

## **The Zarc Recycling Quality Policy:**

**Zarc Recycling is committed to the development, implementation, maintenance, and on-going improvement of its Management System (MS), and compliance with the customer requirements, those of identified interested parties, and referenced national and international standards, including, but not limited to, the current version of ISO 9001 for Quality.**

**This is accomplished by adherence to the MS and verified through Internal and External Audits, Management Reviews and monitoring of the Quality Targets and Objectives.**

**Zarc Recycling will provide all the resources necessary to ensure its success, improvement of the MS and the processes of delivery of product and services to our customers.**

## **The Zarc Recycling Occupational, Health and Safety Policy:**

**Zarc Recycling is committed to providing safe and healthy working conditions for the prevention of work-related injury and ill health.**

**Zarc Recycling ensures this Occupational Health and Safety Policy is appropriate to the purpose, size, and context of Zarc Recycling and to the specific nature of its Occupational Health and Safety risks and Occupational Health and Safety opportunities.**

**Zarc Recycling provides a framework for setting the Occupational Health and Safety objectives through its Management Review procedure.**

**Zarc Recycling is committed to fulfilling all of its legal and other requirements.**

**Zarc Recycling is committed to the elimination of hazards and the reduction of Occupational Health and Safety risks.**

**Zarc Recycling is committed to continual improvement of the Environmental Health and Safety Management System.**

**Zarc Recycling is committed to consultation and participation of workers, and, where they exist, workers' representatives.**

**This Occupational Health and Safety Policy is: Available as documented information; communicated within Zarc Recycling, and is available to interested parties, as appropriate, and has been determined by Top Management to be relevant and appropriate.**

## **The Zarc Recycling Environmental Policy:**

**Zarc Recycling's top management has established, implemented, and maintains this Environmental Policy that, within the Scope of its Environmental, Health and Safety Management System:**

**This Environmental Policy has been determined to be appropriate to the purpose and context of Zarc Recycling, including the nature, scale and**

environmental impacts of its activities, products, and services.

Zarc Recycling's Environmental, Health and Safety Management System has and adheres to a framework for the setting of its environmental objectives.

Zarc Recycling is committed to the protection of the environment, including prevention of pollution and other specific commitments relevant to the context of Zarc Recycling

Zarc Recycling is committed to fulfilling all its legal and voluntary compliance obligations with all due diligence.

Zarc Recycling is committed to the continual improvement of this Environmental, Health and Safety Management System in order to enhance its environmental performance.

This Environmental Policy is documented in the Environmental, Health and Safety Management System Manual and posted in the publicly accessible area of the facility for all interested parties and available on request.

This Environmental Policy is maintained through the Internal and External Audits and Assessments procedure and the Management Review procedure.

This Environmental Policy is communicated to all Zarc Recycling personnel through the Training and Competence procedure and postings throughout the facility.

Zarc Recycling adheres to the R2 policy for managing used and end-of-life electronic equipment that is based on a reuse, recover, dispose hierarchy of responsible management strategies documented in the Environmental, Health and Safety Management System Manual.

## **The Zarc Recycling Data Security Policy:**

Zarc Recycling prohibits unauthorized individuals from accessing or handling equipment containing data.

Zarc Recycling has assigned a competent Data Protection Representative (see Data Protection Representative above) with the overall responsibility and authority for the R2 Facility's data security and legal compliance, including oversight of all related duties otherwise assigned.

Zarc Recycling mandates reporting of known and suspected breaches of security and data to the Data Protection Representative.

Zarc Recycling requires completed training and confidentiality agreements prior to individual authorization to handle equipment containing data.

Zarc Recycling has identified penalties for non-compliance with this policy, including personal liability.

## **The Zarc Recycling Food and Beverage Policy:**

Zarc Recycling provides designated eating areas for personnel. Eating at

workstations and areas outside of designated eating areas is not permitted to protect the health and safety of all personnel.

Beverages may be consumed outside of designated eating areas if the beverage container is of the type that can be secured from spillage. Open containers and uncovered cups or glasses may only be used in the designated eating areas.

## **The Zarc Recycling Anti-Discrimination Policy:**

Zarc Recycling's Anti-Discrimination policy applies to all employees, contractors, visitors, customers, and stakeholders.

This anti-discrimination policy is intended to prevent discrimination and protect our employees, customers, and stakeholders from offensive and harmful behaviors. This policy supports our overall commitment to create a safe, amiable, and productive workplace for everyone.

Discrimination is not to be tolerated toward anyone because of protected characteristics, like race, gender, age, religion, ethnicity/nationality, disability/medical history, marriage/civil partnership, pregnancy/maternity/paternity, and/or sexual orientation.

Zarc Recycling also complies with the applicable Federal and State compensation wage laws.

The Zarc Recycling Employee Manual defines the process to report discrimination complaints, Zarc Recycling will investigate and respond to discrimination complaints through the A-HDI Harassment and Discrimination Investigation procedure. Anti-Discrimination procedures are periodically communicated to all staff.

Zarc Recycling complies with all anti-discrimination laws, including [Title VII of the Civil Rights Act of 1964, Americans with Disabilities Act (ADA) and Age Discrimination in Employment Act (ADEA.)]

## **The Zarc Recycling Child, Forced Labor and Prison Labor Policy:**

Zarc Recycling does not, and will not use child labor, as defined by the International Labor Organization (ILO) or forced labor, where the worker cannot leave or terminate employment freely.

**Child Labor:** Work that deprives children of their childhood, their potential, and their dignity, and that is harmful to physical and mental development.

**Forced Labor:** Work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily".

Prisoner labor is only acceptable and will only be used if it is voluntary, compensated beyond room and board, and skills are taught for gainful

employment after release.

Zarc Recycling will, to the extent possible, ensure that all suppliers, contractors, and down-stream vendors adhere to this policy.

## **The Zarc Recycling Hierarchy of Responsible Management Strategies Policy:**

Zarc Recycling manages used and end-of-life electronic equipment, components, and materials – with respect to off-site and on-site activities, as well as the selection of downstream vendors – that is based on a hierarchy of responsible management strategies.

Zarc Recycling evaluates and sorts, equipment, components, and materials in accordance with the R2 policy and Core Requirement 6, and take all practical steps to direct items for processing in the following order of preference:

**Reuse** – For all equipment and components capable of reuse, Zarc Recycling directs the items to a Reuse process meeting the requirements of the R2 Standard. However, equipment and components that are not legal to sell such as lost/stolen, counterfeit, or recalled equipment are not reused and instead are directed to Materials Recovery.

**Materials Recovery** – Equipment and components not capable of reuse, Zarc Recycling directs the items to a Materials Recovery process meeting the requirements of the R2 Standard for recycling.

**Disposal of Focus Material** - Energy recovery, incineration, or land disposal (See NOTE below) are not used as a management strategy for FMs or equipment and components containing FMs unless applicable law requires the use of a specific technology (e.g., hazardous waste landfill or incineration of PCBs). However, if documented extreme and rare circumstances beyond the control of Zarc Recycling disrupts its normal management of an FM, it may consider using these technologies to the extent allowed under applicable law until normal management is again possible.

**Disposal of Non-Focus Material** - Only when all opportunities for reuse or materials recovery have been exhausted and there are no technically viable recycling processes available will Zarc Recycling direct material to the most environmentally beneficial option of energy recovery, incineration, or land disposal.

**NOTE:** Land disposal includes any application of materials to the ground, including forms of alternative daily cover and storage cells in landfills.