



Dell's Position Statement on REACH

REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals, EC 1907/2007) is the European Union's chemical regulation that came into force on 1 June 2007 and will be phased in over an 11 year period (until 2018). Dell supports the basic objective of REACH to further improve the European Union's chemicals regulatory system, including the aim to advance public health and safety and the protection of the environment.

Dell will meet all REACH requirements and is committed to provide our customers with information about substances in our products according to future REACH requirements. Dell's Chemical Use Policy restricts the use of environmentally-sensitive substances in products and works to minimize our impact on the environment through every stage of the product lifecycle. For more details about our chemical policy please see www.dell.com/environment.

Dell REACH Implementation

(Pre-) Registration

Manufacturers and importers are obliged to register substances they produce or import in quantities over 1 ton per year. The registration requirement applies to substances on their own, in preparations and in articles under special conditions (intentional release). Pre-registration, will take place from 1 June 2008 to 30 November 2008. Registration deadlines apply in November 2010, June 2013 and June 2018, depending on the volumes or level of concern of the substance.

(Pre-)registration is required for substances which are used in the EU for manufacturing of articles (e.g. manufactured goods such as cars, textiles, electronic chips), which does not apply to Dell's EU operations. Inks and toners for imaging products (printers) are defined as "preparations in containers" and do require pre-registration by November 2008. Dell's printer partners will pre-register substances used in inks and toners to comply with REACH requirements.

Information on Substances of Very High Concern (SVHC)

Suppliers of articles must provide recipients with information on Substances of Very High Concern (SVHC) if those are present above a concentration limit of 0.1 % on an article level. SVHC will be defined through the list of candidate substances for authorisation that will be produced by the European Chemicals Agency.

The first SVHC candidate list was published on October 22nd, 2008. Information on SVHC at the article level in the first and subsequent candidate lists can be found at the following link: www.dell.com/reach.

Notification

All articles containing SVHC above a concentration limit of 0.1% and above a total SVHC mass/volume of 1 ton per year manufactured in or imported into the EU must be notified to the European Chemicals Agency by June 2011. Notification is not required if the substance has already been registered for that use or where exposure to humans and environment can be excluded during normal conditions of use including disposal. It is anticipated that substances



used in electronic products will be registered by raw material manufacturers within the supply chain.

Dell will work with its suppliers to ensure that all SVHC are notified to the European Chemicals Agency if necessary to comply with this REACH requirement.