



## STATEMENT AGAINST SLAVERY AND HUMAN TRAFFICKING

Dell Technologies Inc., on behalf of itself, Dell Inc and its direct or indirect subsidiaries, ("Dell") is committed to social and environmental responsibility. As part of its commitment, Dell prohibits slavery and human trafficking in our operations and supply chain and works to minimize any associated risks. No matter the circumstances, we will not tolerate forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons in any of our own business operations or by any Dell supplier, or for any other purpose. Dell is a founding member of the [Responsible Business Alliance \(RBA\)](#), formerly known as the Electronics Industry Citizenship Coalition (EICC) and has 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-a-vis this Code and supplier's adherence to Dell's Supplier Principles when awarding and/or renewing business with the supplier.

This Statement is made pursuant to the requirements of the California Transparency in Supply Chains Act of 2010 and section 54(1) of the U.K. Modern Slavery Act 2015, and Part 2 of the Australian Modern Slavery Act 2018, and constitutes Dell's slavery and human trafficking statement for the financial year ending January 28, 2022 (and for the financial year ending 31<sup>st</sup> January 2022 in respect of Dell Bank International Designated Activity Company). For the purposes of Part 2 of the Australian Modern Slavery Act 2018, this Statement is made on behalf of the applicable reporting entities, Dell Australia Pty Limited ABN 46 003 855 561 and EMC Global Holdings Company ABN 86 699 010 685 (Australian Reporting Entities). The corporate structure of the Australian Reporting Entities is set out in Annexure A of this Statement along with Australian specific details required under Australian law.

For the purposes of section 54(1) of the U.K. Modern Slavery Act 2015, this statement is made on behalf of reporting entities Dell Corporation Limited (02081369), Dell Emerging Markets (EMEA) Limited (03266654), Dell Products Unlimited Company (191034), EMC Information Systems International Unlimited Company (461022), EMC Europe Limited (00990752), Virtustream Ireland Limited (433356) and Dell Bank International d.a.c. (502362).

Christopher A. Garcia signs this Statement as Assistant Secretary and Senior Vice President on behalf of Dell Inc. and its wholly owned subsidiaries, and in his capacity as Director or authorized representative of the above-named legal entities.

The term "Dell" as used in this Statement refers to Dell Inc. and its wholly owned subsidiaries.

### **Structure, operations, and supply chains**

Dell Technologies is one of the largest information technology (IT) providers in the world. Our technology and services portfolio spans both traditional infrastructure and multi-cloud technologies. We design, develop, manufacture, market, sell, and support a wide range of comprehensive and integrated solutions, products, and services.

Dell is a corporation incorporated in the state of Delaware with principal executive offices in Round Rock, Texas. Dell Technologies Inc. and its subsidiaries operate worldwide and are collectively known as Dell. A complete list of Dell's subsidiaries worldwide as of the end of its most recently completed fiscal year can be found as Exhibit 21 to Dell's Form 10-K, filed with the US Securities and Exchange Commission on March 24, 2022.

We have operations and conduct business in many countries located in the Americas, Europe, the Middle East, Asia, and other geographic regions. Dell directly employs approximately 130,000 people worldwide. We also manage responsible business practices in one of the world's largest supply chains. Our own manufacturing facilities are located in the United States, Malaysia, China, Brazil, India, Poland,

and Ireland. We also utilize contract manufacturers throughout the world to manufacture or assemble our products under the Dell Technologies brand. Components used in these manufacturing facilities are sourced primarily from those same countries listed above, but also from Japan, South Korea, Mexico, Taiwan, Singapore, Philippines, Thailand, Laos, Germany, Netherlands, Israel, Vietnam, and Indonesia to meet the technology, quality and sustainability requirements of our broad global portfolio of products.

Our biggest spend is for direct materials and our due diligence in our supply chain primarily relates to those suppliers. [Dell's Public Supplier List](#) includes original design manufacturers (ODMs), final assembly and suppliers that Dell buys from directly and/or provide substantial product transformation, including the location of these facilities. This list represents a snapshot covering at least 95% of Dell's direct material spend during fiscal year 2022. In addition to these direct global material suppliers, our next biggest areas of spend include products and services procured in country or regionally for customer-facing services, marketing and global real estate and facilities.

### **Identify and assess the risk of modern slavery**

Given the differing legal governing structures and fluctuations in labor markets that exist globally, the technology sector's biggest risk of modern slavery and human trafficking comes from the use of foreign migrant workers. Our efforts on verification, risk assessment and audits are described below. Even with these efforts, there remains risk that direct suppliers or their suppliers do not have sufficient controls to fully identify, prevent, correct, or remediate risks of forced labor. In addition to Dell's internal risk assessments, Dell also collaborates with industry peers through the Responsible Labor Initiative (RLI, a sub-group initiative to the RBA) to address identified risks in the supply chain to drive accountability and corrective actions with suppliers.

Minerals are used in many Dell Technologies products. For example, gold is used in circuit boards, and tantalum is used in capacitors. Some of these minerals are mined in conflict affected and high-risk areas. While we do not purchase minerals directly from mines, smelters or refiners, our expectations for responsible sourcing extend throughout our supply chain.

Emphasis is placed on the identification and assurance of smelters or refiners (SORs) used to process material supplied by mines or mineral agents. This includes an independent, third-party assessment of management systems and sourcing practices to validate conformance with the Responsible Minerals Assurance Process (RMAP). To track conformance rates, we require suppliers who use 3TG (tin, tungsten, tantalum and gold — known as 3TG) and/or cobalt within their supply chain to complete the Conflict Minerals Reporting Template or the Cobalt Reporting Template to report on SORs within their own supply chains.

Given the many supply chain tiers involved and the size of smelting and refining operations, multiple suppliers will likely include some of the same SORs in their reporting. We collaborate with suppliers to develop their own capabilities and help them to remediate issues with SORs that are not participating in any third-party assurance program to achieve conformance or remove them from their supply chains. More information is available in the [Dell Technologies Conflict Minerals Disclosure report](#).

As previously noted, the biggest risk of forced labor based upon both our own audits as well as industry data from the RBA and several NGOs would include any area or type of supplier that uses foreign migrant workers (FMW). In addition to substandard labor conditions, FMWs may be vulnerable to high fees at different points during their journey as a potential worker, ranging from home and/or receiving country labor agents, to travel, visa or health check fees. FMWs may not fully understand or consent to the adverse conditions of work opportunities prior to leaving their home country. Once they leave the protection and resources of their family or home country, workers can become vulnerable to forced labor conditions. Specifically, Dell has seen risk to FMWs in situations involving Onsite Service Providers (OSPs) and in countries in which worker fees are legally and culturally accepted.

Dell's assurance practices are risk-informed with high risk circumstances, and actions to avoid or mitigate associated risks, most highly prioritized. Dell's audit and capability building programs specifically target areas of known or highest potential of forced labor risk. Dell's risk assessment method uses a blend of our own audit activity, international government, and NGO information to assign each country a risk score which is heavily weighted by forced labor risks, including for FMWs. The risk

scores inform our audit programs, such that we focus resources in countries where we have seen higher risk. For countries that are lower risk and for which we have not seen high risk in their in-country or regional supply chains, such as Western Europe, USA or Australia, we do not divert resources from higher risk locations. Dell takes a balanced approach by responding to new risk information with audits as needed for lower risk countries. The risk assessment is completed annually, so as country risk levels change, so does Dell's audit and capability programing to adapt to shifting risks.

Dell has 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, including the [Dell Human Rights Policy](#), and other policies and principles referenced in this statement are available online on our [Supply Chain Responsible Labor](#) and [ESG Policies, Positions & Guidelines](#) pages.

The Supply Chain Assurance organization within Dell's Global Operations organization has a Social and Environmental Responsibility (SER) function that deploys programs and operations teams and drives social and environmental standards across the supply chain, including those related to forced labor. These teams work across Global Operations with procurement and manufacturing organizations and include specialists dedicated to monitoring and training suppliers. The SER function aligns with internal Dell stakeholders in each applicable Dell group entity to engage for the purposes of preparing this Statement. Representatives from each of the group entities (including the reporting entities) participate in working group meetings and/or receive regular/ periodic briefings from the SER function. A working group is operational to consult Dell group entities to ensure that the country specific risks have been appropriately identified, assessed and addressed and that the group entities are aware of the actions needed to be taken to mitigate and eliminate the risks. Specifically, input is sought and considered prior to the annual refresh of this Statement to ensure all group entity requirements are clearly stated.

For more information on our work to remediate forced labor risks with our suppliers, please review the Supply Chain section of our annual [Environmental, Social and Governance \(ESG\) Report](#).

### **Actions taken to address risks of modern slavery**

Dell focuses on the following key criteria to ensure and verify the absence of forced labor, slavery, and human trafficking of any kind within our direct materials supply chain. We have similarly implemented initiatives for suppliers in key parts of Dell's indirect supply chain, including workers employed by suppliers known as Onsite Service Providers (OSPs) that provide a range of services, which include but are not limited to: janitorial, security, or food and cafeteria management services.

**1. VERIFICATION AND RISK ASSESSMENT:** Dell's risk-based approach means that the highest risk countries and supplier types will be in scope for all parts of our programs (risk assessment, audits, corrective actions, capability building and accountability measures like quarterly business reviews), while lower risk countries may not be audited or be in capability building programs. Even if a country represents low risk, Dell will adjust its audit plans if new information related to risk of forced labor is found either through Dell's own due diligence or from other credible stakeholder insights. Dell conducts an annual internal assessment of supply chain risk that is based on the commodity produced and independent research that identifies labor risks associated with geographic locations, spend, past performance, and other targeted risk factors. This risk assessment incorporates data on human trafficking incidence from sources including, but not limited to, the U.S. State Department's annual "Trafficking in Persons Report," The Global Slavery Index, U.S. Department of Labor's [Bureau of International Labor Affairs](#). Our risk assessment further considers local risk factors including human rights risk, country governance, and accountability.

**2. AUDITS:** Suppliers are selected for audits based on risk. We target to have third-party audits at all high-risk supplier sites every two years. Typically, all audits are completed on-site. However, due to ongoing COVID-19 impact, we conducted remote audits in some circumstances, as allowed by RBA guidance. This temporary process initiated for remote audits during the pandemic enabled us to adhere to recommended COVID-19 containment measures while protecting the health and safety of the people in our supply chain, assuring the responsible manufacturing of our products, and meeting customer demands.

As part of the audit process, auditors review documents, observe daily work practices and interview supplier management, workers and contractors independently to assess the implementation of the SER standards in the RBA Code of Conduct. In FY22, auditors conducted 12,641 confidential feedback interviews as part of the audit process.

Our audits are completed by RBA-certified third-party entities to ensure full RBA Code coverage and consistency of interpretation of requirements even in countries where local law does not align with the RBA Code. Auditors are qualified by the RBA based upon a combination of RBA-specific training, specific relevant industry training (i.e., for certain health/safety or environmental disciplines), and minimum threshold levels of field experience under certified RBA lead auditors. Auditors, including those involved in unannounced investigations, monitor suppliers' adherence to over 40 provisions covered by the RBA Code, including an assessment of suppliers' policies and practices addressing human trafficking risks and controls. Auditors also assess supplier management and oversight of their own suppliers, with a particular emphasis on labor brokers. Auditors are re-certified to ensure up-to-date skills and interpretations. Auditors are trained on RBA Code of Conduct requirements concerning confidentiality, as well as worker interview skills, particularly for forced labor or other labor issues that workers may be reticent to discuss.

Importantly, site audits are conducted in areas where workers' freedom of movement may be restricted or constrained, such as suppliers' dormitories, canteens, storage and common areas. Access to these areas may facilitate the identification of specific risks or instances of modern slavery if the audit reveals workers are being denied freedom of movement, are housed in inadequate or substandard housing, or are being charged exorbitant fees for food and housing – these are known indicators that modern slavery practices may exist.

Auditors review documents related to the labor provisions of the RBA Code of Conduct (including working hours, pay slips with wages, benefits, and deductions) and conduct interviews with both management and the workers to assess conformance to the RBA Code of Conduct. Auditor interviews of workers are key, for example, in identifying expenses or deductions in factory pay slips, which may not reflect the use of a labor recruiter involved in the hiring process. Auditor interviews are an important assurance step; it is critical to ensure workers can provide information safely and confidentially before, during, or after an audit. Workers selected for interviews during onsite audits are also given a communication card with access to Dell's or RBA's (for audits of a supplier shared with other RBA members) helpline to provide anonymous feedback outside the factory and outside the audit process, if they prefer.

While helpline usage related to an audit is a critical verification for the audit, Dell's third-party operated supply chain grievance mechanism can be used for any concerns that arise outside the 2 year audit cycle. Any issues that meet the defined RBA Code criteria are escalated through established procedures to ensure issues are promptly addressed along with the determination of the root cause.

This third party operated mechanism targeted at suppliers is in addition to [Dell Technologies Ethics Helpline](#) options globally available for anyone, including team members, partners, suppliers or their employees, or any other internal or external stakeholder to report concerns or issues they believe may violate Dell's Code of Conduct, Dell's Human Rights Policy or any other related Dell policies or standards. Dell will promptly investigate allegations and take appropriate action, where necessary, to mitigate actual or potential adverse human rights impacts. Dell does not tolerate retaliation against anyone acting in good faith to report a concern, provide information, or otherwise assist in an investigation or proceeding regardless of the helpline a worker chooses to use.

Any allegations of modern slavery or modern slavery risks received through these mechanisms are fully investigated immediately by Dell Technologies. Methods to research allegations include unannounced visits by our social and environmental responsibility (SER) specialists and/ or third-party auditors. Depending on the nature of any findings, SER specialists work with suppliers to develop corrective action plans to address modern slavery risks and/or remediate instances of modern slavery. In cases of severe (priority and/or major) findings, suppliers may be required to complete a third-party closure audit to resolve the issue.

In FY22, 100% of our audited suppliers also had helpline mechanisms in place. This is a requirement for RBA Code compliance to enable suppliers to receive worker feedback and create processes to directly address and/or improve issues outside of an audit, including but not limited to forced labor.

All workers within our supply chain fall within the scope of Dell's assurance procedures, including those migrating for work. Dell's social and environmental responsibility (SER) initiatives apply to workers in final assembly, direct and sub-tier suppliers regardless of their form of employment. Whether a worker is directly hired or is in an indirect, contract, dispatch or temporary employment relationship, the labor protections apply.

We use audits to supplement our Supplier Engagement, Capability Building and Assessment program and internal tracking mechanisms to monitor suppliers' performance to our requirements. These audits are part of our overall strategy to responsibly manage our supply chain, identify risks, and interact with workers. We select supplier sites for audits based on the risk assessment described above. Audit findings that indicate potential risks of forced labor or human trafficking are immediately addressed and tracked until closed

Where recruitment fees either to the supplier or a labor broker have been used, we work with suppliers to return recruitment fees and pay direct remedies to affected workers. Additional details on these programs and statistics for the last reporting year are available in the Supply Chain section of our annual Environmental, Social and Governance (ESG) Report.

**3. SUPPLIER CERTIFICATION:** Compliance with [Dell's Supplier Principles](#), which includes the [Dell Vulnerable Worker Policy](#), is a contractual obligation for suppliers. These Principles include requirements to directly address risks of forced labor and human trafficking. Compliance with these requirements is evaluated through the mechanisms referenced above.

Suppliers are required to conduct a root cause analysis and develop a plan to address issues found during an audit within RBA-specified timelines, including findings associated with forced labor conditions.

Dell develops corrective action plan (CAP) toolkits that provide resources to help suppliers address audit findings in relation to labor and ethics risk (including forced labor) and enhance Dell's review of CAPs developed by suppliers. These CAP toolkits help suppliers address modern slavery risks, particularly in locations that are heavily reliant on internal country migrants and foreign migrant workers who frequently work through labor agents. Suppliers need to understand their responsibility to effectively manage agents as well as bear the full cost of the recruitment process (i.e., at no point to have recruitment fees for workers). Suppliers cannot delegate the ownership and responsibility of implementing the 'no recruitment fees' policy to labor agents, even as individual tasks are delegated. This applies for the full journey of the worker from home country to final factory. If employees are found to have been paying recruitment fees to their employer or a third-party labor broker, Dell will work with the suppliers to repay the workers.

Progress in addressing these issues is regularly reported across Dell's procurement organization through monthly reports, executive escalations, and quarterly business reviews with suppliers. Closure audits are conducted to confirm priority and major findings have been resolved. Dell reserves the right to take any and all available actions against suppliers for violations of Dell's Vulnerable Worker Policy including without limitation the reduction of business, frequent required onsite compliance auditing at supplier's expense (including but not limited to dormitories, canteens, storage and common areas), employee compensation at supplier's expense, and/or termination of Dell's contract with the supplier.

**4. INTERNAL ACCOUNTABILITY:** Internal accountability standards and procedures help confirm that workers and suppliers meet Dell's supply chain standards. Supplier accountability occurs through mechanisms ranging from audit corrective action procedures (see "AUDITS," above) to Dell executive review of supplier performance and quarterly business reviews to ensure alignment and timely action. Typically, this occurs during suppliers' quarterly business reviews, which are attended by key executives to help determine future business awards, supplier resources and policy, as well as to

address progress toward aligned goals. Alternatively, meetings may be accelerated depending on the type of finding. Dell maintains an internal tracking system of RBA audit findings that allows for monitoring and regular reporting on open issues and due dates. Commodity teams are measured during their quarterly and annual performance scorecards with the audit performance and closure status of RBA audit issues for suppliers they manage. Procurement executives receive monthly reports on suppliers with any audit findings that suggest risks of forced labor and human trafficking and hold suppliers accountable to address the risks. Where there is a 'priority' or 'major' supplier audit finding in relation to forced labor or child labor, this issue is escalated for review at an executive level prior to the QBR cycle to ensure timely review by executives.

Dell's SER team works with suppliers to determine root cause, provide targeted capability-building and monitor corrective action plans to closure. We also believe some human rights risks and issues can be addressed most effectively by working in partnership with others. In addition to our standard procedures, where we believe it may accelerate and improve outcomes for affected stakeholders, Dell may collaborate with other RBA members or nongovernmental organizations (NGOs), or other stakeholders.

The timeliness and completeness of the corrective action plans are measured by the supplier's quarterly business reviews to ensure alignment and timely actions. For more detail on how accountability is built into our work with suppliers, see the Supply Chain section of our annual Environmental, Social and Governance (ESG) Report.

**5. TRAINING:** Expectations to comply with laws and ethical business practices, including respecting the fundamental human rights of others, are embedded in Dell's culture and policies, and clearly set out in the Dell Technologies Code of Conduct. Dell Technologies team members are required to complete annual Code of Conduct training and adhere to our Code and standards, including adherence to the RBA Code which sets out required protections against forced, bonded, or indentured labor, human trafficking and more.

Dell conducts additional RBA Code training for supply chain management professionals and manufacturing operations teams. This training includes engagement with global commodity managers, as well as other key relationship owners, and is conducted through a variety of training approaches, from in-person, all-day workshops to online modules. Human trafficking is a key part of the training. Dell's Global Operations organization has responsibility for implementing and monitoring compliance to all the supply chain activities described above. Our focus on identifying even potential risks of slavery and human trafficking is part of a larger effort to encourage business integrity, ethical conduct, and supply chain transparency and accountability.

In FY21, Dell released [Guidelines for Suppliers' Protections of Workers During COVID-19](#). These Guidelines document the minimum requirements expected of Dell suppliers through a global pandemic. Minimum requirements specifically delineate that the RBA Code must continue to be followed, including language that: "It is never ethical to exploit vulnerable or desperate job seekers. This is a time of high-risk for forced and child labor due to losses of jobs and opportunities." In FY22, we clarified the reimbursement requirement for prohibited recruitment fees in our toolkit used by suppliers. Even with the challenges related to COVID-19, the reach of our capability building program, including forced labor and labor protections training, remained high.

- a. 1,616 unique participants attended our capability building training programs
- b. 407 unique supplier factories were represented
- c. 11,791 hours capability building training on social and environmental responsibility topics were completed
- d. 5,267 hours online training
- e. 6,524 hours in-person training sessions and webinars

In addition, audit scores of suppliers who have previously attended training are analyzed to improve or clarify training where needed.

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. For more information about our business, see the business description available in the Dell Technologies 10-K.

**6. EFFECTIVENESS:** Dell measures and monitors the cumulative impact of its various programs and provides transparency into progress in its annual [ESG Report](#). Ongoing analysis of related performance indicators helps inform our understanding of the effectiveness of initiatives such as supplier training on labor rights and recruitment fees, utilization and impact of CAP toolkits directed at identifying and addressing labor rights risks, including forced labor, and more.

These programs are also integrated into supplier performance management and escalation processes such that the total impact is reflected in the audit score improvements or recruitment fees identified and returned to workers.

Improvements in supplier factory audit performance, FY22

- Overall: 70% of our factories that went through at least their second audit cycle improved their audit scores between cycles
- Final assembly suppliers: 38%
- Direct suppliers: 79%
- Sub-tier suppliers: 66%
- High performing supplier factories: 68% of factories are high performing based on their audit scores (at least 180 out of 200 for final assembly factories or 160 out of 200 for other factory tiers and no priority findings)

These mechanisms and indicators are closely monitored and tracked as part of our practices to help ensure all of our products, wherever they are manufactured or delivered to customers around the world, are made responsibly, without the use of any form of forced labor.

Signature:



Christopher A. Garcia

Assistant Secretary & Senior Vice President

Dell Inc.

Last revision date: July 1, 2022