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Dell's Position on RoHS

Global concerns over the human health and environmental risks associated with the use of certain environmentally-sensitive materials in electronic products has led the European Union ("EU") to enact the Directive on the Restriction of the use of certain Hazardous Substances (RoHS), that is designed to restrict the use of cadmium, hexavalent chromium, lead, mercury and certain halogenated flame retardants (PBBs and PBDEs) in electronic products. This directive was implemented in the EU on July 1, 2006. Dell products sold in the EU on or after July 1, 2006 comply with the EU RoHS requirements (as permitted by the RoHS Directive, service or upgrade parts that do not meet the restricted levels may continue to be offered to support legacy products sold prior to July 1, 2006). In addition, effective July 1, 2006, Dell met the requirements of the "Japan RoHS" or "J-MOSS" legislation for applicable products. Dell is also meeting the requirements of the EU RoHS Directive worldwide. For more information on Dell's global compliance with RoHS requirements, please see www.dell.com/rohsinfo.

Dell understands the environmental risks associated with the substances covered by the RoHS Directive and is committed to eliminating or reducing the use of these, as well as other environmentally-sensitive substances, in our products. Through our integrated Chemicals Management Program, Dell restricts the use of cadmium, hexavalent chromium, lead, mercury, PBBs and PBDEs in Dell branded products (in accordance with regulatory requirements). Dell has also established public goals (see pg.7 of the 2006 Sustainability Report on www.dell.com/environment) to phase-out the use of lead and other non-regulated brominated flame retardants in our products in advance of legal requirements.

Delivering RoHS compliant¹ products is a significant challenge for the electronics industry and involves a complex set of technical attributes. Since 2003, Dell has had a strategic team focused on the importance of standardization in this area. Dell held the chair position in the lead-free working group within the industry group iNEMI, which has been focused on addressing supply chain issues surrounding the electronics' industry transition to lead-free products. Dell continues to participate in the development of global standards to accelerate the overall industry transition and encourage harmonization of RoHS requirements in other geographies such as China and various US states.

Almost all of Dell's products are affected by the RoHS Directive, primarily through the substitution of lead-based solders and finishes with lead-free alternatives. Dell established a lead-free qualification process to help ensure that products meet stringent reliability and quality requirements, as well as regulatory compliance requirements. In June 2005, Dell introduced the OptiPlex™ GX520 and GX620

¹ Meets the requirements of the EU Directive on the Restriction of the use of certain Hazardous Substances, dated January 27, 2003.

desktops which were designed with lead-free² motherboards, chassis and power supplies. Since the launch of this initial RoHS compliant system, Dell has continued to launch RoHS compliant products across our product lines. For more details on Dell's RoHS transition and the latest list of compliant systems, please see www.dell.com/rohsinfo .

On February 28, 2006, China released a regulation called "Management Methods for Controlling Pollution by Electronic Information Products" or commonly referred to as **China RoHS**. Although this regulation restricts use of the same six hazardous substances as EU RoHS, China government adopts a totally different approach for compliance verification. That is, producers shall properly label and disclose RoHS information for all applicable "EIP"(electronic and information products) and parts sold in China on and after March 1st, 2007.

Dell has been working with China government and trade associations such as AeA and USITO since 2003 during the China RoHS legislative process. Dell also sits in the China RoHS standards working group. **All Dell products shipping directly into China which are manufactured on or after March 1st, 2007, will be China RoHS compliant.**

In addition to meeting RoHS requirements, Dell will continue to work to reduce the use of environmentally-sensitive materials in our products, as well as continue to evaluate the technical and environmental, health and safety impacts of alternative materials. For additional information on Dell's environmental programs, please see www.dell.com/environment.

² Per the EU Directive on the Restriction of the use of certain Hazardous Substances, this system (chassis and factory installed components) or configuration contains less than 0.1% lead by weight.