

Company Name Dell
Industry ICT (Own Operations and Supply Chain)
Overall Score 27.2 out of 100

Theme Score	Out of	For Theme
2.3	10	A. Governance and Policies
8.4	25	B. Embedding Respect and Human Rights Due Diligence
8.0	20	C. Remedies and Grievance Mechanisms
5.9	25	D. Performance: Company Human Rights Practices
2.5	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	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: General HRs commitment: The Company states in its Human Rights Policy that it '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'. [Human Rights Policy, 12/2021: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Commitment to the UNGPs: The Company indicates in its updated Human Rights Policy: 'We are committed to making certain that we are not complicit in any human rights violations, and we hold our suppliers and other business partners to this same standard. We strive to align our approach and actions to fulfil this commitment with the UN Guiding Principles on Business and Human Rights, and the Principles of the United Nations Global Compact, to which Dell is a Signatory.' However, 'to strive to align to fulfil the commitment with' is not considered a formal statement of commitment according to CHRB wording criteria. The Company has provided additional comment/source to CHRB during engagement regarding this indicator. However, evidence was not material. [Human Rights Policy, 12/2021: i.dell.com] Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO	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"> Met: Company has a commitment to the ILO Core: The Company states in its Human Rights Policy that it 'respects the human rights of all people as reflected in [...]the International Labour Organization's (ILO's) Declaration on Fundamental

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	Declaration on Fundamental Principles and Rights at Work		<p>Principles and Rights at Work'. [Human Rights Policy, 12/2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org]</p> <ul style="list-style-type: none"> • Not Met: Company has a explicit commitment to All four ILO Core: The Company indicates in its Human Rights Policy: 'Dell has adopted the Responsible Business Alliance (RBA) Code of Conduct for itself and its suppliers'. The RBA Code includes requirements related to ILO Core, including: no discrimination, no child labor and no forced labor. With respect freedom of association and collective bargaining, this Code indicates: In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.' However, it is not clear whether the Company is requiring to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases, companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Policy, 12/2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company expect suppliers to commit to ILO Core: In its Supplier Principles, the Company indicates: 'Suppliers must comply with: [...] The Responsible Business Alliance (RBA) Code of Conduct [...] Relevant International Labor Organization (ILO) conventions, including the eight fundamental conventions and conventions 1, 102, 131, 155 and 170'. [Supplier Principles, 2021: i.dell.com] • Not Met: Company explicitly list All four ILO for suppliers: The Company indicates in its Human Rights Policy: 'Dell has adopted the Responsible Business Alliance (RBA) Code of Conduct for itself and its suppliers.' On the other hand, the RBA Code of Conduct 7.0, includes requirements related to ILO Core, including: no discrimination, no child labor and no forced labor. With respect freedom of association and collective bargaining, this Code indicates: In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities'. However, it is not clear whether the Company is requiring to respect those rights in all contexts, as it indicates 'in conformance with local law'. In these cases, companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Policy, 12/2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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"> • Met: Commitment to 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 neighbours, 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'. [Global Occupational Health and Safety Policy, 06/2020: i.dell.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Company indicates in its Human Rights Policy: 'Dell has adopted the Responsible Business Alliance (RBA) Code of Conduct for itself and its suppliers'. The RBA Code indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. The Company provided feedback to this indicator nor clarifications regarding regular working hours. [Human Rights Policy, 12/2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: The Company indicates in its Human Rights Policy: 'Dell has adopted the Responsible Business Alliance (RBA) Code of Conduct for itself and its suppliers.' The RBA Code of Conduct includes health and safety requirements, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. [Human Rights Policy, 12/2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Company indicates in its Human Rights Policy: 'Dell has adopted the Responsible Business Alliance (RBA) Code of Conduct for itself and its suppliers'. The RBA Code indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. All overtime must be voluntary. Workers shall be allowed at least one day off every seven days'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Human Rights Policy, 12/2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org]
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	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: Responsible mineral sourcing: The Company states in its 'Responsible Sourcing Policy' that it is 'committed to the responsible sourcing of materials used in our products. [...] Mining is an intensive process, and some mining operations in conflict-affected and high-risk areas have been linked to human rights violations including child labor, labor abuses, and environmental degradation. It is Dell's goal not to purchase product materials containing minerals whose sale directly or indirectly finance armed conflict or contribute to human rights abuses. In those regions where conflict and poor labor practices in mining operations are more prevalent, we are committed to supporting those suppliers who practice responsible sourcing'. [Responsible Sourcing Policy, 2018: i.dell.com] • Met: Based on OECD Guidance: In addition, the Company indicates: 'we follow the OECD Due Diligence Guidance for Responsible Supply Chains from Conflict-Affected and High-Risk Areas to investigate our supply chain and engage with suppliers.' [Responsible Sourcing Policy, 2018: i.dell.com] • Met: Requires suppliers to commit to responsible mineral sourcing: The Company indicates in its Suppliers Principles document that it 'is committed to the responsible sourcing of materials used in our products, and expects our suppliers to adhere to the same high standards. Suppliers shall have a policy to assure that products manufactured with mineral identified as "conflict" or otherwise designated as requiring specific assurance, and incorporated in Dell-branded finished products do not directly or indirectly finance or benefit armed groups that engage in human rights violations in the Democratic Republic of the Congo or an adjoining country. Such minerals include, but are not limited to, tantalum, tin, tungsten and gold (3TG), and cobalt. The list of such minerals might vary based on the use of such minerals within Dell-branded finished products supply chain'. [Supplier Principles, 2021: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to follow OECD Guidance for all minerals: In a section of its Responsible Sourcing Policy, the Company indicates: 'Dell is committed to continuing to develop our due diligence systems to apply to the sourcing of materials beyond those defined as Conflict Minerals 3TG. As a first step, we have broadened our responsible material management system to include cobalt, which is used in the production of lithium-ion batteries, and are implementing the OECD Due Diligence Guidelines using the tools and programs of the RMI. We expect suppliers to follow this same framework and to participate in cobalt due diligence processes and capability building efforts around responsible minerals sourcing. Such minerals include, but are not limited to, tantalum, tin, tungsten, and gold (3TG), and cobalt. The list of such minerals might vary based on risk profiles and the use of such minerals within Dell Technologies branded finished products supply chain.' [Responsible Sourcing Policy, 2018: i.dell.com] • Met: Suppliers expected to make similar requirements of their suppliers: As above. And, in addition, 'Suppliers shall also conduct a supply chain survey to identify smelters and refiners of minerals, including 3TG and/or cobalt within their supply chain, and report to Dell Technologies using the last version of industry tools, including the Responsible Mineral Initiative's Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT).' [Responsible Sourcing Policy, 2018: i.dell.com] & [Supplier Principles, 2021: i.dell.com]
A.1.3.b.ICT	Commitment to respect human rights particularly	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: Migrant worker's rights: The Company indicates in its Human Rights Policy: 'Dell has adopted the Responsible Business Alliance (RBA) Code of Conduct for itself and its suppliers'. The RBA Code reads: Participants are committed to uphold the

Indicator Code	Indicator name	Score (out of 2)	Explanation
	relevant to the industry – vulnerable groups (ICT)		<p>human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including [...] migrant...and any other type of worker'. [RBA Code 7.0, 2021: responsiblebusiness.org]</p> <ul style="list-style-type: none"> • Met: Expects suppliers to respect at least one of these rights: The Company indicates in its Suppliers Principles: 'Suppliers must comply with: [...] U.N. Convention on the Rights of the Child[...]'. In addition, the RBA Code, adopted by the Company for own operations and suppliers, indicates: 'Participants are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including [...] migrant...and any other type of worker'. [Supplier Principles, 2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: CEDAW/Women's Empowerment Principles • Not Met: Child Rights Convention/Business Principles • Not Met: Convention on migrant workers • Met: Expecting suppliers to respect these rights: The Company indicates in its Suppliers Principles: 'Suppliers must comply with: [...] U.N. Convention on the Rights of the Child'. [Supplier Principles, 2021: i.dell.com]
A.1.4	Commitment to remedy	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: The Company commits to remedy: The Company states in its Human Rights Policy: '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.' [Human Rights Policy, 12/2021: i.dell.com] • Met: Company expect suppliers to make this commitment: The Company states in its Human Rights Policy: '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'. [Human Rights Policy, 12/2021: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives: The company provided feedback to this datapoint. The Company has provided feedback to CHRB regarding this subindicator. However, evidence was not material. It is not clear if the company will under no circumstances impede the access to state based judicial or non-judicial mechanism and will cooperate with any such mechanism should the situation arise. • Not Met: Work with suppliers to remedy impact: The Company states in its Human Rights Policy: '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.' However, 'to seek to engage and collaborate' is not considered a formal statement of commitment according to CHRB wording criteria. [Human Rights Policy, 12/2021: i.dell.com]
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): Although the company state on its Human Rights Policy that '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.' The statement is related to grievance mechanism while this indicator looks for clear evidence of commitment to those who for example, oppose a company's operations or have raise concern about a company's activities. [Human Rights Policy, 12/2021: i.dell.com] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board level responsibility for HRs: The Company states in its Human Rights Policy: 'Dell's Board of Directors oversees the establishment and maintenance of our governance, compliance and risk management processes and procedures to promote the conduct of our business with the highest standards of responsibility, ethics and integrity. Our Chief Executive Officer, who is also Chairman of our Board of Directors, approves this policy' However, no further information found describing specific human rights responsibilities for a specific Member / Committee outside the CEO. [Human Rights Policy, 12/2021: i.dell.com] • Not Met: Describe HR expertise of Board member Score 2 <ul style="list-style-type: none"> • Not Met: Speeches/letters by Board members or CEO
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board/Committee review HRs strategy • Not Met: Examples/trends re HR discussion in the last reporting period Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Senior responsibility for HR implementation and decision making: The Company states in its Human Rights Policy: 'Dell's Environmental, Social and Governance (ESG) Steering Committee leads and oversees the programs and policies to uphold these standards and to advance Dell's ESG strategy. The Committee includes senior leadership from Dell's corporate sustainability, diversity and inclusion, human resources, ethics and privacy, supply chain, legal, investor relations, accounting, security, corporate affairs, government affairs, giving and social innovation organizations. We provide regular reporting to the Board on ESG priorities and progress'. [Human Rights Policy, 12/2021: i.dell.com] Score 2 <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: In addition, it states: 'We have also established an internal ESG Interlock Team which meets throughout the year and is responsible for ensuring cross organizational awareness and engagement on relevant priorities and policies, and an integrated approach to fulfilment of our related commitments'. [Human Rights Policy, 12/2021: i.dell.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Senior manager incentives for human rights • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	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: HR risks is integrated as part of enterprise risk system: The Company indicates its process in order to improve its suppliers' sustainability performance. It includes risk assess, audits, corrective actions and capability building which means the development of a management system. However, no evidence found in relation to the enterprise risk management system including human rights in its process. No further information found in latest documents. [Dell FY19 Corporate Social Responsibility Report, 2019: corporate.delltechnologies.com] & [FY20 Social Impact Report, 21/07/2020: dell.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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: Score of 1 on A.1.2.a: See indicator A.1.2.a • Met: Communicates its policy to all workers in own operations: The Company indicates in its FY2021 Progress made real Report: 'Our commitments to uphold human rights (including support for diversity, equity and inclusion efforts) and ethical business practices are embedded in the Dell Technologies Code of Conduct. All Dell Technologies employees are required to complete annual Code of Conduct training. In FY21, we launched new global privacy training as part of our required annual ethics training to develop stronger awareness of the importance of privacy and customer trust'. [Progress made real report 2021, 2022: delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder • Not Met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Met: Requires suppliers to communicate policy requirements: The Company discloses to Know the Chain 'Policies on public website are incorporated into our contracts through our Supplier Principles'. The Supplier Principles include the RBA Code of Conduct, which includes details on human rights. The Company indicates that 'Suppliers are to cascade RBA requirements down to their suppliers (including labor agents) per the management systems section of the RBA code'. The RBA Code includes human rights. [Know the Chain additional disclosure, 2020: business-humanrights.org] & [RBA Code 7.0, 2021: responsiblebusiness.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company discloses to Know the Chain 'Policies on public website are incorporated into our contracts through our Supplier Principles'. The Supplier Principles include the RBA Code of Conduct, which includes details on human rights. In addition, it states in its MSA 2020: 'Compliance with Dell's Supplier Principles is part of our contract language for suppliers'. [Know the Chain additional disclosure, 2020: business-humanrights.org] & [Statement Against Slavery and Human Trafficking (2020 update), 07/2020: i.dell.com] • Met: Company requires suppliers to cascade down to their suppliers: The Company indicate 'Dell Technologies, on behalf of itself and its direct or indirect subsidiaries, ("Dell Technologies") is committed to responsible business practices and ethical behavior. This includes holding our suppliers to the same high standards of excellence to which we adhere, as set forth in Dell Technologies' Code of Conduct [...]Complying with Dell Technologies Supplier Principles ("Principles") is a condition of doing business with Dell Technologies. These Principles are applicable to Dell Technologies' suppliers, including but not limited to final assembly, direct and sub-tier suppliers working within Dell Technologies' supply chain, including Suppliers' employees, contractors, agents, independent contractors; and sub-tier suppliers within Suppliers' supply chain ("Supplier(s)").'
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: How workers are trained on HR policy commitments: The Company indicates in its FY2021 Progress made real Report: 'Our commitments to uphold human rights (including support for diversity, equity and inclusion efforts) and ethical business practices are embedded in the Dell Technologies Code of Conduct. All Dell Technologies employees are required to complete annual Code of Conduct

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>training. In FY21, we launched new global privacy training as part of our required annual ethics training to develop stronger awareness of the importance of privacy and customer trust'. [Progress made real report 2021, 2022: delltechnologies.com]</p> <ul style="list-style-type: none"> • Met: Trains relevant managers including procurement: The Company 'conducts RBA Code of Conduct training for supply chain management professionals and manufacturing operations teams. This training includes engagement with global commodity managers, as well as other key relationship owners, and is conducted regularly through a variety of training approaches, from in-person, all-day workshops to online modules. Human trafficking is consistently covered as part of the training.' [Statement Against Slavery and Human Trafficking (2020 update), 07/2020: i.dell.com] & [Progress made real report 2021, 2022: delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Meets both requirements under score 1 • Met: Trains suppliers to meet company's HR commitment: In addition, in its FY2021 Progress made real Report, it indicates: 'To help ensure that the people who work in our supply chain understand their rights, including workplace health and safety, prohibition of forced labor, and other topics, we provided 61,124 hours of social and environmental training in 2020'. The Supply chain sustainability report disclose further information on suppliers' employee training. : 'Dell Technologies provides numerous resources for suppliers to develop key skill sets to help ensure responsible manufacturing: [...] Front-line supplier employee training: We recognize that supplier employees are important partners for us, both in monitoring factories that may not meet Dell Technologies' expectations and in participating in actions to help factories meet our standards. See B.1.7 for examples of training. [Progress made real report 2021, 2022: delltechnologies.com] & [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com] • Not Met: Disclose % trained: The Company provided feedback to this indicator, however, it is not clear what is the percentage of suppliers trained.
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates: 'Suppliers are subject to audits by Dell or by third parties designated by Dell and must complete any associated corrective actions'. The Know the chain response describes monitoring process that includes non-scheduled visits, review of relevant documents, off-site interviews with workers, visits to associated production facilities and related worker housing and steps to ensure that suppliers below the first tier are monitored. In addition, 'While human rights due diligence and assurance practices are implemented and continually monitored by organizations and experts across our business, we also periodically engage third-party experts to conduct formal human rights impact assessments. Insights from these cross-functional assessments enhance our awareness of actual and emerging salient human rights risks, inform our mitigation priorities and help identify strategic opportunities for creating a positive social impact.' [Human Rights Policy, 12/2021: i.dell.com] & [Know the Chain additional disclosure, 2020: business-humanrights.org] • Not Met: Proportion of supply chain monitored: Although the Company states 'we completed audits for 313 factories across 12 countries in 2020', it is not clear what proportion of its supply chain does this figure represent. [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com] • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Met: Describes corrective action process: The Company discloses the following: 'When areas of nonconformance with the Responsible Business Alliance (RBA) Code of Conduct are discovered through an audit, our Dell Technologies social and environmental responsibility (SER) specialists work with the supplier to create a corrective action plan (CAP) to resolve the issues within RBA-defined timelines. Through the CAP, our team supports the supplier in identifying root causes and implementing mitigations that support enduring improvement'. [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com] • Met: Disclose findings and number of corrective action: The Company reports: '239 factories completed corrective actions [...], 141 closure audits were completed to verify corrective actions [...]' In addition, the Company provides the following example in its Know the Chain Disclosure: 'In 2019, we were informed by a third-party hotline operator, that a worker in our supply chain reported cases of

Indicator Code	Indicator name	Score (out of 2)	Explanation
			overtime and double books at the factory. The Social and Environmental Responsibility (SER) team performed an unannounced investigation to follow up on the worker reported case. During the investigation, the SER team interviewed both workers and management to gain more understanding. In addition, the SER team checked the production record and other relevant materials which revealed inconsistencies with the working hour sheets and overtime payments. As a result, the supplier has agreed with the findings and developed an action plan. We are working with the supplier to resolve and promote worker wellbeing'. [Know the Chain additional disclosure, 2020: business-humanrights.org] & [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com]
B.1.7	Engaging and terminating business relationships	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: HR affects selection of suppliers: The Company indicates 'New suppliers undergo a risk assessment during the onboarding process. Based on their assigned risk level, suppliers must conduct an audit based on the RBA Code of Conduct. As a condition of doing business with Dell, these suppliers undergo the same audit and corrective action plan processes as existing Dell suppliers to maintain Dell's commitment to social and environmental responsibility within the supply chain'. [Accountability, 20/12/2019: corporate.delltechnologies.com] • Met: HR affects on-going supplier relationships: The Company discloses the adherence to the RBA Code of Conduct as a criteria to monitor and audit its suppliers. In addition, in its MSA 2020, it states: 'Closure audits confirm findings have been resolved; and if a supplier does not remediate or correct an issue Dell may reduce or suspend business with the supplier. Dell reserves the right to take any and all available actions against suppliers for violations of Dell's Vulnerable Worker Policy including without limitation the reduction of business, frequent required onsite compliance auditing at Supplier's expense (including dormitories, canteens, storage and common areas), employee compensation at Supplier's expense, and/or termination of Dell's contract with the Supplier'. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com] & [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: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The Company describes in its Supply Chain Sustainability Report 2020: 'Dell Technologies provides numerous resources for suppliers to develop key skill sets to help ensure responsible manufacturing: [...] Front-line supplier employee training: We recognize that supplier employees are important partners for us, both in monitoring factories that may not meet Dell Technologies' expectations and in participating in actions to help factories meet our standards. One example is the proper use of personal protective equipment. To ensure we can involve factory employees, we developed targeted training delivered through mobile phones. [...] During 2020, we continued to work with suppliers to ensure their employees received training through their phones on areas such as health and safety protocols and awareness of labor rights. [...] Ongoing training topics include: • Labor rights: Policies banning recruitment fees (see page 17); contract requirements; pay structures; rules around voluntary overtime; requirements for factories to pay social insurance benefits; rights to paid leave and holidays; grievance mechanisms; and right to resign from work. • Health and safety: Safety training; guidelines on the use of process chemicals (see page 20); how to use personal protective equipment; the importance of daily machine safety checks; and fire and emergency procedures'. [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com]
B.1.8	Approach to engagement with affected stakeholders	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"> • Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company states in its Human Rights Policy: 'We believe unique and diverse perspectives are essential to expand and deepen our understanding of actual and potential impacts, and they help guide our actions to drive meaningful progress and positive outcomes. We value constructive engagements with, and insights from, stakeholders across our business and value chain, including our team members, customers, suppliers and their employees, other business partners and the local communities where we operate. We also believe some human rights issues can be addressed most effectively by working in partnership with others. To advance progress on complex human rights challenges we engage and participate in collaborative initiatives with suppliers, business partners, customers, industry and cross-sector alliances and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>working groups, civil society organizations, governmental authorities, and others.' [Human Rights Policy, 12/2021: i.dell.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses stakeholders that HRs may be affected: The Company reports 'Stakeholder engagement and a global understanding of the ESG topics that are most important to our stakeholders are critical inputs that inform our broader ESG strategy. We have conducted an ESG materiality assessment to identify the ESG topics that are most important to stakeholders, as well as those where Dell Technologies can play the most meaningful role. We used this analysis to guide our ESG Plan for 2030 to focus resources on areas where we have the greatest opportunities for growth and leadership or the biggest ESG risks to mitigate.' However, no information found on the stakeholders that human rights may be affected. [FY22 Environmental, Social and Governance Report, 2022: dell.com] • Not Met: Provides two examples of engagement with stakeholders: Example 1: 'Supplier employees are in a unique position to provide insight on day-to-day factory operations. This feedback is critical in helping us validate supplier compliance with the Responsible Business Alliance Code of Conduct and build greater context around issues and how they are being addressed. [...] supplier employees who participate in audit interviews are provided with information cards that include the helpline number and details as an alternative way to provide anonymous feedback.' However, no other example was found. [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Analysis of stakeholder views on company's HR issues: The company reports 'we have conducted an ESG materiality assessment to identify the ESG topics that are most important to stakeholders, as well as those where Dell Technologies can play the most meaningful role. We used this analysis to guide our ESG Plan for 2030 to focus resources on areas where we have the greatest opportunities for growth and leadership or the biggest ESG risks to mitigate.' The analysis indicates that Human Rights issues are of high importance to stakeholders. [FY22 Environmental, Social and Governance Report, 2022: dell.com] • Not Met: Describe how views influenced company's HR approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Identifying risks in own operations: The Company indicates 'We periodically engage third-party experts to conduct human rights impact assessments (HRIAs) to ensure and advance our understanding of human rights risks and impacts. These assessments inform Dell's policies, support risk mitigation and governance practices, and inform our strategic priorities. The company identified Discrimination, Child Labour, Forced Labour, Health and Safety, [etc] both in the own operations an supply chain as their salient risks.' [FY22 Environmental, Social and Governance Report, 2022: dell.com] • Met: Identifying risks through relevant business relationships: The Company discloses a table (page 19) with its salient human rights risks and the value chain impact area. For example, Discrimination risk has been identified as a salient risk in the following value chain impact areas: Own Operations, Supply Chain, Products (Accessibility). The HRIA includes supply chain and own operations. [FY22 Environmental, Social and Governance Report, 2022: dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above, the Company 'engaged a third party to conduct a corporate-level HRIA', however no further evidence found showing human rights experts or affected stakeholders consulted as part of the HRIA. [Progress made real report 2021, 2022: delltechnologies.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing human rights risks and impacts	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"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates in its FY2021 Progress made real Report: 'Recently, we engaged a third party to conduct a corporate-level HRIA. The objective was to ensure and advance our understanding of human rights risks and impacts, and gain insights to inform current or future policies, support risk mitigation and governance practices, and determine strategic priorities. The HRIA confirmed our awareness of our salient human rights risks and impact areas (see table), and that we have the essential structures in place to monitor and address our most significant risk areas.'

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Insights and suggestions from this HRIA — including external stakeholder perspectives collected as part of the assessment — continue to influence the evolution of our human rights strategy and opportunities to accelerate positive impacts as well as address risks.' However, no further information was found describing the assessment process of human rights risks and impacts, including factors taken into account (social, geographical, economic, etc.). [Progress made real report 2021, 2022: delltechnologies.com]</p> <ul style="list-style-type: none"> • Met: How process applies to supply chain: 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] • Met: Public disclosure of the results of HR assessment: The Company discloses the salient risks identified in the HRIA in its FY2021 Progress made real Report: Discrimination (Own Operations, Supply Chain, Products (Accessibility)), Child Labor, Forced Labor (Supply Chain), Health & Safety (Own Operations, Supply Chain, Products), Privacy (Own Operations, Supply Chain, Products), Working Hours/Wages (Supply Chain). [Progress made real report 2021, 2022: delltechnologies.com] & [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment
B.2.3	Integrating and acting on human rights risks and impact assessments	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"> • Not Met: Action Plans to mitigate risks • Met: Description of how global system applies to supply chain: The Company indicates 'Dell operates one of the largest social and environmental responsibility (SER) assurance and engagement programs in the technology sector. Through our SER initiatives, we proactively identify and mitigate issues throughout the tiers of our supply chain, including final assembly, direct and sub-tier suppliers. We focus on the most salient human rights and environmental issues, using insights gained through our own operations, collaboration with industry partners, and engagement with stakeholders that empower us to drive responsible manufacturing practices and diversity and inclusion in our supply chain.' [FY22 Environmental, Social and Governance Report, 2022: dell.com] • Met: Example of actions decided on at least 1 salient HR issues: The Company state 'It is important to us that people working in our supply chain are treated fairly...[we] prohibit our suppliers from charging recruitment fees to their workers, even in locations where these practices are legal. Through our social and environmental responsibility (SER) specialists' direct engagement with factories and our thirdparty audits, we work with supplier management and workers to identify and resolve potential issues around fees. Due diligence efforts in this area include conducting confidential interviews with supplier management, and separately with workers as part of regular audits. We also take immediate action to investigate any allegations related to recruitment fees that are received through our helpline, media sources or nongovernmental organization reports.' [FY22 Environmental, Social and Governance Report, 2022: dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking the effectiveness of actions to respond to 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: System for tracking or monitor if actions taken are effective: Company provided feedback to this indicator but evidence was not material. • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating on human rights 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: Provides two examples of comms with stakeholders: The Company indicate 'Dell is committed to acting on concerns raised in our supply chain. Last year, we received a complaint via the helpline from an employee of one of our suppliers in China. The caller expressed concern that her request for a transfer to a different role was denied. The employee noted that her transfer request was due to her pregnancy status and the desire for a less strenuous role.' However, no other information / example found of how the company communicate with stakeholder. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	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: Channel accessible to all workers: The Company states in its Human Rights Policy: 'Dell has an established third-party operated grievance mechanism. Dell Technologies Ethics Helpline options are available for anyone, including team members, partners or any other internal or external stakeholder to report concerns or issues they believe may violate Dell's Code of Conduct, this policy or any other related Dell policy or standard'. [Human Rights Policy, 12/2021: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Channel is available in all appropriate languages and workers aware: The EthicsPoint website is available in over 20 different languages. In addition, the Company indicates in its FY2021 Progress made real Report: 'Our commitments to uphold human rights (including support for diversity, equity and inclusion efforts) and ethical business practices are embedded in the Dell Technologies Code of Conduct. All Dell Technologies employees are required to complete annual Code of Conduct training'. The Code of Conduct includes information about the Ethics Helpline. [EthicsPoint, N/A: secure.ethicspoint.com] • Met: Describe how workers in the supply chain have access to grievance mechanism: The Company indicates: 'Dell Technologies maintains a free phone helpline to ensure the people in our supply chain, as well as individuals and organizations representing them, have a reliable, confidential communications channel through which to share concerns or suggestions. A third-party, nongovernmental organization with expertise in supplier employee feedback channels manages the helpline on our behalf. Available 24 hours a day, seven days a week, supplier employees can access the helpline outside the workplace, reinforcing the confidentiality of their feedback'. [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com] • Met: Expect Suppliers to convey expectation to their own suppliers: The Company indicates in its Supplier Principles document: 'Dell expects facilities managed by its suppliers to abide by the [RBA] Code and for them to expect the same of their Suppliers; in doing so, Dell manages its own facilities to the same standards'. The RBA Code of Conduct requires an 'effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this Code and to foster continuous improvement'. And it also requires that 'At a minimum, Participants shall also require its next tier suppliers to acknowledge and implement the Code'. [Supplier Principles, 2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org]
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 states in its Human Rights Policy: 'Dell has an established third-party operated grievance mechanism. Dell Technologies Ethics Helpline options are available for anyone, including team members, partners or any other internal or external stakeholder to report concerns or issues they believe may violate Dell's Code of Conduct, this policy or any other related Dell policy or standard'. [Human Rights Policy, 12/2021: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes accessibility and local languages and stakeholder awareness: The EthicsPoint system is available online in a variety of languages. However, no information was found describing how the Company ensures external stakeholder awareness. [EthicsPoint, N/A: secure.ethicspoint.com] • Met: Communities access mechanism direct or through suppliers: The Company indicates: 'Dell Technologies maintains a free phone helpline to ensure the people in our supply chain, as well as individuals and organizations representing them,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>have a reliable, confidential communications channel through which to share concerns or suggestions. In addition, 'Dell maintains a free phone helpline to ensure the people in our supply chain, as well as individuals and organizations representing them have a reliable, confidential communications channel through which to share concerns or suggestions.' [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com] & [RBA Code 7.0, 2021: responsiblebusiness.org]</p> <ul style="list-style-type: none"> • Not Met: Expect supplier to convey expectation to their own suppliers
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	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: Response timescales and how complainants will be informed: The Company indicates in its EthicsPoint's FAQ: 'The NAVEX Global communications specialist will then assign a Report Key to your report and give you that number and Password so that you can call back to find out the status of your report.' However, no information with respect to response timescales was found. [EthicsPoint FAQ, N/A: secure.ethicspoint.com] • Not Met: Describe support (technical, financial, etc) available for equal access by complainants <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation: The Company states: 'Dell Technologies will not retaliate against anyone who provides information or otherwise assists in an investigation or proceeding regarding any conduct the person reasonably believes constitutes a violation of applicable laws or regulations or this Code'. [Dell Technologies Partner Code of Conduct, 2019: corporate.delltechnologies.com] • Met: Practical measures to prevent retaliation: The Company's Partner Code of Conduct refers to its own employees, suppliers, independent contractors, agents and downstream partners. The Company discloses: 'Any reported violation will be kept confidential to the maximum extent allowed under applicable laws. Such reports may be made anonymously, where local law permits, by using any of the methods set forth above'. Also, the Company indicates anonymity in the case of concerns raised by its workers via Ethicsline or Ethics Helpline. In addition, the Company indicates in its EthicsPoint FAQ: 'Per Dell's Anti-Retaliation Policy, retaliation is strictly prohibited at Dell, and persons who try to use retaliation will be subject to disciplinary action'. As indicated in C.1 there's training for employees in relation to the code. [Dell Technologies Partner Code of Conduct, 2019: corporate.delltechnologies.com] & [EthicsPoint FAQ, N/A: secure.ethicspoint.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders: No further information found regarding prohibition of retaliation through legal action, firing or engaging in economic forms of retaliation, etc • Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Company indicates in its Partner Code of Conduct: 'Dell Technologies partners, including their permanent and temporary employees, independent contractors, suppliers, agents and downstream partners (collectively, "Partners" or "you") are required to comply with this partner Code of Conduct ("Code")', which demonstrates the requirement of non retaliation, mentioned above, to its suppliers. [Dell Technologies Partner Code of Conduct, 2019: corporate.delltechnologies.com]
C.6	Company involvement with state-based judicial and non-judicial	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: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)

Indicator Code	Indicator name	Score (out of 2)	Explanation
	grievance mechanisms		
C.7	Remedying adverse impacts	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: 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'. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes to systems, processes and practices to stop similar impact: The Company indicate that 'Dell addressed the situation by providing the supplier with education and training materials about pregnant and nursing employee rights. We also asked the site to revise their policy and processes to implement protections for female workers. In addition to updating the policy and processes, we collaborated with the supplier to create a checklist related to female worker rights. Using this checklist, the human resources team can identify whether similar issues arise and is empowered to act quickly to protect the workplace rights of pregnant and nursing workers.' [FY22 Environmental, Social and Governance Report, 2022: dell.com] • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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: Number grievances filed, addressed or resolved and outcome achieved • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.1.a	Living wage (in own production or manufacturing operations)	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: Pays living wage or sets target date • Not Met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Paying living wage • Not Met: Definition of living wage reviewed with unions
D.4.1.b	Living wage (in the supply chain)	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: Discloses living wage requirements in supplier code or contracts: In the RBA Code of Conduct, which the Company requires its suppliers to abide, it is stated: 'Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.' However, no evidence found of the Company indicating that it pays living wages which covers not only basic needs of employee and its family but also provides some discretionary income. [RBA Code 7.0, 2021: responsiblebusiness.org] & [Supplier Principles, 2021: i.dell.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.2	Aligning purchasing decisions with human rights	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: Avoids business model pressure on HRs (purchasing practices): The Company indicates in its Partner Code of Conduct, the expectation and requirement of compliance with Human Rights of workers and individuals within the suppliers and its supply chain. However, the Company does not describe the practices adopted in order to achieve the prevention of purchasing practices which does not undermine Human Rights. No new evidence found in latest documents. [Dell Technologies Partner Code of Conduct, 2019: corporate.delltechnologies.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Examples of how it assessed, addressed and change purchasing practices
D.4.3	Mapping and disclosing the supply chain	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: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The Company states: 'Focusing solely on the last facility that a product left before it entered our customers' homes or businesses would limit our visibility to many of the businesses and people around the world who manufactured that product. That's why we take a holistic and comprehensive approach across our supply base'. The Company identifies 'final assembly and original design manufacturers' and 'direct material suppliers'. Moreover, the Company provides a list with its suppliers. [Our Suppliers, N/A: corporate.delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Discloses names and locations of significant parts of SP and why: The Company discloses a list whose content indicates its suppliers. It states: 'The list of suppliers includes original design manufacturers (ODMs), final assembly and suppliers that Dell buys from directly and/or provide substantial product transformation. The volume and nature of business conducted with suppliers shifts as business needs change. This list represents a snapshot covering at least 95% of Dell's spend during fiscal year 2021.' [Supplier List, 2021: delltechnologies.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.a	Prohibition of child labour: Age verification and corrective actions (in own production or manufacturing operations)	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"> • Met: Does not use child labour: The Company states in its Vulnerable Worker Policy: 'Dell prohibits the use of forced or indentured child labor by its suppliers at any tier of its supply chain. The use of child labor is strictly prohibited'. 'The policies listed here underscore Dell's own commitment and expectations for its entire supply chain'. [Vulnerable worker policy, 2022: i.dell.com] • Not Met: Age verification of workers recruited <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remediation if children identified
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	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"> • Met: Child Labour rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Child labor is not to be used in any stage of manufacturing. [...] Participants shall implement an appropriate mechanism to verify the age of workers. [...] If child labor is identified, assistance/remediation is provided.' [Supplier Principles, 2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on child labour <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Met: Analysis of trends in progress made: The Company provides data related to factory audits. It found that 99% of audited factories were in compliance of young worker protections in 2019, up from 98% in 2018. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.a	Prohibition of forced labour: Recruitment fees and costs (in own production or manufacturing operations)	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: Job seekers and workers do not pay recruitment fee: The Company states in its Vulnerable Worker Policy: 'Workers shall not be required to pay recruitment fees, health fees, or any other employment-related fees [...] The policies listed here underscore Dell's own commitment and expectations for its entire supply chain'. [Vulnerable worker policy, 2022: i.dell.com] • Met: Commits to fully reimbursing if they have paid: It adds: 'If any such fees are found to have been paid by workers, such fees shall be immediately returned to workers'. [Vulnerable worker policy, 2022: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How practices are implemented and monitored for agencies, labour brokers or recruiters
D.4.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	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: Debt and fees rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons is not permitted. [...] Workers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker'. [Supplier Principles, 2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org] • Met: How working with suppliers on debt & fees: The Company discloses that 'In 2019, we worked with a civil society organization to provide training around recruitment fees to supplier factories in Taiwan. This helped suppliers better understand forced labor issues and best practices around recruitment'. [2020 Modern Slavery Statement, 01/07/2020: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Met: Analysis of trends in progress made: The Company provides data related to factory audits. It found that 86% of factories audited in 2019 were in compliance with freely chosen employment protections, up from 85% in 2018. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com]
D.4.5.c	Prohibition of forced labour: Wage practices (in own production or manufacturing operations)	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: Pays workers in full and on time: The Company discloses the identification of 16 sites where workers had been charged recruitment fees in 2018 and the work to fix it. No evidence found of statement indicating that it pays workers in full and on time. No new information found in latest review. [Statement Against Slavery and Human Trafficking (2020 update), 07/2020: i.dell.com] • Met: Payslips show any legitimate deductions: The Company indicates that it has adopted the RBA code for itself and its suppliers. The RBA code requires: 'For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.' [RBA Code 7.0, 2021: responsiblebusiness.org] & [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: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	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"> • Met: Requirement for suppliers to pay workers in full and on time in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct, which requires: 'For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.' [RBA Code 7.0, 2021: responsiblebusiness.org] & [Supplier Principles, 2021: i.dell.com] • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Met: Provides analysis of trends demonstrating progress: The Company reports on its FY22 ESG Report, compliance and trends with the wages and benefits provision of the RBA Code of Conduct. For FY22 the company reported a 85% compliance rate in comparison to 78% in 2021. [FY22 Environmental, Social and Governance Report, 2022: dell.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.5.e	Prohibition of forced labour: Restrictions on workers (in own production or manufacturing operations)	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: Does not retain documents or restrict movement: The Company states in its Vulnerable Worker Policy: 'Suppliers shall not place unreasonable restrictions on workers' freedom of movement in the facility, nor place unreasonable restrictions on entering or exiting company-provided facilities. [...] 4. Workers shall be free to leave work at any time or terminate their employment. 5. Suppliers may not hold or otherwise destroy, conceal, confiscate or deny access by workers to workers' identity or immigration documents or credentials, such as government-issued identification, passports or work permits, unless the holding of work permits is required by law. Passports may not be held even when permitted by local[...] The policies listed here underscore Dell's own commitment and expectations for its entire supply chain'. [Vulnerable worker policy, 2022: i.dell.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How these practices are monitored for agencies, labour brokers or recruiters
D.4.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	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"> • Met: Free movement rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters.[...] All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract. Employers, agents, and sub-agents' may not hold or otherwise destroy, conceal, or confiscate identity or immigration documents, such as government-issued identification, passports, or work permits. Employers can only hold documentation if such holdings are required by law. In this case, at no time should workers be denied access to their documents'. [Supplier Principles, 2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Met: Provides analysis of trends demonstrating progress: The Company provides data related to factory audits. It found that 86% of factories audited in 2019 were in compliance with freely chosen employment protections, up from 85% in 2018. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com]
D.4.6.a	Freedom of association and collective bargaining (in own production or manufacturing operations)	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 not to interfere with union rights / Steps to avoid intimidation or retaliation • Not Met: Discloses % total direct operations covered by collective CB agreements <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.4.6.b	Freedom of association and collective bargaining (in the supply chain)	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: FoA & CB rules in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'In conformance with local law, participants shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.' However, it is not clear whether the Company is requiring to respecting those rights in all contexts, as it indicates 'in conformance with local law'. [RBA Code 7.0, 2021: responsiblebusiness.org] & [Supplier Principles, 2021: i.dell.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Provides analysis of trends demonstrating progress: The Company provides data related to factory audits. In 2019, it found that 100% of factories audited were in compliance with freedom of association, up from 98% in 2018. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com]
D.4.7.a	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own production of manufacturing operations)	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"> • Met: Describes process to identify H&S risks and impacts: The company indicates that 'Each year through 2030, we will show continued commitments to provide healthy work environments where people can thrive. Continued our commitment to the health and safety of everyone in our supply chain by prioritizing high-risk manufacturing processes. We implemented a hierarchy of control for processes, such as aluminium-magnesium smelting, electroplating, painting and solvent cleaning. Processes include elimination and substitution, as well as engineering and administrative controls. We also assessed supplier management systems, machine safeguarding, process operation and material management for high-risk processes.' [FY22 Environmental, Social and Governance Report, 2022: dell.com] • Met: Injury Rate or Lost days or Near Miss disclosures for last reporting period: The Company discloses injury rates of 0.04 for the last reporting period. [FY22 Environmental, Social and Governance Report, 2022: dell.com] • Met: Discloses Fatalities for last reporting period: The Company reported zero fatalities in the last reporting period [FY22 Environmental, Social and Governance Report, 2022: dell.com] • Not Met: Occupational disease rate for last reporting period: No information found in relation to occupational disease rate. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance • Not Met: Met targets or explain why not or what is doing to improve management systems
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	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"> • Met: Sets out clear Health and Safety requirements: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct includes health and safety requirements, including the following topics: Occupational Safety; Emergency Preparedness; Occupational Injury and Illness; Industrial Hygiene; Physically Demanding Work; Machine Safeguarding; Sanitation, Food, and Housing; and Health and Safety Communication. [Supplier Principles, 2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for last reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Met: How working with suppliers on H&S: The Company reports the training with its suppliers workers in order to improve their knowledge against health and safety in the factories. It discloses: 'During 2019 we continued to work with suppliers to deliver training directly to employees via their mobile phones. This training reinforces the importance of following health and safety protocols and awareness of labor rights. Through this program, Dell Technologies covers the cost of developing training modules. We share these with suppliers who deliver them and cover the cost of the Wi-Fi so that employees can connect to the internet to complete the training. Everyone – direct, temporary, student, migrant, contract or any other type of line employee – are eligible and encouraged to participate'. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com] • Not Met: Assessment of the number affected by H&S issues in the SP • Met: Provide analysis of trends in progress made: Additionally to the statement above, the Company also disclose an analysis in order to indicate the improvement in the areas. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.8.a	Women's rights (in own production or manufacturing operations)	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"> • Met: Process to stop harassment and violence against women: The Company states in its Diversity and Equal Employment Opportunity Policy: 'Dell is committed to the principle of equal employment opportunity for all employees and to providing employees with a work environment free of discrimination and harassment. All employment decisions at Dell are based on business needs, job requirements and individual qualifications, without regard to race, color, religion or belief, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, HIV status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information, family or parental status, or any other status protected by the laws or regulations in the locations where we operate. Dell will not tolerate discrimination or harassment based on any of these characteristics. Employees who violate this policy will be subject to disciplinary action, up to and including termination of employment.' from Dell. [Diversity and Equal Employment Opportunity Policy, N/A: corporate.delltechnologies.com] • Not Met: Working conditions take account of gender: The Company provided feedback to this indicator but no information found regarding how working conditions take account of gender. • Not Met: Measures and steps to address gender pay gap at all levels of employment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap
D.4.8.b	Women's rights (in the supply chain)	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: Women's rights in codes or contracts: The Company indicates the participation of women-owned businesses as a diversity requirement in its supplier principles. However, there is no mention of equal opportunities, equal pay for equal work or health and safety concerns among women . [Supplier Principles, 2021: i.dell.com] • Not Met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.a	Working hours (in own production or manufacturing operations)	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: Respects max hours, min breaks and rest periods in its own operations • Not Met: Assesses ability to comply with its commitments when allocating work/targets <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How it implements and checks this in its operations
D.4.9.b	Working hours (in the supply chain)	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: Working hours in codes or contracts: The Company requires its suppliers to comply with the RBA Code of Conduct. The RBA Code of Conduct indicates: 'Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.' However, no evidence found of references to international standards and national laws or standard weekly hours. [Supplier Principles, 2021: i.dell.com] & [RBA Code 7.0, 2021: responsiblebusiness.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on working hours: The Company states in its Supplier Principles document: 'To help ensure that global standards and Dell policy commitments are implemented and reinforced, Dell requires that Suppliers participate in several programs in which we work with Suppliers to understand and evaluate risks and supplier performance, build capability to meet and exceed applicable standards, and remedy areas of concern that may be revealed in our audits. Programs include but are not limited to: [...] management of working hours'. The supply chain responsibility report states that 'To ensure we can involve factory employees, we developed targeted training delivered through mobile phones. [...] During 2020, we continued to work with suppliers to ensure their employees received training through their phones on areas such as health and safety protocols and awareness of labor rights.'. Topics include 'rules around voluntary overtime, rights to paid leave and holidays. [Supplier Principles, 2021: i.dell.com] & [Supply Chain Sustainability progress report 2020, 2021: delltechnologies.com] Score 2 • Not Met: Assessment of number affected by excessive working hours • Met: Provide analysis of trends in progress made: The Company provides data related to factory audits. It found that 15% of factories audited in 2019 were in compliance of working hours and rest days, down from 19% in 2018. [Supply Chain Sustainability Progress Report 2019, 22/06/2020: corporate.delltechnologies.com]
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	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: Due diligence in accordance with OECD Guidance in supplier contracts: The Company discloses to Know the Chain 'Policies on public website are incorporated into our contracts through our Supplier Principles'. The Supplier Principles include the RBA Code of Conduct 'The RBA Code of Conduct requires: 'Participants shall adopt a policy and exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework'. [Supplier Principles, 2021: i.dell.com] & [Know the Chain additional disclosure, 2020: business-humanrights.org] • Met: Works with smelters/refiners and suppliers to build capacity: In its Conflict Minerals Report 2020, the Company states: 'Dell continues to work with suppliers throughout its supply chain to assess and improve their information reporting quality and capacity, taking into account supply chain fluctuations and other changes in status or scope and relationships over time.' In addition, in its Conflict Mineral Report: 'We are working with the RMI to provide supplier training on how to manage and address [risk in all conflict affected and high-risk areas]. [...] Last year, Dell increased engagement with smelters and refiners to promote participation and to encourage conformant smelters and refiners to maintain their status in the RMAP program. As a member of the RMI workgroups, we and our industry peers encourage smelters and refiners to request they undergo an RMI audit. In 2018, RMI announced revisions to the smelter audit standards to align with the OECD framework. Dell championed these revisions by sending information packs to smelters and refiners who were due for a re-audit to educate and affirm conformant statuses'. [Conflict Minerals Report 2020, 2021: delltechnologies.com] & [Conflict Minerals Report 2019, 2020: investors.delltechnologies.com] Score 2 • Met: Contractual requirement to disclosure smelter/refiner information: The Company indicates in its Supplier Principles document that 'Suppliers shall also conduct a supply chain survey to identify the 3TG smelters and refiners in their supply chain, and report to Dell using the Responsible Mineral Initiative's (formerly the Conflict-Free Sourcing Initiative) Conflict Minerals Reporting Template (CMRT). Suppliers shall respond to Dell's requests for additional information or action [...]'. Supplier compliance with these Principles is mandatory. Also, as indicated above, in its Responsible Sourcing Policy, the Company states: 'we require adherence to this policy as well as to the Responsible Business Alliance (RBA) Code of Conduct. [Supplier Principles, 2021: i.dell.com] & [Responsible Sourcing Policy, 2018: i.dell.com] • Not Met: Contractual requirement covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral supply chain	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: Risk identification and disclosure in line with OECD Guidance: The Company describes its process to identify smelters and refiners and assess whether they are on the RMAP list. However, no further details found, including risks identified. [Conflict Minerals Report 2020, 2021: delltechnologies.com] • Met: Identification of smelter/refiners and OECD Guidance: In its Conflict Minerals Report, the Company indicates: 'Dell requests an annual CMRT from in-scope suppliers and expects them to cascade this reporting requirement through the supply chain. Dell requires suppliers to provide comprehensive, accurate data on 3TG acquired from their supply chain through the CMRT process. This data is used to identify and verify the smelters and refiners in our supply chain that participate in RMAP. Collected CMRTs are analysed to ensure conformity with Dell's assessment. [...] Dell's due diligence process identifies smelters and refiners that lack audit validation or are at high risk of benefitting armed groups in conflict-affected and high-risk areas, including the Covered Countries. Evidence of such factors is drawn from CMRT and RMI databases, customer engagements as well as independent research'. [Conflict Minerals Report 2019, 2020: investors.delltechnologies.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance: The Company discloses the list of smelters/refiners provided by suppliers that 'are on the RMAP standard smelter list' in its Conflict Minerals Report. However, it is not clear which of those are 'conformant' smelters/refiners. [Conflict Minerals Report 2020, 2021: delltechnologies.com] • Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	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: Describes mineral risk management plan for supply chain: The Company reports: 'Dell is taking the following steps, among others, to continue to improve the due diligence conducted by it and to further mitigate any future risk of sourcing 3TG that benefits armed groups from the Covered Countries: 1) Continue to work closely with suppliers to obtain the necessary information on the origin of 3TG contained in the materials or components used in the Covered Products. 2) Work with smelters and refiners through our engagement with RMI to promote participation in RMAP and other equivalent third-party certifications. 3) Monitor incidents related to OECD Annex II risks to assess their impact on Dell's supply chain. 4) Continue partnering with organizations dedicated to supporting mining communities and contributing to ethical sourcing of minerals.' However, no further details found on the work carried out to mitigate risks faced (current evidence refers to actions already taken for risk identification and assessment). [Conflict Minerals Report 2020, 2021: delltechnologies.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Child labour; working hours; health & safety • Headline: Dell accused of child labour in DRC • 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> <p>The defendants replied with a motion to dismiss, arguing they did not violate the TVPRA as the child labour occurred only in their supply chain which is not the same as a venture. Furthermore, they argued that the children affected by the mine collapse were not forced into work by direct threats of force or harm by the employer. According to their argument the TVPRA does not include economic pressure in its definition of forced labour. In a third argument, the defendants deny a sufficient degree of knowledge of the issue. The court dismissed the case in November 2021. In the ruling the judge found that the harm claimed by the plaintiffs was not traceable to any of the defendants. Furthermore, the judge did not find a violation of the law cited and voiced doubts regarding the extraterritoriality of the TVPRA. The plaintiffs appealed this decision.</p> <p>[The Guardian, 16/12/2019, "Apple and Google named in US lawsuit over Congolese child cobalt mining deaths": theguardian.com] [Business and Human Rights Resource Centre, 09/10/2020, "Major tech companies respond to lawsuit over child labour in cobalt mines, argue that global supply chains do not fall under the scope of the Trafficking Victims Protection Reauthorization Act": business-humanrights.org] [Clifford Change, 07/12/2021, "Testing the US Trafficking Victims Protection Act: Doe v. Apple": cliffordchance.com]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: According to the Press, the company stated: " "Dell Technologies is committed to the responsible sourcing of minerals, which includes upholding the human rights of workers at any tier of our supply chain and treating them with dignity and respect. We have never knowingly sourced operations using any form of involuntary labor, fraudulent recruiting practices or child labor. We work with suppliers to manage their sourcing programs responsibly. Any supplier with reports of misconduct is investigated and, if misconduct is found, removed from our supply chain. We're currently investigating these allegations, and have informed the Responsible Minerals Initiative as part of their grievance mechanism." [The Guardian, 16/12/2019: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company does not address the details of the allegation.
E(1).2	The company has investigated and taken 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: Engaged with 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 affected stakeholders. • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence that the company improved its management systems following the lawsuit. • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Forced labour; discrimination <p>• Headline: Dell among companies accused of using suppliers linked to forced labour in China</p> <p>• Story: On March 1st, 2020, the Australian Strategic Policy Institute (ASPI) released a report called "Uyghurs for sale" that named Dell among 83 companies benefiting from the use of potentially abusive labour transfer programmes. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are working in forced labour conditions across the country. The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. In addition, the think tank said that the workers were allegedly transferred out of Xinjiang between 2017 and 2019 and claimed that people are being effectively "bought" and "sold" by local governments and commercial brokers.</p> <p>The ASPI used open-source public documents, satellite imagery, and media reports, allowing to identify 27 factories in nine Chinese provinces that have used labourers. The research found up to 560 Xinjiang workers were transferred to work several factories including to Foxconn Technology, that supplies brands such as Amazon, Apple, Dell, Google, Huawei and Microsoft. Other factory implicated is O-Film Technology which supplies Apple, Huawei, Lenovo and Samsung with camera and touchscreen components.</p> <p>ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". The report calls on companies mentioned to "conduct immediate and thorough human rights due diligence on its factory labour in China, including robust and independent social audits and inspections."</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>On July 22, 2020, O-Film subsidiary Nanchang, a Dell supplier, was one of the eleven companies blacklisted by the U.S. Department of Commerce's Bureau of Industry and Security over alleged human rights abuses involving Uighur Muslims in China.</p> <p>According to the U.S. Department of Commerce, the O-Film subsidiary was named on the list "in connection with the forced labour of Uighurs and other Muslim minority groups in western China". Companies on the list must apply for special licenses to access U.S. technologies.</p> <p>[ABC, 01/03/2020, "Apple, Nike and other major companies implicated in Muslim forced labour in China": abc.net.au] [Australian Strategic Policy Institute, 01/03/2020, "Uyghurs for sale": aspi.org.au] [The Guardian, 01/03/2020, "China transferred detained Uighurs to factories used by global brands – report": theguardian.com] [ZDNet, 22/07/2020, "US adds 11 more Chinese companies to entity list for Uyghur human rights violations": zdnet.com]</p>
E(2).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: After the publication of the report, Dell said it had “no evidence” of forced labor in its supply chains but would investigate. The company told ZDNet it regularly conducts due diligence of its supply chain. <p>"Though our current supplier audit data shows no evidence of forced labour in our supply chain, we take all allegations of this nature seriously and will investigate fully." Dell said.</p> <p>The company has responded to the letter sent on 12 March 2021 by the Working Group on Business and Human Rights on the allegation of forced labour of ethnic Uyghurs in its supply chain. In this response, Dell stated: "Dell does not source from Xinjiang Province. We are concerned about allegations that ethnic Uyghurs are subject to forced labor in factories outside of Xinjiang Province, including those supplying the tech industry. We do not tolerate forced labor anywhere in our supply base and will address it if identified." [ZDNet, 06/03/2020, "Tech giants push back on forced Uyghur labour claims": zdnet.com] [Dell Technologies' Reply to the Joint Communication by UN Special Rapporteur dated 12/03/2021 (OTH 80/2021), 11/05/2021: spcommreports.ohchr.org] [BBC, 02/03/2020, "China Uighurs 'moved into factory forced labour' for foreign brands": bbc.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company did not address the allegation in detail but uses only general terms to describe the situation. Most part of the response to the UN Working group is an outline of existing policies.
E(2).2	The Company has appropriate policies in place	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: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(2).3	The Company has taken 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: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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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