GRI Content Index

This FY19 GRI index, references the GRI Standards 2016 disclosures, unless otherwise noted in the "Comments" section of this Index. This content index also supplements our FY19 Corporate Responsibility Report.

| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS | | | |
|----------------------|--|--|--|--|--|--|
| GRI General Disclosi | GRI General Disclosures | | | | | |
| GRI 102: General | 102-1 Name of the organization | Dell Technologies | | | | |
| Disclosures 2016 | 102-2 Activities, brands, products, and services | 10K - pages 5-7 | | | | |
| | 102-3 Location of headquarters | 10K - page 1 | | | | |
| | 102-4 Location of operations | 10K Manufacturing and Materials and Geographic Operations – page 8 Dell Locations | | | | |
| | 102-5 Ownership and legal form | On December 18, 2018, Dell Technologies became a privately controlled public reporting company. Dell Technologies has privately held Class A and Class B Common Stock as well as publicly-traded Class C Common Stock. | | | | |
| | | Stock Information | | | | |
| | | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – pages 73-78 10K Business – page 5 | | | | |
| | 102-6 Markets served | 10K Geographic Operations – page 8, Sales and Marketing – page 9 Our Brands | | | | |
| | | Customer Stories | | | | |
| | 102-7 Scale of the organization | 10K Selected Financial Data – pages 39-41, Employees – page 12 | | | | |
| | 102-8 Information on employees and other workers | 10K Employees – page 12 FY19 Corporate Social Responsibility (CSR) Report – By the Numbers, People – page 55 | We provide data on total number of full-time employees and total percentage of female team members | | | |



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| GRI General Disclosures (continued) | | | |
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| GRI 102: General Disclosures 2016 (continued) | 102-9 Supply Chain | 2018 Supply Chain Sustainability (SCS) Progress Report – Letter from Kevin Brown, EVP, Global Operations and Chief Supply Chain Officer – page 2, Our Approach to Sustainability – page 3 | |
| | | 10K - Manufacturing and Materials - page 8 | |
| | | Sustainable Supply Chain Our Suppliers | |
| | | | |
| | | Dell Supplier List | |
| | | Conflict Minerals Report | |
| | 102-10 Significant changes to the organization and its supply chain | 10K - Class V Transaction - page 12 | |
| | organization and its supply chain | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – page 14 | |
| | | There were no significant changes in our supply chain during FY19. | |
| | 102-11 Precautionary principle or approach | Dell Policies & Positions: | |
| | | - Dell Global Environmental Policy | |
| | | - Dell's Chemical Use Policy | |
| | | - Dell's Guidelines for Management of Manufacturing Process Chemicals | |
| | | - Dell Producer Responsibility Policy | |
| | | - Dell Electronic Disposition Policy | |
| | | Advancing Sustainability | |
| | | Sustainable Products and Services | |
| | | Circularity at Work | |
| | 102-12 External initiatives | The Responsible Business Alliance (RBA) | |
| | | Responsible Minerals Initiative | |
| | | The Net Positive Project | |
| | | Next Wave | |
| | | Reboot Representation Tech Coalition | |
| | | Eco labels | |



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| GRI General Disclosures (continued) | | | |
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| GRI 102: General Disclosures 2016 | 102-13 Membership of associations | Membership and Associations Cultivating Inclusion – Our Partnerships | |
| (continued) | 102-14 Statement from senior decision maker | FY19 CSR Report – Letter from Michael Dell – page 3 | |
| | 102-15 Key impacts, risks, and opportunities | Dell's Legacy of Good Plan 10K - Government Regulation and Sustainability - pages 10-11, Risk Factors - pages 18-34 FY19 CSR Report - 2020 Goals Dashboard - pages 7-21, Progress narrative by action area - pages 22-41, Support for SDGs - pages 42-43, Materiality & Our GRI Report - pages 44-46 | |
| | 102-16 Values, principles, standards, and norms of behavior | How We Win: Dell Technologies Code of Conduct Code of Conduct Corporate Governance Principles FY19 CSR Report – Governance – pages 40-41 | |
| | 102-17 Mechanisms for advice and concerns about ethics | Code of Conduct – pages 54-58 | |
| | 102-18 Governance structure | Board of Directors Committee Composition Governance Documents | |
| | 102-19 Delegating authority | Leadership Team 10K - Executive Officers of Dell Technologies - pages 14-17 | |
| | 102-20 Executive level responsibility for economic, environmental, and social topics | Ms. Karen H. Quintos, Chief Customer Officer of Dell Technologies, leads the Diversity and Inclusion and Corporate Responsibility business imperatives, which encompass social responsibility, entrepreneurship, and diversity. | |



| GRI STANDARD DISCLOSURE URL AND/OR PAGES NUMBER | COMMENTS |
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| GRI General Disclosures (continued) | | | |
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| GRI 102: General Disclosures 2016 (continued) | 102-20 Executive level responsibility for economic, environmental, and social topics (continued) | Ms. Christine Fraser SVP and Chief Responsibility Officer, reporting to Ms. Quintos, leads Corporate Social Responsibility. Mr. Brian Reaves Chief Diversity and Inclusion Officer, also reporting to Ms. Quintos, leads Diversity and Inclusion. 10K – Executive Officers of Dell Technologies – page 16 FY19 CSR Report – Letter from Michael Dell – page 3, Letter from Christine Fraser & Brian Reaves – page 4 Dell Technologies World – Social Impact at Dell Technologies | |
| | 102-21 Consulting stakeholders on economic, environmental, and social topics | Materiality Reporting FY19 CSR Report – Materiality & Our GRI Report – page 44-46 | |
| | 102-22 Composition of the highest governance body and its committees | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – pages 15-22 Board of Directors Committee Composition | |
| | 102-23 Chair of the highest governance body | Code of Conduct – pages 54-58 | |
| | 102-25 Conflicts of interest | Code of Conduct – page 47 Code of Ethics for Senior Financial Officers Corporate Governance Principles | |
| | 102-26 Role of highest governance body in setting purpose, values, and strategy | Corporate Governance Principles - Ethics and Values - page 1 Code of Conduct - pages 35, 59 FY19 CSR Report - Governance - pages 40-41 | |
| | 102-27 Collective knowledge of highest governance body | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – pages 17-22 Corporate Governance Principles – pages 2-3 Board of Directors | |



| GRI STANDARD DISCLOSURE URL AND/OR PAGES NUMBER | COMMENTS |
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| GRI General Disclosures (continued) | | | |
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| GRI 102: General Disclosures 2016 (continued) | 102-30 Effectiveness of risk management processes | Corporate Governance Principles – Governance, compliance, and risk management – page 2 Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – page 28 As founding members of the RBA, we have fully adopted the RBA Code of Conduct for our own operations, and we expect our suppliers to abide by the Code and to expect the same of their suppliers. As part of this process and through the years we have implemented robust management systems—embedded in our operations—to identify, manage and mitigate risks in these areas (environmental, social and governance). In addition, our own facilities are subject to audits through RBA's validated audit process. This audit process is one of the mechanisms we use to assess the effectiveness of our risk management processes for social, environmental and governance issues. During FY19, five of our facilities underwent RBAs audits. There were no priority findings. One of these facilities had one major nonconformance. Corrective action plans have been developed and are being implemented. We expect to have closure audits, as appropriate, during FY20. | |
| | 102-31 Review of economic, environmental, and social topics | Annual review cycle. Materiality FY19 CSR Report - Materiality & Our GRI Report - pages 44-46 | |
| | 102-32 Highest governance body's role in sustainability reporting | The SVP and Chief Responsibility Officer is the primary executive responsible for approving the entire report. The Executive Leadership Team participates in the review and approval process. Other functional executives also review and approve relevant parts of the report such as operations, human resources, etc. FY19 CSR Report – Letter from Michael Dell – page 3 FY19 CSR Report – Letter from Christine Fraser & Brian Reaves – page 4 | |
| | 102-33 Communicating critical concerns | There are different mechanisms available to raise concerns to the highest level of governance. These are described in our Corporate Governance Principles – page 7, our Code of Conduct – page 54 and the Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – Communications with Directors – page 29. To send an anonymous and confidential message for senior management or the board of directors, you can email any questions or comments to Board_of_Directors@Dell.com | |



| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS |
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| GRI General Disclosures (continued) | | | |
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| GRI 102: General Disclosures 2016 (continued) | 102-34 Nature and total number of critical concerns | 102-34b Code of Conduct – page 55 Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – page 29 | 102-34a Confidentiality constraints. Dell treats this data as confidential company information. |
| | 102-35 Remuneration policies | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – Director Compensation pages 29-31; Executive Compensation – pages 51-71. | |
| | 102-36 Process for determining remuneration | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – Director Compensation – pages 29-31; Executive Compensation – pages 51-71. | |
| | 102-37 Stakeholders' involvement in | Corporate Governance Principles – page 7 | |
| | remuneration | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – Proposal 3 – Advisory vote to approve named executive compensation – page 34, Consideration on annual say-on-pay results – page 55. | |
| | 102-38 Annual total compensation ratio | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – Pay Ratio Disclosure – page 71. | |
| | 102-39 Percentage increase in annual total compensation ratio | Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – Pay Ratio Disclosure – page 71. | |
| | 102-40 List of stakeholder groups | Materiality | |
| | | Membership and Associations | |
| | | Cultivating Inclusion – Our Partnerships | |
| | | Customer Engagement Programs | |
| | 102-41 Collective bargaining agreements | Human Rights and Labor Policy Statement RBA Code of Conduct – Freedom of Association – page 4 | We do not use reference 102-41a. The percentage of employees covered by collective bargaining agreements is managed at a local level. We do not track or consider relevant the consolidated percentage. |



| GRI General Disclosures (continued) | | | |
|---|---|---|--|
| GRI 102: General Disclosures 2016 (continued) | 102-42 Identifying and selecting stakeholders | Materiality FY19 CSR Report - Materiality & Our GRI Report - page 44-46 | |
| | 102-43 Approach to stakeholder engagement | Materiality FY19 CSR Report – Materiality & Our GRI Report – page 44-46 | |
| | 102-44 Key topics and concerns raised | Materiality FY19 CSR Report – Materiality & Our GRI Report – page 44-46 Dell Technologies World - Social Impact as a Business Imperative with Dell Technologies Chief Customer Officer Karen Quintos | |
| | 102-45 Entities included in the consolidated financial statements | 10K - Business, page 5 - 7 FY19 CSR Report About This Report - page 58 | |
| | 102-46 Defining report content and topic boundaries | FY19 CSR Report - Materiality & Our GRI Report - page 44-46, About This Report - page 58 Materiality | |
| | 102-47 List of material topics | FY19 CSR Report - Materiality & Our GRI Report - page 44-46 Materiality | |
| | 102-48 Restatements of information | During FY19, we restated the following metrics: 2020 Goals Dashboard: Sustainable Materials cumulative total: We are restating our cumulative total and the amount of reclaimed carbon fiber for CY17 because we found an error in last year's calculation. By the Numbers: Supplier diversity spend FY17 and FY18 due to changes in methodology. CY16 and CY17 for all Supply Chain indicators due to changes in calculation methodology. We now calculate these indicators on a calendar year basis rather than fiscal year basis. As such, these have been restated for comparability purposes. | |



| GRI General Disclosu | GRI General Disclosures (continued) | | | | |
|---|---|--|--|--|--|
| GRI 102: General Disclosures 2016 (continued) | 102-48 Restatements of information (continued) | FY17 and FY18 Scope 3 GHG emissions –supply chain, due to improvements in calculation methodology. FY17 and FY18 People of Color team members due to an error. FY18 Total number of ERG locations due to an error. | | | |
| | 102-49 Changes in reporting | During FY19 we had a few changes in our reporting: We have added a new section to the "By the Numbers" for Sustainable Products and Packaging. In this section, we now provide a breakdown of the different materials that contribute to the Sustainable Materials goal on an annual basis. In addition, we are now tracking and reporting our use of Ocean-bound plastic in packaging. We will continue tracking and reporting these metrics in this section moving forward. Please see FY19 CSR Report- By the Numbers – pages 53-54 for additional information. This year we are also closing our 2020 Plan, and launching our Progress Made Real: Our Vision for 2030. | | | |
| | 102-50 Reporting period | FY19 CSR Report - About This Report - page 58 | | | |
| | 102-51 Date of most recent report | FY18 CSR Report | | | |
| | 102-52 Reporting cycle | Annual | | | |
| | 102-53 Contact point for questions regarding the report | FY19 CSR Report – About This Report – page 58 | | | |
| | 102-54 Claims of reporting in accordance with the GRI Standards | FY19 GRI Content Index | | | |
| | 102-55 GRI content index | FY19 GRI Content Index | | | |
| | 102-56 External assurance | We conduct limited assurance of specific key performance indicators, including our GHG emissions and underlying energy consumption data, along with our water withdrawals and discharges and underlying data, is currently in progress. The FY19 assurance statement may be accessed here by July 29, 2019 (the FY18 statement will be at this link until then). | | | |



| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS |
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| Material Topics | | | |
|---|--|--|--|
| Data Privacy and Sec | urity | | |
| | 103-1 Explanation of the material topics and its boundaries | FY19 CSR Report - Materiality & Our GRI Report - page 45, Governance Section - pages 40-41 10K - Risk Factors - page 23 | |
| GRI 103: Management Approach 2016 | 103-2 The management approach and its components | Privacy Statement Regarding Customer and Online User Information Dell Supply Chain Assurance | |
| | 103-3 Evaluation of the management approach | FY19 CSR Report – Governance Section – pages 40-41 | |
| GRI 418 Customer Privacy 2016 | 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data | Confidentiality constraints. Dell takes customer data and privacy very seriously and has strict standards and policies and robust management systems in place to prevent, mitigate and manage customers' data and privacy. | |
| Role of IT in Society | | | |
| GRI 103: Management Approach 2016 | 103-1 Explanation of the material topics and its boundaries | FY19 CSR Report – Materiality & Our GRI Report – page 45, Progress narrative – Net Positive – pages 38-39 Transforming Lives with Technology Net Positive | |
| | 103-2 The management approach and its components | Transforming Lives with Technology Net Positive FY19 CSR Report – Progress narrative – Net Positive – pages 38-39 | |
| | 103-3 Evaluation of the management approach | FY19 CSR Report - 2020 Goals Dashboard - Net Positive - page 21, Progress narrative - Net Positive - pages 38-39 | |



| Material Topics (co | Material Topics (continued) | | | | |
|---|--|---|---|--|--|
| Diversity and Inclusi | ion | | | | |
| GRI 103: Management Approach 2016 | 103-1 Explanation of the material topics and its boundaries | FY19 CSR Report - Materiality & Our GRI Report - page 45 Cultivating Inclusion | | | |
| Approach 2010 | 103-2 The management approach and its components | Cultivating Inclusion Diversity and Equal Employment Opportunity Policy Code of Conduct – pages 18-19 Diversity and Inclusion Ethnic and Cultural Empowerment Gender Empowerment Team Member Empowerment Community Empowerment Workforce of the Future Mitigating Bias Supplier Diversity | | | |
| | 103-3 Evaluation of the management approach | FY19 CSR Report – 2020 Goals Dashboard – People – pages 18-20, Progress narrative – People – pages 34-37, By the Numbers – People – pages 55-56 2018 SCS Progress Report – Supplier Diversity –pages 27-29 | | | |
| GRI 405: Diversity and Equal Opportunity 2016 | 405-1 Diversity of governance bodies and employees | Board of Directors Notice and Proxy Statement for 2019 Annual Meeting of Stockholders – Directors – pages 18-22 Our Leadership FY19 CSR Report – By the Numbers – People – pages 55-56 | We use 405-1a i and ii; and partially use 405-1b i and iii, as we do not provide breakdown by group age for team members. | | |
| | 405-2 Ratio of basic salary and remuneration of women to men | Confidentiality constraints | Dell treats this data as confidential company information. | | |



| Material Topics (continued) | | | | |
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| Diversity and Inclusion | n (continued) | | | |
| GRI 406: Non- discrimination 2016 | 406-1 Incidents of discrimination and corrective actions taken | Confidentiality constraints | Dell treats this data as confidential company information. | |
| STEM Education | | | | |
| GRI 103: Management Approach 2016 | 103-1 Explanation of the material topics and its boundaries | FY19 CSR Report - Materiality & Our GRI Report - page 45 Youth Learning FY19 CSR Report - Communities - Youth Learning - pages 32-33 | | |
| | 103-2 The management approach and its components | Youth Learning FY19 CSR Report - Communities - Youth Learning - pages 32-33 | | |
| | 103-2 The management approach and its components | Youth Learning FY19 CSR Report - 2020 Goals Dashboard - Communities - page 17, Progress narrative - Communities - Youth Learning - pages 32-33, By the Numbers - Communities - page 55 | | |
| Flexible Workforce | | | | |
| | 103-1 Explanation of the material topics and its boundaries | FY19 CSR Report - Materiality & Our GRI Report - page 45 | | |
| GRI 103: Management Approach 2016 | 103-2 The management approach and its components | Work Flexibility at Dell FY19 CSR Report - 2020 Plan Achievements - Flexible Work Options - page 6, 2020 Goals Dashboard - People - page 19 | | |
| | 103-3 Evaluation of the management approach | FY19 CSR Report - 2020 Goals Dashboard - People - page 19, Progress narrative - page 36 | | |



| Material Topics (continued) | | | | | |
|---|---|---|--|--|--|
| Energy and Emission | Energy and Emissions | | | | |
| GRI 103: Management Approach 2016 | 103-1 Explanation of the material topics and its boundaries | FY19 CSR Report - Materiality & Our GRI Report - page 45 | | | |
| | 103-2 The management approach and its components | Global Environmental Policy Global Climate Policy Principles Climate Change Sustainable Supply Chain > Environment Sustainable Operations Sustainable Products and Services Science-based Emission Reduction targets CDP - Climate Change Energy Management System ISO 50001 - Dell (EMC) (Cork, Ireland) Energy Management System ISO 50001 - Dell Poland Manufacturing ISO 14001 Environmental Management System - Worldwide Certificate The FY19 assurance statement may be accessed here by July 29, 2019 (the FY18 statement will be at this link until then). | | | |
| | 103-3 Evaluation of the management approach | FY19 CSR Report – 2020 Goals Dashboard – Environment – pages 7, 9-12, Progress narrative – pages 22, 25-27 Energy Management System ISO 50001 – Dell (EMC) (Cork, Ireland) Energy Management System ISO 50001 – Dell Poland Manufacturing ISO 14001 Environmental Management System – Worldwide Certificate The FY19 assurance statement may be accessed here by July 29, 2019 (the FY18 statement will be at this link until then). Dell 2020 Energy Intensity Goal – Midterm Report | | | |



| Material Topics (continued) | | | | | |
|-----------------------------|--|--|---|--|--|
| Energy and Emission | Energy and Emissions (continued) | | | | |
| GRI 302: Energy 2016 | 302-1 Energy consumption within the organization | FY19 CSR Report – By the Numbers – Sustainable Operations – page 51 CDP – Climate Change | | | |
| | 302-2 Energy consumption outside of the organization | No information available | Dell Inc. does not track this indicator. However, we do track and report scope 3 emissions for relevant categories. | | |
| GRI 302: Energy | 302-3 Energy intensity | CDP - Climate Change | | | |
| 2016 (continued) | 302-4 Reduction of energy consumption | CDP - Climate Change FY19 CSR Report - By the Numbers - Sustainable Operations - page 51 | | | |
| | 302-5 Reductions in energy requirements of products and services | FY19 CSR Report – 2020 Goals Dashboard – Environment – pages 11-12, Progress narrative page 25-27 Sustainable Products and Services > Energy Efficiency Dell 2020 Energy Intensity Goal – Midterm Report | | | |
| GRI 305: Emissions 2016 | 305-1 Direct (Scope 1) GHG emissions | CDP - Climate Change FY19 CSR Report - By the Numbers - Sustainable Operations - page 50 | | | |
| | 305-2 Energy indirect (Scope 2) GHG emissions | FY19 CSR Report – By the Numbers – Sustainable Operations – page 50 CDP – Climate Change | | | |
| | 305-3 Other indirect (Scope 3) GHG emissions | FY19 CSR Report – By the Numbers – Sustainable Operations – page 50 CDP – Climate Change | | | |
| | 305-4 GHG emissions intensity | CDP - Climate Change | | | |
| | 305-5 Reduction of GHG emissions | FY19 CSR Report - 2020 Goals Dashboard - page 9, Progress narrative - page 25 | | | |
| | 305-6 Emissions of ozone-depleting substances (ODS) | No information available | Dell does not produce, import or export ODS materials | | |



| Material Topics (continued) | | | | |
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| Energy and Emissions | (continued) | | | |
| GRI 305: Emissions 2016 (continued) | 305-7 Nitrogen oxides (NOX), sulfur oxides (SOX), and other significant air emissions | No information available | Dell has not estimated the emissions of these gases, but these are expected to be negligible. | |
| Product Stewardship | | | | |
| GRI 103: Management | 103-1 Explanation of the material topics and its boundaries | FY19 CSR Report - Materiality & Our GRI Report - page 45 | | |
| Approach 2016 | 103-2 Explanation of the material topics and its boundaries | Global Environmental Policy Sustainable Products and Services Design for Environment – white paper Circularity at Work Eco Labels Product Carbon Footprints Position Statement on REACH Chemical Use Policy Producer Responsibility Policy Electronics Disposition Policy Dell Recycling Electronics Disposition Partner Performance Standard The Business Case for a Sustainable Supply Chain Dell Waste Electrical and Electronic Equipment Disassembly Instructions Global Takeback Leadership ISO 14001 Environmental Management System – Worldwide Certificate | | |



| Material Topics (continued) | | | |
|-----------------------------|--|---|--|
| Product Stewardship | (continued) | | |
| | 103-3 Evaluation of the management approach | FY19 CSR Report – 2020 Goals Dashboard – Environment – pages 11-15, Progress narrative pages 26-31 ISO 14001 Environmental Management System – Worldwide Certificate Design for Environment – white paper The Business Case for a Sustainable Supply Chain How to Recycle | |
| GRI 301: Materials 2016 | 301-1 Materials used by weight or volume | Materials Use Bio-based Resources | We do not currently track this KPI. |
| | 301-2 Recycled input materials used | FY19 CSR Report – 2020 Goals Dashboard – Environment – pages 13-14, By the Numbers – Sustainable Product and Packaging – pages 53-54 Recycled Materials | Because we do not currently track 301-1a, it is not possible to calculate 301-2a. Alternatively, we provide a cumulative total of sustainable materials used in products (2020 goals dashboard > product sustainable materials), and a breakdown of those by type of materials (By the Numbers). We do provide a percentage of sustainable and recyclable materials used in packaging, as percentage of total packaging used, by weight. |
| | 301-3 Reclaimed products and their packaging materials | FY19 CSR Report – 2020 Goals Dashboard – Environment – page 15. By the Numbers – Sustainable Operations – page 52 | We do not use 301-3a and b. Alternatively, we provide the cumulative total amount of product takeback since FY08. |



| Material Topics (cont | Material Topics (continued) | | | | |
|--|--|---|--|--|--|
| Human Rights | Human Rights | | | | |
| GRI 103: Management | 103-1 Explanation of the material topics and its boundaries | FY19 CSR Report - Materiality & Our GRI Report - page 45 | | | |
| Approach 2016 | 103-2 The management approach and its components | How We Win: Dell Technologies Code of Conduct – page 20 RBA Code of Conduct Dell Supplier Principles Human Rights and Labor Policy Statement Statement Against Slavery and Human Trafficking Vulnerable Worker Policy Responsible Minerals Policy 2018 SCS Progress Report – Our Approach to Sustainability – pages 2-5 Sustainable Supply Chain > Human Rights | | | |
| | 103-3 Evaluation of the management approach | FY19 CSR Report – 2020 Goals Dashboard – Supply Chain – page 8, Progress narrative pages 22-23, By the Numbers – Supply Chain – pages 47-49 2018 SCS Progress Report – Letter to Our Stakeholders – page ii, Highlights – pages 8-12, Audit results – pages 33, 38-39 | | | |
| GRI 408: Child Labor 2016 | 408-1 Operations and suppliers at significant risk for incidents of child labor | 2018 SCS Progress Report – 2018 RBA Audit Results – page 33, Labor and Human Rights audit results – page 38, Priority findings identified in 2018 – page 39 Our aim is to audit 100% of our high-risk supplier facilities on a two-year cycle. During the FY18–FY19 cycle, 97% of our high-risk supplier facilities (including first-tier and sub-tier supplier facilities) underwent RBA third-party audits. | We present results on a consolidated basis as percentage of facilities in compliance with the RBA Code of Conduct. | | |
| GRI 409: Forced or Compulsory Labor 2016 | 409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor | 2018 SCS Progress Report - 2018 RBA Audit Results - page 33, Labor and Human Rights audit results - page 38, Priority findings identified in 2018 - page 39 Statement Against Slavery and Human Trafficking Our aim is to audit 100% of our high-risk supplier facilities on a two-year cycle. During the FY18-FY19 cycle, 97% of our high-risk supplier facilities (including first-tier and sub-tier supplier facilities) underwent RBA third-party audits. | We present results on a consolidated basis as percentage of facilities in compliance with the RBA Code of Conduct. | | |



| Material Topics (continued) | | | | |
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| Human Rights (contin | nued) | | | |
| GRI 410: Security Practices 2016 | 410-1 Security personnel trained in human rights policies or procedures | No information available Code of Conduct | Dell currently does not track this figure. | |
| GRI 411: Right of Indigenous Peoples 2016 | 411-1 Incidents of violations involving rights of indigenous peoples | Dell is unaware of any part of our operations that would pertain to indigenous rights violations. Dell and Dell's suppliers are required to respect the human rights of others as detailed in our Code of Conduct, our Supplier Principles and the RBA Code of Conduct. | | |
| GRI 412: Human Rights Assessment 2016 | 412-1 Operations that have been subject to human rights reviews or impact assessments | Human Rights and Labor Policy Statement 2018 SCS Progress Report – Building sustainable change through continuous improvement – page 3 Our aim is to audit 100% of our high-risk supplier facilities on a two-year cycle. During the FY18–FY19 cycle, 97% of our high-risk supplier facilities (including first-tier and sub-tier supplier facilities) underwent RBA third-party audits. | | |
| | 412-2 Employee training on human rights policies or procedures | Code of Conduct – 100% of employees are required to take the Code of Conduct training and pass the associated test. The Code addresses core human rights aspects and risk areas. 2018 SCS Progress Report – Sharing our knowledge to help suppliers reach long-term success – page 4 | We do not track training using 412-2a, because Dell does not track training in terms of quantity of hours, but rather modules and courses completed. | |
| | 412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening | Dell Supplier Principles Sustainable Supply Chain 2018 SCS Progress Report – Key Performance Indicators – page 31 | Our aim is to audit 100% of our high-risk supplier facilities on a two-year cycle. During the FY18–FY19 cycle, 97% of our high-risk supplier facilities (including first-tier and subtier supplier facilities) underwent RBA third-party audits. | |



| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS |
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| GRI 200: Economic Topics | | | | | |
|---|--|---|--|--|--|
| GRI 201: Economic Performance 2016 | 201-1 Direct economic value generated and distributed | 10K – Selected Financial Data, pages 39-41 | | | |
| | 201-2 Financial implications and other risks and opportunities due to climate change | CDP - Climate Change 10K - page 25 Sustainable Operations > Climate Change | FY19 CDP Climate Change submission will be completed by July 31, 2019. | | |
| GRI 201: Economic Performance 2016 | 201-1 Direct economic value generated and distributed | 10K – Selected Financial Data, pages 39-41 | | | |
| GRI 201: Economic Performance 2016 | 201-3 Defined benefit plan obligations and other retirement plans | 10K - pages 163-166 | | | |
| (continued) | 201-4 Financial assistance received from government | 10K - pages 136-140 | | | |
| GRI 202: Market Presence 2016 | 202-1 Ratios of standard entry level wage by gender compared to local minimum wage | Confidentiality constraints | Dell treats this data as confidential company information. | | |
| | 202-2 Proportion of senior management hired from the local community | No information available | Dell does not disclose these percentages, however it is our common practice to promote and/or hire senior managers within the country/region that they manage. | | |
| GRI 203: Indirect Economic Impacts 2016 | 203-1 Infrastructure investments and services supported | FY19 CSR Report – Progress narrative – Communities – pages 32-33, By the Numbers – Communities – page 55 Transforming Lives with Technology | | | |
| | 203-2 Significant indirect economic impacts | FY19 CSR Report – Progress narrative – Communities – pages 32-33, By the Numbers – Communities – page 55 Transforming Lives with Technology | | | |



| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS | | |
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| GRI 200: Economic Topics (continued) | | | | | |
| GRI 204: Procurement Practices 2016 | 204-1 Proportion of spending on local suppliers | Supplier Diversity Overview FY19 CSR Report – By the Numbers –Supplier diversity spending – page 47 2018 SCS Progress Report – Supplier Diversity – pages 27-29 | We report our spending with diverse suppliers, not as percentage of total procurement budget, but as an absolute figure. | | |
| GRI 205: Anti- Corruption 2016 | 205-1 Operations assessed for risks related to corruption | Dell analyzes for corruption risk within all global functions and departments annually. Code of Conduct – page 39 FY19 CSR Report – Governance Section – pages 40-41 | | | |
| | 205-2 Communication and training about anti-corruption policies and procedures | All Dell employees receive Code of Conduct training annually. Code of Conduct – page 39 FY19 CSR Report – Governance Section – pages 40-41 Dell EMC Partner Code of Conduct – pages 4-5 | | | |
| | 205-3 Confirmed incidents of corruption and actions taken | Confidentiality constraints | Dell treats this data as confidential company information. | | |
| GRI 206: Anti- Competitive Behavior 2016 | 206-1 Legal actions for anti- competitive behavior, anti-trust, and monopoly practices | Code of Conduct – page 14 Zero legal actions. | | | |
| GRI 300: Environmenta | al Topics | | | | |
| GRI 301: Materials 2016 | See Material Topics section above | | | | |
| GRI 302: Energy 2016 | See Material Topics section above | | | | |
| GRI 303: Water 2016 | 303-1 Water withdrawal by source | FY19 CSR Report – By the Numbers – Sustainable Operations – pages 51-52 CDP – Water | | | |

Dell Water Policy Principles

Sustainable Operations > Water and Waste



| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS |
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| GRI 300: Environmental Topics (continued) | | | | |
|---|---|--|---|--|
| GRI 303: Water 2016 (continued) | 303-2 Water sources significantly affected by withdrawal of water | No information available. | Dell does not directly withdraw significant quantities of water from any source. Municipal supplies of water are, to the best of our knowledge, not sensitive or Ramsarlisted. Our CDP – Water Disclosure for FY18 question W1.2 listed several countries or cities where water supplies are stressed, following the Aqueduct modeling. We do not report on the specific sources | |
| | 303-3 Water recycled and reused | CDP - Water | | |
| GRI 304: Biodiversity 2016 | 304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | No information available | Dell is unaware of any significant impacts on biodiversity in protected areas resulting directly from its activities. | |
| | 304-2 Significant impacts of activities, products, and services on biodiversity | No information available | Dell is unaware of any significant impacts on biodiversity resulting from its activities. | |
| | 304-3 Habitats protected or restored | Plant a Tree Program | | |
| | 304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations | No information available | Dell's operations do not have a known impact on any endangered species. | |
| GRI 306: Effluents and Waste 2016 | See Material Topics section above | | | |
| GRI 306: Effluents and Waste 2016 | 306-1 Water discharge by quality and destination | CDP – Water Our wastewater discharges consist primarily of domestic sewage released to wastewater public utilities. Additional details will be available in our 2019 CDP Water Disclosure. | We do not use 306-1a ii, iii. | |
| | 306-2 Waste by type and disposal method | FY19 CSR Report - By the Numbers - Sustainable Operations - pages 52-53 | | |



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| GRI 300: Environment | GRI 300: Environmental Topics (continued) | | | | |
|---|--|---|--|--|--|
| GRI 306: Effluents | 306-3 Significant spills | Dell did not have any significant spills during FY19. | | | |
| and Waste 2016 (continued) | 306-4 Transport of hazardous waste | No information available | Dell's operations generate only small amounts of hazardous wastes (all facilities are conditionally exempt from small quantity generators, or equivalent), typically from maintenance of facility equipment such as heating/cooling systems. Wastes are managed according to local regulatory requirements and are recycled where feasible. Hazardous wastes are not exported. The total amount is not fully tracked at the corporate level. | | |
| | 306-5 Water bodies affected by water discharges and/or runoff | No information available | We do not track this information | | |
| GRI 307: Environmental Compliance 2016 | 307-1 Non-compliance with environmental laws and regulations | Dell was not assessed for any material environmental fines nor did we have any material environmental remediation or other environmental costs during FY19. | | | |
| GRI 308: Supplier Environmental Assessment 2016 | 308-1 New suppliers that were screened using environmental criteria | 2018 SCS Progress Report - Key Performance Indicators - page 31 | | | |
| | 308-2 Negative environmental impacts in the supply chain and actions taken | 2018 SCS Progress Report – Mitigating environmental risks – page 26 | | | |



| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS |
|--|---|---|--|
| GRI 400: Social Topic | s | | |
| GRI 401: Employment 2016 | 401-1 New employee hires and employee turnover | Careers FY19 CSR Report - People - Pages 34-37 | Dell considers this information proprietary and therefore does not publicly disclose it. |
| | 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees | Our Benefits | |
| | 401-3 Parental leave | No information available | |
| GRI 402: Labor/Management Relations 2016 | 402-1 Minimum notice periods regarding operational changes | Confidentiality Constraints Code of Conduct RBA Code of Conduct | Dell treats this data as confidential company information. |
| GRI 403: Occupational Health and Safety 2016 | 403-1 Workers representation in formal joint management—worker health and safety committees | Global Health and Safety Policy OHSAS 18001 Certificate | We do not track this metric. We provide a link to our Global Health and Safety Policy and to the Worldwide, Multi-site OHSAS 18001 Certificate. |
| | 403-2 Types of injury and rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities | FY19 CSR Report – By the Numbers – People – page 56 | |

Health and safety programs designed to prevent workplace injuries and illnesses are in place for employees throughout the company. Dell's very low occupational injury

and illness incident rate demonstrates the effectiveness of these programs.

Confidentiality constraints



403-3 Workers with high incidence or

high risk of diseases related to their

covered in formal agreements with

403-4 Health and safety topics

occupation

trade unions

Dell treats this data as confidential company

information.

| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS |
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| GRI 400: Social Topics | GRI 400: Social Topics (continued) | | | | | |
|---|--|---|---|--|--|--|
| GRI 404: Training and Education 2016 | 404-1 Average hours of training per year per employee | No information available | Dell does not track training in terms of quantity of hours, but rather modules and courses completed. | | | |
| | 404-2 Programs for upgrading employee skills and transition assistance programs | Growing Your Career | | | | |
| | 404-3 Percentage of employees receiving regular performance and career development reviews | Dell's performance management system links individual goals with organizational performance. The performance management process requires annual formal reviews, the calibration of talent and allocation of performance rewards and promotions — all decisions in line with being a meritocracy. Throughout the year, managers provide employees with ongoing feedback, coaching, training and on-the-job development. Employees and managers mutually create the employee-development plans. This entire process aligns individual-performance objectives and career-development planning with business and company goals and results. | | | | |
| GRI 405: Diversity and Inclusion 2016 | See Material Topics section above | | | | | |
| GRI 406: Non- discrimination 2016 | See Material Topics section above | | | | | |
| GRI 407: Freedom of Association and Collective Bargaining 2016 | 407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk | Human Rights and Labor Policy Statement Code of Conduct RBA Code of Conduct 2018 SCS Progress Report – page 5 | | | | |
| GRI 408: Child Labor 2016 | See Material Topics section above | | | | | |



| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS | | | |
|---|--|--|----------------|--|--|--|
| GRI 400: Social Topic | GRI 400: Social Topics (continued) | | | | | |
| GRI 409: Forced or Compulsory Labor 2016 | See Material Topics section above | | | | | |
| GRI 410: Security Practices 2016 | See Material Topics section above | | | | | |
| GRI 411: Rights of Indigenous People 2016 | See Material Topics section above | | | | | |
| GRI 412: Human Rights Assessment 2016 | See Material Topics section above | | | | | |
| GRI 413: Local Communities 2016 | 413-1 Operations with local community engagement, impact assessments, and development programs | FY19 CSR Report – Communities Progress narrative – pages 32-33, By the Numbers – Communities – page 55 Transforming Lives with Technology | | | | |
| | 413-2 Operations with significant actual and potential negative impacts on local communities | No information available | Not applicable | | | |
| GRI 414: Supplier Social Assessment | 414-1 New suppliers that were screened using social criteria | 2018 SCS Progress Report - Key Performance Indicators - page 31 | | | | |
| 2016 | 414-2 Negative social impacts in the supply chain and actions taken | 2018 SCS Progress Report - Supply Chain Sustainability Highlights - pages 7-19 | | | | |
| GRI 415: Public Policy 2016 | 415-1 Political contributions | Public Policy | | | | |



| GRI STANDARD | DISCLOSURE | URL AND/OR PAGES NUMBER | COMMENTS | | | | |
|--|---|--|--|--|--|--|--|
| GRI 400: Social Topic | GRI 400: Social Topics (continued) | | | | | | |
| GRI 416: Customer Health and Safety 2016 | 416-1 Assessment of the health and safety impacts of product and service categories | Dell Inc. (Dell) is committed to compliance with the laws and regulations in each country into which the company ships our products. All Dell products are designed and tested to meet the appropriate worldwide standards for Product Safety, Electromagnetic Compatibility, Ergonomics and other regulatory compulsory requirements, when used for their intended purpose. | | | | | |
| | 416-2 Incidents of non-compliance concerning the health and safety impacts of products and services | All reports of possible safety issues are investigated. Dell Inc. is not aware of any incidents traced to a product non-compliance for FY19. | | | | | |
| GRI 417: Marketing | 417-1 Requirements for product and | ISO Certifications | 417-1b. We do not track this indicator. | | | | |
| and Labeling 2016 | service information and labeling | Chemical Use Policy | | | | | |
| | | Dell Eco-labels | | | | | |
| | | Responsible Sourcing | | | | | |
| | | Product Carbon Footprints | | | | | |
| | | RBA Code of Conduct | | | | | |
| | | Product Safety, EMC and Environmental Datasheets | | | | | |
| | 417-2 Incidents of non-compliance concerning product and service information and labeling | Confidentiality constraints | Dell treats this data as confidential company information. | | | | |
| | 417-3 Incidents of non-compliance concerning marketing communications | Confidentiality constraints | Dell treats this data as confidential company information. | | | | |
| GRI 418: Customer Privacy 2016 | See Material Topics section above | | | | | | |
| GRI 419: Socioeconomic Compliance 2016 | 419-1 Non-compliance with laws and regulations in the social and economic area | Confidentiality constraints | Dell treats this data as confidential company information. | | | | |

