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Dell's Producer Responsibility Policy

This policy outlines Dell's approach to producer responsibility and the principles we see as being essential where product takeback and recycling is legislated in a given geography.

Dell's Producer Responsibility Policy is based on more than two decades of experience providing recycling and reuse services directly to our customers and contributes to our [Environmental, Social and Governance goals](#). To meet customer needs at product end-of-life, we provide free end-of-life management direct to the consumer in many countries and territories around the world, with or without legal mandates, and where local law permits for:

- Any Dell-branded product from individual consumers; and
- Any brand of electronic product when an individual consumer purchases a similar new product from Dell.

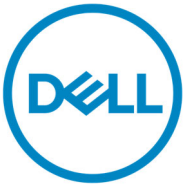
We also provide to our consumers convenient recycling services through partners, networks and public collection points. Full details of Dell takeback programs can be viewed at www.dell.com/recycle.

Furthermore, Dell is:

- Expanding these same programs globally across all consumer product lines and continually working to meet the demands of our customers;
- Expanding our recovery and recycling operations wherever our business grows and to meet our takeback goals;
- Committed to transparent and effective goal-setting and public reporting on appropriate elements of our end-of-life recovery programs; and
- Offering commercial takeback services to meet the specific needs of our commercial customers.

Dell is committed to continually improving the environmental design aspects of our products and their end-of-life management. We have consistently been an IT industry leader in disposal convenience for customers and overall volume of collections. This includes jurisdictions without recycling laws as well as those with laws that require collection by producers but do not set targets. Dell encourages this same level of commitment and investment from other IT producers as well as producers of all electronic and electrical products. Only then can there be a level playing field with full commitment by all producers that will increase collection volumes and ensure proper end-of-life treatment of electronic and electrical products.

Dell integrates the principles of individual producer responsibility into our policies. Under these principles, all producers take responsibility for proper end-of-life product management of their own electronic products through cost internalization measures. This approach incents emphasis on eco-design to reduce end of life costs, better achieves the goals of producer responsibility and demonstrates circular economy principles. Dell also supports the establishment of collective solutions where industry stakeholders work together to establish common



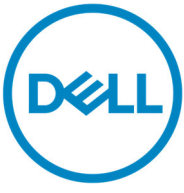
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collection networks, with a goal of increasing the volume of products collected.

Dell Principles for Product Recovery Legislation

Dell engages directly with a diverse set of stakeholders, including customers, recyclers, retailers, non-governmental organizations, non-profits and government. This engagement, coupled with over two decades of experience in complying with producer responsibility legislation in jurisdictions globally, has helped shape Dell's view of essential core principles that should be implemented in all product recovery legislation. These principles are laid out below.

- Producers should be required to offer end-of-life recovery of their own brand of products from consumers at no charge, through their own recycling/reuse collection programs, and/or through an industry collective program. This ensures that all producers take responsibility for the collection and treatment of end-of-life product equal to their fair share of the total electronic waste generated. Fair share determinations should be managed confidentially and be based on actual sales data.
- Producers should have the flexibility to implement varying collection systems which provide free and reasonably convenient collection or return options for consumers and should provide information on how to use their program. Producers should meet their obligation by collecting products in their own product categories utilizing individual or collective systems.
- Dell recognizes the need for effective regulatory enforcement by the government to ensure that all producers, and indeed all stakeholders, are assuming a fair share of the responsibilities and costs of a comprehensive recycling program and take accountability for the responsible processing of equipment. This includes other producers, recyclers, collectors and retailers.
- Dell does not support arbitrary collection targets that are unsustainable over the long term, or that do not reflect changes in consumer demands, product composition or lifecycle. Arbitrary collection targets can cause market manipulation and pricing distortions that unnecessarily increase costs. End-of-life product collected through the producers' own collection channels should count toward collection targets.
- Governments should assist producers in driving awareness of proper disposal options and should also promote awareness of current and pending legislation as well as of available producer recycling programs.
- Producers of electronic products within the scope of legislation must be required to include a label on their products sufficient to identify the brand. Producers, resellers and retailers should not be allowed to sell products that do not include an identifiable brand label of the producer.
- Any legislation for free electronic product recycling should focus on consumers. Commercial and public organizations already take responsibility for the disposition of their products and avail themselves of producers' asset recovery services, therefore, professional business products do not need legislating. Dell launched its own takeback programs for commercial customers of all sizes over two decades ago.
- Governments should not charge producers fees to finance the creation of government infrastructure to collect and process end-of-life electronics. Dell does not support visible or external fees imposed on consumers at the time of purchase or at the end of the useful life of electronic products.



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- Producers should have the flexibility to internalize the end-of-life costs of their own products, to reduce end-of-life costs and enable the continual review and improvement of the eco-design of products in line with circular economy principles.
- Any costs imposed on producers as part of the registration process should be minimal and used only to defray the administrative costs of the registration and compliance process, not for government-financed recycling infrastructure or inflated administrative costs.
- Dell believes that a free market should be the best determinant of the price paid by producers for the collection and treatment of their products by others.
- Consumers should remain responsible for removing their personal data from any products they return.
- Government legislation and regulation should establish or require recycling standards equivalent with globally recognized third-party accredited standards for electronics recyclers to ensure that materials are managed in a socially and environmentally sound manner from the point of collection to final treatment, including reporting requirements, worker health and safety criteria, and penalties for violations, promoting a level playing field for all recyclers.
- Recyclers should have a state/province/authority approved closeout plan in case of cessation of operation or abandonment.

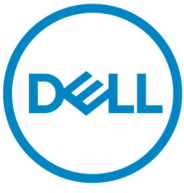
Bans

- Dell would not oppose a landfill ban on end-of-life IT products where other more appropriate treatment is locally available.

Dell's Prerequisites for Successful Product Recovery Legislation

Producer responsibility mandates based on Dell's Principles for Product Recovery Legislation have the capacity to provide efficient and easy product recovery options directly to consumers, facilitating responsible product retirement no matter the jurisdiction. However, the benefits of such legislation will only be realized after appropriate laws, regulations and infrastructures are put in place.

- Governments must be prepared to support local communities, commercial organizations and consumers to develop a culture and practice of responsible recycling. Many regions do not yet have the necessary infrastructure in place to ensure proper handling of waste materials and end-of-life electronics.
- Before these Principles should be considered for application in any country, the following three measures should be in place, each of which is necessary to ensure that appropriate human health and environmental standards are met and that the resulting recycling is beneficial, not harmful, to the community:
 1. Regulation of General Waste Handling: The government should adopt a robust set of laws, rules and practices — including education, monitoring and enforcement — to ensure the safe handling and disposition of waste materials in general.
 2. General Waste Handling Physical Infrastructure: Infrastructure must exist to enable appropriate collection, transportation, dismantling and disposition of equipment — along with the training of workers — to ensure proper handling of waste materials in general.



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3. Reformation of Unregulated Informal Recycling Markets: With the necessary regulatory policies and physical infrastructure in place to address waste in general, specific measures must also be taken to eliminate the unsafe recycling of end-of-life electronics using existing unregulated informal recycling operations.

Dell stands ready to work with governments to share its experience and best practices and to help identify appropriate systems to manage end-of-life electronics within their borders. We seek to work toward a common goal of being able to realize the benefits of effective producer responsibility legislation.

Revisions

Date	Description
October 2023	Reviewed, no changes
October 2022	Major revision
July 2018	Minor revision
January 2017	Minor revision & formatting following merger of Dell & EMC
February 2014	Major revision
January 2010	Initial publication

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