



## **Dell Human Rights Policy**

*Updated 2025*

### **Respect for Human Rights**

At Dell Technologies, upholding and advancing respect for the fundamental human rights of all people is core to our business strategy, purpose, and commitments to drive human progress and create a positive and lasting social impact. We believe everyone deserves to be treated equally with dignity and respect and we are committed to responsible, ethical, inclusive and sustainable business practices.

This Human Rights Policy (“Policy”) is intended to reflect the company’s global commitment to respect the rights of all our stakeholders - including all Dell team members, our suppliers, contractors and subcontractors at any tier, partners and resellers, customers and end-users, and other people impacted by our value chain.

### **Our Commitment**

Dell respects the human rights of all people as reflected in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organization’s (ILO’s) Declaration on Fundamental Principles and Rights at Work. We will not be complicit in human rights violations, and we hold our suppliers and other business partners to this same standard.

Our policies and practices are grounded in expectations set out in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Responsible Business Conduct.

We comply with local laws and regulations wherever we do business. If local law conflicts with the principles in this policy, within the bounds of local laws we seek ways to honor the principles of internationally recognized human rights and influence progress towards the highest standards.

### **Our Approach**

To demonstrate and implement our commitment to respect human rights, we have formalized this and other policies, processes and governance protocols. We conduct due diligence to identify, prevent or mitigate adverse human rights impacts to people across our business and value chain, avoid complicity in adverse impacts caused by others, and account for how impacts are addressed.

Expectations to comply with laws and ethical business practices, including acting with integrity and respecting the fundamental human rights of others, are embedded in Dell’s culture and policies and clearly set out in the [Dell Technologies Code of Conduct](#). Dell Technologies team members are required to complete annual Code of Conduct training and adhere to our Code and the policies, including this Policy, and standards which flow from it. We also expect our suppliers and business partners to uphold and assure respect for human rights as reflected in the [Dell Supplier Principles](#) and [Dell Technologies Code of Conduct for Partners](#).

Training, operational policies, compliance requirements and assurance protocols are embedded throughout our organization and incorporated into business relationship agreements to further address and govern human rights risks and impact priorities.

While human rights due diligence and assurance practices are implemented and continually monitored by internal organizations and experts across our business, we also periodically engage third-party experts to conduct formal human rights impact assessments. Insights from these cross-functional assessments enhance our awareness of actual and emerging salient human rights risks, inform our mitigation priorities and help identify strategic opportunities for creating a positive social impact.

## **Salient Risk Areas of Focus**

### **Diversity and Inclusion**

We believe a company dedicated to continued growth and innovation must be committed to equality and inclusion, and we seek to build and develop a workforce that reflects the diversity of our stakeholders around the world. As set out in [Dell's Diversity and Equal Employment Opportunity Policy](#), we are committed to the principle of equal employment opportunity for all team members and to providing team members with a work environment free of discrimination and harassment. All employment decisions at Dell are based on business needs, job requirements and individual qualifications. Dell does not tolerate discrimination or harassment based on any of the characteristics identified in Dell's Diversity and Equal Employment Opportunity Policy.

### **Pay Equity**

Dell Technologies is a meritocracy. We believe people should be equitably compensated for the value they deliver to our customers and stakeholders, no matter their gender, ethnicity, or other factor. We review salaries – and make adjustments if needed – to ensure we pay employees consistently when compared to peers and the relevant compensation market. As a global employer, this commitment includes complying with all laws, and where feasible, going beyond what the law requires in the countries in which we operate.

### **Health and Safety**

We are committed to operating our businesses in a manner that protects the health and safety of our team members, contractors, visitors and neighbors, while maintaining full compliance with applicable laws, regulations and voluntary obligations. When our own requirements are more stringent, we will operate to these higher standards. We will provide safe and healthy working conditions and require the same of suppliers, business partners, and contractors working on behalf of Dell Technologies, as set out in our [Global Occupational Health and Safety Policy](#).

### **Worker Protections**

Dell 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

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, Dell suppliers must comply with the [Dell 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.

### **Forced Labor and Human Trafficking**

Dell prohibits slavery and human trafficking in our operations and supply chain. We will not tolerate forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, or trafficking of persons in any of our own business operations or by any Dell supplier, or for any other purpose. We undertake due diligence to assess and address risks of modern slavery, and report annually on our actions and progress in our [Dell Technologies Statement Against Modern Slavery, Human Trafficking, and Child Labor](#).

### **Child Labor**

Dell prohibits the use of child labor in our operations or at any stage in our supply chain and expects the same of our suppliers. The use of legitimate workplace apprenticeship or intern programs that comply with all laws and regulations, and with the specific young worker provisions in the [RBA Code of Conduct](#) and the [Dell Vulnerable Worker Policy](#) if those provisions are stricter, are permitted and supported.

### **Responsible Sourcing**

Dell is committed to the responsible sourcing of materials used in our products, in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and we expect the same of our suppliers. We require adherence to this Policy and other policies and standards as detailed in the [Dell Responsible Sourcing Policy](#), and our [Dell Supplier Principles](#).

### **Privacy**

We are committed to being transparent about our privacy practices as reflected in our [Dell Privacy Statements](#). We are also committed to respecting our customers' personal data preferences and are actively working to ensure our customers have the latest privacy resources.

## **Responsible Innovation**

Dell is committed to responsible innovation. Responsible innovation at Dell refers to designing, deploying, and scaling our artificial intelligence technologies in a manner that prioritizes ethical considerations, societal impact, and long-term sustainability. It involves proactively addressing potential risks, such as bias, privacy considerations, and unintended outputs, while ensuring that AI innovation aligns with respect for human rights and values. This approach, addressed in [Dell Technologies Principles for Ethical Artificial Intelligence](#), encourages transparency and accountability, fostering trust and maximizing the benefits of AI for all stakeholders.

## **Responsible Sales**

We are committed to doing business with third parties who share our commitment to equality, trust and driving human progress. We leverage tools such as customer and vendor screening and other procedures to avoid selling to or purchasing from unauthorized entities. As global restrictions continue to increase in complexity, we continue to proactively strengthen our program through enhanced cross-functional collaboration, improved tools and awareness initiatives across the business. For additional information, please refer to [Dell Code of Conduct for Partners](#).

## **Environmental Responsibility**

As described in the [Dell Global Environmental Policy](#), we are a sustainability-focused company that operates in a manner that protects the environment and prevents pollution. This includes driving improvements beyond our own operations and seeking to develop more environmentally sustainable technologies that help our customers and supply chain meet their own Environmental, Social and Governance (ESG) goals.

## **Bribery and Corruption**

Bribery and corruption undermine respect for human rights and hurt the very communities we are committed to helping grow and thrive. Dell is committed to winning business only on the merits and integrity of its products and solutions. We do not tolerate bribery or corruption in any form, regardless of where we are located or where we do business.

## **Stakeholder Engagement**

We believe unique and diverse perspectives are essential to expand and deepen our understanding of actual and potential impacts, and they help guide our actions to drive meaningful progress and positive outcomes. We value constructive engagements with, and insights from, stakeholders across our business and value chain, including our team members, customers, suppliers and their employees, other business partners and the local communities where we operate.

We also believe some human rights issues can be addressed most effectively by working in partnership with others. To advance progress on complex human rights challenges we engage and participate in collaborative initiatives with suppliers, business partners, customers, industry and cross-sector alliances and working groups, civil society organizations, governmental authorities, and others.

## **Grievances and Remediation**

Dell has an established grievance mechanism. [Speak Up](#) is our reporting system that augments our other efforts to foster a culture of trust, integrity and ethical decision making. Speak Up allows our Global Ethics and Compliance Office line of sight into attempted circumvention of policies and/or controls or other activities that may negatively impact customers and other stakeholders. Anyone can confidentially and anonymously use Speak Up to report suspected violations of the Dell Technologies Code of Conduct, policies or applicable laws. Dell does not tolerate retaliation and is committed to protecting anyone who reports suspected misconduct in good faith.

Where we have identified adverse human rights impacts caused or contributed to by our business activities, we are committed to providing for or cooperating in their fair and equitable remediation through legitimate processes. We expect the same of our suppliers and other business partners. Where we have determined Dell is directly linked to adverse impacts through our relationships with suppliers or business partners, we seek to engage and collaborate with them to promote appropriate remediation through their own grievance management processes.

## **Accountability and Governance**

Dell's Board of Directors, directly and through its 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 this Policy.

Dell's ESG Steering Committee leads and oversees the execution of our ESG strategy. The Committee includes senior leadership from Dell's corporate sustainability and ESG, diversity and inclusion, human resources, ethics and privacy, supply chain, legal, investor relations, accounting, finance, security, corporate affairs, government affairs, risk management, product, operations, services, and giving and impact organizations. Representatives from our ESG Steering Committee regularly provide updates to the Board of Directors on ESG priorities and progress.

We have established a Human Rights Advisory Committee, a cross-functional coalition of executives who lead organizations responsible for managing human rights due diligence and advancing governance of salient risks and impact priorities. This committee supports Dell's human rights strategy and ensures operational accountability for human rights governance and implementation of this Policy across Dell's own operations and value chain. Subject matter experts from these organizations also participate in our Human Rights Working Group which meets throughout the year and is responsible for ensuring cross-organizational awareness, implementation and advancement of human rights related commitments and priorities.

This Policy is periodically reviewed and updated as appropriate to address new or evolving areas of focus, due diligence, regulatory requirements or governance practices advancements.

## **Moving Forward**

We recognize that human rights risks and opportunities can evolve rapidly. While our ongoing due diligence and governance practices ensure we maintain momentum and focus on our current human rights risks and impacts, we continually monitor for emerging risks, evolving conditions and opportunities to improve our practices and accelerate positive outcomes for people.

We publicly report on our social impact commitments, priorities and performance on an annual basis. This Policy and other supporting policies and positions are available on Dell Technologies' website.