



## STATEMENT AGAINST SLAVERY AND HUMAN TRAFFICKING

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. Dell is a founding member of the [Responsible Business Alliance \(RBA\)](#), formerly known as the Electronics Industry Citizenship Coalition (EICC) and have 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-à-vis this Code when awarding and/or renewing business with the supplier.

Dell has also 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 are available online under [Policies and Compliance](#).

Dell has taken a variety of actions to verify the absence of forced labor, slavery, and human trafficking in our direct materials supply chain, including the following. Similar initiatives to those described below are in the process of being implemented for suppliers in Dell's indirect supply chain, which includes workers who may be at greater risk in our direct operations such as service and contract employees.

1. **VERIFICATION AND RISK ASSESSMENT:** Internal assessment of supply chain risk based on international indices, supplier performance to the Code (e.g., audit results), and other indicators of supplier-specific risks. This risk assessment is conducted annually, and incorporates data on human trafficking incidence from the U.S. State Department's annual "Trafficking in Persons Report," as well as other risk factors including human rights risk and country governance and accountability. More information on our risk assessment methodology is available in our public [Supply Chain Social and Environmental Responsibility Progress Report](#).
2. **AUDITS:** On-site verification of RBA Code conformance through independent, third-party audits that are announced. The third-party audits follow the [RBA standard protocol](#), which includes an assessment of the suppliers' policies and practices with regards to human trafficking risks and controls as well as their management and oversight of their own suppliers, with particular emphasis on any labor brokers. We select supplier sites to audit based on the risk assessment described above. Audit findings that indicate potential risks of forced labor or human trafficking are tracked until closed. In 2017, Dell had audited 91% of high-risk suppliers within the past two years. In addition, in 2017 Dell surveyed 50 suppliers in geographic locations considered high risk for non-compliance with our recruitment fee policy, and identified 14 sites where workers had been charged recruitment fees. We worked with those suppliers to return over \$2 million to the workers affected. Additional detail on these programs and statistics for the last reporting year are available in the [Supply Chain Social and Environmental Responsibility Progress Report](#).
3. **SUPPLIER CERTIFICATION:** Compliance with Dell's [Supplier Principles](#) is also part of our standard contract language for all Dell vendors. These Principles include requirements to address risks of forced labor and human trafficking. Compliance to these requirements are evaluated through the audit mechanisms referenced above. Dell also reserves the right to take any and all available actions against suppliers for violations of its Vulnerable Worker Policy including without limitation the termination or reduction of business, frequent required onsite compliance auditing at Supplier's expense, employee compensation at Supplier's expense, and/or termination of Dell's contract with the Supplier.
4. **INTERNAL ACCOUNTABILITY:** Internal accountability standards and procedures to help confirm that employees and suppliers meet Dell standards. This program is intended to ensure that Dell employees and suppliers are

aware of and adhere to established standards and processes. Supplier accountability occurs through mechanisms ranging from audit corrective actions (see "AUDITS," above) to Dell executive review of supplier performance and supplier quarterly business reviews. Senior procurement executives receive monthly reports on suppliers with audit findings indicating risks of forced labor and human trafficking, and hold suppliers accountable to address the risks. For more detail on how accountability is built into our work with suppliers, see the [Supply Chain Social and Environmental Responsibility Progress Report](#).

Dell also maintains corporate-wide accountability and grievance mechanisms (e.g., the [Dell Ethics Hotline](#)), which are available to both employees and external parties. For additional information, see the [Dell Code of Conduct](#).

5. **TRAINING:** Training Dell supply chain management professionals and manufacturing operations teams on the RBA Code of Conduct. This includes 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 consistently covered as part of the training provided.

Dell's Global Operations organization has responsibility for implementing and monitoring compliance to all of the supply chain activities described above.

Our focus on slavery and human trafficking is part of a larger effort to encourage business integrity and ethical conduct, supply chain transparency and accountability. We prohibit forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons by any Dell supplier or for any other purpose. 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](#), as well as Dell's [Supply Chain Social and Environmental Responsibility Progress Report](#). For more information about our business, see the business description available in the [Dell Technologies 10K](#).

This statement is made pursuant to the requirements of the California Transparency in Supply Chains Act (SB-657) and section 54(1) of the UK Modern Slavery Act 2015, and constitutes Dell's slavery and human trafficking statement for the financial year ending 2<sup>nd</sup> of February, 2018 (and for the financial year ending 31<sup>st</sup> December 2017 in respect of Dell Bank International Designated Activity Company. The term "Dell" as used in this Statement refers to Dell, Inc. and its subsidiaries, including Dell Corporation Limited, Dell Emerging Markets (EMEA) Limited, Dell Products, Dell Bank International Designated Activity Company, EMC Computer Systems (U.K.) Ltd., and EMC Europe Limited and this Statement is signed accordingly on behalf of these entities.



Director  
Dell, Inc

Date: October 24, 2018



Director  
Dell Bank International Designated Activity Company

Date: 26/10/18