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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 a decade of experience providing recycling and reuse services directly to our customers. To meet customer needs at product end of life as a part of the total value of the Dell customer relationship, we provide free end-of-life management direct to the consumer in over 75 countries and territories 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.

Furthermore, Dell is:

- Expanding these same programs globally across all consumer product lines and continually working to meet the demands of all of our customers;
- Expanding our recovery and recycling operations wherever our business grows;
- 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 integrates the principles of individual producer responsibility into our own 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 as a way 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 collection networks, with a goal of increasing the volume of products collected.

Dell is committed to providing efficient and easy product recovery options directly to customers to facilitate responsible product retirement with or without legal mandates. We accept responsibility for 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



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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 responsibility 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 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 a decade 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 must 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.
- Producers must 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.
- 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, retailers and consumers.
- 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.
- 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 resale and recycling services, therefore, professional business products do not need legislating. Dell launched its own takeback programs for commercial customers of all sizes more than a decade ago.



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- 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.
- Consumers should remain responsible for removing their personal data from any products they return.
- Legislation should require recycling standards equivalent with globally-recognized standards to ensure that materials are managed in a socially and environmentally sound manner, ensuring a level playing field for all recyclers.
- Producers must 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.

Background Details on Dell Principles for Product Recovery Legislation

The following points provide supporting detail and clarification on the principles described above.

Collection

- In order to ensure that all producers are taking responsibility for their share of the electronic waste generated, they must demonstrate that they are collecting end-of-life product equivalent to their market share of the new products being placed on the market in their product categories. End-of-life product collected through the producers' own collection channels should count toward this total. The amount required can be effectively calculated using electronic waste projection models that account for product lifecycle and allow for reuse volumes, reflecting the actual volumes of electronic waste in the manufacturers' product categories generated in a market in a given time frame such as the previous year/s. Systems collecting on behalf of multiple members would be responsible for collecting the total combined amount of end-of-life product required from its members based on their aggregate market share. Market share should be determined using actual sales data.
- Producers must meet their obligation by collecting products in their own product categories utilizing individual or collective systems. For example, IT producers' obligations would be met by collecting IT products, including computers and peripherals associated with computers, such as monitors, keyboards, mice, printers and external hard drives. Producers with products in multiple categories (e.g., TVs and IT products) would collect products in those same categories. Producers may join a collective system and pay a proportionate share of the collective costs based on their market share in each category. This prevents cross-subsidization of the cost of recycling products with little residual value (e.g., TVs) by producers of products with residual value (e.g., IT). It also prevents stockpiling of certain products by collectors and processors to inflate the price of these products in the market.
- Recyclers should have a state/province/authority approved closeout plan in case of cessation of operation or abandonment.
- 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.



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- 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.
- 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. This ensures a level playing field, which is critical for environmental protection and ensuring the economic stability of the recycling market. Dell requires all its Electronics Disposition Partners to comply with all of these requirements, as described in the Dell Electronics Disposition Partner Performance Standard.
- Our commitment as an organization is to be responsible for our own brands. We recognize that not all producers act responsibly, and that with the implementation of varying producer responsibility models, we will at times be required to take reasonable responsibility for others' orphaned brands. Government, however, should first take responsibility to ensure all producers have a financial plan to ensure appropriate collection of their market share in the event of cessation of business, as well assigning those producers appropriate end-of-life responsibility for their products.

Bans

- Dell would not oppose a landfill ban on end-of-life IT products where other more appropriate treatment is locally available.
- Dell would not oppose a ban on certain materials in IT products, consistent with Europe's Restriction of the Use of Certain Hazardous Substances (RoHS) directive.
- Dell would not oppose prohibition of the use of prison labor in recycling electronics.
- Dell would not oppose a prohibition of the export of Electronic Waste from developed (OECD/EU) to developing (non-OECD)/non-EU countries. Electronic waste as classified by Dell is equipment that has reached the end of its useful life in its original form or is incapable of performing its original intended function(s) and cannot be reused, remanufactured, repaired or refurbished.

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 elements in place to ensure proper handling of waste materials and end-of-life electronics.
- Before the Dell Principles for Product Recovery Legislation should be considered for application in any particular country, that country first should have in place the following three measures, 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:



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- 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.
- 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.
- 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
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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