



Dell Responsible Sourcing Policy

(revised Dec. 2018)

Dell supports and respects the protection of internationally proclaimed human rights for all, including the basic human rights of our employees and workers within our supply chain. (For more information, please see our [Human Rights and Labor Policy Statement](#)). As part of our global approach to respecting human rights, Dell is committed to the responsible sourcing of materials used in our products. We expect our suppliers to adhere to the same high standards. This policy is referenced in our [Supplier Principles](#), and we require adherence to this policy as well as to the Responsible Business Alliance (RBA) [Code of Conduct](#) and all other applicable laws.

Mining is an intensive process, and some mining operations in conflict-affected and high-risk areas have been linked to human rights violations including child labor, labor abuses, and environmental degradation. It is Dell's goal not to purchase product materials containing minerals whose sale directly or indirectly finance armed conflict or contribute to human rights abuses. In those regions where conflict and poor labor practices in mining operations are more prevalent, we are committed to supporting those suppliers who practice responsible sourcing.

Recognizing the complexity of this issue, Dell appreciates the need for broad collaboration to reach our objectives. We are actively engaged with our industry peers, suppliers, and other stakeholders to promote the responsible sourcing of minerals through the Responsible Minerals Initiative (RMI).

Conflict Minerals (3TG)

The term "conflict mineral," as defined in Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, refers to columbite-tantalite (coltan), cassiterite, gold, wolframite and their derivatives – which include tantalum, tin and tungsten – or any other mineral or its derivatives determined by the U.S. State Department to be financing conflict in the DRC or an adjoining country.

Dell buys parts and components which may include 3TG, and we follow the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas to investigate our supply chain and engage with suppliers. We expect our suppliers to have policies and due diligence practices in place to reasonably assure that products and components supplied to Dell are not sourced from conflict mines. Dell is working diligently with our suppliers and other stakeholders to improve the transparency of, and systematically address risks in, the global mineral supply chain.

In support of this policy, we:

- Conduct due diligence in accordance with the OECD Due Diligence Guidance and request its use by our suppliers
- Participate in and support RBA Responsible Minerals Initiative (RMI) programs
- Provide our customers, and expect our suppliers to provide us, due diligence information on the sourcing of the tin, tantalum, tungsten and gold in our supply chain

For more information regarding Dell's work with Conflict Minerals, visit our [website](#).

Beyond Conflict Minerals

Dell is committed to continuing to develop our due diligence systems to apply to the sourcing of materials beyond those defined as Conflict Minerals 3TG. As a first step, we have broadened our responsible material management system to include cobalt, which is used in the production of lithium-ion batteries, and are implementing the OECD Due Diligence Guidelines using the tools and programs of the RMI. We expect suppliers to follow this same framework and to participate in cobalt due diligence processes and capability building efforts around responsible minerals sourcing.

Dell is a member of multiple workgroups within the RMI including the Cobalt Working group. Through these industry-coordinated approaches, we are building the infrastructure necessary to map the cobalt supply chain and to certify smelters and mining companies with the right due diligence practices to safeguard against child labor and other human rights violations. Participating in these multi-stakeholder initiatives also enables us to contribute to efforts to address risks and challenges on the ground, through partnerships with local government and Non-Governmental Organizations (NGOs).