

Company Name Dell
Industry ICT (Supply Chain and Own Operations)
UNGP Core Score (*) 8.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
0	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
0.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
1	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1.5	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
1	2	C.7 Remedying adverse impacts and incorporating lessons learned
8.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: General HRs commitment: The Company indicates: 'Dell Inc. (Dell) supports and respects internationally-recognized human rights of all people. We are committed to making certain that we are not complicit in any human rights violations, and hold our suppliers and partners to this same high standard' [Dell Human Rights and Labor Policy Statement, 2018: i.dell.com] • Met: UNGC principles 1 & 2: The Company states: 'Dell Inc. (Dell) supports and respects internationally-recognized human rights of all people. We are committed to making certain that we are not complicit in any human rights violations, and hold our suppliers and partners to this same high standard. Dell has adopted the principles below as informed by international standards and conventions including, among others: the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, UN Global Compact, Rio Declaration on Environment and Development, UN Convention Against Corruption, the UN Conventions on Rights of the Child, and fundamental conventions of the International Labour Organization (ILO), and understands our responsibility to respect and support human rights.' [Dell Human Rights and Labor Policy Statement, 2018: i.dell.com] • Met: UDHR: As indicated above, the Company has adopted the UDHR in its Human Rights Policy. [Dell Human Rights and Labor Policy Statement, 2018: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: UNGPs: As stated in the document, the Company adopts UNGPs in its Human Rights Policy. [Dell Human Rights and Labor Policy Statement, 2018: i.dell.com]
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: ILO Core: The Company indicates the following: 'The Responsible Business Alliance (RBA) Code of Conduct establishes standards for safe working conditions and environmentally responsible and ethical business operations in which workers are treated with respect and dignity. Dell has fully adopted the Code for our own operations, and we expect our suppliers to abide by the Code and to expect the same of their suppliers'. The RBA Code of Conduct includes specific provisions against the use of forced labour, child labour and discrimination, as well as protections related to freedom of association and collective bargaining. However, regarding freedom of association and collective bargaining, It is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in conformance with local law'. Additionally, in its Human Rights and Labour Policy Statement, it states 'Dell has adopted the principles below as informed by international standards and conventions including, among others: [...] fundamental conventions of the International Labour Organization (ILO), and understands our responsibility to respect and support human rights.' However, 'informed by' is not considered a formal statement of commitment according to CHRB wording criteria. [Dell Supplier Principles, 12/2017: i.dell.com & Responsible Business Alliance Code of Conduct, 2018: responsiblebusiness.org] • Not met: UNGC principles 3-6: The Company discloses 'Dell has adopted the principles below as informed by international standards and conventions including, among others: [...] UN Global Compact'. However, 'informed by' is not considered a formal statement of commitment according to CHRB wording criteria. No evidence found of Dell being signatory to the UN Global Compact. [Dell Human Rights and Labor Policy Statement, 2018: i.dell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Explicitly list ALL four ILO for ICT suppliers: As above, the Company expects suppliers to abide by the RBA Code of Conduct. However, as indicated above, the RBA code requirements regarding freedom of association and collective bargaining is not considered a formal statement of commitment according to CHRB wording criteria. [Dell Supplier Principles, 12/2017: i.dell.com & Responsible Business Alliance Code of Conduct, 2018: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: See above. [Dell Supplier Principles, 12/2017: i.dell.com & Responsible Business Alliance Code of Conduct, 2018: responsiblebusiness.org] • Met: Respect H&S of workers: The Company indicates: 'We will operate our businesses in a manner that protects the health and safety of our employees, contractors, visitors and neighbors, while maintaining full compliance with applicable laws, regulations and voluntary obligations'. Moreover, it states: 'We will provide safe and healthy working conditions and require the same of business partners and contractors working on behalf of Dell'. [Dell Global Occupational Health and Safety Policy, 15/01/2019: i.dell.com] • Met: H&S applies to ICT suppliers: The Company states on its website: 'We're committed to creating safe environments for workers across our supply chain, minimizing risks and having the right procedures in place to avoid or resolve issues quickly'. [Human Rights, 20/12/2019: corporate.delltechnologies.com] • Not met: working hours for workers: The Company indicates the fully adoption of RBA Code of Conduct for itself and its suppliers, where it mentions 60 hours as the maximum of workweek. However, the Company does not provide any evidence against ILO standards nor clarifications regarding regular working hours in its own operations. [Dell Human Rights and Labor Policy Statement, 2018: i.dell.com] • Not met: Working hours for ICT suppliers: The Company discloses: 'We require all suppliers to abide by the Responsible Business Alliance standard of a maximum 60-hour work week, at least one rest day and no mandatory overtime – as a minimum – or comply with local laws, whichever is stricter. We've also implemented a working hours monitoring program to help us track performance and compliance with our expected standards.' However, it does not mention the ILO Standard or not exceeding 48 hours per week. [Human Rights, 20/12/2019: corporate.delltechnologies.com]
A.1.4	Commitment to engage with stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to stakeholder engagement: The Company discloses on its website the engagement with stakeholders in order to identify material issues, which are listed on its website. It states: 'To ensure our focus for our social impact work is clear, we conducted a thorough analysis in 2018-2019 of our material issues in conjunction with consulting firm SustainAbility, beginning with a review of external corporate sustainability and philanthropy frameworks and trends, benchmarking our peers and analyzing customers' Requests for Proposal (RFPs) to identify trends in topics they care about. We also gathered insight from a diverse set of internal and external stakeholders including senior executives across Dell Technologies, suppliers, customers representing different sectors, nongovernmental organizations (NGOs) and thought leaders. Additionally, we surveyed Dell Technologies employees.' However, it does not indicate a formal commitment to engagement with potentially or actually affected stakeholders neither an ongoing engagement. [Materiality and Stakeholder Engagement, 12/11/2019: corporate.delltechnologies.com] • Not met: Regular stakeholder engagement: While the Company works with various initiatives, no details found of actual regular affected stakeholder engagement. The Company provided further information regarding this indicator, however, the evidence was not material. This indicator looks for cases of regular engagement with affected stakeholders (employees, workers in the supply chain, local communities, local authorities, etc.) [Dell Supply Chain Sustainability Progress, 2018: corporate.delltechnologies.com & 2019 Supply Chain Sustainability Progress Report, 22/06/2020: corporate.delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to remedy: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Collaborating with other remedy initiatives • Not met: Work with ICT suppliers to remedy impacts: The Company indicates: 'Dell's Supply Chain Sustainability team works closely with procurement teams to monitor social and environmental performance. We incorporate discussions about social and environmental progress in suppliers' quarterly business reviews to ensure their sustainability progress mirrors that of Dell Technologies.' However, no evidence found of commitment to work with its suppliers in order to remedy its adverse impacts, either through the business relationship's own mechanism, or through the development of third party non-judicial remedies'. [Accountability, 20/12/2019: corporate.delltechnologies.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions: See indicator A.1.2. Companies are awarded this if they are committed either to the ILO Declaration or the UN Global Compact. • Not met: Senior responsibility for HR: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. This indicator looks for description of the senior management level person/body to which responsibility for human rights is allocated. [Statement Against Slavery and Human Trafficking (2020 update), 07/2020: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Met: Day-to-day responsibility for ICT in supply chain: The Company indicates in the know the chain response that 'The Supply Chain Risk, Tools and Governance organization within Dell's Global Operations organization has a Social and Environmental Responsibility (SER) team. The SER team consists of programs and operations teams responsible for reducing the risk of forced labor within the supply chain. The team works cross-functionally across Global Operations (including procurement and manufacturing) and includes specialists dedicated to monitor and train suppliers'. [Know the Chain additional disclosure, 2020: business-humanrights.org]
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: Although The Company indicates supplier risks evaluation, it does not mention risk identification in its own operations. [Accountability, 20/12/2019: corporate.delltechnologies.com] • Not met: Identifying risks in ICT suppliers: The Company states on its website: 'Every year, Dell evaluates supplier risk and develops an annual audit plan for our supplier facilities. During our risk assessment process, we evaluate all direct material suppliers based on geographic location, business relationship, manufacturing processes, past SER performance, and public report.' Additionally, in its Supply Chain Sustainability Report, it states 'We evaluate potential suppliers for risks and those with high-risk indicators complete an audit based on the Responsible Business Alliance (RBA) Code of Conduct as part of the social and environmental responsibility qualification process.' However, it is not clear how this supplier evaluation and assessment is used to identify which are the human rights risks and impacts that the Company faces across its supply chain. Also in its Supply Chain Sustainability Report, the Company discloses 'Working across a global and complex supply chain, we operate one of the largest assurance and engagement programs in the sector. Through it, we can proactively identify and solve issues in different tiers of the supply chain, including final assembly, direct, and sub-tier.' However, it is unclear how this is used to identify potential human rights risks. This indicator looks for evidence of how the Company follows a process to identify potential risks and impacts. Current evidence seems to focus in assessing risky suppliers. [Accountability, 20/12/2019: corporate.delltechnologies.com & 2019 Supply Chain Sustainability Progress Report, 22/06/2020: corporate.delltechnologies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification: The Company reports: 'Identifying priorities in corporate social responsibility (CSR) is a complex and thorough process. It involves a broad mix of tactics, including business introspection, industry analysis, environmental and community impact review, and stakeholder engagement beyond traditional business analytics. Through our analysis, we can identify and mitigate risks while leveraging opportunities that improve our business and the world around us. This includes helping our customers achieve their goals while improving the environment and well-being for all in our value chain.' However, it is not clear how the process includes Human Rights risks and impacts in the Company's operations. Nothing further found in latest version of the report. [Dell FY19 Corporate Social Responsibility Report, 2019: corporate.delltechnologies.com & FY20 Social Impact Report, 21/07/2020: corporate.delltechnologies.com] • Not met: In consultation with stakeholders: The Company consults stakeholders to construct a materiality matrix to identify important risks. However, no evidence could be found of consultation with affected stakeholders to identify potential human rights risks. [FY20 Social Impact Report, 21/07/2020: corporate.delltechnologies.com] • Not met: In consultation with HR experts: 'Internal assessment of supply chain risk based on commodity produced, independent research that identifies labor risks associated with geographic locations, spend, past performance, and other targeted risk factors. This risk assessment is conducted annually and incorporates data on human trafficking incidence from the U.S. State Department's annual "Trafficking in Persons Report," as well as other risk factors including human rights risk and country governance and accountability. Dell also collaborates with our industry peers through the Responsible Labor Initiative (RLI, a sub-group initiative to the RBA) to address identified risks in the supply chain to drive accountability and corrective actions with suppliers.' However, it is unclear if the Company works with human rights experts to identify potential labour rights risks across all operations. [2020 Modern Slavery Statement, 01/07/2020: i.dell.com] • Not met: Triggered by new circumstances
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Salient risk assessment (and context): 'Internal assessment of supply chain risk based on commodity produced, independent research that identifies labor risks associated with geographic locations, spend, past performance, and other targeted risk factors. This risk assessment is conducted annually and incorporates data on human trafficking incidence from the U.S. State Department's annual "Trafficking in Persons Report," as well as other risk factors including human rights risk and country governance and accountability. Dell also collaborates with our industry peers through the Responsible Labor Initiative (RLI, a sub-group initiative to the RBA) to address identified risks in the supply chain to drive accountability and corrective actions with suppliers'- [2020 Modern Slavery Statement, 01/07/2020: i.dell.com] • Not met: Public disclosure of salient risks: The Company discloses results of supplier compliance audits in its annual Supply Chain Sustainability Report. Additionally, in the Social Impact Report, it reports that it has identified human rights as a material risk. However, no disclosure of the human rights risks the Company has found to be salient could be found. [FY20 Social Impact Report, 21/07/2020: corporate.delltechnologies.com & 2019 Supply Chain Sustainability Progress Report, 22/06/2020: corporate.delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks • Not met: Including in ICT supply chain: The Company discloses details regarding results from audit processes, which include corrective action plans. However, no description of a global system to take action to prevent, mitigate or remediate its salient human rights issues could be found. This indicator looks for evidence of broad actions carried out, from a risk-based approach, to mitigate the different salient issues determined by the Company. [2019 Supply Chain Sustainability Progress Report, 22/06/2020: corporate.delltechnologies.com & Know the Chain additional disclosure, 2020: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Example of Actions decided: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. As indicated above, the Company reports in relation to corrective action plans in the context of non-compliances found. This indicator looks for examples of actions carried out from a risk perspective, to mitigate a specific human rights salient issue. Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: System to check if Actions are effective: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. • Not met: Lessons learnt from checking effectiveness Score 2 <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: In order to be awarded this indicator, the Company needs to achieve at least 1,5 points in B.2.1 • Not met: Comms plan re assessing risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2 • Not met: Comms plan re action plans for risks: In order to be awarded this indicator, the Company has to achieve a full score in B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including ICT suppliers: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 Score 2 <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: 'When allegations are received via this helpline, we investigate through all means available to us which can include unannounced visits by Dell Technologies' on-the-ground specialists and third-party auditors. Based on what we find, we request factory managers develop and carry out Corrective Action Plans to address any issues identified. Depending on the seriousness of the issue, suppliers are required to go through another third-party closure audit to make sure necessary changes agreed to in Corrective Action Plans have been made.' However, it is unclear how the Company responds to the affected stakeholders in terms of communication. [2019 Supply Chain Sustainability Progress Report, 22/06/2020: corporate.delltechnologies.com] • Not met: Ensuring affected stakeholders can access communications: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material.

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Channel accessible to all workers: The Company states: 'If you have an ethics concern or suspect that someone is behaving illegally or unethically, please speak up. Talk to your leader, call the Ethics Helpline, submit an online report via the web-based Ethicsline, send an email to ethics@dell.com or use any of the other resources and reporting avenues described in the Code or on the Global Ethics & Compliance intranet site.' [How We Win, 09/2017: corporate.delltechnologies.com] Score 2 <ul style="list-style-type: none"> • Not met: Number grievances filed, addressed or resolved • Met: Channel is available in all appropriate languages: The EthicsPoint website is available in over 20 different languages. [EthicsPoint, N/A: secure.ethicspoint.com] • Met: Opens own system to ICT supplier workers: Dell Technologies Partner Code of Conduct is applicable to all suppliers, employees, independent contractors and downstream partners. The Company provides some channels where workers can report Code violations. It includes Dell's Global Ethics and Compliance Office, Audit Committee of the Dell Board of Directors, Dell's Ethics Helpline and Dell's Privacy team. The channel is available to 'anyone' [Dell Technologies Partner Code of Conduct, 2019: corporate.delltechnologies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company discloses the following regarding the EthicsPoint system: 'Dell Ethics Helpline and the Ethics Web Form were created so that team members and external parties can ask for help or raise concerns/issues'. [EthicsPoint FAQ, N/A: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The EthicsPoint system is available online in a variety of languages. [EthicsPoint, N/A: secure.ethicspoint.com] • Not met: Expects ICT supplier to have community grievance systems • Not met: ICT supplier communities use global system: The Company discloses in its Supply Chain Sustainability Report that 'Calls received from supplier employees or others on their behalf give us another level of understanding of supply chain issues and help enable us to monitor implementation of our expectations.' <p>Additionally, in its Statement Against Slavery and Human Trafficking, it discloses that it 'contracts an independent third-party service provider to run a helpline to ensure workers' rights and safety are respected and to enhance the well-being of worker communities through tripartite communications. The helpline is independent and acts as both a grievance mechanism for the worker (covering grievance and information on common psychological issues and conflict resolution) and as an alert mechanism for Dell to understand issues impacting workers.'</p> <p>However, although the mechanism is available for third parties to raise complaints on behalf of workers, and is used to 'enhance the well-being of worker communities', no evidence of suppliers' external stakeholders having access to the system in order to raise grievances against suppliers could be found. [2019 Supply Chain Sustainability Progress Report, 22/06/2020: corporate.delltechnologies.com & 2020 Modern Slavery Statement, 01/07/2020: i.dell.com]</p>
C.7	Remedying adverse impacts and incorporating lessons learned	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The Supply Chain Sustainability Report discloses the following example: 'In 2019 a call from a supplier employee to our helpline prompted an unannounced visit by Dell Technologies' on-the-ground specialists to a supplier factory. We wanted to investigate claims of inaccurate pay for overtime. During our visit, we interviewed employees and managers to gain a better understanding of the conditions and the helpline claims. We found that for 17 employees, pay was not consistent with the working hour sheets and overtime wages. As a result, the supplier developed and carried out a three-month action plan. During this time our on-the-ground specialists provided technical expertise to the supplier and the procurement team helped to track progress and reinforce Dell Technologies' policies around working hours and overtime wages. The supplier has now paid all overtime, and we have confirmed the remedy of this issue with affected workers. We continue to work with this supplier to solve working hour issues and promote employee wellbeing. The supplier will undergo a third-party RBA audit to confirm the issues have been remediated'. [2019 Supply Chain Sustainability Progress Report, 22/06/2020: corporate.delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: Dell accused of child labour in DRC • Area: Child labour, working hours, health & safety • Story: On December 15, 2019, a legal complaint has been filed in US by human rights group Rights Advocates on behalf of 14 families from the Democratic Republic of Congo (DRC) against Tesla, Microsoft, Alphabet, Dell, and Apple. The lawsuit accused the companies of aiding and abetting in the death and serious injury of children who they claim were working in cobalt mines owned by Glencore. It alleged that the defendants have known for a "significant period of time" that Congo's mining sector "is dependent upon children." The claim further alleged that cobalt from the Glencore-owned mines was then sold to Umicore, which in turn then sells battery-grade cobalt to Apple, Google, Tesla, Microsoft, and Dell. <p>The lawsuit alleged that the children, some as young as 6 years old, were forced by their families' extreme poverty to leave school and work in cobalt mines owned by Glencore. According to the complaint, 6 of the 14 children were killed in tunnel collapses, while others suffered life-altering injuries, including paralysis. Some children were allegedly paid USD 1.50 a day, working 6 days a week.</p> <p>According to the complaint, the main drivers of the cobalt supply chain are Glencore/Umicore and Zhejiang Huayou Cobalt Company. Knowing that the tech boom was going to cause a major surge in demand for cobalt, these companies allegedly stepped in to dominate the market and develop reliable sources for DRC cobalt.</p> <p>The complaint claimed that "Umicore and Glencore formally agreed to form a venture in which Glencore's DRC cobalt from, among other places, Glencore's mines operated by KCC, MUMI and Katanga Mining, where most of the plaintiffs were severely injured or killed, and Umicore would sell the cobalt to the defendants. All of these companies were formally locked in a "venture" that was created to mine cobalt using young children to perform hazardous labor. The venture was also allegedly established to preserve the existing supply chains of cobalt in the DRC to create plausible deniability for all involved. In the refining process, Umicore reportedly intentionally mixes the cobalt mined by children working under hazardous conditions with other cobalt and takes other steps to impair the traceability of the DRC cobalt to give Defendants Apple, Alphabet, Dell, Microsoft and Tesla plausible deniability as to the source of the cobalt they purchase from Umicore."</p> <p>The lawsuit further alleged that "based on the Congolese Mining Code, only Congolese nationals can work as artisanal miners, so Glencore arranged to set up a sham cooperative, CMKK (Coopérative Minière Maadini kwa Kilimo), with Congolese nationals as leaders. CMKK then put a Lebanese man known as "Ismail" in charge of buying the output of the artisanal miners at Tilwezembe to sell to Glencore."</p> <ul style="list-style-type: none"> • Sources: [The Guardian - 16/12/2019: theguardian.com][PacerMonitor - 15/12/2019: pacermonitor.com]
E(1).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: According to the press, the Company is 'currently investigating these allegations, and have informed the Responsible Minerals Initiative as part of their grievance mechanism.' [Apple and Google named in US lawsuit over Congolese child cobalt mining deaths, 16/12/2019: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(1).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Company policies address the general issues raised: According to the Human Rights and Labor Policy, the Company's policies are informed by the ILO fundamental conventions, which includes child labour. While the Company has a working hours policy for suppliers, no policy could be found for its own operations. [Dell Human Rights and Labor Policy Statement, 2018: i.dell.com & Human Rights, 20/12/2019: corporate.delltechnologies.com] • Met: Policies apply to the type of business relationships involved: The Human Rights and Labor Policy also applies to suppliers. As stated above, the Company has a policy on working hours for suppliers. [Dell Human Rights and Labor Policy

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Statement, 2018: i.dell.com & Human Rights, 20/12/2019: corporate.delltechnologies.com Score 2 • Not met: Policies address the specific rights in question
E(1).3	The Company has taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages with affected stakeholders: Though the company states that 'We're currently investigating these allegations, and have informed the Responsible Minerals Initiative as part of their grievance mechanism' there is no further evidence it engaged with stakeholders • Not met: Provides remedies to affected stakeholders: Though the company states that 'We're currently investigating these allegations, and have informed the Responsible Minerals Initiative as part of their grievance mechanism' there is no further evidence it provided remedies • Not met: Has reviewed management systems to prevent recurrence: Though the company states that 'We're currently investigating these allegations, and have informed the Responsible Minerals Initiative as part of their grievance mechanism' there is no further evidence it already reviewed its management systems following the lawsuit Score 2 • Not met: Remedies are satisfactory to the victims • Not met: Has improved systems and engaged affected stakeholders

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a

company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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