Dell Ethics Helpline and online Ethics Web Form
Frequently Asked Questions (FAQs)

ABOUT THE DELL ETHICS HELPLINE AND ONLINE ETHICS WEB FORM

Resources
- Dell Technologies Code of Conduct
- Global Privacy Policy
- Global Policy on Raising and Investigating Potential Ethics and Compliance Violations and Anti-Retaliation
- Dell Ethics & Compliance Site
- MyHR Portal
- Report a Concern (Helpline & Webform)
- Ask a Question (ethics@dell.com)

What are the Dell Ethics Helpline and Ethics Web Form?
Both the Dell Ethics Helpline (phone-based) and Ethics Web Form (online web form) are comprehensive and confidential reporting tools to assist Dell team members in raising concerns, issues or questions related to misconduct, (e.g. finance, accounting, fraud, anti-corruption), corporate policies or applicable laws.

Why does Dell have an Ethics Helpline and Ethics Web Form?
We believe that our team members are our most important asset. An effective reporting system augments our other efforts to foster a culture of trust, integrity and ethical decision-making.

Dell Ethics Helpline and the Ethics Web Form were created so that team members and external parties can ask for help or raise concerns/issues, even anonymously (where allowed by law). Although we always encourage open communication with managers, by providing these channels of communication, we can ensure there is always a comfortable venue for our organization and that they may be reviewed (and investigated) in a timely and fair manner.

To raise general HR issues such as peer relation concerns, use the Open-Door Process to talk with your manager or contact Human Resources by first leveraging the MyHR portal.

Why should I call the Ethics Helpline or use the online Ethics Web Form?
The Dell Ethics Helpline and online Ethics Web Form are primarily tools that you can use to submit reports of suspected misconduct, as well as legal or regulatory obligations in the financial, accounting, auditing, banking and anti-corruption areas and other very serious topics.

You are encouraged to email ethics@dell.com to get general advice and feedback, if you're not sure about an ethics-related policy or situation, or if you need help understanding the Code of Conduct. Similarly, you are encouraged to reach out to ethics@dell.com if you need to seek approvals from the Ethics Office for things such as outside or secondary employment opportunities.

To raise general HR issues such as peer relation concerns, use the Open-Door Process to talk with your manager or contact Human Resources by first leveraging the MyHR portal.

How do I call the Ethics Helpline or leverage the online Ethics Web Form?
The Dell Ethics Helpline is a telephone number that you can call at any time of day or night, 365 days of the year. You may leverage any phone to use the Dell Ethics Helpline, including your own cell or smartphone. Depending on the country you are calling from, there are specific dialing instructions, so be
What happens when I call the Ethics Helpline or use the online Ethics Web Form?
When you call the Dell Ethics Helpline, your call does not go to someone within Dell, but to a specially-trained NAVEX communications specialist (an independent third party) whose only interest is listening to and reporting your questions and concerns. Any allegation made to the Dell Ethics Helpline must be made in good faith and facts reported to Dell should be relevant to the allegation being reported.

If your first language is not English, NAVEX will obtain a translator for you. You will then be asked to describe your inquiry or concerns. During the call, the NAVEX communications specialist will ask where you are located so that your inquiry or concern can be assigned to someone in your location or country for review and response. The specialist will make a report which will contain only the relevant facts and which will be read back to you so that you can make sure that the notes are accurate. The NAVEX communications specialist will then assign a Report Key to your report and give you that number and Password so that you can call back to find out the status of your report.

When you use the online Ethics Web Form, your experience is almost identical to the call experience as described above, except that you are simply providing the information by typing into the form versus providing it live to a person on the phone. The form is submitted directly to the third party, NAVEX, just as the call record.

What type of situations should I report?
For situations occurring in (or being reported from within) the European Union (EU) countries, reports should focus on critical items such as legal or regulatory obligations in the financial, accounting, auditing, banking and anti-corruption areas and other very serious topics. Outside of the EU, reports can include any type of issue such as any of the principles outlined in the Dell Code of Conduct or any other corporate policies or applicable laws. NOTE: If you suspect misuse or potential disclosure of personal information (of a customer or a fellow team member) then please quickly report that to cybersecurity@dell.com instead of the Dell Ethics Helpline or another mailbox.

You are encouraged to email ethics@dell.com to get general advice and feedback, if you're not sure about an ethics related policy or situation, or if you need help understanding the Code of Conduct. Similarly, you are encouraged to reach out to ethics@dell.com if you need to seek approvals from the Ethics Office for things such as outside or secondary employment opportunities.

To raise general HR issues such as peer relation concerns, use the Open-Door Process to talk with your manager or contact Human Resources by first leveraging the MyHR portal.

If I see a violation, shouldn’t I just report it to my manager, human resources or legal and compliance and let them deal with it?
Ideally, you should bring any questions or concerns forward to your managers, local Human Resources, local Legal & Compliance Department, or as otherwise provided under local reporting procedures. We recognize, however, that there may be circumstances when you are not comfortable reporting the issue in this manner. It is for such circumstances that we have established these alternate reporting methods.

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May I report using either the telephone or online web form?
Yes, both the Dell Ethics Helpline and online Ethics Web Form allow you to file a concern or question by identifying yourself or anonymously (subject to applicable local laws).

Why should I report what I know?
We all have the right to work in a positive environment. With this right comes the responsibility of acting in an ethical manner and letting the appropriate people know if you believe someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the assets, goodwill and reputation of Dell.

Does Dell really want me to report?
We certainly do. In fact, we encourage you to report your concerns and ask questions. You know what is going on in Dell - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on Dell and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Where do these concerns go? Who can access them?
Reports are entered directly into NAVEX’s (an independent third party) secure server to prevent any possible security concerns. Reported concerns are made available to Global Ethics & Compliance team members who are charged with evaluating the reports based on the type of reported concern and location of the incident. Each of these team members, (including extended team members such as HR and Security), has had training in keeping these reports confidential to the fullest extent possible under the circumstances.

Isn’t this system just an example of someone watching over me?
The Dell Ethics Helpline and online Ethics Web Form concentrate on being positive aspects of our overall philosophy, and help us maintain a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is critical in today’s workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance needs while maintaining a positive reporting environment.

REPORTING SECURITY & CONFIDENTIALITY

It is my understanding that any concern I send from a company computer generates a server log that shows every website my PC connects with; won’t this log identify me as a report originator?
NAVEX, (an independent third party), fuels the Dell Ethics Helpline and online Ethics Web Form and does not generate or maintain any internal connection logs with IP addresses; no information linking your PC to NAVEX is available when you access the Dell Ethics Helpline or Ethics Web Form. In fact, NAVEX is contractually committed not to pursue a reporter’s identity.

Can I file a concern from home and still remain anonymous (where allowed by law)?
A report from home, a neighbor’s computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the third-party NAVEX system strips away identifying information, such as an IP address, so that anonymity is maintained. Plus, NAVEX is contractually committed not to pursue a reporter’s identity.

I am concerned the information I provide NAVEX Global will ultimately reveal my identity (note: laws in some countries do not allow anonymous reporting). How can you assure me that will not happen?
The NAVEX Global system is designed to protect your anonymity, where local law allows.
NAVEX is contractually committed not to pursue a reporter’s identity. To further ensure your anonymity (where allowed by law) you - as a reporting party - need to be careful not to reveal any identifying details as part of your report.

Is the telephone-based Dell Ethics Helpline confidential and anonymous too, where allowed by law?
Yes. Based on local law, you will be asked to provide the same information you would provide in an Internet-based report; the interviewer will type your responses directly into NAVEX’s secure environment. Telephone helpline-based reports have the same security and confidentiality measures applied to them during delivery as internet-based reports.

Does it help if I identify myself?
Investigating a report is usually faster and more efficient when the Dell Global Ethics & Compliance team can follow up directly with the person who reported the issue. If you have identified yourself, reasonable efforts will be made to respect your confidentiality. Your identity will not be disclosed unless necessary for carrying out a proper investigation, required during legal proceedings, or as required by local laws or local company mandates. Per Dell’s commitment to our Anti-Retaliation Policy, Dell will not tolerate any form of retaliation for reporting a concern in good-faith.

How can I monitor the progress of my concern if I choose to remain anonymous (where allowed by law)?
Once you have finished reporting your concern, you will be provided with a Report Key and asked to create a Password. With these two pieces of identification, you will be able to follow up the report, either by visiting the online Ethics Web Form portal or contacting the Dell Ethics Helpline. You may need to wait a few days after your submission before you can monitor progress and check whether you are being asked for any additional information.

What if I lose my Report Key or Password?
In order to maintain the highest level of confidentiality, you will be asked to file a new concern if you lose either your Report Key or your Password. You should mention that your new report relates to one supplied earlier.

What happens after I call the Ethics Helpline (if I choose to use that method)?
The NAVEX communications specialist sends a copy of the report through their secure system, and only specific individuals authorized to view that report (e.g. within Global Ethics & Compliance) will have access to the report within that system. Depending on the type of issue, the Dell individuals will provide the report to the appropriate internal Dell contact for review, investigation, and response. This is often determined by the location of the report and the type of issue reported. The data received through the Dell Ethics Helpline may be communicated within the Dell group, including in countries outside the European community, such as the United States, if such communication appears necessary to the requirements of the investigation. Any necessary transfer of data will be in compliance with Dell’s Global Privacy Policy.

If you give your name, the assigned Dell contact person may contact you through email or phone to give advice or ask for more information.

You may make a report anonymously (where allowed by law). However, Dell is better able to protect you from retaliation and to investigate your report if you provide your name. NAVEX and Dell will treat your name in confidence and it will only be disclosed, if necessary, to investigators or in subsequent legal proceedings, where allowed by local law.

The reports will be treated at all times confidentially and the information collected will be kept within a restricted group of people responsible for investigating and following up the allegations made.
Remember, if you report what you believe to be misconduct or unlawful activities, nobody at Dell can retaliate against you for reporting the activities. Per Dell’s Anti-Retaliation Policy, retaliation is strictly prohibited at Dell, and persons who try to use retaliation will be subject to disciplinary action. For more information, you can send an email to ethics@dell.com or contact someone in the Global Ethics & Compliance Office directly.

We will inform the person identified in a report of the allegation made against him or her as part of any process of investigating the allegations made. This allows that person to exercise his or her right to defend themselves against allegations made. The detail of the report will be communicated to that individual as soon as possible but not before necessary measures have been taken, in particular to avoid the destruction of evidence.

What about retaliation?
Per the Dell Anti-Retaliation Policy, if you report what you believe to be misconduct or illegal activities, nobody at Dell can retaliate against you for reporting the activities; retaliation is strictly prohibited at Dell, and persons who try to use retaliation will be subject to disciplinary action. At the same time, false accusations, made in bad faith, will not be tolerated. If an investigation shows that an employee knowingly made a false accusation under this policy, that employee may be subject to disciplinary action, up to and including termination, where allowed by local law. However, employees who make good-faith reports (reports that he/she reasonably believes to be true) won't be subject to discipline.

Will I be told the final outcome?
No. Dell is unable to share findings or details regarding potential discipline with you due to employee privacy rights. Even those that might be found to have committed wrongdoing also have rights that must be protected. Please know, however, that just because actions cannot necessarily be communicated or, depending on the situation, outwardly noticed, all reports are taken very seriously, treated fairly and necessary actions are taken. We welcome dialogue around your thoughts and questions on the process and encourage you to reach out via ethics@dell.com.

TIPS & BEST PRACTICES

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?
Dell chooses to promote ethical behavior. All misconduct, at any level, ultimately hurts Dell and all our team members, including you. One should consider what happened in recent corporate scandals to see the disastrous effects a seemingly harmless lapse in ethics can have on an otherwise healthy company. If you know of any incidents of alleged misconduct or ethical violations, consider it your duty to yourself and your co-workers to report it.

I am not sure if what I have observed or heard is a violation of Dell’s principles, company policy, applicable law or involves unethical conduct, but it just does not look right to me. What should I do?
File a concern. Perhaps leverage the telephone-based Dell Ethics Helpline and let NAVEX (an independent third party), help you prepare and file your concern so it can be properly understood. Dell would rather you report a situation that turns out to be harmless than let possible misconduct or illegal behavior go unchecked because you were unsure.

What if my boss or other managers are involved in a violation? Won’t they get the report and start a cover-up?
The Dell Ethics Helpline or online Ethics Web Form, managed by NAVEX's, (an independent third party), system and report distribution protocols are designed so implicated parties are not notified about or granted access to reports in which they have been named, unless required by local laws.
What if I remember something important about the incident after I file the concern?
When you file a concern via the Dell Ethics Helpline or online Ethics Web Form either using the internet or through NAVEX’s telephonic contact center, you receive a unique Report Key and are asked to select a Password. With the Report Key and your Password, you can return to the system again, either by internet or telephone, and access the original report. At that point, you can add more details.

What if you have questions for me concerning my report?
The third-party system, fueled by NAVEX, provides functionality that enables Dell investigators to post questions for you, even if you report anonymously (where allowed by law). When you receive your Report Key, you will be provided with the amount of time we expect for the report to be processed. When that time has passed, we strongly suggest you check to see if any questions have been posted. Providing the opportunity for such dialogue means situations may not only be identified but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?
All NAVEX system correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity, if you so choose, to the extent permitted by local law.

Can I still file a report if I don’t have access to the Internet?
You can file a report via the online Ethics Web Form from any computer that can access the Internet. Many public locations, including most public libraries, have Internet computers. If you don’t have access or are uncomfortable using a computer, you can call the Dell Ethics Helpline, which is available 24 hours a day, 365 days a year. Specific dialing options are available by country.