

# Dell Technologies Inc. (Dell)

**TICKER**  
DELL

**MARKET CAPITALIZATION**  
US\$43.2 billion

**HEADQUARTERS**  
United States

**DISCLOSURES**

[UK Modern Slavery Act](#): Yes

[California Transparency in Supply Chains Act](#): Yes

[Australia Modern Slavery Act](#): Yes (Disclosure of Subsidiary)

**OVERALL RANKING**

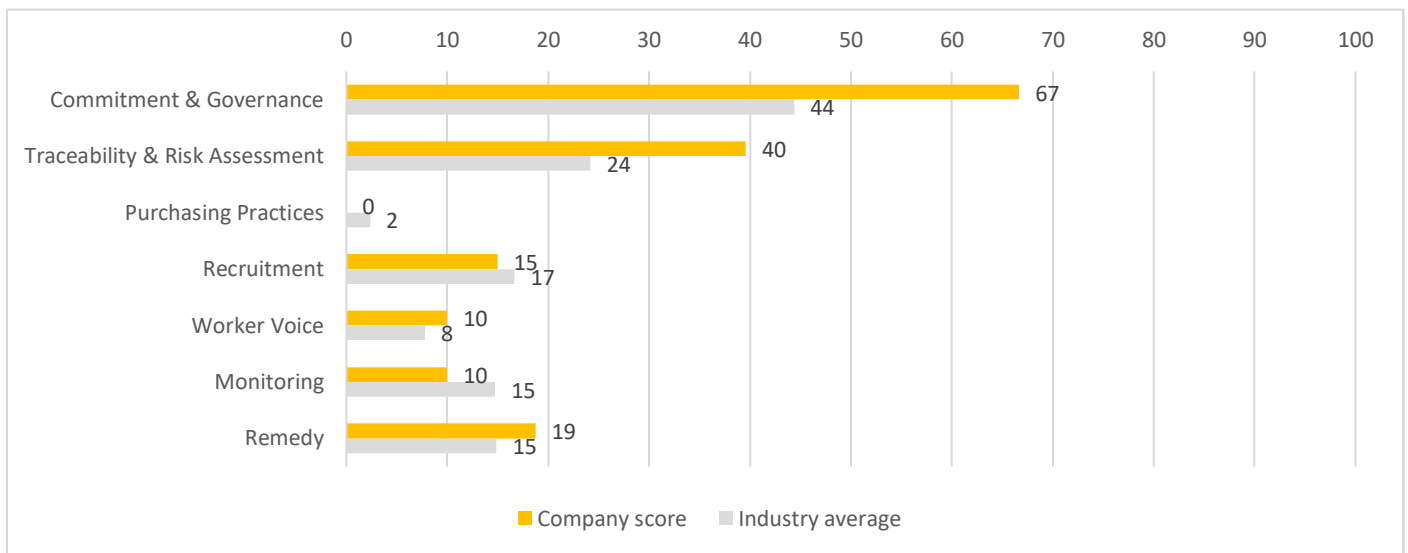
**16** out of **60**

([2020 Rank](#): 6 out of 49)

**OVERALL SCORE**

**27** out of **100**

**THEME-LEVEL SCORES**



**KEY DATA POINTS**

**SUPPLIER LIST**

Yes (Names only, not addresses)

**RISK ASSESSMENT**

Yes

**ENGAGED WITH KNOWTHECHAIN<sup>1</sup>**

Yes

**ALLEGATIONS OF FORCED LABOUR**

Yes

**NO-FEE POLICY**

Yes (Employer Pays Principle)

**REMEDY FOR SUPPLY CHAIN WORKERS**

Yes

**HIGH-RISK SOURCING COUNTRIES**

China and Malaysia

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## SUMMARY

Dell Technologies Inc. (Dell) ranks 16<sup>th</sup> out of 60 companies. Since 2020, the company improved on the themes of Commitment & Governance and Recruitment, disclosing board oversight of policies addressing forced labour in supply chains and additional instances of fee repayment to supply chain workers. However, the company did not disclose improvements across other themes and performed particularly poorly on Purchasing Practices and Worker Voice. As such, the company's rank dropped by 10 places.<sup>2</sup> KnowTheChain identified one allegation of forced labour in the company's supply chains.<sup>3</sup> The company has an opportunity to improve its performance and disclosure on the themes of Purchasing Practices, Worker Voice, and Monitoring.

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## LEADING PRACTICES

**Traceability and Supply Chain Transparency:** Dell discloses a list of the names and addresses of its suppliers, including procurement category and supplier type (original design manufacturers, final assembly and those which it buys from directly) covering 95% of its procurement spend.

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## OPPORTUNITIES FOR IMPROVEMENT

**Purchasing Practices:** To address forced labour risks in its supply chains, the company is encouraged to adopt purchasing practices that decrease the risk of forced labour, such as improving planning and forecasting and prompt payment. The company may further consider separating labour costs from price negotiations such that all direct and indirect labour costs are isolated and incorporated as a distinct costing block in pricing. The company should consider integrating [responsible buying practices in its contracts](#) with suppliers, to ensure that the responsibility for respecting human rights is shared.

**Worker Voice:** The company discloses grievance mechanisms for workers in its supply chains and external stakeholders. The company may consider disclosing data about the practical operation of the mechanism, such as the number of grievances filed, addressed, and resolved. In addition, to support collective worker empowerment, the company is encouraged to work with local or global trade unions to support freedom of association in its supply chains. The company is also encouraged to disclose the percentage of suppliers' workers covered by collective bargaining agreements.

**Monitoring:** The company discloses that it assesses suppliers against the standards in its supplier code of conduct, which includes forced labour. It reports that auditors are trained on worker interview skills including in relation to forced labour in particular. Disclosing information on the results of its monitoring efforts, such as a breakdown of findings, assures stakeholders that the company has strong monitoring processes in place.

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<sup>1</sup> For further details on high-risk raw materials and sourcing countries, see KnowTheChain's [2022 ICT benchmark findings report](#). Research conducted through June 2022 or through September 2022, where companies provided additional disclosure or links. For more information, see the full dataset [here](#). For information on a company's positive and negative human rights impact, see the Business & Human Rights Resource Centre [website](#).

<sup>2</sup> KnowTheChain's 2022-23 benchmarks use a revised methodology which prioritises a focus on the implementation of policies and processes and the outcomes they result in, as well as integrating a stronger focus on stakeholder engagement. See [here](#) for more information.

<sup>3</sup> For more information on the allegations, and the disclosures the company made about its response to those allegations, see the full dataset [here](#).