Annual Data - Gold

- **Member: Dell**
- **Year: 2014**
- **Cycle: Annual**

Please submit all numbers in tons.

An asterisk (*) denotes a required field. Participants cannot submit the data form until all fields marked with an asterisk are complete.

Total Collected for Reuse & Recycling from all Streams

Total Collected for Reuse & Recycling: [1]43,195.00 *tons*

Equipment: [2] *43,195.00 *tons*
Cell Phones and other Mobile Devices: [3] *0.00 *tons*
Accessories: [4] *0.00 *tons*
Total: 43,195.00 *tons*

Recycling Data

Total sent to third-party certified recyclers from All Streams: [5]*43,195.00 *tons*
Percentage sent to third-party certified recyclers: 100.00 *%*

Has collection increased compared to the previous year?*

1. ○ Yes

2. ● No

Please explain company-specific contributing factors (e.g. decrease weight in electronic devices).*
Shrinking form factors is an industry trend that requires us to constantly work toward innovative and creative ways to recover and recycle a greater number of pieces to reach our goal of recovering 2 billion pounds of used electronics. Since we began tracking toward this goal in FY08, sales of laptops, tablets and phones have greatly outpaced desktops, and new models of all equipment continue to get lighter and thinner. We have set our goal accordingly and believe our aggressiveness in every area of our takeback strategy—from expanding into new countries to increasing our services—will compensate for this trend. Dell sold processed pounds to manufacturers to meet their state mandates and other company objectives. The flexibility to sell pounds enables Dell to optimize cost and reinvest funds to expand our recycling programs to new markets.
Will you include this explanation in the final publicly-posted report? (Note: You WILL NOT be penalized for not achieving an increase in collection if the rationale is publicly posted).***

1. ● Yes

2. ○ No

State Reporting Data

Total Collected for reuse and recycling from all streams (Note: The total from the below categories should equal the total recycled)

Weight of electronics collected in states with take-back laws explicitly to meet these laws.*20,052.00 *tons*
Weight of electronics that exceeds state take-back laws, collected in states with take-back laws.*1,348.00 *tons*
Weight of electronics collected in states without take-back laws.*10,581.00 *tons*
Weight of electronics collected but not attributable to a specific state (e.g., collected by mail-back program, regional agreement, or other method that does not allow a company to track).*11,214.00 *tons*

Please use this space to convey any details to EPA about your approach for arriving at your state data (i.e., with and without take-back laws) and any company-specific contributing factors and other useful information (e.g., did your company sell pounds to other OEMS? if so, how many?)

*We sold 4,515.09 tons collected by Dell and processed by Dell's environmental partner network to other OEMs. We excluded this weight from our calculations. Box 1 above represents Dell takeback programs, state invoiced weight, and weight purchased to meet Dell's compliance obligations. Box 2 above represents weight collected by Dell and processed by Dell's environmental partner network that exceeded state compliance requirements. Box 3 above represents weight collected by Dell and processed by Dell's environmental partner network in states without takeback laws. Box 4 above represents weight collected by Dell and processed by Dell's environmental partner network including commercial and other takeback weight not attributed to a specific state.

Did your company increase collection, recycling and/or reuse in at least one state without a take-back law?*
1. ◉ Yes
2. ○ No

Provide a specific state without a take-back law and actual data (i.e., not derived from an estimate) in which you achieved a total increase in recycling.*
Massachusetts
Data:*50.00 *tons*
Please explain how you achieved this increase in the text box below.*
In June 2014, Dell began partnering with Morgan Memorial Goodwill Industries (Boston, MA), to offer free residential recycling of computer electronics. This partnership provides 23 convenient drop off locations for residents of the Greater Boston area. http://www.goodwillmass.org/donations/dell-reconnect.html

Reporting Requirements

Mass Balance/Tracking Throughput

Have you verified that all recycling vendors used by your company are required to fully account for the organization's used electronics as they enter and leave each facility used?*
1. ◉ Yes
2. ○ No

Provide the methodology used for verification:*
Dell's EP Performance Standard includes specific requirements for materials tracking, audit and inspection. Dell's environmental partners must adhere to this Performance Standard, which is supported by contractual commitments and verified through regular third party audits. Dell manages corrective actions with our environmental partners, if applicable, to ensure their full compliance. Section 3.3 of the EP standard states that audits will extend to

investigation of the materials downstream process, including but not limited to mass balancing of material transfers between EP and all of its subsequent sub-contractors and Vendors.

http://i.dell.com/sites/doccontent/corporate/environment/en/Documents/environmental-partner-performance-standard.pdf

http://i.dell.com/sites/doccontent/corporate/corp-comm/en/Documents/fy15-cr-report.pdf

Beyond 3rd Party Certification Standards

List company policies or programs for vendors that go beyond third-party certification standards, and verify that the policies are followed by each recycler used.*

Dell was the first computer manufacturer to ban e-waste export to developing countries. Section 3.3 of Dell's EP Performance Standard describes requirements with for audits and inspections, including subcontractor obligations. Dell uses third party auditors to evaluate compliance to these and other standards. Full downstream audits are performed annually, while data security audits are performed monthly for all EPs.

http://i.dell.com/sites/doccontent/corporate/environment/en/Documents/environmental-partner-performance-standard.pdf

Our company has verified that all of these policies and/or programs are being followed by each recycler used.*

1. ◉ Yes

2. ○ No

Website where company policies or programs that go beyond third-party certification standards are listed (optional):
http://www.dell.com/recycling

Due Diligence

Have you verified that your company conducts due diligence to ensure that the certified recycler of first entry into the system as well as vendors receiving materials after the initial certified recycler (i.e., downstream vendors) are also certified to an established third-party certification standard or are examined by the company's auditors at least semi-annually to ensure safe management practices? (If a certified body conducts an annual audit, only one additional person or paper audit is required per year)*

1. ◉ Yes

2. ○ No

Provide the methodology used for verification:
*Section 3.3 of Dell's Environmental Partner Performance Standard describes requirements with for audits and inspections, including subcontractor obligations. Dell uses third party auditors to evaluate compliance to these and other standards. Full downstream audits are performed annually, while data security audits are performed monthly for all Environmental Partners. Dell manages corrective actions with our environmental partners, if applicable, to ensure their full compliance. Additionally, we report the number of environmental partner audits performed each year in our annual Corporate Sustainability Report.

http://i.dell.com/sites/doccontent/corporate/environment/en/Documents/environmental-partner-performance-standard.pdf

http://i.dell.com/sites/doccontent/corporate/corp-comm/en/Documents/fy15-cr-report.pdf

Certified Recyclers and Programs *

Is this information included in the final, publicly-posted report?*

1. ○ Yes

2. ◉ No

List names of certified recycler(s) used and certification programs: CONFIDENTIAL

Education & Outreach

List and describe public education and outreach activities on safe management of used electronics and available collection opportunities.*

Dell was the first computer manufacturer to offer free take-back of our products globally. Our dell.com/recycle website enables our customers to easily locate recycling programs. We also share Dell's policy position, electronics disposition policy, EP performance standard and other useful references. We have produced motion graphic videos describing our take-back program with Goodwill and our new Closed Loop system for integrating plastics from our take-back programs into new computer equipment. We also publish an annual Corporate Sustainability Report measuring our progress towards recycling goals, number of environmental partner audits, etc.

Website where public education and outreach activities are listed (optional): http://www.dell.com/recycling

Company Policies Favoring Recycling and Reuse

List and describe company policies that favor recycling and reuse of electronics equipment and/or components, as opposed to energy recovery, incineration, or land disposal.*

In our Electronics Disposition Policy we define the hierarchy for reuse/recycling/disposal, which is whole system reuse, component/piece-part reuse or commodity materials reuse. Disposal shall only be considered when the previous methods have been exhausted.
http://i.dell.com/sites/content/corporate/environment/en/Documents/electronic-disposition-policy.pdf

Website

List website where EPA provided baseline/annual tier data is publicly posted:* http://www.dell.com/recycling

Notes:

1. *Total Collected for Reuse and Recycling:* This is the total amount of used electronics collected for reuse and recycling, including the amount sent to certified and non-certified recyclers. It can include company assets, business to business, warranty returns, and electronics collected and/or purchased to meet state take-back laws. See below for definitions of "reuse" and "all streams".

2. *Equipment:* Defined as electronics equipment such as central processing units (CPUs), desktops, laptops, televisions, printers, monitors, copiers, fax machines, scanners, imaging equipment, radios, tablets, e-readers, slates, netbooks, and heavy equipment such as servers. It further includes any other or new (future) types of equipment that are designed primarily to store or convey information electronically and have a 4-inch screen or larger measured diagonally.

3. *Cell Phones & Other Mobile Devices:* Defined as electronic equipment such as cell phones, personal digital assistants (PDAs), organizers, tablets, e-readers, slates, smart phones, compact disc players, gaming systems, calculators, and MP3 devices. It also includes any other or new (future) types of equipment that are designed primarily to store or convey information electronically and that are lightweight, mobile in design, and have a 4-inch screen or less measured diagonally.

4. *Accessories:* Defined as headphones, speakers, CDs, printers, toner cartridges, USB sticks, keyboards, game system accessories, cables, chargers, and other small, miscellaneous items as defined by the Participant. It further includes any other or new (future) types of accessories to either the equipment or cell phone and other mobile devices equipment. The participant is welcome to provide a separate breakout of any of the items listed as accessories.

5. *Total sent to third-party certified recyclers:* For the purposes of the SMM Electronics Challenge, the term "recycler" denotes refurbisher or recycler certified to a recognized third-party certified recycling program. Similarly, the term "recycling" denotes recycling, refurbishment and reuse. Currently, Responsible Recycling Practices (R2) and e-Stewards are the only recognized certification standards for recyclers. However, EPA may recognize additional standards at a later date. Also see definition of 'all streams' below.

6. *Reuse:* Denotes an electronics object, or component of an electronics object that is used again by a different owner either for its original purpose or for a similar purpose, without significantly altering the physical form of the object or material. The electronics object may be cleaned, repaired, or refurbished between uses.

7. *All Streams:* Denotes used electronics collected for recycling or reuse from the various return streams used by the participant. Streams could include consumer take-back programs, asset recovery programs, retired lease returns, collection events, or trade-in programs.

8. *Baseline:* The year a participant joins the challenge. Annual results are compared to the baseline as well as preceding years' results.