



Title: Electronics Disposition Policy	Issue Date: 10 November 2025
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Dell Electronics Disposition Policy

Introduction

Dell's vision under the Electronics Disposition Policy is that electronic Equipment and related assemblies recovered by Dell from its customers, used by Dell in its operations and any such Equipment to which Dell holds title are appropriately managed, from assessment prior to potential Reuse or Remanufacture through to Final Disposition. All terms below with initial capitals are defined at the end of this document.

Scope

This Policy pertains to all retired, excess and obsolete electronics generated by Dell's global operations and programs, including, but not limited to, retired corporate Equipment, takeback, returns programs, manufacturing/assembly and repair operations and product previously used by Dell's customers when Equipment reaches End-of-Use or End-of-Life.

This policy is applicable globally across Dell Technologies and its subsidiaries (hereinafter referred to as "Dell"), and any third parties acting on Dell's behalf, including Dell Electronics Disposition Partners, contractors, subcontractors and suppliers ("Partners"), except where prohibited by local laws, regulations and established practices. It is the Partners responsibility to support and implement this Policy. Compliance is mandatory.

Policy Statement

The following Electronics Disposition Policy objectives have been established by Dell to achieve its vision:

1. Maximize Reuse Opportunities (Prevent Pollution)

- 1.1. Dell shall endeavor to maximize Reuse opportunities.
- 1.2. Dell and its Electronics Disposition Partners shall provide Disposition services to include Remanufacturing, Refurbishing, Repair, Reuse, and Recycling in alignment with Dell's Reuse Hierarchy for all electronics in scope for this policy.
- 1.3. Products and components that meet standard Minimum Technology Specifications and are able to be Remanufactured, Refurbished or Reused shall be a priority.

2. Test Equipment Functionality for Reuse (Be a Responsible Neighbor)

- 2.1. All Equipment with potential Reuse capacity shall be fully tested and Functional when marketed or distributed as a Refurbished product. All testing records must be maintained. Remanufactured components shall meet Minimum Technology Specifications.
- 2.2. Products that are non-Functional shall not be marketed or distributed and shipped either domestically or internationally as Refurbished Equipment.
- 2.3. Data on Equipment for Reuse shall be responsibly and appropriately handled and Sanitized by employing tools and processes that meet or exceed Dell's Media Sanitization Statement.



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3. Manage End-of-Life Electronics throughout Disposition Channels (Minimize Waste)

- 3.1. Where Refurbishment, Remanufacture or Reuse is not a viable option, every reasonable effort will be made to control all Electronic Waste and to minimize Electronic Waste from entering landfills or incinerators or entering other environmentally irresponsible processes.
- 3.2. Dell Electronics Disposition Partners shall contractually commit to employing environmentally responsible processes and practices in the Recycling and disposal of materials as evidenced through Dell's audit program.
- 3.3. All exports and imports of End-of-Use Electronics and Electronic Waste handled by Dell and its Electronics Disposition Partners will comply with existing international environmental and waste shipment conventions, agreements, local laws and other legal requirements.
- 3.4. Dell Electronics Disposition Partners shall ensure that the entire Disposition Channel, including downstream Intermediaries, meet or exceed all applicable environmental, transportation and health and safety regulations.

4. On-board/Sustain Responsible Electronics Disposition Partners (Apply Globally Consistent Supplier Standards)

- 4.1. All Dell Partners that provide Disposition services shall be contractually on-boarded as an Electronics Disposition Partner through Dell's on-boarding and sustaining process which includes a comprehensive environmental, health, safety, security, logistics, downstream channel and data security audit for each active or new site using Dell's prescribed audit protocol which is aligned with globally accepted disposition standards.
- 4.2. Dell Electronics Disposition Partners shall track and document refurbished and End-of-Life Electronics throughout the relevant product Disposition Channels and provide tracking information to Dell on request. Tracking information shall show the Final Disposition of all recyclable materials and wastes. Documentation provided by Electronics Disposition Partners for Refurbished electronics shall be traceable to first point of Reuse over which Electronics Disposition Partner has direct oversight.
- 4.3. Full requirements for Electronics Disposition Partners are contained in the Dell Electronics Disposition Partner Performance Standard.

5. Comply with the Law

- 5.1. Dell and its Electronics Disposition Partners shall at all stages of the Disposition Channel comply with all applicable international, regional, national and local laws and conventions and hold all necessary permits, certifications, accreditations, licenses, trans-frontier shipping (export, import and transit) pre-approvals and authorizations that govern and affect activities outlined in this policy.
- 5.2. Dell requires its Electronics Disposition Partners to comply with US and all other applicable trade compliance laws in the Reuse and Recycling of Electronic Waste.
- 5.3. Dell does not permit Electronic Waste to be exported from Organization for Economic Cooperation and Development (OECD) or European Union (EU) member countries to non-OECD or non-EU countries either directly or through Intermediaries except where legally permitted by national legislation and by prior approval from Dell.

6. Continually Manage Dell Disposition Channels and Communicate Performance

- 6.1. Electronic Waste processed through Dell's Disposition Channels shall be tracked, documented and audited. Electronic Waste shall be managed throughout the entire chain of custody until Final Disposition.
- 6.2. Dell will measure and report Electronic Waste Disposition data in its annual Corporate Responsibility Report, as part of its commitment to continuous improvement.



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Asking Questions

If you have questions about this Policy, please contact environment_policy@dell.com.

Reporting and Investigation

It is very important that you immediately report any known or suspected violations of this Policy. To report known or suspected violations of this Policy, contact Dell – Ethics & Compliance or the Ethics_Helpline. Calls to the Ethics Helpline, a toll-free telephone service, may be made anonymously.

Discipline

For Dell employees, compliance with this Policy is a requirement. For Dell's contractors, subcontractors, Electronics Disposition Partners and third parties, compliance with this Policy is a condition of doing business with Dell. Employees who do not follow this Policy will be subject to corrective action. Dell Partners who violate this Policy may be subject to contract termination.

Waivers

The provisions of this Policy cannot be waived unless approved by Dell's Return Stream Risk Governance Council. Dell management does not otherwise have the authority to approve waivers to this Policy.

Definitions

Term	Definition
Dell Reuse Hierarchy	<p>Most preferred method of Reuse is whole system Reuse.</p> <p>When that is not feasible, Refurbishment or Remanufacturing of whole system for Reuse is the next priority.</p> <p>If Reuse, Refurbishment or Remanufacturing are not feasible, Repair or component-level piece part Reuse is the next preferred method of Reuse.</p> <p>If none of these methods are feasible, commodity materials Reuse is preferred. Not until all of the above methods are exhausted shall Recycling be considered.</p>
Disposition	<p>Includes all activities associated with handling end-of-use and End-of-Life Electronics that includes, but is not limited to, data sanitization, testing for reuse and recycling.</p>



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Disposition Channel	The route taken by end-of-use electronic devices through direct and downstream processing for Remanufacturing, Refurbishment and Resale for Reuse or Recycling for Final Disposition as reusable Material or final waste.
Electronic Waste	<p>Equipment that has reached the end of its useful life in its original form or is incapable of performing its original intended function(s) and cannot be Reused, Remanufactured, or Refurbished.</p> <p>Electronic Waste does not include:</p> <ul style="list-style-type: none">a. Working Equipment and parts that are tested, certified and labeled as working and that are not intended for disposal or Recycling, Refurbishment, Reuse or resale;b. Components being returned under warranty to the original equipment manufacturer;c. Dell products and components intended for Repair in an authorized Dell Repair Centerd. Materials that are to be used as a direct feedstock in manufacturing without further processing or preparation, and the “Competent Authority” of an importing country makes a written determination that the material is acceptable. <p>“Competent Authority” means the entity (usually a government agency) that is responsible for overseeing its country’s compliance with the Basel Convention.</p>
Electronics Disposition Partner	A partner or contractor providing any of the following electronics Disposition activities to Dell when Equipment reaches End-of-Use or End-of-Life: Remanufacturing, Refurbishment, Repair, Data Sanitization, Recycling and Final Disposition services either directly or through sub-contractors.
End-of-Life Electronics	Electronic Equipment that has reached the end of its useful life in its original form or to perform its original intended function(s). (This material may be Reused, Refurbished, Remanufactured or recycled as appropriate.)



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Term	Definition
End-of-Use Electronics	Electronic Equipment that has been used and returned in its original form and can be reused, refurbished, or remanufactured as appropriate to perform its original intended function(s).
Equipment	All electronic products, devices, assemblies, sub-assemblies or components recovered by Dell from its customers, used by Dell in its operations, and any such Equipment to which Dell holds title.
Final Disposition	The last point in the Disposition process at which a commodity requires no further processing before introduction to manufacturing or landfill of non-recyclables.
Functional	Equipment that functions in the way originally intended by the manufacturer following a testing or Refurbishment process where essential functions are tested.
Intermediaries	Any broker, treatment operator or agent that facilitates the transfer of product, material or waste of any form from the owner or holder to a third party.
Material	Dismantled Equipment in whole or part suitable for Recycling.
Minimum Technology Specifications	<p>Minimum standards for which an end-of-use electronic device can be adequately Reused with current compatible software and peripherals and in line with its core useful purpose.</p> <p>For Dell EMC and EMC-branded product, devices must be equivalent to previously unused components.</p>
Recycling	A process where electrical and electronic devices not suitable for Refurbishment, Remanufacturing, Repair and/or Reuse should be processed for material recovery of scarce resources and reusable raw materials and appropriate treatment of environmentally sensitive materials.
Refurbishment	A process that includes, but is not limited to, disassembly or physical modifications to the Equipment, part removal and upgrades in order to render the whole unit available for Reuse.



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Remanufacturing	A process that includes, but is not limited to, disassembly or physical modifications to the Equipment, part removal and upgrades in order to render the whole device available for Reuse in an "as new" condition with an original manufacturer's warranty.
Repair	The process of fixing a specified fault or series of faults to render the product or component available for Reuse.
Reuse	A process of using again an electrical or electronic device directly following a functionality test or possibly after Refurbishment or Repair. Other relevant processes to enable Reuse may include data Sanitization and software installation.
Sanitized/Sanitization	A process to render access to Target Data on the media infeasible for a given level of effort. Purge, Clear and Destroy are actions that can be taken to sanitize media. (IEEE 2883 page 15, NIST Special Publication 800-88 Revision 1 - Page 44 and NIST Special Publication 800-88 Revision 2, Page 8).

Revisions

Date	Description
November 2025	Revision of definitions to align with NIST SP800-88r2
November 2024	Revision of 4.1 & minor changes
October 2023	Revision of definitions to align with IEEE 2883-2022
October 2022	Minor revisions
October 2021	Reviewed, no changes
March 2019	Minor revisions



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January 2017	Major revision following merger of Dell & EMC
March 2014	Minor revisions
June 2011	Minor revisions
March 2009	Initial publication

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