



STATEMENT AGAINST SLAVERY AND HUMAN TRAFFICKING

Dell Technologies Inc., on behalf of itself, and its direct or indirect subsidiaries, ("Dell") is committed to social and environmental responsibility. As part of this commitment, Dell prohibits slavery and human trafficking in our operations and supply chain and works to minimize any associated risks. No matter the circumstances, 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 is a founding member of the [Responsible Business Alliance \(RBA\)](#), formerly known as the Electronics Industry Citizenship Coalition (EICC) and has adopted its Code of Conduct (the "RBA Code"), to which we hold ourselves and our supply chain accountable. The [RBA Code of Conduct](#) prohibits the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons. Dell considers each supplier's conduct vis-a-vis this Code when awarding and/or renewing business with the supplier.

This Statement is made pursuant to the requirements of the California Transparency in Supply Chains Act of 2010 and section 54(1) of the U.K. Modern Slavery Act 2015, and Part 2 of the Australian Modern Slavery Act 2018, and constitutes Dell's slavery and human trafficking statement for the financial year ending January 29, 2021 (and for the financial year ending 31st December 2020 in respect of Dell Bank International Designated Activity Company). For the purposes of Part 2 of the Australian Modern Slavery Act 2018, this Statement is made on behalf of reporting entities, Dell Australia Pty Limited ABN 46 003 855 561 and EMC Global Holdings Company ABN 86 699 010 685 (Australian Reporting Entities). The corporate structure of the Australian Reporting Entities is set out in Annexure A of this Statement.

For the purposes of section 54(1) of the U.K. Modern Slavery Act 2015, this statement is made on behalf of reporting entities Dell Corporation Limited, company number 02081369, Dell Emerging Markets (EMEA) Limited, company number 03266654, Dell Products, company number 191034, EMC Information Systems International, company number 461022 and Dell Bank International d.a.c., company number 461022

Robert Potts signs this Statement as Assistant Secretary and Senior Vice President on behalf of Dell Inc and its wholly owned subsidiaries, and in his capacity as Director of the above named legal entities and authorized representative of Dell Bank International d.a.c.

The term "Dell" as used in this Statement refers to Dell Inc. and its wholly owned subsidiaries.

Structure, operations, and supply chains

Dell Technologies is one of the largest information technology (IT) providers in the world. Our technology and services portfolio spans both traditional infrastructure and multi-cloud technologies. We design, develop, manufacture, market, sell, and support a wide range of comprehensive and integrated solutions, products, and services.

Our global corporate headquarters is located in Round Rock, Texas. We have operations and conduct business in many countries located in the Americas, Europe, the Middle East, Asia, and other geographic regions. We also manage responsible business practices in one of the world's largest supply chains. Our own manufacturing facilities are located in the United States, Malaysia, China, Brazil, India, Poland, and Ireland. We also utilize contract manufacturers throughout the world to manufacture or assemble our products under the Dell Technologies brand. Components used in these manufacturing facilities are

sourced primarily from those same countries listed above, but also from Japan, South Korea, Mexico, Taiwan, Singapore, Philippines, Thailand, Laos, Germany, Netherlands, Israel, Vietnam, and Indonesia to meet the technology, quality and sustainability requirements of our broad global portfolio of products.

Dell is a corporation incorporated in the state of Delaware with principal executive offices in Round Rock, Texas. Dell Technologies Inc. and its subsidiaries operate worldwide and are collectively known as Dell. A complete list of Dell's subsidiaries worldwide as of the end of its most recently completed fiscal year can be found as Exhibit 21 to Dell's Form 10-K, filed with the US Securities and Exchange Commission on March 26, 2021.

Identify and assess the risk of modern slavery

Given the differing legal governing structures and fluctuations in labor markets that exist globally, the technology sector's biggest risk of modern slavery and human trafficking comes from the use of foreign migrant workers. Our efforts on verification, risk assessment and audits are described below. Even with these efforts, there remains risk that direct suppliers or their suppliers do not have sufficient controls to fully identify, prevent, correct, or remediate risks of forced labor. In addition to Dell's internal risk assessments, Dell also collaborates with industry peers through the Responsible Labor Initiative (RLI, a sub-group initiative to the RBA) to address identified risks in the supply chain to drive accountability and corrective actions with suppliers. For more information on our work to remediate forced labor risks with our suppliers, please review our [Supply Chain Sustainability Progress Report](#).

Dell has published policies to define our commitment to international labor and human rights standards. These principles reinforce and strengthen our commitment to the rights of our employees, workers in our supply chain, and workers in the global community. Our policies, including the [Dell Human Rights and Labor Policy](#), and other policies referenced in this statement are available online on our [Supply Chain Sustainability Human Rights](#) and [Social Impact Policies and Positions](#) home pages.

The Supply Chain Assurance organization within Dell's Global Operations organization has a Social and Environmental Responsibility (SER) function that deploys programs and operations teams and drives social and environmental standards across the supply chain, including those related to forced labor. These teams work across Global Operations with procurement and manufacturing organizations and include specialists dedicated to monitoring and training suppliers.

Actions taken to address risks of modern slavery

Dell focuses on the following key criteria to ensure and verify the absence of forced labor, slavery, and human trafficking of any kind within our direct materials supply chain. We have similarly implemented initiatives for suppliers in key parts of Dell's indirect supply chain, including workers employed by suppliers known as Onsite Service Providers (OSPs) that provide a range of services, which include but are not limited to: janitorial, security, or food and cafeteria management services.

1. VERIFICATION AND RISK ASSESSMENT: Dell conducts an annual internal assessment of supply chain risk that is based on the commodity produced and independent research that identifies labor risks associated with geographic locations, spend, past performance, and other targeted risk factors. This risk assessment incorporates data on human trafficking incidence from the U.S. State Department's annual "Trafficking in Persons Report," and further considers risk factors including human rights risk, country governance, and accountability.

2. AUDITS: Our audits are completed by RBA-certified third-party entities to ensure full RBA Code coverage and consistency of interpretation of requirements even in countries where local law does not align with the RBA Code. Auditors are qualified by the RBA based upon a combination of RBA-specific

training, specific relevant industry training (i.e., for certain health/safety or environmental disciplines), and minimum threshold levels of field experience under certified RBA lead auditors. Auditors, including those involved in unannounced investigations, monitor suppliers' adherence to over 40 provisions covered by the [RBA Code](#), including an assessment of suppliers' policies and practices addressing human trafficking risks and controls. Auditors also monitor supplier management and oversight of their own suppliers, with a particular emphasis on labor brokers. Re-certification is required to ensure up-to-date skills and interpretations. Auditors are trained on RBA Code of Conduct requirements concerning confidentiality, as well as worker interview skills, particularly for forced labor or other labor issues that workers may be reticent to discuss.

Auditors review documents related to the full labor section of the RBA Code of Conduct (including working hours, pay slips with wages, benefits, and deductions) and conduct interviews with both management and the workers to assess conformance to the RBA Code of Conduct. Auditor interviews of workers are key, for example, in identifying expenses or deductions in a factory pay slip, which may not reflect the use of a labor recruiter involved in the hiring process.

Auditor interviews are an important assurance step; it is critical to ensure workers can provide information safely and confidentially before, during, or after an audit. Dell contracts with independent third-party service providers to manage Dell's helpline to ensure workers' rights and safety are respected and to enhance the well-being of worker communities through tripartite communications. The independence of the helpline serves as both a grievance mechanism for the worker (covering grievances, information on common psychological issues, and conflict resolution, etc.) and an alert mechanism for Dell to understand issues impacting workers. In 2020, 99% of our manufacturing suppliers audited had helpline mechanisms aligned to the RBA requirements in place. The use of helplines has enabled our suppliers to directly address and/or improve many issues without escalation. Any issues that meet the defined RBA Code criteria are escalated through established procedures to ensure issues are promptly addressed along with the determination of the root cause.

All workers within our supply chain fall within the scope of Dell's auditing procedures, including those migrating for work. Workers selected for interviews during onsite audits are also given a communication card with access to the helpline to provide anonymous feedback outside the factory and outside the audit process, if they prefer.

We use audits to supplement our Supplier Engagement, Capability Building and Assessment program and internal tracking mechanisms to monitor suppliers' performance to our requirements. These audits are part of our overall strategy to responsibly manage our supply chain, identify risks, and interact with workers. We select supplier sites for audits based on the risk assessment described above. Audit findings that indicate potential risks of forced labor or human trafficking are immediately addressed and tracked until closed.

Where debt-bonded labor has been used, we work with suppliers to return recruitment fees and pay direct remedies to affected workers. Additional detail on these programs and statistics for the last reporting year are available in our [Supply Chain Sustainability Progress Report](#).

3. SUPPLIER CERTIFICATION: Compliance with [Dell's Supplier Principles](#), which includes the [Dell Vulnerable Worker Policy](#), is a contractual obligation for suppliers. These Principles include requirements to directly address risks of forced labor and human trafficking. Compliance to these requirements are evaluated through the audit mechanisms referenced above. Suppliers are required to conduct a root cause analysis and develop a plan to address any issues found during an audit within RBA-specified timelines, including any findings associated with forced labor conditions. Progress in addressing these issues is regularly reported across Dell's procurement organization through monthly reports, executive review board communications, and quarterly business reviews with suppliers. Closure audits are

conducted to confirm findings have been resolved; and if a supplier does not promptly remediate or correct an issue Dell may, in its discretion, reduce or suspend business with the supplier. Dell reserves the right to take any and all available actions against suppliers for violations of Dell's Vulnerable Worker Policy including without limitation the reduction of business, frequent required onsite compliance auditing at supplier's expense (including but not limited to dormitories, canteens, storage and common areas), employee compensation at supplier's expense, and/or termination of Dell's contract with the supplier.

4. INTERNAL ACCOUNTABILITY: Internal accountability standards and procedures help confirm that workers and suppliers meet Dell's supply chain standards. Supplier accountability occurs through mechanisms ranging from audit corrective action procedures (see "AUDITS," above) to Dell executive review of supplier performance and quarterly business reviews to ensure alignment and timely action. Typically, this occurs during suppliers' quarterly business review, but meetings may be accelerated depending on the type of finding. Dell maintains an internal tracking system of RBA audit findings that allows for monitoring and regular reporting on open issues and due dates. Commodity teams are measured during their quarterly and annual performance scorecards with the audit performance and closure status of RBA audit issues. Procurement executives receive monthly reports on suppliers with any audit findings that suggest risks of forced labor and human trafficking and hold suppliers accountable to address the risks.

Dell's SER team works with suppliers to determine root cause, provide targeted capability-building and monitor corrective action plans to closure. If Dell believes cooperating with other RBA members or non-governmental organizations (NGOs), such as the Fair Hiring Initiative, will produce a more effective, efficient approach to closing an issue, Dell will engage beyond its standard approach. The timeliness and completeness of the corrective action plans are measured by the supplier's quarterly business reviews to ensure alignment and timely actions. For more detail on how accountability is built into our work with suppliers, see our [Supply Chain Sustainability Progress Report](#).

Dell also maintains additional corporate-wide accountability and grievance mechanisms, for example the [Dell Ethics Helpline](#) which is available to both employees and any external parties, and applies to all Dell entities globally. Dell team members are required to complete annual ethics and compliance training. For additional information, see the [Dell Code of Conduct](#).

5. TRAINING: Dell conducts RBA Code training for supply chain management professionals and manufacturing operations teams. This training includes engagement with global commodity managers, as well as other key relationship owners, and is conducted regularly through a variety of training approaches, from in-person, all-day workshops to online modules. Human trafficking is a key part of the training. Dell's Global Operations organization has responsibility for implementing and monitoring compliance to all the supply chain activities described above. Our focus on identifying even potential risks of slavery and human trafficking is part of a larger effort to encourage business integrity, ethical conduct, and supply chain transparency and accountability.

In 2020, Dell released [Guidelines for Suppliers' Protections of Workers During COVID-19](#). These Guidelines document the minimum requirements expected of Dell suppliers through a global pandemic. Minimum requirements specifically delineate that the RBA Code must continue to be followed, including language that: "It is never ethical to exploit vulnerable or desperate job seekers. This is a time of high risk for forced and child labor due to losses of jobs and opportunities." In 2019, we worked with a civil society organization to provide training related to debt-bonded labor and the use of recruitment fees to supplier factories in Taiwan. This helped suppliers better understand forced labor issues and ethical best practices around recruitment. We received updated audit reports in 2020 for all sites participating in the 2019 recruitment fee training to ensure management understanding and implementation of the requirements and to gather worker feedback on their experience. For additional information describing the structure of Dell's direct materials supply chain and our supply chain responsibility program, see the supply chain

sections of Dell's sustainability reporting. For more information about our business, see the business description available in the Dell Technologies 10-K.

6. EFFECTIVENESS: As a founding member of the RBA, Dell has recognized the need to collaborate on consistent standards that improve over time based on industry best practices to address evolving risks. In the RBA Code 7 process, which became effective Jan 1, 2021, Dell supported and advocated for updates to several audit requirements which further strengthened or clarified expectations related to recruitment fees, withholding passports and contract practices to protect workers. The proposals were approved by membership and rolled out to all RBA approved auditors. Dell has worked jointly with RBA peers for capability building and enforcement of these enhancement code requirements.

Signature:

A handwritten signature in black ink, appearing to read "Robert Potts", written in a cursive style.

Robert Potts

Assistant Secretary & Senior Vice President

Dell Inc.

Last revision date: June 25, 2021