



9 February 2009

RE: Invitation to respond to Business & Human Rights Resource Centre

The National Labor Coalition (NLC), a non-governmental organization (NGO) based in the United States, has authored a report “High Tech Misery in China, The Dehumanization of Young Workers Producing Our Computer Keyboards”, alleging social and health and safety issues in the Mei Tai factory in Dongguan City, Guangdong China. We welcome the perspective and input from important stakeholders such NLC.

Dell is committed to responsibly operating in all areas of our business; that responsibility extends to our global supply chain as well. Dell expects our suppliers to employ the same high standards for workplace policies and safety that we do in our own facilities. We recognize our responsibility to work with suppliers promoting sustainable environmental practices, the health and safety of people and fundamental human rights and dignity.

Dell shares your concern about the issues raised in the NLC report. Mei Tai is not a direct supplier to Dell, but the company is part of our supply chain. We’ve requested our tier-one supplier engage a third party audit firm to assess the social and environmental conditions at the supplier. Our tier-one supplier will report the results of the audit and necessary corrective actions to Dell.

As a founding member of the Electronic Industry Citizenship Coalition (EICC – www.eicc.info), we are committed to maintaining EICC Code of Conduct standards throughout our global supply chain:

- We enforce these standards through a variety of tools including business reviews with suppliers, self assessments and audits. Reports of poor working conditions in Dell’s supply chain are investigated and appropriate action is taken. Dell continually monitors the supply chain through a specialist team within Worldwide Procurement.
- We believe we can best address full implementation of EICC standards by being a supportive partner to our tier-one suppliers. Dell works with its partners to identify issues and drive improvements where needed. These changes may be driven through business process improvement (BPI) projects, management reviews or a number of other tools. Additional information about Dell's programs can be found at www.dell.com/supplierprinciples. Dell also participates in joint third-party EICC audits.
- We also partner with our tier-one suppliers to help them improve social and environmental practices over time; we help them educate their suppliers in order to drive change throughout the supply chain.

Dell's approach is drawn from a review of global best practices, management systems, and acknowledged standards. Included among these are the United Nations Declaration of



Human Rights, the U.N. Convention on the Rights of the Child, fundamental conventions of the International Labor Organization (ILO), Electronic Industry Citizenship Coalition (EICC) Code of Conduct, International Organization for Standardization (ISO14001), Occupational Health and Safety Assessment Series (OHSAS 18001), The Dell Code of Conduct, as well as the benchmarking of other corporations and Industries around the globe.

Given the size and breadth of the global supply chain, full implementation of EICC standards is a long-term effort. We look forward to continuing to work with our industry colleagues and the NGO community in ensuring these proper standards for workplace conditions and practices are implemented.

For additional information on our actions and commitments, see our 2008 Corporate Responsibility Report at www.dell.com/responsibilityreport.

Best regards,

Tod Arbogast
Director, Dell Sustainable Business