

ANNUAL DATA - GOLD

Member: **Dell** | Year: **2016** | 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 45,074.00 *tons*

Equipment: 2 * 45,074.00 *tons*

Cell Phones and other Mobile Devices: 3 * 0.00 *tons*

Accessories: 4 * 0.00 *tons*

Total: 45,074.00 *tons*

Reuse and Recycling Data

Total sent to third-party certified recyclers from All Streams: 5 * 45,074.00 *tons*

Percentage sent to third-party certified recyclers: 100.00 %

Has collection increased compared to the previous year? *

Yes

No

Please explain company-specific contributing factors (e.g. decrease weight in electronic devices). *

Globally, Dell recovered 177 million pounds (80.3 million kilograms) of used electronics in FY17. This includes heritage EMC volumes tracked for Q4 only. Since our baseline year of FY08, we have recovered a cumulative total of 1.8 billion pounds. We have achieved 88% of our 2020 goal and our estimates show we are on track to meet our target. While units collected continues to increase, shrinking form factor places downward pressure on total volumes.

Gold participants are required to increase collection each year of all used electronics collected for reuse and recycling to third party certified recyclers. Please contact EPA if you have questions about this requirement.

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. *

13,818.00 *tons*

Weight of electronics that exceeds state take-back laws, collected in states with take-back laws. *

9,492.00 *tons*

Weight of electronics collected in states without take-back laws. *

7,986.00 *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). *

12,454.00 *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 742 tons of used electronics collected in Texas through the Dell Reconnect program and processed by Dell's environmental disposition partner network to a 3rd party compliance organization. We excluded this weight from our calculations. Box 1 above represents Dell takeback programs, state invoiced weight, and weight sub-contracted to meet Dell's compliance obligations. Box 2 above represents weight collected by Dell and processed by Dell's environmental disposition partner network that exceeded state compliance requirements. Box 3 above represents weight collected by Dell and processed by Dell's environmental disposition partner network in states without takeback laws. Box 4 above represents weight collected by Dell and processed by Dell's environmental disposition partner network including commercial and other takeback weight (E.g. ARR, spare parts returns, Ink/Toner) not attributed to a specific state.

Did your company increase collection, recycling and/or reuse in two states without take-back laws? *

Yes

No

Provide two states without a take-back law and actual data (i.e., not derived from an estimate) in which you achieved a total increase in recycling.

State: *

Colorado

Previous Year's Data: *

1,365.00 *tons*

Current Year's Data: *

1,634.00 *tons*

Please explain how you achieved this increase in the text box below. *

We provided our Dell Reconnect partners with updated marketing collateral to increase consumer awareness.

State: *

Mississippi

Previous Year's Data: *

26.00 *tons*

Current Year's Data: *

98.00 *tons*

Please explain how you achieved this increase in the text box below. *

We provided our Dell Reconnect partners with updated marketing collateral to increase consumer awareness.

Reporting Requirements

Due Diligence

Have you verified that your company conducts due diligence to ensure that the recycler of first entry into the system, as well as any vendors receiving materials after the initial recycler (i.e., downstream vendors), either:

- are 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 certifying body conducts an annual audit, only one additional in-person or paper audit is required per year. *

Yes

No

Provide the methodology used for verification: *

Section 3 of Dell's Environmental Partner Performance Standard outlines requirements for audits and inspections of Electronics Disposition Partners, 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 Electronics Disposition Partners. Dell manages corrective actions with our Electronics Disposition Partners, if applicable, to ensure their full compliance. <http://i.dell.com/sites/doccontent/corporate/environment/en/Documents/environmental-partner-performance-standard.pdf>

Certified Recyclers and Programs *

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

Yes

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 www.dell.com/recycling website enables our consumer and commercial customers to easily locate recycling opportunities, including ARR, Mailback, Dell Reconnect, Ink & Toner and Trade-In programs. We also share Dell's policy position, electronics disposition policy, Electronics Disposition Partner performance standard and other useful references. We continue using our Dell Reconnect motion graphic video describing our take-back program with Goodwill and the motion graphic video for our 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 our long term goals including recycling.

Website where public education and outreach activities are listed (optional):

<https://www.dell.com/recycling> *Ensure website address begins with http:// or https://*

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: *

<https://www.dell.com/recycling> *Ensure website address begins with http:// or https://*

Upstream Communication & Innovation

Answer two of the three questions.

How do you influence supplier behavior (e.g. in the areas of materials selection, design for product longevity, reuse and recycling, energy conservation, end-of-life management and corporate performance)?

Website where company activities or programs are listed (optional):

<https://www.dell.com/recycling> *Ensure website address begins with http:// or https://*

How have you helped customers reduce their electronics packaging waste (e.g., through creative packaging design, innovative material choices, and better logistics)?

Dell's industry-leading packaging solutions focus on reducing packaging volume, increasing the use of sustainable content and making it easy for customers to responsibly dispose of packaging through recycling or even composting. We pioneered the use of natural materials in our packaging, like our bamboo and mushroom cushions. These successes have led to other packaging innovations, including our recent use of ocean-bound plastics. By using this waste material, we keep it out of the oceans and in the economy where it can have another life. Dell has a 2020 Goal to ensure 100% of product packaging is sourced from sustainable materials (those that come from recycled or renewable sources) and is either recyclable or compostable. In FY17, 94% of Dell product packaging and services packaging material by weight was sourced from sustainable materials. We continue to categorize a material as being recyclable if it is accepted by a majority of municipalities, and as being compostable if it can be certified to meet the ASTM D6400 standard. By continually evaluating our transportation and logistics, we find better, greener ways of delivering products to customers. For example, we are increasingly taking advantage of efficient ocean-going cargo containers instead of air freight to cut the amount of fuel needed per product shipped. We also refined our processes for increasing shipment density and optimizing carrier selection in order to reduce trips and carbon emissions. In the U.S., Dell has been certified as a SmartWay Shipper by the EPA. We continue to work with our carrier partners to support their status as SmartWay Carriers. By leveraging these partnerships, Dell can select carriers who are committed to tracking and reducing their fuel consumption and carbon footprint. Using these partners enables Dell to optimize overall logistics while reducing environmental impact. Please visit <http://www.dell.com/learn/us/en/uscorp1/corp-comm/dell-and-smartway?c=us&l=en&s=corp&cs=uscorp1>

Website where company activities or programs are listed (optional):

<https://www.dell.com/recycling> *Ensure website address begins with http:// or https://*

How do you encourage customers (including large purchasers) to buy sustainable or "green" electronics products?

Dell is working toward a circular economy by analyzing the whole system in which our products are created and used, looking for ways to eliminate waste. We choose sustainable materials for products and packaging. We design our products to be easy to reuse, repair and recycle, and provide programs that make it convenient for customers to do so. Our work with closed-loop plastics is an example of these areas coming together. One thing customers often convey is that they want products that are better for the environment, but they don't want to pay more or sacrifice performance. The use of closed-loop plastics in our supply chain is proving we can deliver an energy-efficient product made from recycled content that is nominally less expensive, with the potential to show even greater cost savings as the program scales. Dell used 5.4 million pounds of closed-loop plastics during FY17 and there are now 91 Dell products that have shipped worldwide with closed-loop recycled plastics.

Website where company activities or programs are listed (optional):

<https://www.dell.com/recycling> *Ensure website address begins with http:// or https://*

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.

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.

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.

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

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