April 15, 2014

This document covers all Dell batteries identified as lithium batteries rated less than 100 Wh.

Dell’s suppliers are bound to ensure that the battery packs and button cells meet the transport regulations including the latest revision of: ICAO, IATA DGR, Title 49 CFR 173.185 HMR – Special Provision 188, UNECE ADR and IMDG and the applicable exemptions.

Dell declares the following with respect to lithium ion batteries and Type CR 2032 lithium metal button cells used in Dell products:

- Dell’s battery suppliers are bound to ensure that every cell and battery is of a type proven to meet the requirements of each test in the UN Manual of Tests and Criteria, Part III, subsection 38.3.
- Dell lithium ion batteries rated less than 100 Wh contain cells within the pack rated less than 20 Wh capacity.
- Type CR 2032 lithium metal button cells used in Dell equipment have less than 1 gram of lithium content.
- Dell Lithium ion and Lithium metal batteries shipped in equipment, with equipment, or individually should be shipped under the applicable section, Section IB or Section II of IATA Packing Instructions 965 – 970.
- Packages should meet all of the requirements which may also include applicable labeling and documentation as required in IATA Packing Instructions 965 – 970.
- Dell batteries or Dell equipment containing lithium batteries returned for repair or under warranty are NOT returned for safety reasons. These returns do not have safety concerns or are returned for safety reasons.
- Information for a specific battery may be downloaded from http://www.dell.com/regulatory_compliance_battery_msd
- For additional information in an emergency, please contact the following phone number:
  Toll Free (800) 424-9300
  Toll (703) 527-3887

Daniece Carpenter
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Dell Regulatory Compliance Engineering

Dell Inc.
MS PS4-30
One Dell Way
Round Rock, Texas 78682
USA

References:
- ICAO
- IATA DGR
- UNECE ADR
- IMDG
- International Civil Aviation Organization
- International Air Transport Association Dangerous Goods Regulations
- European Agreement Concerning the International Carriage of Dangerous Goods by Road
- International maritime Dangerous Goods Code
Summary For Air Shipment

The table below outlines some common examples and the appropriate IATA Packing Instruction to be used when shipping by air. This does not apply to shipment by surface.

<table>
<thead>
<tr>
<th>Example</th>
<th>Quantity</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notebook, Tablet, or Phone with Lithium Ion battery installed</td>
<td>1 or 2 installed batteries</td>
<td>Ship under Section II, PI 967</td>
</tr>
<tr>
<td>Server with PERC Cards</td>
<td>1 or 2 PERC cards</td>
<td>Ship under PI 967, Section II</td>
</tr>
<tr>
<td>Server with PERC Cards</td>
<td>3 or more installed batteries</td>
<td>Ship under PI 967, Section II additional labeling, documentation, etc. required</td>
</tr>
<tr>
<td>Battery (ies) shipped separately</td>
<td>1 or 2 battery packs</td>
<td>Ship under PI 965, Section II</td>
</tr>
<tr>
<td>Battery (ies) shipped separately</td>
<td>3 or more battery packs in one package</td>
<td>Ship under PI 965, Section IB **</td>
</tr>
<tr>
<td>Lithium Metal Button cells shipped separately</td>
<td>2.5 kg net weight per package</td>
<td>Ship under PI 968, Section II</td>
</tr>
<tr>
<td>Lithium Metal Button cells shipped separately</td>
<td>More than 2.5 kg net weight per package</td>
<td>Ship under PI 968, Section IB **</td>
</tr>
</tbody>
</table>

NOTE: The IATA Battery Handling Label may only be applied as required by the specific Packing Instruction

* Type CR2032 Lithium Metal Button cells are <0.3g of lithium content.

** Shipments under these conditions require special process and training. The services of an outside company qualified for shipments of Dangerous Goods are required.

IATA Packing instructions (PI) do not have provisions for a signature or stamp. All shipments should be prepared in accordance with the proper PI. All documentation required by the PI must be prepared by a person knowledgeable of the product and the shipping method. Therefore, Dell Regulatory does not provide or sign blanket or generic documents prepared by outside individuals or companies.

For situations other than listed in the table above, consult your local logistics team, or contact the Regulatory Mailbox ( Regulatory_Compliance@dell.com )