

## **ACCOUNT OF HUMAN RIGHTS AND DECENT WORKING CONDITIONS DUE DILIGENCE UNDER THE NORWEGIAN TRANSPARENCY ACT**

### **Introduction**

#### **Obligation to issue the account**

The Norwegian Transparency Act (the Act) applies to large enterprises resident in Norway and that offer goods and services in or outside Norway. Dell AS (Company Number 861272702) (the Company) is resident in Norway and is considered a large enterprise as a result of exceeding, for two consecutive years, at least two of the three criteria listed under Section 3 of the Act on the date of the financial statements ended 31 January 2024 (fiscal year 2024 covering the period between 1 February to 31 January).

As such, the Company must publish this account pursuant to Section 5 of the Act and the reporting period it covers is from 1 February 2023 to 31 January 2024.

### **About the company**

#### **The Company's organisation and operating area**

Dell Technologies Inc. is a corporation incorporated in the state of Delaware with principal executive offices in Round Rock, Texas. Dell Technologies Inc., on behalf of itself, Dell Inc. and its direct and indirect subsidiaries (Dell, or the group) are committed to social and environmental responsibility, including human rights and decent working conditions.

The Company is part of the group and is a 100% owned subsidiary of EMC Information Systems International Unlimited Company, registered in Ireland under Company Number 461022. The Company is located in Lilleakerveien, Oslo.

The Company is represented by the following members of the Board of Directors:

- Nicolai Johan Moresco – Chairman of Board of Directors ([nicolai\\_moresco@dell.com](mailto:nicolai_moresco@dell.com))
- Geir Rostadmo-Strømme – General Manager & Member of Board of Directors ([geir.stromme@dell.com](mailto:geir.stromme@dell.com))

The Company operates as a limited risk distributor since June 2017, by which it purchases products (meaning all hardware, updates, supplier offerings and any other product and service which Dell generally supplies) and software from group companies with the purpose of reselling to final customers in Norway.

#### **Internal routines and guidelines**

The Company upholds the policies and principles of the group, even in instances where the requirements may be more stringent than local legislation.

Dell Technologies respects the fundamental human rights of all people. This respect is core to our commitment to drive human progress. We have adopted and uphold expectations set out in the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Principles of the United Nations Global Compact, to which Dell is a signatory. We align our policies and practices to these principles.

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.

We believe everyone deserves to be treated equally, with dignity and respect, and we are committed to responsible, ethical, inclusive and sustainable business practices. The [Dell 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 and others impacted by our value chain. Additional policies supplement the Human Rights Policy, including the [Dell Supplier Principles](#), [Vulnerable Worker Policy](#), [Responsible Sourcing Policy](#) and our annual [Statement Against Modern Slavery](#), [Human Trafficking](#), and [Child Labor](#) and more.

The Dell Human Rights Policy confirms our alignment with expectations of the UNGPs. We have also formalized and embedded other policies, human rights due diligence and governance protocols throughout our business. These are addressed in the Dell Human Rights Policy.

## **Employees**

Expectations to comply with laws and ethical business practices, including acting with integrity and respecting the fundamental human rights of others, are embedded in the Dell Technologies culture and policies and clearly set out in the [Dell Technologies Code of Conduct](#). The (Code of Conduct) is available in 27 languages and is accessible on Dell's intranet and the Dell Technologies external website.

The Code of Conduct contains links to unified and localized global compliance policies, as well as key take-aways and frequently asked questions. Numerous goals and KPIs related to healthy work environments, diversity and inclusion, sustainability practices and more are tracked and reported on in our annual Environmental, Social and Governance (ESG) Report.

Dell team members are required to complete annual Code of Conduct training and adhere to our code and policies, including the Dell Human Rights Policy and standards that flow from it. Annual Code of Conduct training also includes workplace health and safety requirement reminders. In FY24, 100% of eligible team members completed training on topics including trade compliance, use of social media, AI governance, and upholding human rights.

## **Pay Equity**

At Dell Technologies 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 routinely review salaries — and make adjustments if needed — to ensure we pay employees competitively when compared to peers and the relevant compensation market, and in accordance with applicable law.

## **Resellers and other third parties**

We expect our resellers and other third parties to maintain a culture that embraces diversity, equity and inclusion and respects cultural differences, while operating at the highest level of integrity and accountability. These expectations are clearly defined in the Dell Technologies Code of Conduct for Partners.

## **Supply chain**

Dell is a founding member of the Responsible Business Alliance (RBA), which embeds requirements to uphold respect for human rights in the [RBA Code of Conduct](#). Dell adheres to these standards and also expects its suppliers to comply with the RBA Code and other requirements set out in our [Dell Supplier Principles](#).

Dell does not tolerate forced labor or child labor in any form. We undertake due diligence to assess and address risks of modern slavery in our supply chain and report on these priorities and progress in our annual Statement Against Modern Slavery, Human Trafficking, and Child Labor. 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 Responsible Sourcing Policy. Dell is also involved in building an industry-wide approach to responsible sourcing of minerals through groups such as the Responsible Minerals Initiative, as evidenced by our annual Conflict Minerals Disclosure Report.

Comprehensive insights on our responsible labor and supply chain standards, governance practices, key performance indicators, and progress are addressed in the Supply Chain Responsibility section of our annual ESG report.

## **Collaboration**

We value engagements with, and insights from, stakeholders across our business and value chain. We also believe some human rights issues can be addressed most effectively by working in partnership with others. To drive progress on complex challenges, we collaborate with suppliers, business partners, customers, local communities, industry and cross-sector working groups and other organizations. We seek and leverage external stakeholder feedback collected by third-party human rights experts engaged to conduct our periodic Human Rights Impact Assessments (HRIA). These assessments inform Dell's policies, support risk mitigation, governance practices, and strategic priorities.

We utilize insights and guidance from third-party business and human rights experts, including Article One Advisors and actively participate in the BSR (Business for Social Responsibility) Human Rights Working Group.

The Company's Board of Directors are familiar with and uphold all relevant Dell Technologies' policies, including the Code of Conduct, taking them into consideration when making decisions in the interest of the Company. In addition, many internal organizations across Dell are engaged to embed and operationalize our commitments to responsible and ethical business conduct, including respect for human rights and decent working conditions, across our value chain.

Dell Technologies believes that effectively assessing and managing risk is central to the design and execution of our business strategy and the creation of long-term value. Our Board of Directors, directly and through its standing committees, oversees the establishment and maintenance of governance, compliance and risk oversight processes and procedures to promote the conduct of business with the highest standards of responsibility, ethics and integrity.

Dell's management team is trained on ESG-related topics, including fundamental human rights, and the Board is regularly briefed on ESG-related matters. In addition to these regular updates, we provide relevant training to the board as needed. For example, in FY24, the board received training on the company's corporate human rights policy commitments, due diligence and governance practices in alignment with the UNGPs.

Dell has formalized ESG as an organization, with governance extending to the most senior levels of leadership. There are two governance bodies responsible for oversight of ESG issues at Dell: the ESG Steering Committee (reporting into the Executive Leadership Team) and the ESG Interlock Team, each with its own roles and responsibilities. The responsibilities of these governance bodies continue to evolve to match our growing ESG efforts and risk management assessments.

For detailed information on Dell Technologies governance structure, please refer to the Corporate Governance section of the voluntary ESG Report, in which the group further addresses the engagement and roles of the Board of Directors, ESG Steering Committee and ESG Interlock Team.

We will continue to share insights and progress in future ESG reporting and comply with all mandatory disclosure requirements.

### Salient risks

Our first corporate-level third-party HRIA, completed in FY19, confirmed our awareness of salient human rights risks and impact areas and 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 and expanded our understanding of current, new and evolving salient risks. It continues to inform and strengthen our risk mitigation strategies and governance practices.

We remain dedicated to continually increasing our understanding and effective mitigation of actual, potential and emerging risks and identifying opportunities to accelerate positive impacts.

This table provides an overview of the most significant human rights impact areas across our value chain, respective governing policies and expectations. It also lists additional Dell resources and references that further address these topics.

Salient Risks	Value Chain Impact Area(s)	Policies	Additional Resources and Reporting
Discrimination	Own Operations, Supply Chain, Products, Community	<a href="#">Dell Human Rights Policy</a> <a href="#">Dell Code of Conduct</a> <a href="#">Dell Diversity &amp; Equal Opportunity Employment Policy</a> <a href="#">RBA Code of Conduct</a>	Inclusive Workforce section of the <a href="#">ESG Report</a> <a href="#">Accessibility Statement for Dell Technologies</a>
Child Labor, Forced Labor	Supply Chain	<a href="#">Dell Human Rights Policy</a> <a href="#">RBA Code of Conduct</a> <a href="#">Dell Vulnerable Worker Policy</a>	Supply Chain Responsibility section of the <a href="#">ESG Report</a> <a href="#">Statement Against Modern Slavery, Human Trafficking and Child Labor</a> <a href="#">Dell Supplier Principles</a>
Health & Safety	Own Operations, Supply Chain, Products	<a href="#">Dell Human Rights Policy</a> <a href="#">Global Occupational Health and Safety Policy</a> <a href="#">RBA Code of Conduct</a> <a href="#">Dell Product Regulatory Compliance Policy</a>	Health and Safety Metrics included in By the Numbers section of the <a href="#">ESG Report</a> Supply Chain Responsibility section of the <a href="#">ESG Report</a> <a href="#">Dell Product Safety Information</a> <a href="#">Dell Supplier Principles</a>
Working Hours/Wages	Own Operations, Supply Chain	<a href="#">Dell Human Rights Policy</a> <a href="#">RBA Code of Conduct</a>	Supply Chain Responsibility section of the <a href="#">ESG Report</a> <a href="#">Dell Supplier Principles</a> Inclusive Workforce section of the <a href="#">ESG Report</a>
Privacy	Own Operations, Supply Chain, Products, Community	<a href="#">Dell Human Rights Policy</a> <a href="#">RBA Code of Conduct</a> <a href="#">Dell U.S. Privacy Statement</a> <a href="#">Dell Code of Conduct for Partners</a>	Trust section of the <a href="#">ESG Report</a> <a href="#">Dell Supplier Principles</a>

Salient Risks	Value Chain Impact Area(s)	Policies	Additional Resources and Reporting
Environmental Responsibility	Community	<a href="#">Dell Human Rights Policy</a> <a href="#">Dell Global Environmental Policy</a>	Climate Action and Circular Economy section of the <a href="#">ESG Report</a>
Bribery and Corruption	Supply Chain, Community	<a href="#">Dell Human Rights Policy</a> <a href="#">Dell Code of Conduct</a> <a href="#">Dell Code of Conduct for Partners</a> <a href="#">RBA Code of Conduct</a>	<a href="#">Dell Supplier Principles</a>
Responsible Product Development	Products, Community	<a href="#">Dell Human Rights Policy</a>	<a href="#">Dell Technologies Principles for Ethical Artificial Intelligence</a> Trust section of the <a href="#">ESG Report</a>
Responsible Sales	Products, Community	<a href="#">Dell Code of Conduct for Partners</a>	Trust section of the <a href="#">ESG Report</a>

## The due diligence assessments

### General information about the Company's execution of due diligence assessments

The [Dell Human Rights Policy](#) sets out due diligence expectations and is approved by Dell's CEO, who is also Chairman of our Board of Directors. The [Dell Supplier Principles](#), which are referenced in the Dell Human Rights Policy, clarify our commitments to uphold standards of the RBA Code of Conduct, of which Dell is a founding member, and Dell's expectations that facilities managed by its suppliers abide by the RBA Code of Conduct and expect the same of their suppliers, including in our operations in Norway.

As noted in the Dell Human Rights Policy, Dell respects the fundamental 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. Dell is committed to making certain that we are not complicit in any human rights violations throughout our supply chain and align our approach and actions to fulfil this commitment with the UNGPs, and the Principles of the United Nations Global Compact, to which Dell is a signatory.

Dell's due diligence practices are aimed at effectively addressing the salient risks identified across the value chain, as presented in the table above. As part of this, with respect to our supply chain, Dell has a risk assessment process that incorporates risk elements including geography, protections to labour rights, environmental practices, and management systems. Dell takes a comprehensive approach to monitoring supply chain impact, including the risk of modern slavery and other human rights harms. We evaluate suppliers' sustainability risk levels every year through our internal risk assessment tool and calibrate by a supplier self-assessment questionnaire (SAQ) to determine risk level using criteria including geographic location, commodity, prior responsible manufacturing performance, and other relevant data. Based on the results of the SAQ and additional insight, we classify suppliers as low-, medium-, or high-risk. Suppliers deemed high-risk must complete a third-party audit that determines conformance with the Responsible Business Alliance (RBA) Code of Conduct. In addition, we audit a portion of medium- and low-risk strategic partner suppliers to determine if their risk is rising.

We also monitor Social and Environmental Responsibility (SER) risk for our Dell factories and suppliers annually. Continuous improvement is important for our operations, as well as those of our suppliers. RBA Code of Conduct conformance audits cover over 40 topics across five areas: labor (including risks of forced labor, child labor and noncompliance with weekly working hour requirements), employee health and safety, environment, ethics and management systems.

Finally, 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.

## **Complaint mechanisms**

Dell Technologies' Speak Up is a third-party reporting tool available for anyone, including team members, partners, or any other internal or external stakeholder to report concerns or issues they believe may violate Dell Technologies' Code of Conduct, Dell's Human Rights Policy, or any other related Dell policy, standard, or applicable laws. Speak Up is accessible 24/7, available in multiple languages and offers the option of anonymous reporting. Speak Up can be accessed via [link](#), internally published QR code, or the internal My Ethics app. Dell promptly investigates allegations and takes appropriate action, where necessary, to mitigate actual or potential adverse impacts, including those related to human rights and working conditions. Dell does not tolerate retaliation against anyone acting in good faith to report a concern, provide information, or otherwise assist in an investigation or proceeding.

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 believe 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.

## **The supply chain and business partners of the Company**

The Company relies on the group for the supply of the products and software offered to the Norwegian market and engages different business partners to provide goods and services locally to carry out operational activities (i.e. rent, utilities, employee related benefits, professional services etc).

In assessing risk in our supply chain, we have conducted appropriate human rights due diligence on our global operations as part of our Dell-wide processes and policies, but also with respect to our Norwegian operations specifically. Our due diligence confirms that a significant majority of our local suppliers to the Company have contractually agreed to abide by our Supplier Principles incorporating the RBA Code of Conduct, amongst other Dell policies. Robust contractual agreements are in place with all suppliers in Norway. Dell considers each supplier's conduct vis-a-vis the RBA Code of Conduct and the supplier's adherence to Dell's Supplier Principles when awarding and/or renewing business with a supplier, including in Norway.

Dell Technologies has operations and conducts business in many countries located in the Americas, Europe, the Middle East, Asia, and other geographic regions. As reported in our most recent 10-K, as of February 2, 2024, we had approximately 120,000 employees worldwide. Dell also manages responsible business practices in one of the world's largest supply chains. The Dell-owned manufacturing facilities are located in the United States, Malaysia, China, Brazil, India, Poland, and Ireland. Dell also utilizes contract manufacturers throughout the world to manufacture or assemble our products under the Dell Technologies brand. Components used in these manufacturing facilities are sourced primarily from those same countries listed above, but also from Japan, South Korea, Mexico, Taiwan, Singapore, Philippines,

Thailand, Laos, Germany, Netherlands, Israel, Vietnam, and Indonesia to meet the technology, quality and sustainability requirements of our broad global portfolio of products.

Our primary focus in due diligence within our supply chain is on our Suppliers of direct materials, as it represents our largest spend category. Dell's Public Supplier List identifies the category type and location of our original design manufacturers (ODMs) and final assembly Suppliers. This list represents a snapshot covering at least 95% of Dell's direct material spend during fiscal year 2023. Our second largest spend category includes products and services procured in-country or regionally for customer-facing services, followed by marketing, and global real estate and facilities, respectively.

Dell's Supply Chain Assurance organization sits within its Global Operations organization and includes a Social and Environmental Responsibility (SER) function that deploys programmatic and operational teams to drive social and environmental standards across the supply chain, including those related to forced labor and child labor. The SER assurance and engagement program is one of the largest in the technology sector. We proactively recognize and tackle issues within both Dell-owned factories and those of our suppliers, including final assembly, direct and sub-tier suppliers.

Our suppliers demonstrate varying levels of maturity in their own corporate sustainability programs. We work closely with them to drive progress and continuous improvement. We use a four-element approach, also applicable to Norway, in our SER audit program. This continuous improvement model is a framework for advancing supplier performance that includes risk assessments, supplier audits, corrective action plans and capability building.

We refer to each activity in the model as an element, rather than a phase or step, because suppliers do not always move through the elements sequentially. For example, the results of a risk assessment may indicate that an audit is unnecessary, but there is a need to drive improvement in a targeted area.

**Risk assessments:** Dell performs a supplier risk assessment on its key supplier list annually. Our engagement with suppliers at any tier – including final assembly, direct and sub-tier – begins with an assessment of their social and environmental risks. We conduct rigorous initial risk assessments of suppliers before starting a business relationship, and we refresh those risk levels every year through internal tools and processes. Suppliers onboarded to Dell in between the fiscal year are assessed for risk per the Supplier Onboarding Procedure and subsequently added to the next cycle of risk assessment.

**Supplier audits:** The Dell audit program is one of the largest in the technology sector, both in the number of audits conducted and reach across the supply chain. The audit score is the result of the RBA audit for each facility within the past two years. It is a compilation of labor, health and safety, environment and ethics indicators showing a supplier's performance across these social responsibility categories. It is designed to identify sustainability risks in our supply chain and enable suppliers to both mitigate issues and build their SER capabilities. In addition, we engage our suppliers in targeted assessments and programs to drive more opportunities for improvement. In our global due diligence assessments, our Norwegian operations have been identified as "low risk", as the Company is a sales-only entity.

**Corrective action plans:** When areas of nonconformance with the RBA Code of Conduct are discovered through an audit, our Dell SER specialists work with the supplier to create a corrective action plan (CAP) to resolve the issues within RBA- or Dell-defined timelines, whichever is earliest.

**Capability building:** We share best practices collected from our highest performing suppliers and encourage lower-performing suppliers to take appropriate actions to improve performance.

We share SER performance metrics alongside other key indicators, such as cost and quality, as part of our supplier quarterly business reviews (QBRs). Key executives attend QBRs, help determine future business awards and address progress toward aligned goals.

We strive to work with our suppliers to improve their sustainability performance. However, in rare circumstances where it is evident that continued poor performance will not be resolved through further engagement, we may end our business relationship with a supplier.

For more detailed information related to the SER audit program please refer to the Supply Chain Responsibility section of the ESG Report.

### **Results of the due diligence assessments**

Dell measures and monitors the cumulative impact of its various programs and provides transparency on our progress in the annual ESG Report. Ongoing analysis of related performance indicators helps inform our understanding of the effectiveness of initiatives, such as supplier training on labor rights and recruitment fees, utilization and impact of corrective action plan toolkits directed at identifying and addressing labor rights risks, including forced labor, and more. These programs are also integrated into supplier performance management and escalation processes such that the total impact is reflected in the audit score improvements or recruitment fees identified and returned to workers.

Audit findings may result in corrective action and the implementation of capability-building elements of the continuous improvement model. In FY24, we saw clear improvement in supplier factory audit performance, with 63% of factories that went through at least their second audit cycle improving their audit scores between cycles. This includes final assembly suppliers (69%), direct suppliers (61%) and sub-tier suppliers (64%).

These mechanisms and indicators are closely monitored and tracked as part of our practices to help ensure all our products, wherever they are manufactured or delivered to customers around the world, are made responsibly, without the use of any form of forced labor and with respect for decent working conditions.

### **Fair and competitive wages**

In fiscal year 2024, the Company employed on average 126 employees. Dell Technologies provides a competitive and fair wage to all employees, including in our Norwegian operations. We focus on both external and internal factors to ensure our high standards of compensation and benefits are met. Externally, Dell participates and gathers data from the most reputable third-party technology survey vendors on an annual basis to ensure Dell's pay ranges are as competitive as possible. Technology Sector Compensation Surveys provide Dell timely insights, driven by a collection of data from peer companies operating in highly competitive talent markets spanning Dell's full product portfolio. Additionally, Dell partners with Strategic Advisory Committees that provide real-time market trends, and the availability of robust data ensures Dell is globally consistent across our own operating entities, locally relevant and competitive in the market.

Looking internally, Dell focuses on company and business unit objectives, critical skills to meet business needs, affordability, attrition hot spots, and internal equity.

Our due diligence with respect to our Norwegian operations confirms that we provide a living wage to all employees of Dell AS, enabling workers to support themselves and their families.

### **Measures to stop, prevent or mitigate adverse effects**

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.



To further promote alignment and integration of our human rights strategy, in fiscal year 2024 Dell established a cross-functional Human Rights Advisory Committee composed of executive leaders of organizations responsible for managing human rights risks and advancing robust governance practices across our business and value chain.

Complying with local legislation in place (i.e. the Working Environment Act – WEA), the Company has established a working environment committee (Arbeidsmiljøutvalg) with the role of ensuring a compliant and satisfactory working environment in the business, participating in the planning of the safety and environmental work of the Company, and closely monitoring the development of the working environment. Also, as part of the WEA, the Company has in place safety representatives (Verneombud) with the role of safeguarding the working environment on behalf of the employees by ensuring that activities are organized and maintained, and that work is carried out in such a way that consideration for the safety, health and welfare of the employees is safeguarded in collaboration with the Company.

Partners are expected, consistent with applicable laws and contractual obligations, to provide reasonable assistance to any investigation by Dell of a violation of the Supplier Principles or applicable laws, allowing Dell reasonable access to all facilities, records and documentation concerning their compliance. In cases of non-compliance with the Supplier Principles, Dell reserves the right to take all available actions against suppliers for violations, including the termination or reduction of business, onsite compliance auditing at the supplier's expense, compensation and/or reimbursement to affected workers at the supplier's expense, seeking of damages, and/or termination of Dell Technologies' agreement with the supplier.

### **Further Information**

For further information on this report, or Dell's policies or practices generally, please contact:

[social.impact@dell.com](mailto:social.impact@dell.com)

For any request, please include sufficient detail to enable Dell to respond as soon as practicable in accordance with the requirements of the Act.

Norway, 24 June 2024



Jaromir Krnac  
Chairman of Board of Directors



Geir Rostadmo-Strømme  
General Manager & Member of Board of Directors