. Equipment that fails to meet this standard or is presorted to be recycled shall be adequately stored and protected from theft until disk drives are rendered inoperable and unreadable.

4. Properly Manage End-of-Life Electronics throughout Disposition Channels (Minimize Waste)

- Where refurbishment is not a viable option, every reasonable effort will be made to control all Electronic Wastes and to avoid Electronic Wastes from entering landfills or incinerators.
- Dell Environmental Partners shall contractually commit to employing environmentally responsible processes and practices in the recycling on materials and disposal of wastes as evidenced through Dell's audit requirements.

¹ http://www.dell.com/downloads/global/corporate/environ/recovery_policy.pdf

² http://www.dell.com/downloads/global/corporate/environ/Dell_Recovery_and_Waste_Disposition_Guidelines.pdf

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- Dell Environmental Partners providing recycling and/or disposal services shall have in place a comprehensive environmental and safety management system.
- All exports and imports of Electronic Waste handled by Dell and its authorized environmental partners will comply with existing international waste trade agreements and legal requirements.

5. Electronic waste is not exported to developing countries (Be a Responsible Neighbor)

- Dell does not permit Electronic Waste to be exported from developed (OECD/EU) to developing (non-OECD/EU) countries either directly or through intermediaries.

6. Continually Manage Dell Disposition Channels and Communicate our Performance (Continually Improve and Communicate our Performance)

- Electronic Waste processed by Dell's disposition chain shall be tracked and documented. Electronic Wastes shall be managed throughout the entire chain of custody until final disposition.

ASKING QUESTIONS

You are expected to ask any questions you may have about this Policy. Employees and Dell Environmental Partners may contact environment_policy@dell.com.

REPORTING AND INVESTIGATION

It is very important that you immediately report any known or suspected violations of Dell's Electronic Dispositions Policy. To report known or suspected violations of this policy, contact Dell Ethics & Compliance or the [Ethics Helpline](#). Calls to the Ethics Helpline, a toll-free telephone service, may be made anonymously.

DISCIPLINE

For Dell employees, compliance with this Policy is a requirement of employment. For Dell's third parties, compliance with this Policy is a condition of doing business with Dell. Employees who violate this Policy will be subject to discipline up to, and including, termination of employment. Dell third parties who violate this Policy are subject to contract termination.

WAIVERS

The provisions of this policy can not be waived unless approved by the Worldwide Dell Asset Recovery Services Council. Dell management does not otherwise have the authority to approve waivers to this Policy.

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DEFINITIONS

Term	Definition
Disposition Channel -	The route of End-of-First-Use Electronics that begins with Dell or Dell Customer and ends at the Reuse or Refurbishment facility for processing and continues through resale or final disposition.
End-of-Life Electronics -	Any electronic product or part that can no longer be used as intended, or that contains material that may be recycled or processed in order to reclaim a substance for further use.
Electronic Waste -	Dell defines Electronic Wastes as non-working parts or devices, irrespective of material composition.
Electronics Waste does not include -	<ul style="list-style-type: none"> ▪ Basel Convention non-hazardous wastes; ▪ Working equipment and parts that are tested, certified and labeled as working and that are not intended for disposal or recycling, but for donation, reuse or resale; ▪ Components being returned under warranty to the original equipment manufacturer; ▪ Materials that are to be used as a direct feedstock in manufacturing without further processing or preparation, and the “Competent Authority” of an importing country makes a written determination that the material is acceptable. “Competent Authority” means the entity (usually a government agency) that is responsible for overseeing their country’s compliance with the Basel Convention.
Dell Reuse Hierarchy -	Most preferred method of reuse is whole system reuse. When that is not feasible, refurbishment of whole system for reuse is next priority. If both are not economically feasible, component-level piece part reuse is next preferred method of reuse. If none of these methods are feasible, commodity materials reuse is preferred. Not until all of the above methods are exhausted shall the disposal be considered.
Minimum Technology Specifications -	Minimum standards for which an end-of-first use electronic product can be adequately reused with current compatible peripherals and in line with its core useful purpose.
End-of-First-Use Electronics -	Any electronic product or part that is still functional and turned over to a refurbishing or reuse handler for repurposing by the first owner.
End-of-Life Electronics -	Any electronic product or part that can no longer be used as intended or repurposed.
Reuse -	Activities limited to performing non intrusive operation verification, data clearing, and software installation

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<i>Term</i>	<i>Definition</i>
Refurbishment -	Activities include any disassembly or physical modifications to the equipment, including part removal and upgrades
Dell Data Destruction Standard -	Dell Data Destruction Policy, 2009 (pending)
Sorting -	The process for differentiating materials or equipment for the purposes of identifying what is refurbishable, reusable and/or recyclable.