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Dell Electronics Disposition Partner Performance Standard

Purpose

The purpose of this standard (the "Standard") is to define minimum requirements for Dell's Electronics Disposition Partners (EDPs). All capitalized terms below are defined at the end of this document.

Applicability

These requirements apply to all Dell Electronics Disposition Partners, contractors, subcontractors and suppliers providing electronics Disposition, Remanufacturing, Refurbishment, Repair and Reuse services. Dell reserves the right to unilaterally amend, supplement or change these requirements.
This performance Standard pertains to all retired, excess and obsolete electronic Equipment from takeback, returns programs, manufacturing/assembly operations and product previously used by Dell's customers when Equipment reaches End-of-Use or End-of-life.

Requirements

EDPs shall follow all applicable laws and regulations. If any requirement in this document is contrary to applicable federal, national, state, provincial or local law or regulation, the applicable law or regulation will supersede that requirement.

In addition:

1. Partner Onboarding/Sustaining

1.1 All Dell Partners who will manage any Dell return stream or disposition activity shall be on-boarded as a Dell-approved EDP through Dell's globally standardized on-boarding and sustaining process, including:

1.1.1 A comprehensive third-party environmental, health, safety, security, logistics, downstream channel and data security audit for each active or new site using Dell's prescribed audit protocol;

1.1.2 An audit at the time of onboarding and thereafter at a frequency appropriate to the Partner's activity and level of risk as determined by Dell, utilizing Dell's audit protocol in order to ensure conformity with Dell's Master Relationship Agreement and TakeBack Rider (MRA & TBA), Electronics Disposition Policy, Electronics Disposition Partner Performance Standard and Media Sanitization Statement; and

1.1.3 A comprehensive financial and business processes review.

2. Master Relationship Agreement & TakeBack Rider (MRA & TBR)

2.1 Compliance

2.1.1 EDPs shall sign and comply with all requirements of the Dell MRA & TBR and other contractual requirements as applicable.

2.1.2　EDPs shall comply with Dell's Electronics Disposition Policy, Dell's Media Sanitization Statement and this Standard.

2.1.3　EDPs shall at all stages of the Disposition channel comply with international, regional, national and local law and conventions, and shall obtain and maintain all operating permits, certifications, accreditations, licenses, trans-frontier shipping (export, import and transit) pre-approvals and authorizations required to carry out electronics Disposition operations.

2.1.4　All required certifications in 2.1.4.1 and 2.1.4.2 shall be held at the time of onboarding, without lapsing throughout the period of engagement, and shall reflect the scope of work performed at the facility by the EDP for Dell.

2.1.4.1　EDPs shall hold appropriate and valid ISO 9001, ISO 14001 and ISO 45001 certifications.

2.1.4.2　EDPs shall hold at least one appropriate and valid Internationally Recognized Electronic Waste Management Certification or a valid RIOS certification.

2.2　Insurance

2.2.1　EDPs shall obtain and maintain, with insurance companies acceptable to Dell, minimum insurance coverage as defined in Dell's contract terms. Standard insurance requirements may include insurance covering workers compensation/employer's liability, general liability, property, pollution, and data privacy and security. Types of insurance and the limits required may differ depending on where EDPs are providing services and the types of services being provided.
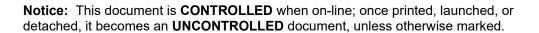
2.3　Data Security

2.3.1　Data on Equipment shall be responsibly and appropriately handled and Sanitized by EDPs by using tools and processes that meet or exceed Dell's Media Sanitization Statement and all other contractual requirements as agreed by the parties. Equipment that cannot be sanitized by this Standard shall be Destroyed following the IEEE 2883 Destruct or NIST SP800-88 Destroy method. Equipment that is presorted for Recycling shall be Destroyed.

2.3.2　Sanitization operations and processes shall be included in certifications per 2.1.4.2

2.3.3　A Certificate of successful Sanitization or Certificate of destruction shall be retained by EDPs per device, for all data Sanitization services performed on Dell's behalf.

2.3.4　EDPs shall store all Data-Containing Devices in a secured, access-controlled location.

2.3.5　EDPs shall maintain tracking documentation and shall provide this documentation to Dell at Dell's request.

2.4　Site Security

2.4.1　EDPs shall maintain systems to ensure the security and control of all Equipment and Material storage, processing and Disposition associated with electronics Disposition activities.

2.4.2　EDPs shall perform pre-employment screens for all employees carrying out Dell electronics Disposition activities.

2.4.3　EDPs shall maintain systems to ensure that only authorized employees have access to electronics Disposition activities.

2.5　Disposition Operations

2.5.1　All Disposition operations shall be carried out in a timely manner utilizing environmentally sound management practices.

2.5.2　No forced, bonded (including debt bondage), indentured, involuntary prison or child labor will be utilized for any handling of the Material covered under this Standard.

2.5.3　All Disposition operations shall be carried out in accordance with Dell's Reuse Hierarchy.

2.5.4   Electronic Waste processed through the Disposition Channel shall be tracked and documented. Electronic Waste shall be managed throughout the entire chain of custody until Final Disposition.

2.5.5   EDPs shall maintain an environmental, health and safety management system, train employees on the management system and document such training. The management system shall include but not be limited to addressing Materials of concern and applicable legal requirements.

2.5.6   Reuse

2.5.6.1 All Equipment with potential Reuse capacity shall be tested and Functional when sold, remarketed or distributed as a refurbished product.

2.5.6.2 Products that are non-Functional shall not be marketed or distributed as refurbished for Reuse or shipped either domestically or internationally.

2.5.6.3 Data on Equipment shall be responsibly handled and sanitized by EDPs prior to Reuse or export for Reuse per 2.3.

2.5.7   Resource Recovery

2.5.7.1 EDPs shall endeavor to use processes that maximize the recovery of recyclable Materials and shall document the evaluation and determination of process options.

2.5.7.2 Mercury lamps, printed circuit boards, cathode ray tubes (CRTs) and batteries shall be processed by downstream vendors capable of and experienced in the environmentally sound management and recycling of the specific material, utilizing best-available technology. Such downstream vendors should hold at least one Internationally Recognized Electronics Waste Management Certification, but must otherwise be compliant with all legal requirements, maintain a robust Environmental Management System, and be authorized in the country in which the operation is located.

2.5.8   Disposal

2.5.8.1 EDPs shall employ environmentally responsible processes and practices as specified in this Standard in the disposal of wastes.

2.5.8.2 Every reasonable effort will be made to control all Electronic Wastes and to minimize Electronic Wastes from entering landfills or incinerators. Where the only available option is landfill, it must be in an appropriately designated and licensed site.

2.6   Export

2.6.1   Prior to export from an EDPs' processing facility, EDP shall test, sanitize and physically divide all Equipment and Material into three categories and not co-mingle thereafter:
   Reusable – tested, repaired and refurbished as functional for remarketing,
   Recyclable - processed ready as raw material or feedstock for use without further treatment or,
   Electronic Waste – needing further processing, treatment or final disposal.

2.6.2   No Equipment or Materials that are classified per 2.6.1 as Electronic Waste shall be exported from OECD or EU member countries to non-OECD or non-EU countries for treatment or Final Disposal either directly or through Intermediaries except where permitted by national legislation and by conditional prior approval from Dell.

2.6.3   Prior to EDPs shipping any Equipment or Material classified under 2.6.1 as Recyclable or Electronic Waste, EDPs shall obtain, verify and document that all required local, trans-boundary and international permits, certifications, accreditations, licenses, pre-approvals, consents and authorizations are in place.

2.6.4   EDPs shall comply with US and all other applicable trade and export compliance laws and not sell, lease or otherwise transfer Equipment or Material to restricted end-users or to restricted countries and shall not sell, lease or otherwise transfer Equipment or Material to end-users engaged in activities related to weapons of mass destruction, including activities related to the design,

development, production or use of nuclear weapons, materials, or facilities; missiles or the support of missile projects; or chemical or biological weapons.

2.7   Materials Tracking

2.7.1   EDPs shall track and document refurbished and End-of-Life electronics throughout the complete product Disposition Channels over which EDPs have contractual obligation.

2.7.2   Tracking information shall show the Final Disposition of all recyclable electronic Materials and wastes.

2.7.3   Refurbished electronics shall be tracked to first point of Reuse over which EDPs have contractual obligation.

2.7.4   EDPs shall maintain, and make available to Dell on request, source documents (e.g., waybills, shipping documents, invoices) verifying all Material transfers.

2.8   Subcontractors

2.8.1   EDPs shall flow the terms of this Standard down to all subcontractors (including downstream Materials vendors) who do not hold an appropriate and valid Internationally Recognized Electronic Waste Management Certification, who shall comply with this Standard and EDPs shall maintain documentation to demonstrate that their subcontractors comply with this Standard.

2.8.2   EDPs shall conduct and document annual audits to this Standard of all subcontractors who do not hold an appropriate and valid Internationally Recognized Electronic Waste Management Certification and are utilized in providing electronics Disposition services to Dell, and shall make the results of subcontractor audits available to Dell on request.

3.   Audit and Inspection

3.1   EDPs shall grant to Dell, or its designee, access to and copies of any information requested by Dell with respect to EDPs' performance of electronics Disposition services, including but not limited to information related to downstream activities.

3.2   Dell, or its designee, shall have the right at any time to enter onto EDPs' premises without notice during normal business hours except where health or security policies require specific notice periods, for the purpose of auditing EDPs' compliance with this Standard.

3.3   EDPs shall make available to Dell, or its designee, for purposes of such audits (a) EDP's books and records of account, records relating to environmental health and safety and any other related records requested by Dell; (b) its receiving, staging, storing, refurbishing, marketing, data sanitization and reselling facilities; and (c) physical inventories of Equipment and/or Material held by EDPs.

3.4   Audits will extend to investigation of the Materials downstream process, including but not limited to mass balancing of Material transfers between EDPs and all their subsequent subcontractors.

3.5   EDPs shall have access to documentation of Material final destination at all times and shall contractually require that its subcontractors and vendors provide access to final destination documentation for all Materials that they process at all times.

3.6   EDPs shall comply with this Standard and require its subcontractors and vendors to comply with any such requests for information by Dell.

Asking Questions

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

Reporting and Investigation

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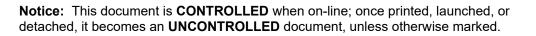
Discipline

For Dell's contractors, subcontractors, Electronics Disposition Partners and third parties, compliance with this Standard is a condition of doing business with Dell. Dell Partners who violate this Standard may be subject to contract termination.

Waivers

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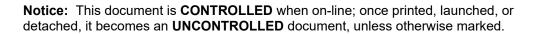
Definitions

Term	Definition
Data-Containing Device	Any media device, to which data can be written to, stored on or read from. E.g. Hard disk drive, mobile phone, smartphone, tablet, flash memory devices, CDs, DVDs, Tapes, Floppy Drives, etc. Does not include OEM provided optical media necessary for the set-up and operation of the device.
Dell Reuse Hierarchy	Most preferred method of Reuse is whole system Reuse. When that is not feasible, Refurbishment or Remanufacturing of whole system for Reuse is next priority. If Reuse, Refurbishment or Remanufacturing are not feasible, Repair or component-level piece part Reuse is the next preferred method of Reuse. If none of these methods are feasible, commodity Materials Reuse is preferred. Not until all the above methods are exhausted shall Recycling be considered.
Destroy/Destroyed/Destruction	A method of Sanitization using physical techniques that makes target data recovery infeasible using state of the art laboratory techniques and results in the subsequent inability to use the media for storage of data. Method is described in IEEE 2883, page 24-25 and NIST Special Publication 800-88 Revision 1, Page 25, and NIST Special Publication 800-88 Revision 2, Page 11.

Term	Definition
Disposition	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.
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	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, repaired or Refurbished. Electronic Waste does not include: 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 Center d. 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. "Competent Authority" means the entity (usually a government agency) that is responsible for overseeing its country's compliance with the Basel Convention.
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.)
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).

Term	Definition
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.
Internationally Recognized Electronic Waste Management Certification	An accredited electronics recycling certification standard such as EN50625, EN50614, the Responsible Recycling Standard for Electronics Recyclers (R2) or the e-Stewards Standard for Responsible Recycling and Reuse of Electronic Equipment or other similar future certifications that are internationally accredited.
Material	Dismantled Equipment in whole, part or processed suitable for Recycling.
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.
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.

Term	Definition
Sorting	The process for differentiating Materials or Equipment for the purposes of identifying what is suitable for Reuse, Refurbishment, Remanufacturing, Repair, data and/or data bearing Equipment handling and/or Recycling.
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 manufacturers warranty.
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	Addition of RIOS certification, alignment with NIST SP800-88r2 & minor revisions
November 2024	Revision of 2.1.5 & 2.8, addition of EN50614
October 2023	Revision of 2.3 & definitions to align with IEEE 2883-2022
October 2022	Revision of sections 1, 2.1.6, 2.3, 2.5.7, 2.6, 3.2 & minor revisions
February 2022	Reviewed, no changes
March 2019	Minor revisions
January 2017	Major revisions following Merger of Dell & EMC
March 2014, May 2010	Minor revisions

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March 2009	Initial publication

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