



STATEMENT AGAINST MODERN SLAVERY, HUMAN TRAFFICKING AND CHILD LABOR

Dell Technologies Inc., on behalf of itself, Dell Inc. and its direct or indirect subsidiaries ("Dell"), is committed to social and environmental responsibility. As part of its commitment, Dell prohibits slavery, human trafficking, and child labor in our operations and supply chain, and works to minimize any associated risks. Irrespective of the circumstances, 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 of Dell's suppliers, our supplier's suppliers (collectively, "Suppliers"), or for any other purpose. Dell is a founding member of the [Responsible Business Alliance \(RBA\)](#) and has adopted its Code of Conduct (the "RBA Code"), to which we hold ourselves and our supply chain accountable. The RBA Code prohibits the use of forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery, trafficking of persons, and child labor. Additionally, the RBA Code covers employee health and safety, environment, ethics and management systems. The RBA Code, amongst other Dell policies, is incorporated by reference into Dell's [Supplier Principles](#), to which all Suppliers are expected to agree as a condition of doing business with Dell, with the understanding that the obligations imposed by Dell may be more onerous than under applicable law. Dell's Supplier Principles outline the standards Suppliers should meet to do business with Dell, focusing on responsible business practices and ethical behavior. Dell considers each Supplier's conduct vis-a-vis the RBA Code and their adherence to Dell's Supplier Principles when awarding and/or renewing business with the Supplier.

This Statement Against Modern Slavery, Human Trafficking, and Child Labor ("Statement") is made pursuant to the requirements of the California Transparency in Supply Chains Act of 2010, section 54(1) of the U.K. Modern Slavery Act of 2015, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2024, and Part 2 of the Australian Modern Slavery Act of 2018, and constitutes Dell's modern slavery, human trafficking, and child labor statement for the financial year ending January 31, 2025 (and for the financial year ending January 31, 2025 in respect of the Australian Reporting Entity and Dell Bank International Designated Activity Company).

For the purposes of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2024, this Statement is made on behalf of Dell Canada Inc. For the purposes of Part 2 of the Australian Modern Slavery Act 2018, this Statement is made on behalf of the applicable reporting entity, Dell Australia Pty Limited ABN 46 003 855 561 (Australian Reporting Entity). The corporate structure of the Australian Reporting Entity is set out in Annexure A of this Statement along with Australian specific details required under Australian law. For the purposes of section 54(1) of the U.K. Modern Slavery Act 2015, this Statement is made on behalf of reporting entities Dell Corporation Limited (UK company number 02081369), Dell Emerging Markets (EMEA) Limited (UK company number 03266654), Dell Products Unlimited Company (Irish company number 191034), EMC Information Systems International Unlimited Company (Irish company number 461022), and Dell Bank International d.a.c. (Irish company number 502362).

Christopher A. Garcia signs this Statement as Assistant Secretary and Senior Vice President on behalf of Dell Inc. and its wholly owned subsidiaries in his capacity as Director or authorized representative of the above-named legal entities.

Structure, operations, and supply chains

Dell Technologies is a leader in the global technology industry focused on providing broad and innovative technology solutions for the data and artificial intelligence (“AI”) era. These solutions range from client devices and peripherals to infrastructure solutions across servers, networking, and storage to meet the evolving needs of our customers and drive better business outcomes. With our extensive portfolio and our commitment to innovation, we offer secure, integrated solutions that extend from the edge to the core to the cloud, and we are at the forefront of AI, software-defined, and cloud native infrastructure solutions. Our differentiated and holistic information technology (“IT”) solutions enable us to provide value and capture growth as customer spending priorities evolve.

Dell is a corporation incorporated in the state of Delaware with principal executive offices in Round Rock, Texas. A complete list of Dell’s subsidiaries worldwide as of the end of its most recently completed fiscal year can be found at [Exhibit 21.1](#) of the Dell Technologies 10-K, filed with the US Securities and Exchange Commission on March 25, 2025.

We have operations and conduct business in the Americas, Europe, the Middle East, Asia, and other geographic regions. As reported in our most recent 10-K, as of January 31, 2025, we had approximately 108,000 employees worldwide. We also manage responsible business practices in one of the world’s largest supply chains. Our own manufacturing facilities are located in the United States, Malaysia, China, Brazil, India, Poland, and Ireland. We also use contract manufacturers throughout the world to manufacture or assemble our products under the Dell Technologies brand to provide operational flexibility, achieve cost efficiencies, deliver products faster, better serve our customers, and enhance our supply chain. When using contract manufacturers, we purchase components from Suppliers and subsequently sell those components to the manufacturer. Components used in these manufacturing facilities are sourced primarily from the same locations listed above, and from Japan, South Korea, Mexico, Taiwan, Singapore, Philippines, Thailand, Laos, Germany, Netherlands, Israel, Vietnam, and Indonesia. Our manufacturing process consists of assembly, software installation, functional testing, and quality control. We conduct operations utilizing a formal, documented quality management system to ensure that our products and services satisfy customer needs and expectations. Testing and quality control are also applied to components, parts, sub-assemblies, and systems obtained from third-party suppliers. Dell Technologies operations and businesses have earned ISO certifications in many areas, including quality, environmental, occupational health and safety and energy. Learn more about [our certifications](#).

Our primary focus in due diligence within our supply chain is on our Suppliers of direct materials, as they represent our largest spend category and therefore our greatest ability to influence. [Dell’s Public Supplier List](#) identifies the category, type and location of our original design manufacturers (ODMs), final assembly Suppliers and additional key Suppliers. This list represents a snapshot covering at least 95% of Dell’s direct material spend and is updated on an annual basis. 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.

Identifying and assessing the risks of modern slavery and child labor

Given the multi-faceted global legal landscape and corresponding labor market fluctuations, foreign migrant workers (FMWs) represent the technology sector's biggest risk of modern slavery and human trafficking due to their status as a group vulnerable to exploitative labor practices and forced labor. Data collected from audits, the RBA, and several non-governmental organizations (NGOs) indicates the biggest risk of forced labor would include any geographical area or type of Supplier that uses FMWs. In addition to substandard labor conditions, FMWs may be vulnerable to fees at different points during their journey as a potential worker, such as recruiting agent fees, travel, visa, or health check fees. FMWs may also not be in a position to fully understand or consent to the adverse conditions of work opportunities prior to leaving their home country.

Dell identifies, assesses, and addresses risks of modern slavery and child labor in our own operations as well as in our supply chain. Recognizing that Suppliers may not have sufficient controls in place to fully identify, prevent, correct, or remediate risks of forced labor and child labor, Dell develops and deploys robust supplier training and collaborates with industry peers through the RBA to address potential and actual forced labor risks and vulnerabilities and implement corrective measures. These efforts drive Supplier accountability and improve capabilities across the industry.

Dell's assurance practices are risk-based, prioritizing high-risk circumstances and mitigation actions to avoid salient risks such as modern slavery and child labor. Dell's audit and capability building programs specifically target areas of known, or with the highest potential of, forced labor and child labor risks. Dell's risk assessment, conducted on an annual basis, incorporates the data from past Supplier audit performance, known industry risks identified through the RBA's Risk Assessment Platform, key governmental reports, as well as NGO and public media information to assign each country a risk score. The risk scores inform our audit programs, such that we prioritize our due diligence efforts on locations where we have seen higher risk, versus lower risk areas such as Western Europe, Canada, USA or Australia. Dell's human rights due diligence efforts adapt as risk levels and/or factors change, enabling us to quickly address and mitigate evolving risk.

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.

The [Dell Human Rights Policy](#) and priorities and practices addressed in it, are grounded in expectations set out in the UN Guiding Principles on Business and Human Rights and the Organisation for Economic Cooperation and Development ("OECD") Guidelines on Responsible Business Conduct. Dell's Human Rights Policy, and other policies and principles referenced in this Statement are available online on our [Supply Chain Responsible Labor](#) and [Environment, Social, and Governance \("ESG"\) Policies, Positions & Guidelines](#) pages.

Dell's Executive Vice President and Chief Supply Chain Officer leads our global supply chain in our Global Operations organization. Within Global Operations sits the 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 identifying, assessing and responding to risks of forced labor and child labor. This team works across Global Operations with procurement and manufacturing organizations and includes over 15 specialists dedicated to monitoring Supplier performance and building Supplier capabilities around Dell's social and environmental expectations.

Addressing the risks of modern slavery and child labor is a corporate-wide responsibility. This Statement was prepared and approved by representatives from Legal, SER, and ESG. Representatives from each of the group entities (including the reporting entities) participate in internal working group meetings. The working groups consult with Dell group entities to ensure country-specific risks have been appropriately identified, assessed, and addressed and that the group entities are aware of the actions required to mitigate the risks.

In addition to our standard procedures, where we believe it may accelerate and improve outcomes for affected stakeholders, Dell may collaborate with other RBA members, NGOs, or other stakeholders, as permitted by applicable laws. Recognizing that the actual and potential risks of forced and child labor are industry-wide and necessitate collective action, we participate in various industry initiatives to more effectively identify and address these risks. We participate in the [Responsible Labor Initiative \(RLI\)](#), which is a multi-industry, multi-stakeholder initiative focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted through responsible recruitment and employment practices. RLI members, Suppliers, recruitment partners and stakeholders use their collective influence and application of due diligence to drive the transformation of recruitment markets and reduce the risk of forced labor in global supply chains. The RLI was launched in 2017 to drive labor market transformation through collective action.

Dell also participates in the RBA's Responsible Minerals Initiative ("RMI"), which provides tools for conducting due diligence on minerals processing in our supply chain. While we do not purchase minerals directly from mines, smelters, or refiners, our responsible sourcing requirements extend throughout our entire supply chain to address risks of forced and child labor deeper in our materials supply chain. Dell's due diligence process is designed to align with the five-step due diligence framework set forth in the Organisation for Economic Co-operation and Development's "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, 3rd Edition (2016)" and the related Supplements for 3TG. More information is available in the Dell Technologies Conflict Minerals Disclosure Report.

Addressing risks of modern slavery and child labor

Dell's human rights due diligence efforts utilizes robust risk assessments, audits, supplier certifications, training, as well as continuous monitoring. Dell's risk-based approach ensures that direct Suppliers operating in high risk locations and manufacturing high risk commodities will be in scope for our risk mitigation programs, such as onsite audits, corrective actions, capability building, and accountability measures such as quarterly business reviews. Lower risk Suppliers may be required to participate in select programs only.

While we prioritize these efforts on direct Suppliers, we have similarly implemented initiatives for Suppliers in key parts of Dell's indirect supply chain, including workers employed by Suppliers known as Onsite Service Providers (OSPs). OSPs that provide a range of services, which include but are not limited to janitorial, security, or food and cafeteria management services. Most commonly, Dell has investigated and mitigated risks to FMWs in situations involving OSPs in locations where worker fees might be culturally accepted.

1. RISK ASSESSMENT: Dell conducts an annual internal assessment of supply chain risk based on the commodity produced and independent research that identifies labor risks associated with geographic locations, spend, past Supplier performance, and other targeted risk factors. This risk assessment incorporates data on human trafficking incidence from sources including, but not limited to, the U.S. State Department's annual "Trafficking in Persons Report", The Global Slavery Index, and the U.S. Department of Labor's [Bureau of International Labor Affairs](#). Our risk assessment further considers local risk factors, including human rights risk, country governance, and accountability. The risk assessment includes known industry risks identified through the RBA's Risk Assessment Platform, and we incorporate new data or information as it becomes available.

2. AUDITS: Suppliers are selected for audits based on risk. While we audit all high-risk Suppliers at least every two years, our audit program also includes medium and low risk Suppliers, as appropriate. As part of the audit process, auditors review documents, observe daily work practices, and independently interview Supplier management, workers, and contractors to assess the implementation of the RBA Code. In FY25, auditors conducted 14,889 confidential feedback interviews as part of the audit process.

Audits are completed by third-party, RBA-certified auditors to ensure full RBA Code coverage and consistency of interpretation of requirements. Auditors are qualified by the RBA based upon a combination of RBA-specific training, relevant industry training (i.e., for certain health/safety or environmental disciplines), and minimum threshold levels of field experience under certified RBA lead auditors. Auditors, including those involved in unannounced investigations, monitor Suppliers' adherence to over 40 provisions covered by the RBA Code. This includes evaluating Suppliers' policies and practices aimed at mitigating human trafficking risks and implementing effective controls. When areas of nonconformance with the RBA Code 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- and/or Dell-defined timelines, whichever is earliest. Priority and major findings require prompt resolution. Once the supplier addresses an audit finding, it must be closed either by a second successful audit or Dell SER specialists, who validate that the issue has been resolved. The timeliness and completeness of the CAPs are highlighted in the Suppliers' quarterly business reviews to ensure alignment and timely action.

Auditors also assess Supplier management and oversight of sub-tier Suppliers, with a particular emphasis on labor brokers or recruiters. Auditors are frequently re-certified to updated RBA Code standards and expectations. Auditors are trained on RBA Code requirements concerning confidentiality, as well as worker interview skills, particularly for forced labor or other labor issues that workers may be reticent to discuss.

Importantly, site audits include areas where workers' freedom of movement may be restricted or constrained, such as dormitories, canteens, storage, and/or common areas. Access to these areas may

facilitate the identification of known forced labor indicators, including a lack of freedom of movement, inadequate or substandard housing, or unreasonable fees for food and housing.

Auditors review documents related to the labor provisions of the RBA Code (including documents related to working hours, pay slips with wages, benefits and deductions, among others) and interview workers to understand their working conditions, verify compliance with labor standards, and identify any potential issues related to health, safety and worker rights. Auditor interviews of workers are key, for example, in identifying expenses or deductions in factory pay slips, which may not reflect the use of a labor recruiter involved in the hiring process. Interviews also help identify more severe findings, such as the withholding of identity documents. Workers can provide information safely and confidentially before, during, or after an audit, and this type of stakeholder engagement is an essential part of robust human rights due diligence.

3. GRIEVANCE: Workers selected for interviews during onsite audits are given a communication card with access to Dell's and/or RBA's (for audits of a Supplier shared with other RBA members) helpline to provide anonymous feedback outside the factory and outside the audit process, if they prefer.

While helpline usage related to an audit is a critical verification for the audit, Dell's third-party operated supply chain grievance mechanism can be used for any concerns that arise outside the two-year audit cycle. Any issues that meet the defined RBA Code criteria are escalated through established procedures to ensure issues are promptly addressed along with the determination of the root cause.

This third-party operated mechanism is in addition to Dell Technologies own established grievance mechanism, Speak Up, which is available to anyone globally, including team members, partners, Suppliers, or their employees, or any other internal or external stakeholder to report concerns or issues they believe may violate Dell's Code of Conduct, Dell's Human Rights Policy, or any other related Dell policies or standards or applicable laws. Dell will promptly investigate allegations and take appropriate action, where necessary, to mitigate actual or potential adverse human rights impacts. 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 regardless of the helpline a worker chooses to use.

Any allegations of modern slavery or modern slavery risks, or child labor or child labor risks, received through these mechanisms are fully assessed and investigated immediately by Dell. Methods to research allegations include unannounced visits by our SER specialists and/or third-party auditors. Depending on the nature of any findings, these specialists work with Suppliers to develop corrective action plans to address modern slavery and child labor risks and/or remediate instances of modern slavery and child labor. In cases of severe (priority and/or major) findings, Suppliers may be required to complete a third-party closure audit to resolve the issue.

Our audit process verifies that all Suppliers have helpline mechanisms in place. This is a requirement for RBA Code compliance to enable Suppliers to receive worker feedback and create processes to directly address and/or improve issues outside of an audit.

All workers within our supply chain fall within the scope of Dell's assurance procedures, including those migrating for work. Dell's SER initiatives apply to workers in final assembly, direct, and sub-tier Suppliers regardless of their form of employment. Whether a worker is directly hired or is in an indirect, contract,

dispatch, or temporary employment relationship, the labor protections apply. We use audits to supplement our Supplier Engagement, Capability Building, and Assessment program and internal tracking mechanisms to monitor Suppliers' performance to our requirements. These audits are part of our overall strategy to responsibly manage our supply chain, identify risks, and interact with workers. Audit findings that indicate potential risks of forced labor, human trafficking, and child labor are immediately addressed and tracked until closed. Repeat findings are incorporated into our risk assessments.

4. ACCOUNTABILITY: Compliance with [Dell's Supplier Principles](#), which includes the [Dell's Vulnerable Worker Policy](#), is a contractual obligation for Suppliers. These policies include requirements to directly address risks of forced labor, human trafficking, and child labor and strictly prohibit forced and child labor. Dell reserves the right to take any and all available actions against Suppliers for violations of the Supplier Principles or the Vulnerable Worker Policy, including without limitation the reduction of business, frequent required onsite compliance auditing at Supplier's expense (including but not limited to dormitories, canteens, storage and common areas), employee compensation at Supplier's expense, and/or termination of Dell's contract with the Supplier. Compliance with these requirements is evaluated through the mechanisms detailed below.

Internal accountability standards and procedures help confirm that workers and Suppliers meet Dell's supply chain standards. Supplier accountability occurs through mechanisms ranging from audit corrective action procedures to Dell executive review of Supplier performance and quarterly business reviews to ensure alignment and timely action. Typically, this occurs during Supplier quarterly business reviews, which are attended by key executives to help determine future business awards, Supplier resources and policies, as well as to address progress toward aligned goals. Where there is a "priority" or "major" Supplier audit finding in relation to forced labor or child labor, this issue is escalated for review at an executive level to ensure timely review by executives. Dell maintains an internal tracking system of RBA audit findings that allows for continuous performance monitoring and regular reporting on open issues and due dates. Closure audits are conducted to confirm priority and major findings have been resolved. Commodity teams are measured during their quarterly and annual performance scorecards with the audit performance and closure status of RBA audit issues for Suppliers they manage. Procurement executives receive monthly reports on Suppliers with any audit findings that suggest risks of forced labor, human trafficking, and child labor and hold Suppliers accountable to address the risks.

Suppliers are required to conduct a root cause analysis and develop a plan to address issues found during an audit within RBA-specified timelines, including findings associated with forced labor conditions. Dell's SER team works with Suppliers to determine root causes, provide targeted capability-building, and monitor corrective action plans to closure. As part of capability building, Dell develops corrective action plan (CAP) toolkits that provide resources to help Suppliers address audit findings in relation to labor and ethics risk (including forced labor) and enhance Dell's review of CAPs developed by Suppliers. These CAP toolkits help Suppliers address modern slavery risks, particularly in locations that are heavily reliant on internal country migrants and FMWs who frequently work through labor agents.

Suppliers are responsible for effectively managing agents as well as bearing the full cost of the recruitment process (i.e., at no point charging workers for recruitment fees). Suppliers cannot delegate the ownership and responsibility of implementing the 'no recruitment fees' policy to labor agents, even as individual tasks are delegated. This applies for the full journey of the worker from home country to

final factory. If employees are found to have been paying recruitment fees to their employer or a third-party labor broker, Dell will work with Suppliers to repay the workers.

5. TRAINING AND CAPABILITY BUILDING: Expectations to comply with laws and ethical business practices, including 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 Code). Dell Technologies team members are required to complete annual Dell Code training and adhere to our code and standards, including adherence to the RBA Code, which sets out required protections against forced, bonded, or indentured labor, human trafficking, child labor, and more.

Dell requires internal supply chain professionals and manufacturing operations teams to take Supplier Principles & Forced Labor training on an annual basis. Our focus on identifying even potential risks of slavery, human trafficking, and child labor is part of a larger effort to encourage business integrity, ethical conduct, and supply chain transparency and accountability.

In FY25, the reach of our capability building program, including forced labor and labor rights training, remained significant:

- a. 1,723 unique participants attended our Supplier capability building training programs.
- b. 425 unique Supplier factories were represented.
- c. 15,984 hours of capability building training on social and environmental responsibility topics were completed.

In addition, audit scores of Suppliers who have previously attended training are analyzed for effectiveness and to improve or clarify training if needed.

6. EFFECTIVENESS: Dell measures and monitors the cumulative impact of its various programs. By analyzing relevant performance indicators, we gain insights into the effectiveness of our initiatives.

In FY25, we continued to see clear year-over-year improvement in Supplier factory audit performance, with 65.9% of factories that went through at least their second audit cycle improving or maintaining their audit scores, up from 63.0% last year. This includes final assembly Suppliers (75.0%), direct Suppliers (61.8%) and sub-tier Suppliers (69.5%). This continued improvement highlights our successful Supplier capability building efforts to ensure they understand the RBA Code requirements and expectations, helping them to successfully prepare for audit and address findings, as appropriate.

Dell sets Supplier target audit scores that align with the RBA Validated Assessment Program's tiered high performance system. The RBA levels of recognition are Platinum (minimum VAP score of 200, with all Priority, Major, and Minor findings closed), Gold (minimum VAP score of 180, with all Priority and Major findings closed), and Silver (minimum VAP score of 160, with all Priority findings closed). Dell's target audit scores for Suppliers are at least 180 out of 200 for final assembly factories and 160 out of 200 for other factory tiers.

In FY25, we continued to see significant progress in the rate of Suppliers who attained our target audit scores, with 81.0% of our factories achieving high performance status, meaning they scored at least 180 out of 200 available points for final assembly factories, or 160 out of 200 available points for other

factory tiers and had no priority findings. These scores reflect Suppliers' commitments to corporate responsibility and effective remediation of identified issues.

Where recruitment fees either to the Supplier or a labor broker have been used, we work with Suppliers to return recruitment fees to affected workers. By requiring Suppliers to address fee payment issues when they occur and reinforcing responsible employment and recruitment practices through our SER specialists, we drive accountability and ensure continuous improvement. In FY25, we worked with Suppliers to return \$919,906 in recruitment fees, impacting 1,505 workers. Over the last five years, Dell has facilitated the return of \$7,710,314 fees, impacting a total of 28,601 workers. The return of these fees over time highlights our commitment to consistent identification and remediation of forced labor risks.

Understanding that the risks of forced and child labor are ever-evolving, we are committed to continuous improvement, monitoring supplier performance, and reviewing our mitigation efforts for effectiveness.

Signature:

A handwritten signature in black ink, appearing to read 'C. Garcia', with a stylized flourish at the end.

Christopher A. Garcia

Assistant Secretary & Senior Vice President Dell Inc.

Last revision date: 19-MAY-2025

