



EPEAT Criteria 6.4.1 Public Disclosure of Manufacturer Program for Reduction of High Priority Process Chemicals

To further our commitment to safeguard human health, safety and the environment, Dell has formed a Manufacturing Process Chemicals Program to monitor, address, and mitigate risks associated with the use of chemicals in Dell product manufacturing.

In FY25, Dell updated its internal Guidelines for Management of Manufacturing Process Chemicals to further address risks associated with using chemicals in the manufacturing process by providing additional recommendations on how to best manage process chemicals. Within these guidelines, we restrict the use of substances of concern throughout our organization and supply chain, beyond regulatory requirements. Suppliers are expected to demonstrate conformance to the Guidelines for manufacturing operations that produce products supplied to Dell. In FY25, we surveyed 72 suppliers to understand and monitor chemical use in our supply chain.

Dell Technologies Inc.'s list of "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 strive to eliminate substances of concern from our products and product manufacturing processes. We accomplish this by maintaining our banned and restricted substances program and choosing designs and materials that avoid the use of substances of concern. 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.

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 is comprised of 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 workgroups.

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.

In FY25, Dell progressed our commitment to the Toward Zero Exposure program by 1) ensuring facilities completed the Process Chemicals Data Collection (PCDC) tool accurately to help identify Priority Chemicals, 2) eliminating or substituting round one Priority Chemicals at in-scope facilities, and 3) developing a plan to expand the number of suppliers in scope for our PCDC.