

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

Introduction

Obligation to issue the account

The Norwegian Transparency Act (the Act) applies to large enterprises resident in Norway and that offer goods and services in or outside Norway. Dell AS (Company Number 861272702) (the Company) is resident in Norway and is considered a large enterprise as a result of exceeding, for two consecutive years, at least two of the three criteria listed under Section 3 of the Act on the date of the financial statements ended 31 January 2023 (fiscal year 2023 covering the period between 1 February to 31 January).

As such, the Company must publish this account pursuant to Section 5 of the Act.

About the company

The Company's organisation and operating area

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

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

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

- Nicolai Johan Moresco – Chairman of Board of Directors (nicolai_moresco@dell.com)
- Geir Rostadmo-Strømme – General Manager & Member of Board of Directors (geir.stromme@dell.com)

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

Dell Technologies is one of the largest information technology (IT) providers in the world. Our technology and services portfolio spans both traditional infrastructure and multi-cloud technologies. We design, develop, manufacture, market, sell and support a wide range of comprehensive and integrated solutions, products and services.

Internal routines and guidelines

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

At Dell Technologies, upholding and advancing respect for the fundamental human rights of all people is core to our business strategy, purpose and commitment to drive human progress and create a positive and

lasting social impact. Dell has adopted and aligned policies and practices with expectations set out in the United Nations Guiding Principles on Business and Human Rights (U.N. Guiding Principles) and the Principles of the United Nations Global Compact, to which Dell is a signatory. Dell is committed to making certain we are not complicit in human rights violations, and we hold our suppliers and other business partners to this same standard.

Dell Technologies believes everyone deserves to be treated equally with dignity and respect, and we are committed to responsible, ethical, inclusive and sustainable business practices. These commitments are embedded in the [Dell Human Rights Policy](#), reflecting our global commitment to respect the rights of all our stakeholders, including Dell team members, suppliers, contractors and subcontractors at any tier, partners, resellers, and others impacted by our value chain. Additional policies supplement the Human Rights Policy, including the [Dell Supplier Principles](#), [Vulnerable Worker Policy](#), [Responsible Sourcing Policy](#) and our annual [Statement Against Slavery and Human Trafficking](#) and more.

The Dell Human Rights Policy reinforces and clarifies our alignment with expectations of the U.N. Guiding Principles. To implement Dell's commitment to respect human rights, we have also formalized and embedded other policies, human rights due diligence and governance protocols throughout our business. These are addressed in the Dell Human Rights Policy and are also referenced throughout this report.

Employees

Expectations to comply with laws and ethical business practices, including acting with integrity and respecting the fundamental human rights of others, are embedded in the Dell Technologies culture and policies and clearly set out in the [Dell Technologies Code of Conduct](#). Dell team members are required to complete annual Code of Conduct training and adhere to our code and policies, including the Dell Human Rights Policy and standards that flow from it. Annual Code of Conduct training also includes workplace health and safety requirement reminders.

The Code is available in 22 languages and is accessible on our intranet, the Dell Technologies external website and through the My Ethics app available to all employees. The Code contains links to unified and localized global compliance policies, as well as key take-aways and frequently asked questions. Numerous goals and KPIs related to healthy work environments, diversity and inclusion, sustainability practices and more are tracked and reported on in our annual ESG Report.

Pay Equity

Dell Technologies is a meritocracy — we believe people should be equitably compensated for the value they deliver to our customers and stakeholders no matter their gender, ethnicity or other factor. We routinely review salaries — and make adjustments if needed — to ensure we pay employees fairly and consistently as compared to their peers and the relevant compensation market.

Resellers and other third parties

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

Supply chain

Dell is a founding member of the Responsible Business Alliance (RBA), which embeds requirements to uphold and ensure respect for human rights in the [RBA Code of Conduct](#). Dell adheres to these standards and also expects its suppliers to comply with the RBA Code and other requirements set out in our [Dell Supplier Principles](#). We have ongoing dialogue with our high-risk suppliers and regular interlocks with our Dell-owned manufacturing sites regarding varying aspects of our due diligence programs.

Dell's commitment to respecting human rights extends to the responsible sourcing of materials used in our products and is underscored in the [Dell Responsible Sourcing Policy](#). Dell is also involved in building an industry-wide approach to responsible sourcing of minerals through groups such as the Responsible Minerals Initiative, as evidenced by our annual [Conflict Minerals Disclosure Report](#).

Protecting human rights and promoting the well-being of people in our supply chain are imperative. We have set specific goals to support our work in this area and we track KPIs and report on progress in our annual ESG report.

Collaboration

Dell believes 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.

Dell values constructive engagements with, and insights from, stakeholders across our business and value chain. The group also believes some human rights issues can be addressed most effectively by working in partnership with others. To drive progress on complex challenges, we engage and participate in collaborative initiatives with suppliers, business partners, customers, local communities, industry and cross-sector working groups and other organizations, in compliance with applicable Competition law.

Dell seeks and leverages external stakeholder feedback collected by third-party human rights experts engaged to conduct the periodic Human Rights Impact Assessments. Dell is a member of BSR (Business for Social Responsibility) and actively participates in the BSR Human Rights Working Group.

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

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

Dell's management team is trained on ESG-related topics, including fundamental human rights, and the Board is regularly briefed on ESG-related matters. Additional training on salient human rights risk areas (identified in the table below) is provided to business and leadership teams and made available through on-demand training modules.

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

For detailed information on Dell Technologies governance structure, please refer to the ESG Governance section of the voluntary [Environmental, Social and Governance \(ESG\) Report](#), in which the group further addresses the engagement and roles of the Board of Directors, ESG Steering Committee and ESG Interlock Team.

In addition to ongoing human rights due diligence and assurance practices embedded in organizations across our business, Dell also periodically engages third-party experts to conduct human rights impact assessments (HRIAs) to ensure and advance the understanding of human rights risks and impacts. These assessments inform Dell’s policies, support risk mitigation and governance practices, and inform the strategic priorities.

The group’s first corporate-level HRIA, completed in fiscal year 2019, confirmed Dell’s awareness of the salient human rights risks and impact areas and that Dell has the essential structures in place to monitor and address the most significant risk areas. Dell is dedicated to continually increasing our understanding and effective mitigation of actual, potential or emerging risks. The ongoing effectiveness and evolution of our human rights strategy is built on finding opportunities to accelerate positive impacts and address risks. Dell is currently working with third-party human rights experts, Article One Advisors, to complete our second corporate-level HRIA to deepen our understanding of current, new and evolving salient risks and continue to strengthen our risk mitigation strategies and governance practices.

While our current HRIA is still in progress, preliminary insights are already helping to deepen our understanding of evolving risks and inform mitigation and governance practices. Final results and recommendations will guide our human rights road map and strategic priorities to minimize risks and advance positive outcomes. We will continue to share insights and progress in future ESG reporting, including pursuant to our reporting under the UK Modern Slavery Act 2015, the Australia Modern Slavery Act 2018 and the California Transparency in Supply Chains Act 2010, for which the group also reports annually, publishing a Statement Against Slavery and Human Trafficking as part of those efforts.

Dell performs a Supplier risk assessment on its key supplier list annually. Suppliers onboarded to Dell in between the fiscal year are assessed for risk per the Supplier Onboarding Procedure and subsequently added to the next cycle of risk assessment. The audit score is the result of the RBA audit for each facility within the past two years. It is a compilation of labor, health and safety, environment and ethics indicators showing a supplier’s performance across these social responsibility categories. In our global due diligence assessments, our Norwegian operations have been identified as “low risk”, as the Company is a sales-only entity.

Most salient risks

The table below provides an overview of the most significant human rights impact areas across our value chain, respective governing policies and expectations, and additional resources and references that further address these topics

| Salient Risks | Value Chain Impact Area(s) | Policies | Additional Resources and Reporting |
|---------------------------|---|---|--|
| Discrimination | Own Operations, Supply Chain, Products, Community | <u>Dell Human Rights Policy</u> <u>Dell Code of Conduct</u> <u>Dell Diversity & Equal Opportunity Employment Policy</u> <u>RBA Code of Conduct</u> | Cultivating Inclusion section of the <u>ESG Report</u> <u>Accessibility Statement for Dell Technologies</u> |
| Child Labor, Forced Labor | Supply Chain | <u>Dell Human Rights Policy</u> <u>RBA Code of Conduct</u> <u>Dell Vulnerable Worker Policy</u> | Supply Chain Sustainability section of the <u>ESG Report</u> <u>Dell Statement Against Slavery and Human Trafficking</u> <u>Dell Supplier Principles</u> |

| Salient Risks | Value Chain Impact Area(s) | Policies | Additional Resources and Reporting |
|---------------------------------|---|--|--|
| Health & Safety | Own Operations, Supply Chain, Products | <u>Dell Human Rights Policy</u> <u>Global Occupational Health and Safety Policy</u> <u>RBA Code of Conduct</u> <u>Dell Product Regulatory Compliance Policy</u> | Health and Safety Metrics included in By the Numbers section of the <u>ESG Report</u> Supply Chain Sustainability section of the <u>ESG Report</u> <u>Dell Product Safety Information</u> <u>Dell Supplier Principles</u> |
| Working Hours/Wages | Own Operations, Supply Chain | <u>Dell Human Rights Policy</u> <u>RBA Code of Conduct</u> | Supply Chain Sustainability section of the <u>ESG Report</u> <u>Dell Supplier Principles</u> |
| Privacy | Own Operations, Supply Chain, Products, Community | <u>Dell Human Rights Policy</u> <u>RBA Code of Conduct</u> <u>Dell U.S. Privacy Statement</u> <u>Dell Code of Conduct for Partners</u> | Upholding Trust section of the <u>ESG Report</u> <u>Dell Supplier Principles</u> |
| Environmental Responsibility | Community | <u>Dell Human Rights Policy</u> <u>Dell Global Environmental Policy</u> | Advancing Sustainability section of the <u>ESG Report</u> |
| Bribery & Corruption | Supply Chain, Community | <u>Dell Human Rights Policy</u> <u>Dell Code of Conduct</u> <u>Dell Code of Conduct for Partners</u> <u>RBA Code of Conduct</u> | <u>Dell Supplier Principles</u> |
| Responsible Product Development | Products, Community | <u>Dell Human Rights Policy</u> | <u>Dell Technologies Principles for Ethical Artificial Intelligence</u> |

The due diligence assessments

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

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

As noted in the Dell Human Rights Policy, Dell respects the fundamental human rights of all people as reflected in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Labour Organization's (ILO's) Declaration on Fundamental Principles and Rights at Work. Dell is committed to

making certain that we are not complicit in any human rights violations throughout our supply chain and align our approach and actions to fulfil this commitment with the U.N. Guiding Principles on Business and Human Rights, and the Principles of the United Nations Global Compact, to which Dell is a signatory.

Dell's due diligence practices are aimed at effectively addressing the salient risks identified across the value chain, as presented in the table above. As part of this, with respect to our supply chain, Dell has a risk assessment process that incorporates risk elements including geography, protections to labour rights, environmental practices, and management systems. Dell takes a comprehensive approach to monitoring supply chain impact, including the risk of modern slavery and other human rights harms. The group requires high-risk suppliers (including in Norway), as identified through the risk assessment process, to undergo RBA certified third-party audits every two years (referred to as an "initial audit") and conducts as many follow-up audits as necessary to confirm closure of all priority and major findings. RBA Code of Conduct conformance audits include assurance of freely chosen employment, and 40+ other criteria across labour, environmental, ethical behaviour, and management systems.

Dell periodically engages 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. Finally, training, operational policies, compliance requirements and assurance protocols are embedded throughout our organization and incorporated into business relationship agreements to further address and govern human rights risks and impact priorities.

Complaint mechanisms

Dell has an established third-party operated grievance mechanism, which is also applicable for the operation in Norway. [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, Dell's Human Rights Policy or any other related Dell policy or standard. Dell will promptly investigate allegations and take appropriate action, where necessary, to mitigate actual or potential adverse human rights impacts. Dell does not tolerate retaliation against anyone acting in good faith to report a concern, provide information, or otherwise assist in an investigation or proceeding.

Where we have identified adverse human rights impacts caused or contributed to by our business activities, we are committed to providing for or cooperating in their fair and equitable remediation through legitimate processes. We expect the same of our suppliers and other business partners. Where we believe Dell is directly linked to adverse impacts through our relationships with suppliers or business partners, we seek to engage and collaborate with them to promote appropriate remediation through their own grievance management processes.

The supply chain and business partners of the Company

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

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

considers each supplier's conduct vis-a-vis the RBA Code and the supplier's adherence to Dell's Supplier Principles when awarding and/or renewing business with a supplier, including in Norway.

Dell Technologies has operations and conducts business in many countries located in the Americas, Europe, the Middle East, Asia, and other geographic regions. Dell directly employs approximately 130,000 people worldwide. Dell also manages responsible business practices in one of the world's largest supply chains. The Dell-owned manufacturing facilities are located in the United States, Malaysia, China, Brazil, India, Poland, and Ireland.

Dell also utilizes contract manufacturers throughout the world to manufacture or assemble our products under the Dell Technologies brand. Components used in these manufacturing facilities are sourced primarily from those same countries listed above, but also from Japan, South Korea, Mexico, Taiwan, Singapore, Philippines, Thailand, Laos, Germany, Netherlands, Israel, Vietnam, and Indonesia to meet the technology, quality and sustainability requirements of our broad global portfolio of products. Our biggest spend is for direct materials and our due diligence in our supply chain primarily relates to those suppliers. [Dell's Public Supplier List](#) includes original design manufacturers (ODMs), final assembly and suppliers that Dell buys from directly and/or provide substantial product transformation, including the location of these facilities. This list represents a snapshot covering at least 95% of Dell's direct material spend during fiscal year 2022. In addition to these direct global material suppliers, our next biggest areas of spend include products and services procured in country or regionally for customer-facing services, marketing and global real estate and facilities.

The Dell Social and Environmental Responsibility (SER) assurance and engagement program is one of the largest in the technology sector. We proactively recognize and tackle issues within both Dell-owned factories and those of our suppliers, including final assembly, direct and sub-tier suppliers.

Dell works with suppliers that demonstrate varying levels of maturity in their own corporate sustainability programs. Recognizing this, we focus on building sustainable progress with our suppliers through continuous improvement.

Dell uses a specific four-element approach in our SER audit program, applicable to Norway. This continuous improvement model is a framework for advancing supplier performance that includes risk assessment, supplier audits, corrective action plans and capability building. We refer to each activity in the model as an element, rather than a phase or step, because suppliers do not always move through the elements sequentially. For example, the results of a risk assessment may indicate that an audit is unnecessary, but there is a need to drive improvement in a targeted area.

Ongoing communication is critical to driving continuous improvement in supplier sustainability performance. This includes communication among our suppliers, SER specialists and auditors. We also share SER performance metrics alongside other key indicators, such as cost and quality, as part of our supplier quarterly business reviews (QBRs). Key executives attend QBRs, help determine future business awards and address progress toward aligned goals.

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

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

Results of the due diligence assessments

Dell measures and monitors the cumulative impact of its various programs and provides transparency on our progress in the annual ESG Report. Ongoing analysis of related performance indicators helps inform

our understanding of the effectiveness of initiatives, such as supplier training on labor rights and recruitment fees, utilization and impact of corrective action plan toolkits directed at identifying and addressing labor rights risks, including forced labor, and more. These programs are also integrated into supplier performance management and escalation processes such that the total impact is reflected in the audit score improvements or recruitment fees identified and returned to workers.

Improvements in Supplier factory audit performance in fiscal year 2023 are as follows:

- Overall: 73% of Supplier factories that went through at least their second audit cycle improved their audit scores between cycles
- Final assembly Suppliers: 71%
- Direct Suppliers: 73%
- Sub-tier Suppliers: 73%
- High performing Supplier factories: 79% of factories are high performing based on their audit scores (at least 180 out of 200 for final assembly factories or 160 out of 200 for other factory tiers and no priority findings)

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

Fair and competitive wages

In fiscal year 2023, the Company employed on average 146 employees. Dell Technologies provides a competitive and fair wage to all employees, including in our Norwegian operations. We focus on both external and internal factors to ensure our high standards of compensation and benefits are met. Externally, Dell participates and gathers data from the most reputable third-party technology survey vendors on an annual basis to ensure Dell's pay ranges are as competitive as possible. Technology Sector Compensation Surveys provide Dell timely insights, driven by a collection of data from peer companies operating in highly competitive talent markets spanning Dell's full product portfolio. Additionally, Dell partners with Strategic Advisory Committees that provide real-time market trends, and the availability of robust data ensures Dell is globally consistent across our own operating entities, locally relevant and competitive in the market.

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

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

Measures to stop, prevent or mitigate adverse effects

We recognize that human rights risks and opportunities can evolve rapidly. While our ongoing due diligence and governance practices ensure we maintain momentum and focus on our current human rights risks and impacts, we continually monitor for emerging risks, evolving conditions and opportunities to improve our practices and accelerate positive outcomes for people.

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

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

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

Further Information

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

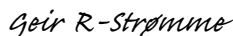
social.impact@dell.com

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

Norway, 21 June 2023



Nicolai Johan Moresco
Chairman of Board of Directors



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