

Dell Electronics Disposition Policy

January 2009

Dell's vision is to ensure that electronic products generated both from customers as well as through Dell's sales, service and manufacturing operations are appropriately managed from assessment prior to potential reuse through final disposition. It is the responsibility of Dell employees, suppliers, and sub-contractors to support and implement this policy. The following Electronics Disposition policy objectives have been established to achieve our vision:

1. Maximize Reuse Opportunities (Prevent Pollution)

- Dell will endeavor to maximize re-use opportunities.
- Dell Environmental Partners shall provide dispositioning services to include refurbishing, reuse, and recycle in alignment with Dell's Reuse Hierarchy.
- Products that meet standard Minimum Technology Specifications and are able to be refurbished and placed back on the secondary market whether for profit or not for profit, shall be a priority.
- Dell Environmental Partners providing refurbishment and reuse services shall adhere to Dell's Reuse Hierarchy.
- Dell Environmental Partners providing refurbishment and reuse services shall have in place a comprehensive environmental and safety management system.
- Dell Environmental Partners shall ensure that the entire disposition channel, including downstream intermediaries, meet or exceed all applicable environmental, transportation and health and safety regulations.

2. On-board Environmental Partners Providing Electronic Materials Sorting Services (Apply Globally Consistent Supplier Standards)

- All Dell Environmental Partners who operate with the initial step of sorting equipment for reuse or recycling/disposal purposes shall be on-boarded through Dell's on-boarding process which includes a comprehensive environmental, health, safety, security, logistics, downstream channel, and data destruction audit using Dell's prescribed audit protocol.
- Dell Environmental Partners shall track and document refurbished and end-of-life electronics throughout the product disposition channels. Tracking information shall show the final disposition of all recyclable materials and wastes. Refurbished electronics will be tracked to first point of reuse over which Dell has had direct oversight.
- Dell shall contractually obligate Dell Environmental Partners to comply with this policy and to require the compliance of their downstream vendors.

3. Functionality Test Equipment for Reuse (Be a Responsible Neighbor)

- All equipment with potential reuse capacity shall be fully tested, and functional when marketed or distributed as a refurbished product.
- Products that are non-functional shall not be marketed or distributed as refurbished for reuse and shipped either domestically or internationally.
- Data on refurbished equipment shall be responsibly handled by refurbishers through the use of Dell’s Data Destruction standard. Equipment that fails to meet this standard or is presorted to be recycled shall be adequately stored and protected from theft until disk drives are rendered inoperable and unreadable.

4. Properly Manage End-of-Life Electronics throughout Disposition Channels (Minimize Waste)

- Where refurbishment is not a viable option, Dell Environmental Partners shall endeavor to use processes that maximize the recovery of recyclable materials and minimize the generation of wastes that must be disposed of through landfill and incineration.
- Dell Environmental Partners shall contractually commit to employing environmentally responsible processes and practices in the recycling on materials and disposal of wastes as evidenced through Dell’s audit requirements.
- Dell Environmental Partners providing recycling and/or disposal services shall have in place a comprehensive environmental and safety management system.
- The entire disposition channel, including downstream intermediaries, shall meet or exceed all applicable environmental, transportation and health and safety regulations.

5. Sensitive electronic waste is not exported to developing countries (Be a Responsible Neighbor)

- Sensitive environmental waste requiring final disposition shall not be exported from developed to developing countries either directly or through intermediaries, unless the Worldwide Dell Asset Recovery Services Council has validated and approved the disposition channel.

6. Continually Manage Dell Disposition Channels and Communicate our Performance (Continually Improve and Communicate our Performance)

- Dell will track and document end-of-life electronics throughout the product disposition channels. Tracking information shall show the final disposition of all waste materials.

Definitions (for purposes of these guidelines):

<i>Disposition Channel -</i>	The route of End-of-First-Use Electronics that begins with Dell or Dell Customer and ends at the
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	Reuse or Refurbishment facility for processing and continues through resale or final disposition.
End-of-Life Electronics -	Any electronic product or part that can no longer be used as intended, or that contains material that may be recycled or processed in order to reclaim a substance for further use.
Sensitive Electronic Waste -	<p>Sensitive Electronic Wastes includes:</p> <ul style="list-style-type: none"> • Materials destined for recycling or disposal but not for direct reuse, that consists of lead-containing circuit boards, cathode ray tubes (CRTs), CRT glass (processed and unprocessed), or mercury-containing lamps. • Aggregated batteries containing lead, mercury, and/or cadmium; and mercury □ and PCB-containing components • Non-working parts or devices exported for repair unless assurances exist that sensitive materials (such as CRTs or circuit boards) will not be disposed of in the importing country as a result. <p>The definition of “sensitive electronic waste” does not include:</p> <ul style="list-style-type: none"> • Working equipment and parts that are tested, certified and labeled as working, and that are not intended for disposal or recycling, but for donation, re□use and resale and • Components being returned under warranty to the original equipment manufacturer. • Electronic equipment to be used as a direct feedstock in manufacturing without further processing or preparation (e.g., CRT cullet), provided a ‘competent authority’ of the importing country makes a determination that the material is not a waste, and therefore not a sensitive electronic waste.
Dell Reuse Hierarchy -	Most preferred method of reuse is whole system reuse. When that is not feasible, refurbishment of whole system for reuse is next priority. If both are not economically feasible, component-level piece part reuse is next preferred method of reuse. If none of these methods are feasible, commodity materials reuse is preferred. Not until all of the above methods are exhausted shall the disposal be considered.
Minimum Technology Specifications -	Minimum standards for which an end-of-first use electronic product can be adequately reused with

	current compatible peripherals and in line with its core useful purpose.
<i>End-of-First-Use Electronics -</i>	Any electronic product or part that is still functional and turned over to a refurbishing or reuse handler for repurposing by the first owner.
<i>End-of-Life Electronics -</i>	Any electronic product or part that can no longer be used as intended or repurposed.
<i>Reuse -</i>	Activities limited to performing non intrusive operation verification, data clearing, and software installation
<i>Refurbishment -</i>	Activities include any disassembly or physical modifications to the equipment, including part removal and upgrades
<i>Dell Data Destruction Standard -</i>	Dell Data Destruction Policy, 2009 (pending)
<i>Sorting -</i>	The process for differentiating materials or equipment for the purposes of identifying what is refurbishable, reusable and/or recyclable.