

Dell Technologies Partners' Compliance Obligations

Dell Technologies is committed to responsible business practices and to high standards of ethical behavior. This includes holding our Partners to recognized international standards and conventions and global best practices. In this sense, in addition to other contractual and/or programmatic obligations, Partners **MUST**:

- ✓ **Comply with** the obligations under the **Dell Technologies Partner Code of Conduct**.
- ✓ **Maintain true, accurate, and complete accounting records** concerning the sale, use and licensing of the Dell Technologies Products and Services. It is important to never establish or use “side funds”, “off-book funds”, “slush funds”, or any undisclosed or unrecorded company funds, such as spreadsheets itemizing reserves of cash, for illegal activities, personal use, or any other purpose.
- ✓ **Adhere to both U.S. and global trade laws** regardless of the country in which you do business in, including:
 - obtain and comply with the requirements of all export and re-export licenses;
 - screen end users against restricted US party lists;
 - comply with anti-boycott laws effective in jurisdictions where Dell does business;
 - ensure business is not carried out by individuals, entities, countries or territories sanctioned by the US (including, North Korea, Cuba, Iran, Sudan, Syria, Crimea, Russia, Belarus, Donetsk & Luhansk regions in Ukraine);
 - **ensure that these obligations are followed by end users** and third parties that cooperate with them.
- ✓ **Abide by all relevant Anti-Corruption Laws**, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, regardless of the country in which you do business, and:
 - maintain, monitor and enforce anti-corruption policies, procedures and internal controls & provide copies of such documents upon request;
 - conduct risk-based due diligence on third parties engaged in Dell Technologies business;
 - provide reasonable gifts and hospitality appropriately and in compliance with Anti-Corruption Laws and MDF terms and conditions, as required;
 - complete all assigned training; and
 - never offer a bribe, either directly or through a third party, to win business.
- ✓ **Ensure compliance with global Competition laws which generally** prohibit (1) price fixing; (ii) market and customer allocation; (iii) limiting production or supply of products/services; (iv) group boycott, or (v) bids rigging. Make sure to check the laws in countries where you do business or effects of your business are felt to ensure compliance with regional rules.

Compliance Resources

Below you will find some useful links that will help you achieve the obligations included here-in. However, please note that they are not exhaustive, and that this document is not intended to provide legal advice.

- ✓ **General U.S. Compliance Program Guidance**
 - ✓ [BIS Elements of an Effective Compliance Program: \(including licensing guidance, recordkeeping, audits, etc.\)](#)
 - ✓ [OFAC Framework for an Effective Sanctions Compliance Program](#)
 - ✓ [DOJ Evaluation of an Effective Compliance Program](#)

- ✓ **Restricted party screening:**
 - ✓ [US Consolidated Screening Tool:](#)
 - ✓ [EU Sanctions Map](#)
 - ✓ [UK Sanctions List](#)
 - ✓ [Trade Compliance FAQs & Trade Compliance Red Flags](#)

- ✓ **Anti-Boycott**
 - ✓ [Office of Antiboycott Compliance \(OAC\)](#)

- ✓ **Anti-corruption:**
 - ✓ [DOJ & SEC Resource Guide to the U.S. Foreign Corrupt Practices Act](#)
 - ✓ [UK Bribery Act Guidance](#)
 - ✓ [Transparency International Corruption Perceptions Index](#)
 - ✓ [Dell Technologies Due Diligence Guide for Distributors](#)
 - ✓ [Compliance Expectations Framework](#)
 - ✓ [Compliance Audit Documentation](#)
 - ✓ [Anti-Corruption FAQs](#)

- ✓ **Competition Law:**
 - ✓ [Federal Trade Commission, Guide to Antitrust Laws](#)
 - ✓ [European Commission, Overview of Competition Laws](#)