

Dell Inc. State of Oklahoma 2016  
Individual Manufacturer Plan Revision 3.0

**Oklahoma Computer Equipment  
Recovery Act (Title 27A, Section 2-11-  
601)**



February 2016

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# State of Oklahoma

## 2016 Individual Manufacturer Plan

### Revision 3.0

## Oklahoma Computer Equipment Recovery Act (Title 27A, Section 2-11-601)

### Dell Inc.

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Dell believes that no computer, materials or component should go to waste. Computers and the natural resources used to make them are too valuable to discard. Dell makes reuse our priority, keeping resources in the system and looking to recycling and proper environmental management next. Dell offers our consumers a variety of convenient options to reuse and recycle computer products.

Dell has developed and implemented standards for reuse, recycling and environmental stewardship. We accept responsibility to provide recycling for all Dell-branded products. We are equally ambitious about the requirements we place on our global Environmental Partners (EPs), our recycling vendors. Dell requires all downstream recycling partners to meet our worldwide standards.

To view these policies/standards please visit our website at: [www.dell.com/recycling](http://www.dell.com/recycling)

These policies emphasize individual producer responsibility. Under them, Dell commits to providing efficient and easy product recovery options directly to our customers:

- We provide free end-of-life management for any brand electronic product when an individual purchases a new, similar Dell product.
- We provide free end-of-life management for any individual's Dell product, regardless of new product purchase.
- We employ these same standards globally across all consumer product lines, and we are continually working to expand our recovery and recycling operations to countries where our business grows.
- We provide transparent and effective goal setting and public reporting on our end-of-life recovery programs.

The specific details of how Dell intends to leverage our portfolio of consumer recycling programs to meet our individual manufacturer covered device recovery commitments in the State of Oklahoma are presented below.

## 1. Management

Dell intends to leverage our portfolio of consumer recycling programs to meet our individual manufacturer covered device recovery requirements in the State of Oklahoma. By leveraging

our existing collection and vendor risk management programs, we will be able to meet our obligations to the State of Oklahoma without adding significant management efforts.

Our current portfolio of take-back (reuse and recycle) options are managed on a national basis and will not require additional Oklahoma-plan specific resources to effectively implement. We also manage and hold our environmental partners (reuse and recycle vendors) to a single global standard that includes inspection and audit functions that we carry out on all of our EPs annually through a third party audit firm. This effort will continue globally as additional volume of covered devices are routed to our EPs.

Key Dell employees who will be responsible for ensuring compliance with this plan and for meeting Dell’s reporting obligations under the program are:

Melissa Mallory, US Takeback Operations Manager  
[Melissa\\_mallory@dell.com](mailto:Melissa_mallory@dell.com)  
 512.723.4937

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[Elizabeth\\_Johnson@dell.com](mailto:Elizabeth_Johnson@dell.com)  
 512.728.9076

## 2. Operation

### 2.1 Collection sites and services

Dell believes that our customers define “convenient” differently thus our approach to providing free and convenient covered device recycle options for our products is built on a portfolio of **free** takeback options. These programs include:

- Residential Collection (mail-back)– Free residential collection through our logistics partner of any Dell branded covered devices
- Residential Collection with Purchase (mail-back)– Free residential collection through our logistics partner of any brand of covered device with the purchase of a similar Dell system
- Goodwill-Dell Reconnect Partnership (Available in Southwestern Oklahoma) – Free recycle opportunities at participating Goodwill stores and attended donation centers (ADCs)

**Figure 2.1 –Program Details**

Program	Why Chosen	Locations/ Contact	Services/ Contact	Hours of Operation	Types of Covered Devices Accepted
Residential Collection (mail-back) – Dell Branded	Easily accessible to all consumers	Consumer door-step	Collection of covered devices	Pick-up options Monday through Friday except major holidays	All Dell branded covered devices

Program	Why Chosen	Locations/ Contact	Services/ Contact	Hours of Operation	Types of Covered Devices Accepted
Residential collection (mail-back) with Purchase	Easily accessible to all consumers	Consumer door-step	Collection of covered devices	Pick-up options Monday through Friday except major holidays	Any brand and type of covered device with the purchase of a similar Dell system
Reconnect	Easily accessible store and attended donation centers (ADCs)	Go to <a href="http://www.dellreconnect.com">www.dellreconnect.com</a> and type in a zip code to find a participating GW location.	Collection and recycling of covered devices	Available at <a href="http://dellreconnect.com/">http://dellreconnect.com/</a>	Any brand and type of covered device

With our portfolio, we are able to provide a minimum of 3 **free** recycle program opportunities to the residents of the State of Oklahoma.

## 2.2 Reuse opportunities

Dell believes that no computer, materials or component should go to waste. Computers and the natural resources used to make them are too valuable to discard. Dell makes reuse our priority as detailed in our Global policies and standards, keeping systems and natural resources in the market where this can be accomplished in a compliant, cost-effective and environmentally responsible manner. All of the covered devices recovered by Dell in Oklahoma will be transported to one of our Environmental Partners (EPs) that have been on-boarded to carry both our reuse and recycle processes. These EPs are incented through our contract to optimize system and material recovery in a compliant manner. Our EPs are required under our ARR Agreement to provide item/weight level tracking of all materials processed on Dell's behalf. This tracking system includes the distinction between systems reused and recycled.

## 2.3 Transportation

Logistics providers vary by program and are indicated in below.

**Figure 2.3 – Transportation Providers by Program**

Program	Logistics Provider	Cities/Counties Covered	Services Provided	Types of Covered Devices Accepted
Residential Collection – Dell Branded	On-boarded logistics provider	All	Residential collection of covered devices and transport to designated EP	Dell branded covered devices
Residential collection with Purchase	On-boarded logistics provider	All	Residential collection of covered devices and transport	Any covered device similar to Dell system purchased

Program	Logistics Provider	Cities/Counties Covered	Services Provided	Types of Covered Devices Accepted
			to designated EP	
Reconnect	Consumer to Goodwill Reconnect store or ADC followed by Reconnect EP	All participating Goodwill stores and ADCs listed at <a href="http://www.dellReconnect.com">www.dellReconnect.com</a>	Transport of all covered devices collected to Reconnect processing location at a Goodwill operation	All brands and types of covered devices

## 2.4 Recyclers

Where covered devices are not deemed suitable for reuse, Dell requires, through our Global policy, that our EPs make every reasonable effort to minimize final disposition through landfill and/or incineration. We enforce this through contractual obligation audited through our risk management program.

Thus, Dell hereby commits that, per our Electronics Disposition Policy, every reasonable effort will be made to control all Electronic Wastes and to avoid Electronics Wastes entering landfills or incinerators.

Corporate policy prevents Dell from disclosing any details of our supplier network publicly. We do have a very rigorous process for on-boarding and ensuring the continued compliance of all of our EPs as detailed below. General information about the location and general business contract status is shown in figure 2.4 below.

**Figure 2.4 – General Environmental Partner (Recycler) Information**

Program	Counties and Cities Covered	EP	Contract Terms	Types of Covered Devices Accepted	Processes
Residential Collection – Dell Branded	All	<b>CONFIDENTIAL</b>	Active MTB Agreement	All computer electronics	Refurbish and recycle operations
Residential collection with Purchase	All	<b>CONFIDENTIAL</b>	Active MTB Agreement	All computer electronics	Refurbish and recycle operations
Reconnect	Please visit <a href="http://www.dellreconnect.com">www.dellreconnect.com</a>	<b>CONFIDENTIAL</b>	Active MTB Agreement	All computer electronics	Refurbish and recycle operations

### **3. Environmentally-Sound Management Practices**

As noted above, Dell has developed and implemented global environmental management standards for all of our EPs. These standards go beyond the requirements detailed in the published EPA facilitated “Guidelines for Responsible Recycling.”

To ensure that our EPs meet or exceed all of Dell’s performance standards, Dell employs a rigorous auditing process to measure our global recycling and end-of-life disposition vendors (our environmental partners) against our standards.

Our auditing consists of three components. First, we require our environmental partners to pass a comprehensive initial audit. Next, we audit them on an annual basis. Last, we conduct periodic on-site spot checks to ensure compliance throughout the year.

Dell’s auditing firm performs all Dell auditing and vendor partner reviews. They use a consistent auditing process in every location worldwide. Dell auditing standards include not only environmental measures, but also traceability, asset and facility security, logistics, data destruction measures, and downstream channel risks.

Dell and its auditing firm track all audit findings and all corrective action plans to closure. Traceability and downstream materials movement are key components of these environmental partner reviews. Dell and its auditing firm follow the initial material transfer to a Tier 1 partner and continue to follow that material through to Tier 2 and Tier 3 partners, globally. We hold our Tier 1 environmental partners to Dell’s highest standard and expect them to hold their suppliers to the same standards. The audit process allows Dell and its auditing firm to confirm compliance.

### **4. Education & Outreach (Advertising & Promotion)**

Dell plans to provide customer awareness around this effort. At a minimum, Dell will include:

- Web presence at [www.dell.com/recycling](http://www.dell.com/recycling)
- A link from the Oklahoma Department of Environmental Quality (ODEQ) electronics recycling web site
- Collaboration with ODEQ outreach and awareness programs

Examples of additional efforts might include:

- Local programs (local grants and partnerships)
- Collective Dell Corporate-based ongoing education initiatives associated with our Sustainability Initiatives
- Prominently branding Dell Product

### **5. Coordination**

Dell will provide for collection services independent of other programs, thus not coordination effort will be required.

## 6. Recordkeeping

All covered devices collected through our programs in Oklahoma will be processed by one or more of our Environmental Partners (EPs) as described in section 3.3 of this plan. Dell EPs are obligated under the Master Takeback Agreement (MTB Agreement) that is signed prior to our business engagement, to provide unit or weight level tracking of all covered device and/or materials to a minimum of three tiers from receipt and to final disposition for sensitive materials. Each EP maintains their own data tracking and accounting system and provides reconciliation reports to both Dell and our independent 3<sup>rd</sup> party environmental auditing firm.

EPs are also obligated through the MTB Agreement to comply with Dell's Environmental Partner Performance Standard. The standard promotes environmentally responsible reuse and recycling and the minimization of disposal.

Dell's policies and standard can be found at [www.dell.com/recycling](http://www.dell.com/recycling).

## 7. Reporting

As required by Oklahoma DEQ, Dell will provide the following reports and information per the schedule provided in figure 7.1 below.

**Figure 7.1 – Reporting and Information Schedule**

<b>Information Requirement</b>	<b>Due Date</b>	<b>Frequency</b>
2016 Plan Submittal	1 March 2016	Annually
Annual Program Report	1 March 2016	Annually