



### **Disclosure on all categories in IEEE 1680.1-2018 criteria 4.10.1.1 and 4.10.1.2**

Dell Technologies assesses factories on a 200-point scale based on performance relative to the RBA Code of Conduct.

We conducted 138 audits at directly contracted supplier factories during the 12-month period August 2021 to July 2022; only seven supplier factories met the lowest threshold across our performance rankings. All other audited factories had solid performance, including Dell-owned and operated factories. No other low performance cases were recorded during this period.

Independent auditors conducted the audits, spending three-to-five days onsite reviewing policies and procedures and interviewing management and workers to double-check their deployment.

Dell drives improvements for all assessed factories, especially the seven low performers. All findings are subject to a corrective action plan that is led by both a Dell team member and representative of the supplier factory in question to make certain the findings identified are remediated. For specific findings, please note:

- **Working hours:** Reflects excursions to the benchmark of 60 hours per week. All additional overtime in Dell-owned or supplier factories, including at the seven factories in question, is undertaken voluntarily.
- **Occupational Safety:** Assess, inspect, minimize, and remediate potential hazards in the workplace to reduce worker injury, illness, and death.
- **Emergency Preparedness:** Precautionary measures in the face of potential incidents, such as fire exits, natural and man-made disasters, designed to avoid and mitigate negative outcomes.

The following pages summarize the assessment results and subsequent improvements at the seven low-performing supplier factories and six Dell-owned and operated manufacturing facilities.

**IEEE 1680.1 Assessment Metrics — Labor  
Supplier Factories**

<b>5 Supplier Factories in Asia</b>					
<b>Labor</b>	<b># of Total Nonconformities</b>	<b>% of Total Nonconformities</b>	<b>Closure Rate %</b>	<b># of Repeat Nonconformities</b>	<b>% of Repeat Nonconformities</b>
Freely Chosen Employment	7	24%	100%	0	0%
Young Workers	0	0%	N/A	0	0%
Working Hours	13	45%	38%	0	0%
Wages & Benefits	6	21%	50%	0	0%
Humane Treatment	0	0%	N/A	0	0%
Non-Discrimination	1	3%	100%	0	0%
Freedom of Association	2	7%	100%	0	0%

<b>2 Supplier Factories in North America</b>					
<b>Labor</b>	<b># of Total Nonconformities</b>	<b>% of Total Nonconformities</b>	<b>Closure Rate %</b>	<b># of Repeat Nonconformities</b>	<b>% of Repeat Nonconformities</b>
Freely Chosen Employment	5	28%	80%	0	0%
Young Workers	1	6%	100%	0	0%
Working Hours	2	11%	50%	0	0%
Wages & Benefits	1	6%	100%	0	0%
Humane Treatment	1	6%	100%	0	0%
Non-Discrimination	4	22%	100%	0	0%
Freedom of Association	4	22%	100%	0	0%

**IEEE 1680.1 Assessment Metrics — Health and Safety  
Supplier Factories**

<b>5 Supplier Factories in Asia</b>					
<b>Health and Safety</b>	<b># of Total Nonconformities</b>	<b>% of Total Nonconformities</b>	<b>Closure Rate %</b>	<b># of Repeat Nonconformities</b>	<b>% of Repeat Nonconformities</b>
Occupational Safety	11	38%	91%	0	0%
Emergency Preparedness	9	31%	78%	0	0%
Occupational Injury & Illness	4	14%	100%	0	0%
Industrial Hygiene	2	7%	50%	0	0%
Physically Demanding Work	0	0%	N/A	0	N/A
Machine Safeguarding	1	3%	100%	0	0%
Food, Sanitation, Housing	1	3%	100%	0	0%
Health and Safety Communication	1	3%	100%	0	0%

<b>2 Supplier Factories in North America</b>					
<b>Health and Safety</b>	<b># of Total Nonconformities</b>	<b>% of Total Nonconformities</b>	<b>Closure Rate %</b>	<b># of Repeat Nonconformities</b>	<b>% of Repeat Nonconformities</b>
Occupational Safety	3	21%	67%	0	0%
Emergency Preparedness	6	43%	100%	0	0%
Occupational Injury & Illness	2	14%	100%	0	0%
Industrial Hygiene	1	7%	100%	0	0%
Physically Demanding Work	1	7%	100%	0	0%
Machine Safeguarding	0	0%	N/A	0	N/A
Food, Sanitation, Housing	0	0%	N/A	0	0%
Health and Safety Communication	1	7%	0%	0	0%

**IEEE 1680.1 Assessment Metrics — Labor  
Dell Factories**

<b>4 Dell-Operated Manufacturing in Asia</b>					
<b>Labor</b>	<b># of Total Nonconformities</b>	<b>% of Total Nonconformities</b>	<b>Closure Rate %</b>	<b># of Repeat Nonconformities</b>	<b>% of Repeat Nonconformities</b>
Freely Chosen Employment	0	0%	N/A	0	N/A
Young Workers	0	0%	N/A	0	N/A
Working Hours	2	50%	0%	2	100%
Wages & Benefits	2	50%	100%	0	0%
Humane Treatment	0	0%	N/A	0	N/A
Non-Discrimination	0	0%	N/A	0	N/A
Freedom of Association	0	0%	N/A	0	N/A

<b>2 Dell-Operated Manufacturing in Europe, South America</b>					
<b>Labor</b>	<b># of Total Nonconformities</b>	<b>% of Total Nonconformities</b>	<b>Closure Rate %</b>	<b># of Repeat Nonconformities</b>	<b>% of Repeat Nonconformities</b>
Freely Chosen Employment	1	100%	100%	0	0%
Young Workers	0	0%	N/A	0	N/A
Working Hours	0	0%	N/A	0	N/A
Wages & Benefits	0	0%	N/A	0	N/A
Humane Treatment	0	0%	N/A	0	N/A
Non-Discrimination	0	0%	N/A	0	N/A
Freedom of Association	0	0%	N/A	0	N/A

**IEEE 1680.1 Assessment Metrics — Health and Safety  
Dell Factories**

<b>4 Dell-Operated Manufacturing in Asia</b>					
<b>Health and Safety</b>	<b># of Total Nonconformities</b>	<b>% of Total Nonconformities</b>	<b>Closure Rate %</b>	<b># of Repeat Nonconformities</b>	<b>% of Repeat Nonconformities</b>
Occupational Safety	0	0%	N/A	0	N/A
Emergency Preparedness	1	100%	100%	0	0%
Occupational Injury & Illness	0	0%	N/A	0	N/A
Industrial Hygiene	0	0%	N/A	0	N/A
Physically Demanding Work	0	0%	N/A	0	N/A
Machine Safeguarding	0	0%	N/A	0	N/A
Food, Sanitation, Housing	0	0%	N/A	0	N/A
Health and Safety Communication	0	0%	N/A	0	N/A

<b>2 Dell-Operated Manufacturing in Europe, South America</b>					
<b>Health and Safety</b>	<b># of Total Nonconformities</b>	<b>% of Total Nonconformities</b>	<b>Closure Rate %</b>	<b># of Repeat Nonconformities</b>	<b>% of Repeat Nonconformities</b>
Occupational Safety	0	0%	N/A	0	N/A
Emergency Preparedness	0	0%	N/A	0	N/A
Occupational Injury & Illness	0	0%	N/A	0	N/A
Industrial Hygiene	0	0%	N/A	0	N/A
Physically Demanding Work	0	0%	N/A	0	N/A
Machine Safeguarding	0	0%	N/A	0	N/A
Food, Sanitation, Housing	0	0%	N/A	0	N/A
Health and Safety Communication	0	0%	N/A	0	N/A

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