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| Electronics Disposition | Document # | ED-01 |
| | Revision # | A04 |
| | Revision Date | 03/19/2014 |

Dell Electronics Disposition Policy

INTRODUCTION

Dell’s vision under its Electronics Disposition¹ Policy is to ensure that retired IT assets and 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 Reuse², through to final Disposition. It is the responsibility of Dell employees, suppliers, subcontractors and Dell Environmental Partners to support and implement this mandated 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, outsourced service providers, general services suppliers, vendor funded heads, and assigned workers/agency temps), and any third parties acting on Dell’s behalf. This Policy also applies to Dell Environmental Partners (e.g., partners providing Disposition, Refurbishment³, Repair⁴ and Reuse services). Compliance is mandatory. This Policy pertains to all retired, excess and obsolete electronics generated by Dell’s global operations and programs, including, but not limited to, retired corporate equipment, takeback, returns programs and manufacturing/assembly operations.

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 Reuse opportunities.
- Dell Environmental Partners shall provide Disposition services to include, Refurbishing, Repair, Reuse, and Recycling⁵ in alignment with Dell’s Reuse Hierarchy⁶.
- Products that meet standard Minimum Technology Specifications⁷ 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 ensure that the entire Disposition Channel⁸, including downstream Intermediaries⁹, meet or exceed all applicable environmental, transportation and health and safety regulations.

^{1,2,3,4,5,6,7,8,9} See Definitions



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2. On-board/Sustaining Environmental Partners Providing Electronics Disposition Services (Apply Globally Consistent Supplier Standards)

- All Dell Environmental Partners and vendors who provide Disposition services, including but not limited to the initial step of Sorting¹⁰ equipment for testing for Refurbishment, Repair and Reuse shall be on-boarded through Dell's on-boarding and sustaining process which includes a comprehensive environmental, health, safety, security, logistics, downstream channel, and data security audit using Dell's prescribed audit protocol. All Dell Environmental Partners and processing vendors shall be audited at least annually to ensure conformity with this Policy and Dell's Environmental Partner Performance Standard¹¹.
- All Dell Environmental Partners shall have in place a comprehensive environmental, occupational health and safety & quality management system.
- Dell Environmental Partners shall track and document refurbished and End-of-Life Electronics¹² throughout the product Disposition Channels. Tracking information shall show the final Disposition of all recyclable materials and wastes. Refurbished electronics shall be traceable 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 Forced bonded (including debt bondage), indentured labor, involuntary prison labor or child labor will be utilized for any handling of the material covered under this Policy.

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

- All equipment with potential Reuse capacity shall be fully tested, and Functional¹³ when marketed or distributed as a refurbished product.
- Products that are Non-Functional¹⁴ shall not be marketed or distributed and shipped either domestically or internationally as refurbished equipment.
- Data on refurbished equipment shall be responsibly handled by refurbishers by employing tools and processes that meet or exceed Dell's Data Security Policy

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 Wastes¹⁵ and to minimize Electronic Wastes

^{10,12,13,14,15} See Definitions

¹¹ <http://www.dell.com/recycling>



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from entering landfills, incinerators or entering other environmentally irresponsible processes.

- Dell Environmental Partners shall contractually commit to employing environmentally responsible processes and practices in the recycling and disposal of materials as evidenced through Dell’s audit requirements.
- All exports and imports of Electronic Waste handled by Dell and its authorized environmental partners will comply with existing international environmental and waste shipment conventions, agreements, local laws and other 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 through Dell’s Disposition channel shall be tracked and documented. Electronic Wastes shall be managed throughout the entire chain of custody until final Disposition.
- An appropriate level of e-waste Disposition data will be published in Dell’s Corporate Responsibility Report every year.

ASKING QUESTIONS

If you have questions about this Policy, please contact environment_policy@dell.com.

REPORTING AND INVESTIGATION

It is very important that you immediately report any known or suspected violations of this 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 disciplinary action up to, and including, termination of employment. Dell third parties who violate this Policy are subject to contract termination.



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WAIVERS

The provisions of this Policy cannot be waived unless approved by Dell’s Global Take Back Council. Dell management does not otherwise have the authority to approve waivers to this Policy.

DEFINITIONS

| Term | Definition |
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| Dell Reuse Hierarchy⁶ | 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, Repair or component-level piece part Reuse is the 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 disposal be considered. |
| Disposition¹ | Includes all activities associated with handling end of first use and end of life electronic devices. |
| Disposition Channel⁸ | The route of end of first use* Electronics that begins with Dell or Dell Customer and reaches the Refurbishment, Repair and Reuse or Recycling facility for processing and continues through to resale, Reuse or final Disposition as reusable raw material or final waste. |
| Electronic Waste¹⁵ | Dell defines Electronic Waste as non-working electronic parts or devices, irrespective of material composition. Electronic Waste does not include: <ul style="list-style-type: none"> a. Basel Convention non-hazardous wastes; b. 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; c. Components being returned under warranty to the original equipment manufacturer; d. Dell products and components** intended for Repair in an authorized Dell Repair Center e. 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 its country’s compliance with the Basel Convention. <p>** intended to be current RoHS-compliant product worldwide</p> |
| End-of-Life Electronics¹² | Any electronic product or part that can no longer be used as intended and that contains material that may be recycled or processed in order to reclaim a substance for further use. |



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| Term | Definition |
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| Functional ¹³ | Devices that function in the way originally intended by the manufacturer following a testing or Refurbishment process where essential functions are tested. |
| Intermediaries ⁹ | Any broker, treatment operator or agent that facilitates the transfer of product, material or waste of any form from the owner or holder to a third party. |
| Minimum Technology Specifications ⁷ | 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 means any electronic product or part that is still functional and turned over to a Refurbishing or Reuse handler for repurposing by the first owner. |
| Non-Functional ¹⁴ | Any device that does not function in the way originally intended by the manufacturer following a testing or Refurbishment process where essential functions are tested. |
| Recycling ⁵ | A process where electrical and electronic equipment not suitable for Refurbishment, Repair and/or Reuse should be processed for material recovery of scarce resources and reusable raw materials and appropriate treatment of environmentally sensitive materials. |
| Refurbishment ³ | A process that includes, but is not limited to, disassembly or physical modifications to the equipment, part removal and upgrades in order to render the whole unit available for Reuse. |
| Repair ⁴ | Repair is the process of only fixing a specified fault or series of faults to render the product or component available for Reuse. |
| Reuse ² | A process of using again a used electrical or electronic device or component directly following a functionality test or possibly after Refurbishment or Repair. Processes to enable Reuse may be limited to performing non-intrusive operation verification, data clearing, and software installation. |
| Sorting ¹⁰ | The process for differentiating materials or equipment for the purposes of identifying what is suitable for Reuse, Refurbishment, Repair, data and/or data bearing equipment handling and/or recycling. |