



EPEAT Criteria 7.1.3 Social Responsibility Performance Audits of High-Risk Suppliers

Identification of Prioritized Supplier Facilities

Dell Technologies conducts an annual assessment to determine its Prioritized Supplier Facilities (PSF). All directly contracted suppliers and select indirect suppliers are in scope for this assessment. Dell's human rights due diligence practice is risk-based, in alignment with the UN Guiding Principles for Business and Human Rights. Select indirect sub-tier suppliers are included based on initial risk scores. Risk scores are informed by worker complaints, current and historic audit performance, high risk manufacturing processes, and geographic location, among other criteria. The assessment covers all risk categories identified in Annex C of EPEAT Responsible Supply Chains Criteria 2025. All high risk supplier facilities identified in the assessment are Prioritized Supplier Facilities, as well as supplier facilities that have priority non-conformances that have not been remediated within the timeframe specified by the supplier audit.

Overview of FY25 Audit Program

In FY25, the 12-month period spanning February 2024 – January 2025, Dell Technologies conducted 270 initial and 171 closure labor rights and OHS audits at supplier facilities. As our audit program is based on a supplier audit schedule of every two years, these audits included all PSFs that were due for an audit during this time. The data provided in this document spans Dell Technologies' entire audit program, which includes hundreds of supplier facilities.

Percentage of Directly Contracted Supplier Facilities Audited by Dell Technologies

The table below reflects the percentage of supply chain facilities directly contracted by Dell Technologies that were audited within the past three fiscal years.

FY23 Feb 2022 – Jan 2023	FY24 Feb 2023 – Jan 2024	FY25 Feb 2024 – Jan 2025
50.4%	52.9%	59.6%

Percentage of Total Supplier Facilities Audited per Risk Category

The table below reflects the percentage of suppliers that fell within each risk category utilized by the supply chain audit program for the last three fiscal years. Our risk categories are defined by the risk scores identified in our annual risk assessment.

	FY23	FY24	FY25
Low Risk (0-60%)	23%	21%	25%
Medium Risk (61-80%)	52%	55%	55%
Medium High Risk (81-89%)	9%	8%	4%
High Risk (90-100%)	16%	16%	16%

Continuous Improvement and Capacity Building

Our suppliers demonstrate varying levels of maturity in their own corporate sustainability programs. We work closely with them to drive progress and continuous improvement, particularly with regard to the RBA Code of Conduct standards, as well as our expectations. When areas of nonconformance with the Responsible Business Alliance (RBA) Code of Conduct are discovered through an audit, our Dell SER specialists work with the supplier to create a corrective action plan (CAP) to resolve the issues within RBA- or Dell-defined timelines, whichever is earliest. We share best practices collected from our highest performing suppliers and encourage lower-performing suppliers to take appropriate actions to improve performance.

Major Non-conformances and Corrective Actions

The following tables summarize the major and priority non-conformances and subsequent corrective actions taken at Dell Technologies' suppliers' facilities across the past three fiscal years:

Labor	FY23		FY24		FY25	
	# of Findings*	% of Total Supplier Facilities Impacted**	# of Findings*	% of Total Supplier Facilities Impacted**	# of Findings*	% of Total Supplier Facilities Impacted**
Freely chosen employment	20	5.5%	16	4.1%	15	4%
Young workers	0	0%	3	0.8%	2	0.5%
Working hours	278	77.9%	272	73.1%	275	71.7%
Wages and benefits	36	10.3%	36	9.6%	33	8.8%
Non-discrimination/non-harassment/Humane treatment	2	0.6%	6	1.4%	4	1.1%
Freedom of association and Collective Bargaining	2	0.6%	2	0.5%	1	0.3%

*These totals reflect both major and priority VAP non-conformances across Dell-owned facilities, final assemblies, direct and select indirect suppliers.

**The percentage of total supplier facilities impacted in our audit program.

Examples of actions taken to address these non-conformances with suppliers:

- We require prompt resolution of priority and major non-conformances. Once the supplier addresses an audit finding, it must be closed by a second successful audit or Dell Technologies' SER specialists, who validate that the issue has been resolved.
- We provide training and resources to suppliers for knowledge and capability building in areas such as forced labor and working hours, among others, to proactively address these risks.
- We continuously monitor weekly working hours (WWH) of factories with known risks of WWH nonconformance based on past audit performance. This provides an early indicator of potential deviation from the standard.
- We collaborate with suppliers to address identified risks of nonconformance. For example, creating a window where customer lead time can be adjusted or identifying when orders can be moved.

Health and Safety	FY23		FY24		FY25	
	# of Findings*	% of Total Supplier Facilities Impacted**	# of Findings*	% of Total Supplier Facilities Impacted**	# of Findings*	% of Total Supplier Facilities Impacted**
Occupational safety	36	10.3%	54	14.8%	70	18.7%
Emergency preparedness	58	16.7%	51	13.1%	68	18.2%
Occupational injury and illness prevention	12	3.4%	13	3.6%	9	2.4%
Industrial hygiene	17	4.9%	13	3.6%	22	5.9%
Physically demanding work	3	0.9%	0	0%	2	0.5%
Machine safeguarding	17	6.9%	18	5%	34	9.1%
Food, sanitation and housing	16	4.6%	13	3.6%	11	2.9%

*These totals reflect both major and priority VAP non-conformances across Dell-owned facilities, final assemblies, direct and select indirect suppliers.

**The percentage of total supplier facilities impacted in our audit program

Examples of actions taken to address these non-conformances with suppliers:

- We require prompt resolution of priority and major non-conformances. Once the supplier addresses an audit finding, it must be closed by a second successful audit or Dell Technologies' SER specialists, who validate that the issue has been resolved.
- We engage in capability building efforts, such as in person and remote training opportunities, that provide suppliers with knowledge and tools regarding EHS to improve audit performance through management systems.

Allegation Management

Dell Technologies takes reports regarding possible human rights and OHS violations seriously. Persons who know of, or suspect, a violation of applicable laws, regulations or Dell Technologies' Supplier Principles, are encouraged to utilize the following reporting options:

- Dell Technologies "Speak Up" Anonymous Report Center: <https://dell.service-now.com/arc>
- Audit Committee of the Dell Technologies Board of Directors at Board_of_Directors@dell.com
- Dell Technologies Privacy Center: <https://www.dell.com/en-us/lp/privacy-center>
- Dell Technologies Human Rights Supply Chain: SChumanrights@dell.com

The people in our supply chain are uniquely positioned to provide insight into day-to-day factory operations. This feedback is a critical input to help us validate supplier compliance with the RBA Code of Conduct and build greater context around issues and how they are addressed. Workers have access to a free phone helpline, available in multiple languages, to ensure the people in our supply chain, individuals and organizations representing them, have a reliable, confidential communications channel to share concerns or suggestions. A third-party, nongovernmental organization with expertise in worker feedback channels manages the helpline. Available 24 hours a day, seven days a week, the helpline can be accessed by supplier employees and contractors outside the workplace, reinforcing the confidentiality of their feedback. Workers are made aware of this tool via worker interviews during audits and trainings.

Any reported violation will be kept confidential to the maximum extent allowed under applicable laws. Such reports may be made anonymously, by using any of the methods set forth above. Although reports of violations or suspected violations under the Principles may be made verbally, Suppliers are encouraged to make any such reports in writing, which assists the investigation process and facilitates any follow-up as appropriate. Dell will promptly investigate allegations and take appropriate action, where necessary, to mitigate actual or potential adverse human rights impacts. Suppliers are expected, consistent with applicable laws and contractual obligations, to provide reasonable assistance to any investigation by Dell Technologies of a violation of the Principles or applicable laws, and to allow Dell Technologies reasonable access to all facilities, records and documentation concerning their compliance with the Principles and laws applicable to Dell Technologies' procurement of Supplier's products and/or services.

Stakeholder Engagement

Dell Technologies has engaged with the following organizations for feedback on its supply chain program*:

- Business for Social Responsibility Human Rights Working Group
- Mekong Sustainable Manufacturing Alliance (The Alliance) in Southeast Asia
- United States Agency for International Development (USAID)
- Institute for Sustainable Communities (ISC)
- Responsible Business Alliance
- Responsible Labor Initiative
- Responsible Minerals Initiative
- Public-Private Alliance for Responsible Minerals Trade
- Asian Institute for Technology (AIT)

*This is not an exhaustive list of stakeholders consulted.

Freedom of Association and Collective Bargaining

Dell Technologies has adopted the Responsible Business Alliance (RBA) Code of Conduct (“RBA Code”) for itself and its suppliers. The RBA Code establishes standards to ensure working conditions in global electronics and related supply chains are safe and workers are treated with respect and dignity. Dell Technologies’ policies in each of its locations serve to ensure protection of workers consistent with the RBA Code, including but not limited to protections against forced, bonded or indentured labor and human trafficking; child labor; inhumane treatment; discrimination in respect of employment and occupation and harassment; and provisions for workplace health and safety, fair payment of wages, hours and benefits, freedom of association, effective grievance mechanisms, and more. As a condition of doing business with us, our suppliers must comply with the Dell Technologies Supplier Principles, which include adherence to the RBA Code, Dell Responsible Sourcing Policy, the International Labour Organization’s (ILO’s) Declaration on Fundamental Principles and Rights at Work (including its principles relating to forced labor, child labor, freedom of association and the right to organize, collective bargaining, discrimination, and health and safety), and other embedded standards, policies and requirements.

For additional reference, the RBA Code 8.0’s section on Freedom of Association and Collective Bargaining provides:

Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment. In alignment with these principles, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Where the right of freedom of association and collective bargaining is restricted by applicable laws and regulations, workers shall be allowed to elect and join alternate lawful forms of worker representations.

The RBA VAP covers these requirements and these requirements are included in our audit program for both our own facilities as well as our suppliers.

Last Updated: October 2025