

Public policy

Political Disclosure and Accountability Policy

Dell embraces a policy of strict adherence to campaign finance laws and regulations that govern political contributions and the disclosure of those contributions. Dell Inc. does not contribute corporate funds to political candidates, national political party committees or other political committees.

Pursuant to U.S. federal law, Dell employees have established a separate, segregated fund or Political Action Committee (PAC) – the Dell PAC – which is supported solely by voluntary contributions from eligible employees and spouses of eligible employees who collectively choose to allocate those contributions to U.S. federal candidates and committees.

Dell PAC's spending reflects company and employee interests and the values of the company and not those of individual officers or directors. Dell has a strict policy regarding gifts to United States Congressional officials. The company policy on political disclosure and accountability is outlined as follows.

Personal employee political activities

Dell encourages its employees to be active and engaged in their communities, through both charitable activities and political engagements. Employees are free to volunteer in political activities and contribute personal resources to candidates and parties in any manner consistent with applicable federal, state and local laws as long as such activities do not interfere with their job at Dell.

Dell political contribution

Dell Inc. does not contribute corporate funds to candidates, national political party committees or other state or local political committees in any jurisdiction. In the U.S., contributions may only be made by the Dell employee PAC (Dell PAC).

Political Action Committee (PAC)

Dell sponsors a federal PAC, which allows eligible employees to voluntarily pool their resources to support candidates for public office. Dell PAC fully discloses all contributions made and received on reports filed with the U.S. Federal Election Commission, as required by law.

In compliance with applicable laws, the Dell PAC contributes funds to candidates for U.S. federal office, political parties and committees. From time to time, the Dell PAC solicits support from employees but coercive solicitations are strictly prohibited. A PAC Executive Committee governs and oversees all PAC activities. Outside ethics counsel reviews and approves all PAC materials and activities. For more information, please contact PAC@Dell.com

PAC Executive Committee

The Dell PAC Executive Committee has the following functions:

- Establishes policy;
- Delegates authority;
- Names the treasurer and assistant treasurer (on recommendation of the Chair);
- Performs the functions of a corporate board of directors.

The Executive Committee is composed of 10 voting members. All members of the Executive Committee must be employees of Dell. The Executive Committee meets quarterly to review, revise and approve PAC activities. The current chair of the Executive Committee is the Dell senior vice president and general counsel.

Contributions to State or Local Ballot initiatives

Dell does not contribute corporate funds or PAC funds to state or local ballot initiatives or to support or oppose state or local referenda.

Contributions to 527 organizations

Dell does not make corporate contributions to political committees organized under section 527 of the U.S. Internal Revenue Code, including those committees organized as Super PACs.

It is Dell's policy to not make political contributions with corporate dollars through third parties.

Contributions to trade associations

Dell belongs to several trade associations and pays regular dues to these groups. Dell does not normally make additional, non-dues contributions to these organizations to support the groups' political activities.

Disclosure

To enable interested parties to review Dell PAC contributions, Dell posts on its company website links to specific databases compiled by the [Federal Election Commission \(FEC\)](http://www.fec.gov), [The Center for Responsive Politics](http://www.responsivepolitics.com) and [The Center for Public Integrity](http://www.publicintegrity.com).

For U.S. Federal Lobbying Reports go to <http://lobbyingdisclosure.house.gov/> or www.disclosure.senate.gov.

For PAC Reports go to <http://www.fec.gov/> and search for Dell.