



Alyn Smith MEP
SNP HQ
Gordon Lamb House
3 Jackson's Entry
Edinburgh
EH8 8PJ
United Kingdom

Dear Mr. Smith

Many thanks for your letter of 30 October requesting more information about Dell's policies with regards to conflict minerals and slavery. Tim Griffin has asked me to respond on his behalf. Dell shares your concern about the use of conflict minerals and slavery and we are committed to operating responsibly in all areas of our business. For our work on conflict minerals we have released the following white paper, which can be found here www.dell.com/conflictminerals. We also strongly agree that slavery has no place in the modern world and as you will see our policies work toward this principle.

For conflict minerals it should be noted that although these minerals are used in nearly all electronics products, as well as other products like jet engines, cars, and medical devices, we do not use these minerals in their raw form. Dell does not have direct purchasing relationships with mining companies or artisan miners and we believe the challenge of responsible sourcing of minerals is bigger than one company, or even one industry.

Dell has been a leader in addressing this issue and publically supported the requirement of traceability and responsible sourcing. Our most effective means of influencing responsible mineral sourcing is to engage with our peers in the ICT industry, the members of our supply chain and other industries that use these same minerals such as the jewelry industry, the medical device industry, the aerospace industry and others.

As a member of the EICC (Electronics Industry Citizenship Coalition www.eicc.info) we are participating in a multi-industry workgroup, partnered with members of GeSI (Global eSustainability Initiative www.gesi.org), to address responsible sourcing of conflict minerals in the Congo and worldwide. The challenge we face is verifying the source of the minerals. Through this work, the Conflict-Sourcing Initiative (CFSI) was created where the smelter volunteers to have their processes audited by a 3rd party and their inventory is traced back to the material origin. We are in support of this program and are educating suppliers on the benefits of a single multi-industry solution. See <http://www.conflictreesourcing.org/> for more information.

In addition we are leveraging the EICC tools and templates with our suppliers to trace materials used in our products. This is a long process and will take time. At this point we believe that few companies are confident in the origin of their material and that most are relying on industry initiatives to help guide them, like the CFSI programme listed above. For the most up to date list of smelters from Dell, please refer to our online smelter list found at <http://i.dell.com/sites/doccontent/corporate/corp-comm/en/Documents/smelter-list.pdf>



As you can see we are active in this space and take it seriously. As you may have read Dell is now a private company with no SEC reporting requirements which are the basis of US law on conflict minerals. Even though we are a private company we will continue to collaborate with the EICC and GeSI members, as well as companies from other industries, to leverage our influence, tools and processes to ensure we're operating as responsibly as possible in every aspect of our business. You can see more about what Dell has done at www.dell.com/extractives

Dell's Human Rights and Labor Policy Statement outlines standards to ensure that all employees are treated with respect and dignity, are working under their own free will, and are being properly compensated for their effort. Dell is committed to upholding the protection of human rights of all workers where it is possible through our sphere of influence. We are committed to ensuring that we are not complicit in any human rights violations and hold our suppliers and partners to this same high standard. Dell supports and respects the principles proclaimed in the Universal Declaration of Human Rights and believes businesses should ensure that they are not complicit in human rights abuses. This position covers Dell employees and other stakeholders.

This policy particularly emphasizes that forced, bonded or indentured labor; involuntary prison labor; slavery or trafficking of persons shall not to be used and we audit our suppliers to ensure compliance with this aspect of our policy.

Similarly the EICC Code of Conduct establishes standards in treating workers with respect and dignity. Since 2004, the EICC Code of Conduct has prohibited the use of forced, bonded, and indentured labor and involuntary prison labor. Again Dell audits its suppliers to this code and takes seriously all forms of non-conformance. The EICC also has a Freely Chosen Employment (FCE) task force designed to help identify opportunities to share best practices among EICC members, expand the code of conduct, and make recommendations on available tools and training.

For complete information concerning our supply chain responsibility programs and specific audit findings, please see <http://www.dell.com/learn/us/en/uscorp1/corp-comm/cr-report-human-rights-labor-policy>

Dell broadly supports the Commission's approach to conflict minerals. The Commission has recognized that the issue of conflict minerals is complex with many actors involved. As the Commission notes a coordinated approach combining supply-chain due diligence and the use of public procurement provisions will help to reduce the problems associated with conflict minerals. It also avoids the pitfalls of the Dodd's Frank act which focused only on one region and forced companies to essentially stop using conflict minerals. At the same time the foreign, trade and development policies must also be used to stop the harm coming from conflict minerals.



I do hope that the above information is useful to you and that I have outlined our policies in these two important areas. Please do not hesitate to contact me on +32 474882072 or by email at william_parker@dell.com, should you have any further questions on this issue

Yours faithfully,


Will Parker, Government affairs Director EMEA, Dell