



**DELL**Technologies

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# Dell Technologies FY25 Supply Chain Human Rights Due Diligence Report

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# Introduction

At Dell Technologies, our purpose is to create technologies that drive human progress. We recognize that respecting human rights is fundamental to achieving this purpose, as well as building trust, driving innovation and operating responsibly. This report summarizes our supply chain human rights due diligence practices, including our commitment to continuously improve our practices in line with international standards.

## Our commitment

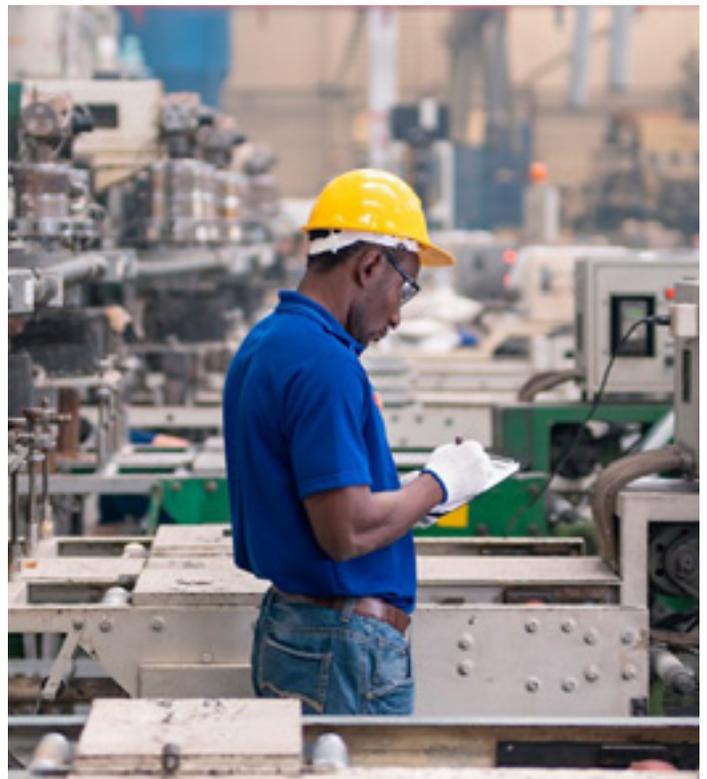
Dell Technologies respects the fundamental human rights of all people. We have adopted and uphold the expectations set out in the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#) and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct \(OECD Guidelines\)](#) and align our policies and practices accordingly. Dell is committed to ensuring we are not complicit in human rights violations, and we hold our suppliers and other business partners to this same standard.

## Human Rights Due Diligence

Our Human Rights Due Diligence (HRDD) process is a cornerstone of our commitment to respecting human rights across our global operations and supply chain. It is guided by the UNGPs and OECD Guidelines to ensure accountability, transparency and continuous improvement.

### Governance and operational oversight

Strong governance is essential to the effectiveness of our human rights due diligence efforts. Our governance emphasizes responsibility, ethics and integrity, with human rights oversight embedded across our operations. Senior leadership drives the execution of human rights standards, ensuring alignment with corporate values and priorities.



Our Board of Directors, directly and through our standing committees, oversees the establishment and maintenance of our governance, compliance and risk management processes and procedures to promote the conduct of our business with the highest standards of responsibility, ethics and integrity. Our Chief Executive Officer, who is also Chairman of our Board of Directors, approves our [Human Rights Policy](#), and the Board of Directors is briefed on salient human rights risks. Additionally, subject matter experts from Global Operations and Supply Chain Sustainability, Ethics & Compliance, Chief Technology Office, Privacy, Labor and Employment, and Human Resources participate in our Human Rights Working Group. This group meets throughout the year and is responsible for ensuring cross-organizational awareness, implementation and advancement of human rights-related commitments and priorities.

Our Global Operations function, led by Executive Vice President and Chief Supply Chain Officer Kevin Brown, includes the Social and Environmental Responsibility (SER) team. The SER team consists of both programmatic and operational experts that drive human rights social and environmental standards across the supply chain. SER's efforts target our salient human rights risks in the supply chain, and SER specialists are dedicated to monitoring supplier audit performance and building supplier capabilities. SER works across Global Operations with the procurement and manufacturing organizations to drive progress and accountability.

## Policies and supplier principles

Dell Technologies has developed and implemented numerous policies incorporating international human rights standards. We believe everyone deserves to be treated with dignity and respect, and we are committed to responsible, ethical and sustainable business practices. Our [Human Rights Policy](#) reflects our global commitment to respect the rights of all our stakeholders, including Dell team members, suppliers, contractors and subcontractors at any tier, partners, resellers, customers and others impacted by our supply chain.

**This policy applies to all our stakeholders and outlines our commitment to respecting internationally recognized human rights, including those enshrined in:**

- [The Universal Declaration of Human Rights](#)
- [The International Labour Organization \(ILO\) Core Conventions](#)
- The [UNGPs](#) and [OECD Guidelines](#)

**Human rights principles are also embedded in other key corporate policies and procedures across the business, including:**

- [How We Win: Dell Technologies Code of Conduct](#)
- [Dell Technologies Supplier Principles](#)
- [Dell Vulnerable Worker Policy](#)
- [Dell Technologies Responsible Sourcing Policy](#)
- [Dell Technologies Guidelines for Management of Manufacturing Process Chemicals](#)
- [Dell Technologies Location-Specific Privacy Policy](#)
- [Dell Technologies Principles for Ethical Artificial Intelligence](#)

Our [Supplier Principles](#) outline mandatory ethical, legal and operational standards for all our suppliers, emphasizing compliance with international laws, responsible sourcing, human rights and data protection. Key topics include: anti-corruption, antitrust, artificial intelligence, global certifications and standards requirements, privacy, trade compliance, working conditions, environmental requirements, financial integrity and supplier engagement programs. Adherence to our Supplier Principles is a condition of doing business with us, and it forms the basis for our supply chain social and environmental due diligence. We work closely with our suppliers to help them develop the necessary insights and capabilities to meet these requirements and continuously improve.

It takes hundreds of thousands of people worldwide to make our products, and we are committed to partnering with our suppliers to respect their human rights. This includes treating all people with respect and dignity, not tolerating forced labor in any form and consistently providing safe working conditions. Our strong, collaborative supplier relationships help ensure we meet the high standards we set for both our own operations and our suppliers.



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## Identifying risks & impacts

As part of our ongoing commitment to responsible business conduct and in alignment with international human rights standards, we systematically assess actual and potential risks and adverse impacts across our operations and global supply chain. This section outlines our risk-based methodology used to identify these risks and our priority areas for mitigation and remediation.

### **Human Rights Impact Assessment (HRIA): Salient risks in the supply chain**

Our ongoing human rights due diligence and assurance practices are embedded in organizations across our business, including our supply chain. To advance our understanding of our human rights risks, we periodically engage third-party experts to conduct HRIsAs. These assessments inform our policies and practices, support our mitigation measures, and guide our strategic priorities. HRIsAs are also an effective tool to measure long-term progress when coupled with a review of the effectiveness of our mitigation measures.

In alignment with the UNGPs, we identify our salient human rights issues, which are those issues at risk of the most severe negative impact through our activities or business relationships.

### Salience is determined by:

**Severity:** **scale** (how grave the impact is), **scope** (how many people are affected) and **remediability** (how hard it is to remedy the harm).

**Likelihood:** potential for the impact to occur, even if it has not yet occurred.

**Negative impact:** focus is on assessing potential harm, not potential positive contributions.

**Risk to people:** prioritize human rights risks over business risks.

Our first corporate-level, third-party HRIA, completed in FY19, identified our salient human rights issues and impact areas and confirmed that we have the essential structures in place to monitor and address our most significant risk areas. Insights from our most recent third-party HRIA, completed in FY24, deepened, increased and expanded our understanding of current, new and evolving salient human rights issues. In FY25, we updated our [Human Rights Policy](#) based on the insights gained from the FY24 HRIA, ensuring it reflects our enhanced understanding and commitment to addressing these risks.

### The most salient human rights issues for our global supply chain are aligned with the broader information communication technology industry and are as follows:

## Working hours

Excessive working hours in global technology supply chains is a persistent human rights concern, and we actively work to ensure our supplier factories comply with the Responsible Business Alliance (RBA) Code's working hour limits to protect worker well-being. We monitor high-risk factories, collaborate with original design manufacturers (ODMs) to manage production schedules, and build supplier capabilities to improve conformance. Our SER specialists also support suppliers in resolving instances of audit nonconformance through improved management practices and sustainable production strategies.

The [RBA Code](#) limits factory line workers to a maximum of 60 working hours per week or the limit stipulated by local law (whichever is stricter) and requires that employees and contractors have a minimum of one rest day every 7 days.

Breaches of working hour limits are the most common audit findings among supplier factories in the technology industry. Although overtime is voluntary, excessive working hours impact work-life balance and can increase health and safety risks. We work diligently with our suppliers to meet the industry standard.

### Our strategy includes the following actions:

- Weekly monitoring of factories with known risks of nonconformance based on past audit performance. This provides an early indicator of potential deviation from the standard.
- Collaboration with original design manufacturers 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 to prevent working hours issues.
- Capability building to provide suppliers with the knowledge and tools needed to improve working hours performance through strong management systems.

Consistently meeting this standard is an ongoing challenge in manufacturing and is affected by several factors, including fluctuations in customer demand, workers' desire to work voluntary overtime, logistics and transportation challenges, and natural events.

As part of our commitment to continuous improvement, Dell SER specialists work with our suppliers to identify and resolve root cause challenges in meeting working hour limits. For example, if a supplier faced an RBA audit violation for excessive working hours, our SER specialists would work with the suppliers to address the root causes identified, including strengthening awareness of industry standards, establishing governance processes to manage working hours issues, improving production efficiency and optimizing production processes. We also encourage our suppliers to use best practices such as assessing capacity to respond to order spikes, establishing a sustainable production rhythm, communicating reasonable lead times to manage customer expectations, and using human resources planning and talent development as well as lean manufacturing to manage overtime. As a result, this supplier could successfully reduce working hours and meet conformance standards. Through this ongoing work for due diligence, we continue to drive progress across the industry as an RBA member.

### Our FY25 weekly working hours tracking:



## Modern slavery, forced labor and child labor

Dell prohibits all forms of slavery, human trafficking and child labor in our operations and supply chain, and we work to minimize all associated risks. Irrespective of the circumstances, we will not tolerate forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, trafficking of persons or child labor in any of our own business operations or by any of Dell's suppliers, our supplier's suppliers or for any other purpose. This expectation is outlined in our [Supplier Principles](#) and in the RBA Code, which prohibits charging recruitment fees to workers, even in locations where these practices are legal. By requiring suppliers to address fee payment issues when they occur and reinforcing responsible employment and recruitment practices through our SER specialists, we continue to drive improvement in this area.

Dell is a member of the Responsible Labor Initiative (RLI), an initiative of the RBA, which focuses on ensuring that the rights of workers vulnerable to forced labor in global supply chains are respected. As members, we access and use tools that help us identify, prevent and remediate forced labor risks effectively such as specialized assessments for forced labor, which is tailored to identify forced labor in factories or through the recruitment process. We foster cross-industry collaboration through the RLI to address root causes of forced labor collectively, rather than in isolation. This collective approach amplifies impact and accelerates the transformation of recruitment markets, thereby reducing vulnerability to forced labor.

While modern slavery is not a salient risk in our own operations, given the multifaceted global landscape and corresponding labor market fluctuations, our (and the entire information communication technology sector's) most salient risk of modern slavery comes from the exploitation of foreign migrant workers (FMWs) within the supply chain. Recognizing this, our human rights due diligence to assess and address risks of forced labor in our supply chain includes FMW risk signals, such as geographies, migratory corridors and historical audit findings. We report on progress in our annual [Statement Against Modern Slavery, Human Trafficking, and Child Labor](#).

**Our human rights due diligence efforts to verify, assess and address risks also include ensuring our suppliers have sufficient controls in place to fully identify, prevent, correct or remediate risks of forced labor and child labor. Our forced labor due diligence includes:**

- Addressing issues proactively with new and potential suppliers prior to their onboarding.
- Coordinating with procurement immediately to ensure timely closure of critical labor findings.
- Requiring suppliers to build internal policies, procedures and governance mechanisms to prevent future instances if critical labor audit findings occur.
- Requiring employees in supplier-facing roles within our procurement and operations organizations to complete our annual forced labor training.
- We also collaborate with industry peers through the RBA to address potential and actual forced labor risks and vulnerabilities in the supply chain, drive supplier accountability and implement corrective measures.

## Health and safety

Health and safety standards directly affect the physical and mental well-being of workers in our supply chain, making health and safety one of our highest priorities. We follow the RBA Code's comprehensive health and safety standards and require our suppliers to do the same. We audit our suppliers to ensure implementation of the Code, and we use risk assessments and capability building to drive continuous improvement and ensure conformance. Through open communication and mobile learning opportunities, Dell works with our suppliers to ensure all workers in our supply chain understand our health and safety expectations.

Dell Technologies adheres to the [RBA Code](#) for our own operations and we require our suppliers to do the same. The Code's comprehensive health and safety standards include occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing, and health and safety communication. Through our continuous improvement model, which includes risk assessments, audits, corrective action plans and capability building, we assess and help improve suppliers' conformance with RBA health and safety standards.

## Supplier onboarding risk assessment

Building strong relationships with suppliers is crucial to Dell, as is identifying potential supplier risks. In many cases, we have the most leverage and influence prior to establishing a business relationship with suppliers, which offers an opportunity to strengthen their commitments to our standards. As such, we assess suppliers' social and environmental risks prior to establishing business relationships so we can evaluate their adherence to human rights standards, commitment to sustainability initiatives and dedication to responsible sourcing practices.

## Annual supplier risk assessment

**Every year, we evaluate suppliers' sustainability risk levels through our internal risk assessment tool, which we calibrate using a supplier self-assessment questionnaire (SAQ). Our risk assessment tool evaluates:**

- **Geographic location:** regional risks around social concerns such as child labor and forced labor as well as environmental risks like water quality and air pollution.
- **Commodity:** specific risks associated with manufacturing, including labor intensity, manufacturing processes, and paints or chemicals involved in the production of a commodity.
- **Historic performance:** previous audit results, closure rates and participation in our capability-building programs.
- **Additional insights:** information obtained by the SER team during regular and unannounced factory visits or from independent sources such as regulatory and third-party organizations, risk-sensing tools, social media and news reports.

Based on the results of the risk assessment, we classify suppliers as low-, medium- or high-risk. All suppliers deemed high-risk must complete a third-party audit on a biannual basis that determines conformance with the RBA Code. In addition, we audit a portion of medium- and low-risk suppliers to determine if their risk is rising and to catch any issues early. We develop our annual audit plan with the results of the risk assessment. That plan is approved by SER leadership prior to implementation.

# Preventing and mitigating risks

## Our audit program

We have fully adopted the RBA Code and expect the same from our suppliers. Audits help monitor suppliers' conformance with the RBA Code and highlight any areas of concern, which in turn helps us work with suppliers to improve their performance. We conduct announced, semi-announced, and unannounced audits to allow for higher transparency, to validate findings and confirm progress, and to prevent the risk of short-term conformance. We conduct unannounced surprise audits for suppliers flagged with high transparency risk in order to detect critical labor issues and identify opportunities for targeted training or further engagement. New suppliers and suppliers with poor historic SER performance participate in our Early Audit Engagement Program to proactively identify and address nonconformance issues. This program has proven successful in improving audit scores and reducing Priority findings with new suppliers. See our Vietnam case study as an example.

### Case study: The importance of surprise audits and early audit engagement in Vietnam

In 2024, Dell SER specialists facilitated a series of surprise visits to multiple supplier facilities in Vietnam to cross-check issues identified by previous RBA audits and to better understand local risks. Through these surprise visits, the SER team identified several issues that affected the suppliers' ability to implement the [RBA Code](#), including:

- Lack of understanding of RBA standards and local law requirements
- Inadequate RBA management systems
- Limited resources to implement RBA requirements

To address these issues, Dell piloted an early engagement process for all newly onboarded suppliers in Vietnam. The early engagement focused on educating suppliers on both Dell and RBA requirements; providing access to RBA training resources and support for understanding the training; improving auditing skills; addressing important audit findings with Corrective Action Plan (CAP) closures; and conducting additional surprise visits to enhance transparency and detect critical labor issues. As a result of these early engagement efforts, suppliers had higher onboarding success with better audit scores and fewer findings compared to those without early engagement.

## Supplier factory audit performance

In FY25, 374 factories in our supply chain across 17 geographic locations were audited. Our suppliers are audited by RBA-certified third-party auditors whose audits cover over 40 topics across five areas: labor (including risks of forced labor, child labor and nonconformance with weekly working hour requirements), employee health and safety, environment, ethics, and management systems. Auditors review documents, observe work practices and independently interview management and workers to assess SER standards implementation according to the RBA Code. Auditors provide workers who participate in interviews with information cards that include the RBA Voices helpline number as an alternative way to provide anonymous feedback.

In FY25, auditors conducted confidential feedback interviews with 14,889 workers as part of the audit process. After completing confidential feedback interviews with workers, auditors issue final reports identifying areas of nonconformance with the RBA Code. The severity and number of these audit findings – classified as Priority, Major, Minor and Risk of Nonconformance – impact a supplier’s overall audit score, which ranges from zero to 200. Dell sets target audit scores for suppliers: at least 180 out of 200 for final assembly factories and 160 out of 200 for other factory tiers. These target audit scores align to high performance based on the RBA Validated Assessment Program.

Our SER specialists work closely with suppliers to help identify the root causes of any issues and drive improvement. Additionally, we engage across our procurement organization and directly with suppliers’ senior-level leadership to emphasize our expectations.

**81%** of Factories Are High Performing



Final Assembly Factories:  
180+ out of 200 points



Other Factory Tiers:  
160+ out of 200 points



No Priority Findings

In cases of persistent nonconformance, Dell may reduce or terminate business relationships, reinforcing its commitment to a responsible and resilient supply chain.

In FY25, **66% of factories that went through at least their second audit** cycle improved their audit scores between cycles.

This includes final assembly suppliers (**75%**), direct suppliers (**62%**) and sub-tier suppliers (**69%**).

This trend highlights the **success of our capability building efforts** and commitment to continuous improvement.

See a **breakdown of our supply chain** audit results [here](#).

## Dell-owned factory audit performance

All Dell-owned factories most recently underwent RBA audits in 2023, and each factory secured a perfect score of 200. This performance reflects the high standards we expect from ourselves and demonstrates the strong systems and practices we have implemented to prevent human rights violations, environmental harm and unethical conduct in our factories.

Dell Factory	2023 Audit Score
Dell Apex	200
Dell Brazil	200
Dell Chengdu	200
Dell Chennai	200
Dell Franklin	200
Dell Ireland	200
Dell Malaysia	200
Dell Poland	200
Dell Xiamen	200

## Supplier capability building and training

Capability building is an essential and often overlooked part of human rights due diligence that supports suppliers to shift from reactive compliance to sustainable and lasting change. Because of our commitment to capability building, workers and managers at our suppliers understand their rights and responsibilities and have agency to speak up, collaborate and work to solve problems.

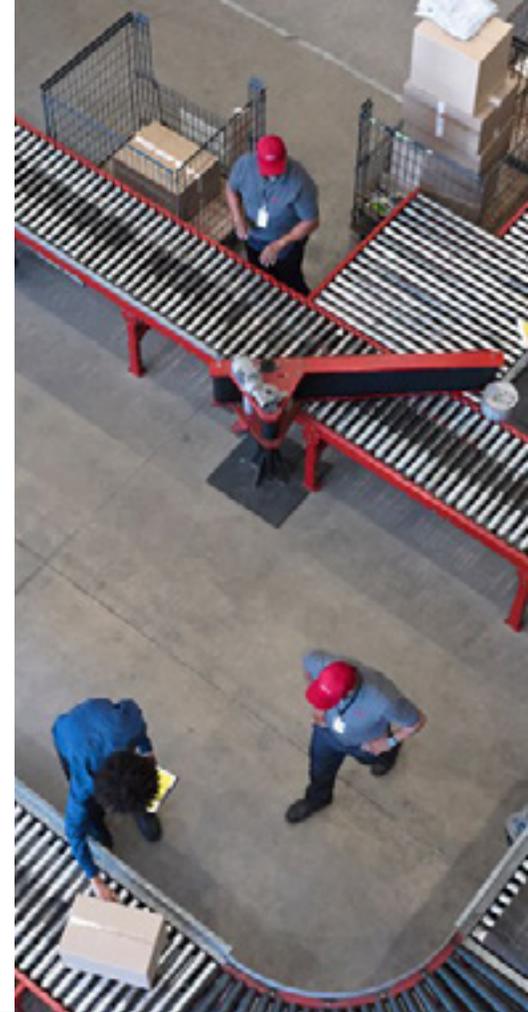
To proactively address risks, we provide resources to suppliers for knowledge development and skills building in areas such as forced labor and health and safety.

- **Factory consultations:** Our SER specialists work directly with supplier factories to better monitor and reduce risk. Engagements are customized to support long-term improvements in targeted areas.
- **Dell-led training and webinars:** We use our digital tools to deliver training, roundtable sessions, interactive webinars and virtual networking sessions. These targeted events connect suppliers with sustainability leaders, examine emerging trends and risks, and share best practices.
- **Self-paced online training:** Our online training programs are offered in various languages. These programs encourage proactive knowledge and performance growth and drive corrective action. Mobile access makes our platform even more accessible, allowing convenient interaction with our SER specialists. In FY25, 782 factories had access to more than 468 training sessions, including mobile frontline worker training.

To support our suppliers as they prepare for RBA audits, we also developed an online question-and-answer system to provide quick and accurate answers to common SER management questions. Through this, our suppliers are provided with information that allows them to better understand and comply with the requirements of RBA audits and help them address potential issues before the audit. We created this system in collaboration with internal and external experts, making it accessible to companies of any size or level of sustainability management experience. In total, 1,723 participants representing 425 factories attended our capability-building programs, completing approximately 147,691 hours of training on SER topics.

Our training programs translate Human Rights Due Diligence (HRDD) standards and policies into actionable practices and foster a culture of learning and adaptation in addition to audits. Short-term training can lead to long-term improvements in workplace safety, communication and compliance — a fact clearly demonstrated in programs like TenSquared. TenSquared is a structured, time-bound initiative created by Social Accountability International (SAI) and the Rapid Results Institute that consists of a 100-day training and change management program designed to improve workplace conditions by uniting workers and managers to solve critical challenges collaboratively. This program empowers teams to tackle real workplace issues through rapid, measurable action.

In FY25, we continued this program with eight of our suppliers, each of which engaged a peer-elected team of supplier employees and managers who work together to identify and solve root causes of workplace challenges. Each participating supplier brought its most challenging environmental, health and safety (EHS) management concerns, spanning EHS hotspots such as reducing fire risks in warehouse areas and reducing occurrences of accidents resulting in work injuries. Each supplier formed a dedicated work team, including members from management and frontline workers, to proactively resolve these issues and achieve a preset goal within 100 days.



#### **These proactive actions included:**

- Conducting a worker survey to understand worker concerns, incidents and historical data collection, among others.
- Team brainstorming to identify risks, risk classification and assessment.
- Communicating with diverse stakeholders to encourage engagement and collect effective improvement suggestions.
- Ensuring support for improvements, including financial and technical support and production flexibility.
- Keeping on track with weekly team meetings to monitor improvement action and implementation progress.
- Attending program training events to build capability and conducting impact surveys among production workers to evaluate improvement, impact and achievements. These surveys also allowed opportunities to provide feedback on further improvements.
- Regularly engaging worker representatives and factory management representatives to review process chemicals.

Collectively, these actions highlight the value of capability building. TenSquared has been a transformative tool to help suppliers put people at the center of change and ensure respect for human rights.

## Mobile training/micro benefits training program

Digital learning through mobile phones enables worker access to vital training sessions on key topics, including health and safety protocols and awareness of labor rights. Mobile phone learning is a collaborative initiative between Dell and our suppliers. We cover the training development costs, and our suppliers make the training available to their workers, covering the cost of Wi-Fi to ensure internet access. All frontline workers — including direct, temporary, students and migrants — are eligible and encouraged to participate.

### Ongoing training topics are:

#### Health and safety

Includes safety training, guidelines on the use of process chemicals, how to use personal protective equipment, the importance of daily machine safety checks, and fire and emergency procedures.

#### Labor rights

Covers policies banning recruitment fees, contract requirements, pay structures, rules around voluntary overtime, requirements for factories to pay social insurance benefits, right to paid leave and holidays, grievance mechanisms and right to resign.

#### Personal development

Includes financial literacy, career development and communication skills. These topics are optional for workers.

Mobile phone learning opportunities increase knowledge and skills and improve safety. In addition, workers are empowered by understanding their rights and the availability of grievance mechanisms to help identify areas of nonconformance with standards in their factories.

## Remediating impacts

Remediation is a cornerstone of our HRDD framework. It reflects our commitment not only to identifying and mitigating adverse human rights impacts across our operations and supply chain, but also to taking meaningful action when harm occurs despite our efforts. We recognize that remediation is not simply a compliance obligation — it is a moral imperative and a business priority that reinforces trust, accountability and long-term supply chain resilience. As a global technology company, we operate in complex environments where human rights risks can emerge despite robust safeguards. When such risks materialize, we must act swiftly and transparently to repair harm and prevent recurrence. Effective remediation strengthens our relationships with workers, suppliers and stakeholders, and it ensures our values are reflected in practice — not just in policy.

## Corrective Action Plans (CAPs)

When areas of nonconformance with the RBA Code are discovered through an audit, our SER specialists work with the supplier to create a CAP to resolve the issues within RBA- or Dell-defined timelines, whichever is earliest. CAPs are used to determine and address root causes of violations. Priority and Major findings require prompt resolution. Once the supplier addresses an audit finding, it must be closed through either a second successful audit or Dell SER specialists, who validate that the issue has been resolved satisfactorily.

We view CAPs as opportunities for continuous improvement, not as punitive measures. Our goals are to build supplier capability, foster a culture of respect and compliance, and ensure that remediation leads to lasting change – not temporary fixes. To aid in lasting change, we share supplier performance metrics with procurement leaders on a monthly basis, as well as any required corrective actions. We also evaluate this data with suppliers in our quarterly business reviews with key executives in the room, helping to determine future business awards and address progress toward aligned goals. Executive compensation is also tied to supplier QBR scores, which includes measures of sustainability such as audit performance.

**In FY25, 272 factories completed corrective actions, with 171 closure audits completed to verify corrective actions. We worked with suppliers to close:**

Final assembly factories		Direct supplier factories		Sub-tier factories	
<b>100%</b>	<b>85%</b>	<b>100%</b>	<b>74%</b>	<b>89%</b>	<b>73%</b>
of Priority findings	of Major findings	of Priority findings	of Major findings	of Priority findings	of Major findings

## Addressing grievances and allegations

Dell Technologies takes reports regarding possible human rights and occupational health and safety violations seriously. Persons who know of, or suspect, a violation of applicable laws, regulations or Dell Technologies Supplier Principles are encouraged to use the [Speak Up](#) anonymous reporting tool online.

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 and build greater context around issues and how they are addressed. In addition to Speak Up, workers have access to a free phone helpline maintained by the RBA, available in multiple languages, ensuring they (and the organizations representing them) have a reliable, confidential communications channel to share concerns or suggestions. In China and Vietnam, Dell also enlists a third-party, nongovernmental organization with expertise in worker feedback channels to manage a helpline on our behalf. 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 the RBA and third-party tools 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. 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. They are also expected 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. We do not tolerate retaliation against anyone acting in good faith to report a concern, provide information or otherwise assist in an investigation or proceeding.

# Stakeholder engagement

Stakeholder engagement is an essential part of our human rights due diligence. As a global technology company operating across diverse geographies and a complex supply chain, we recognize that meaningful engagement with affected stakeholders is essential to understanding risk, building trust and continuous improvement. We believe that those closest to human rights risks – workers, communities, civil society organizations – are best positioned to inform our understanding of and response to human rights risks. Engaging with stakeholders is embedded throughout every phase of our HRDD.

- **Risk identification:** We consult with workers, non-governmental organizations (NGOs) and local experts to surface risks that may not be visible through audits or desk-based assessments. This includes understanding cultural, legal and systemic factors.
- **Impact assessment:** We engage directly with affected groups to validate findings and ensure our assessments reflect their lived realities. This helps us prioritize issues based on severity and likelihood.
- **Mitigation and prevention:** Stakeholders provide feedback on our policies and procedures to ensure they are not only effective but also comprehensive.
- **Remediation:** When harm occurs, we engage with impacted individuals and organizations for their feedback on our remediation efforts. Their feedback informs corrective actions and highlights potential gaps in remediation.

## Supplier engagement

Dell leverages its operations experience to promote responsible manufacturing and respect for human rights. As a condition of doing business with us, we require all partners and suppliers to adhere to [Dell Technologies Supplier Principles](#) and the [RBA Code](#), which together provide the basis for our SER program. Our expectations of our suppliers for responsible and ethical business practices are informed by international standards, including the [UNGPs](#), the [United Nations Universal Declaration of Human Rights](#), the [United Nations Convention on the Rights of the Child](#) and other relevant U.N. conventions. Our strong supplier relationships enable us to work proactively with suppliers to identify and address human rights risks, including training, assessments and corrective action plans. Learn more about our engagement with suppliers in the Capability Building and Training section.

## Worker engagement

The workers in our supply chain are uniquely positioned to provide insight into day-to-day factory operations. Their feedback is a critical input to help us validate supplier conformance with the RBA Code, and workers are interviewed as part of every RBA audit. It also provides deeper context around the root context of issues on the ground and how best we can address them. We maintain open communications with our own workforce as well as the workers in our supply chain. Our grievance helpline, open to everyone and available in multiple languages, ensures a reliable, confidential communications channel to share concerns or suggestions. Dell immediately and thoroughly investigates allegations received through the helpline and works with suppliers to promptly resolve any issues or findings. We also deploy surveys to workers at key suppliers to ensure our human rights due diligence includes worker voices, allowing us to continuously improve.

## Industry and multi-stakeholder initiatives

Dell is a full and founding member of the Responsible Business Alliance (RBA), an industry coalition committed to supporting the rights and well-being of workers and communities worldwide affected by global supply chains. Dell adheres to the [RBA Code of Conduct](#), a set of comprehensive social, environmental and ethical industry standards designed to promote ethical, social, and environmental responsibility across global supply chains. The code is aligned with international standards such as the [ILO Conventions](#), [UNGPs](#), and [OECDs](#). The most current version is structured around five core sections – labor, health and safety, environmental, ethics and management systems. Dell adheres to these standards and expects its suppliers to do the same, as required by our Supplier Principles. The RBA auditing framework is an essential element of our robust environmental and human rights due diligence program.

We are also members of the RBA's Responsible Mineral Initiative (RMI), one of the most widely used frameworks for responsible mineral sourcing. With over 500 member companies, it plays a pivotal role in shaping how stakeholders interact across the mineral supply chain – from mine to market. The RMI also enhances stakeholder engagement by providing a trusted, collaborative platform for companies, civil society and governments to address responsible mineral sourcing through shared standards, transparency and continuous dialogue.

Dell collaborates with the Clean Electronics Production Network (CEPN) to advance IT industry efforts to protect supply chain workers from potentially harmful process chemicals. CEPN comprises over 20 member organizations including electronics brands and suppliers, environmental NGOs, labor and worker representatives, ecolabels, and representatives from academia and government agencies. Our ongoing involvement with CEPN includes active participation in the Worker Engagement and Process Chemical Reporting work groups.



### **Dell is a founding signatory and one of four companies committed to the Toward Zero Exposure program, which:**

- Creates a road map for process chemical management informed by suppliers, nongovernmental organizations and subject matter experts.
- Supports companies in assessing the use of process chemicals, strengthening the culture of worker safety and engagement, reducing worker exposure to identified Priority Chemicals and substituting them with safer alternatives.
- Measures and reports outcomes, expands the impact and reaches into deeper supply chain tiers.

# Responsible minerals sourcing

Our global commitment to respecting human rights also extends to the responsible sourcing of materials used in our products and is underscored in the [Dell Technologies Responsible Sourcing Policy](#).

Dell's responsible sourcing efforts focus on key conflict minerals — tin, tungsten, tantalum and gold — known as 3TG. 3TG minerals are necessary to the functionality or production of technology products Dell manufactures. Dell does not purchase 3TG directly from mines, smelters or refiners; however, we do procure components and materials that may contain 3TG.

We collaborate with suppliers, industry peers and other stakeholders to ensure our products do not contain minerals whose mining and/or sales may directly or indirectly contribute to human rights violations. We are committed to supporting suppliers that practice responsible sourcing.

Our due diligence measures conform with the [Organisation for Economic Cooperation and Development's \(OECD\) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#), and the related supplements for 3TG (the "OECD framework").

## **The OECD framework includes:**

- Establishing a strong company management system.
- Identifying and assessing risks in the supply chain.
- Designing and implementing a strategy to respond to identified risks.
- Carrying out independent third-party audits of supply chain due diligence at identified points in the supply chain.
- Reporting on supply chain due diligence.

Dell recognizes the complexity of responsible minerals sourcing and the need for broad collaboration to reach our responsible sourcing objectives. We actively engage with our suppliers, industry peers, and other stakeholders to promote the responsible sourcing of minerals through RMI, which allows us to drive greater accountability and transparency in our supply chain.

RMI provides tools such as the Conflict Minerals Reporting Template (CMRT) and oversees the Responsible Minerals Assurance Process (RMAP), which is one of three approved third-party audit schemes that verify that sourcing practices of actors at identified points in the supply chain, such as 3TG smelters or refiners (SORs), are aligned to the OECD framework. We use these tools, RMI guidance and the OECD framework to conduct due diligence on our 3TG supply chain and drive toward our minerals sourcing targets. This includes a 100% CMRT response rate by in-scope suppliers. In addition, Dell also conducts annual responsible mineral campaigns on cobalt, mica, natural graphite, lithium, copper and nickel through the Extended Mineral Reporting Template. As part of these campaigns, Dell surveys suppliers to understand which minerals are in the products they provide to Dell and identify the SORs in their supply chains. Each year, we publish a Conflict Minerals Report that outlines our due diligence efforts. We file Form SD with the United States Securities and Exchange Commission annually and publish a copy on our website.

# Process chemicals

To further our commitment to safeguarding human health, safety and the environment, we operate a manufacturing process chemicals program to monitor, address and mitigate risks associated with the use of chemicals in the manufacturing of Dell products. In FY25, we updated our internal [Guidelines for Management of Manufacturing Process Chemicals](#). These guidelines address risks associated with using chemicals in the manufacturing process by providing recommendations to suppliers on how to best manage process chemicals. They also restrict the use of certain substances of concern throughout our operations and supply chain. We accomplish this by maintaining our banned and restricted substances program and choosing designs and materials that avoid the use of substances of concern.

## **Prohibited substances of concern all have hazardous properties that:**

- Are a known threat to human health or the environment.
- Show strong indications of significant risks to human health or the environment.
- Are known to be bio-persistent or bio-accumulative in humans or the environment.

We substitute viable alternative substances when possible, and when alternatives are not yet viable, we work with industry partners to promote industry standards and the development of reliable, environmentally sound and economically scalable technical solutions.

In-scope suppliers are expected to demonstrate conformance to the guidelines for manufacturing operations that produce products supplied to Dell. We survey these suppliers on an annual basis. This year, we surveyed 80 supplier facilities to understand and monitor process chemical use in our supply chain.

## **As a founding signatory and one of four companies committed to Clean Electronics Production Network's (CEPN) Toward Zero Exposure (TZE) program, this year we advanced our commitment to the TZE program by:**

- Ensuring facilities completed the Process Chemicals Data Collection (PCDC) tool accurately to help identify Priority Chemicals.
- Eliminating or substituting round one Priority Chemicals at in-scope facilities.
- Developing a plan to expand the number of suppliers in scope for our PCDC.

We also collaborated with CEPN to roll out a chemical safety training beta test to a select group of suppliers in Vietnam. This training educated workers and managers on process chemical management and safety, and it provided tools to foster a workplace culture where managers actively engage with and inform workers on process chemical safety. Suppliers participated through a mix of in-person, interactive digital and live webinar training. Participants shared that they plan to apply what they learned to their daily work and chemical management practices. They also provided feedback that will directly shape improvements to both the content and delivery of the training, enabling CEPN to refine future iterations of the training. Learn more [here](#).

# FY25 Audit performance summary by category

Performance Metric	Unit of Measure	FY23	FY24	FY25	Notes
Initial audits	Audits	251	275	270	We audit high-risk factories on a two-year cycle. Selected other facilities, including new supplier factories, are also audited.
Closure audits		0	5	7	We work with suppliers to address audit findings and arrange closure audits to confirm findings are remediated.
Priority audit findings closed or downgraded	Audit Findings	92.0%	96.0%	94.1%	The most severe findings are prioritized for resolution. Performance is tracked continuously and measured cumulatively.*
Major findings closed or downgraded		70.0%	67.0%	73.7%	We collaborate with suppliers to remediate priority and major findings. Performance is tracked continuously and measured cumulatively.**
Unique participants attending capability building programs	Participants	1,763	1,680	1,723	Capability building engages unique participants across final assembly, direct and sub-tier suppliers who can share the insights provided by training throughout their factories.
Unique factories participating in capability building programs	Factories	441	400	425	One way that we measure the reach of our capability building programs is by tracking the number of participating factories.
Workers who do not exceed 60 working hours per week	% Workers	88.4%	88.2%	88.9%	Percentage based on the 194,112 workers monitored in our supply chain.
Workers with at least one day of rest day per week, every week		81.7%	83.1%	82.8%	
Factories with active water risk mitigation plans	Factories	192	227	158	158 supplier factories in areas of water stress or with water-intensive processes had active water risk mitigation plans.
Total number of social and environmental responsibility (SER) training hours completed by Dell's suppliers	Training hours	120,648	107,922	79,662	

\* Cumulative represents the calculated closure rates for priority findings as of January 31, 2025.

\*\* Cumulative represents the calculated closure rates for findings as of January 31, 2025.

Category		Facilities with findings of nonconformance			Total % of facilities in conformance
		Dell and final assembly	Direct	Sub-tier	Findings
<b>Environmental</b>					
Environmental permits and reporting	Primary	0	0	0	96.8%
	Major	0	5	7	
Hazardous substances	Primary	0	0	0	98.7%
	Major	0	1	4	
Solid waste	Primary	0	0	0	100%
	Major	0	0	0	
Air emissions	Primary	0	0	0	98.9%
	Major	0	1	3	
Water management	Primary	0	0	0	100%
	Major	0	0	0	
Energy consumption and greenhouse gas	Primary	0	0	0	91.7%
	Major	0	11	20	

Category		Facilities with findings of nonconformance			Total % of facilities in conformance
		Dell and final assembly	Direct	Sub-tier	Findings
<b>Ethics</b>					
Disclosure of information	Primary	0	0	0	100%
	Major	0	0	0	
Intellectual property	Primary	0	0	0	100%
	Major	0	0	0	
Fair business, advertising and competition	Primary	0	0	0	100%
	Major	0	0	0	
Protection of identity and non-retaliation	Primary	0	0	0	100%
	Major	0	0	0	
Privacy	Primary	0	0	0	100%
	Major	0	0	0	

Category		Facilities with findings of nonconformance			Total % of facilities in conformance
		Dell and final assembly	Direct	Sub-tier	Findings
<b>Health &amp; Safety</b>					
Occupational health and safety	Primary	0	0	0	81.3%
	Major	0	21	49	
Emergency preparedness	Primary	0	1	0	81.8%
	Major	0	24	43	
Occupational injury and illness	Primary	0	0	0	97.6%
	Major	0	1	8	
Industrial hygiene	Primary	0	0	0	94.1%
	Major	0	6	16	
Physically demanding work	Primary	0	0	0	99.5%
	Major	0	1	1	
Machine safeguarding	Primary	0	0	0	90.9%
	Major	0	11	23	
Food, sanitation and housing	Primary		0	0	97.1%
	Major		5	6	

Category		Facilities with findings of nonconformance			Total % of facilities in conformance
		Dell and final assembly	Direct	Sub-tier	FY25
<b>Labor</b>					
Prohibition of forced labor	Primary	0	0	2	96.0%
	Major	0	6	7	
Young workers	Primary	0	0	0	99.5%
	Major	0	2	0	
Working hours	Primary	0	3	7	28.3%*
	Major	10	111	114	
Wages and benefits	Primary	0	0	0	91.2%
	Major	10	16	17	
Nondiscrimination / non-harassment / humane treatment	Primary	0	0	0	98.9%
	Major	0	3	1	
Freedom of association and collective bargaining	Primary	0	0	0	99.7%
	Major	0	0	1	

\*Conformance rate affected by share of facilities in jurisdictions that have legal maximum overtime working hours of less than 40 hours per month. In FY25, 88.9% of workers in our supply chain worked 60 hours per week or less, and 82.8% took at least one rest day per week, every week.

Category	Facilities with findings of nonconformance			Total % of facilities in conformance	
	Dell and final assembly	Direct	Sub-tier		
Management system					
Risk assessment	Primary	0	0	0	97.1%
	Major	0	4	7	
Control processes	Primary	0	0	0	39.0%
	Major	9	94	125	
Communications	Primary	0	0	0	96.8%
	Major	0	6	6	
Performance review and continuous improvement	Primary	0	0	0	98.4%
	Major	0	2	4	

Category	Facilities with findings of nonconformance			Total % of facilities in conformance	
	Dell and final assembly	Direct	Sub-tier		
Supply chain management					
Company commitment	Primary	0	0	0	100%
	Major	0	0	0	
Materials restrictions	Primary	0	0	0	100%
	Major	9	0	0	
Responsible sourcing of minerals	Primary	0	0	0	98.9%
	Major	0	1	3	
Supplier responsibility	Primary	0	1	0	91.7%
	Major	1	15	14	