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Quality, Environmental, Health and Safety (QEH&S) Management System Manual

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- Introduction

IT Supply Solutions' Quality, Environmental, Health and Safety Management System (QEH&SMS) Manual was developed for meeting customer requirements and reducing IT Supply Solutions' impacts on the environment and worker health and safety as a result of its operations and activities. This QEH&SMS Manual is intended to meet the requirements of Recycling Industry Operating Standard (RIOS):2016 and Responsible Recycling R2v3.

As a wholesaler dedicated to providing affordable, high-quality, refurbished electronic devices, to both businesses and end-users, we pride ourselves in maintaining environmentally-friendly practices and procedures along with a safe work environment for our employees.

1.1 Reference Documents

Documents referenced in this QEH&SMS Manual are as follows:

Recycling Industry Operating Standard (RIOS):2016

R2v3, The Sustainable Electronics Reuse & Recycling Standard

1.2 Definitions

Terms used in this QEH&SMS Manual are defined as follows:

Supplier – A person or business that supplies a non-service product to IT Supply Solutions. IT Supply Solutions may purchase materials or materials may be processed for a fee.

Outside Provider - A person or business that provides IT Supply Solutions or on behalf of IT Supply Solutions, products or services that affect product quality, create a potential environmental impact of the operations, or create health and safety hazards to products or the operations. Note: Outside providers that perform services at IT Supply Solutions' facility are also referred to as Contractors.

Customer - A person or business that purchases a product from IT Supply Solutions.

Downstream Vendor – A business that provides a service, which consists of processing IT Supply Solutions' material. Vendors may charge IT Supply Solutions for processing the material or IT Supply Solutions may be paid for the material.

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2 General Requirements (RIOS 1.0, R2 1.0 & 3.0)

2.1 Scope and Application (RIOS 1.1, R2 1.0)

IT Supply Solutions shall consider activities performed by IT Supply Solutions and Outside Providers, and determine and document the scope of the QEH&S management system.

- a) The scope statement shall be documented.
- b) IT Supply Solutions shall develop, implement and continually improve a management system that includes the core elements of RIOS and R2 and relationships to documentation necessary to conform to the requirements of RIOS and R2.
- c) IT Supply Solutions shall be audited and R2 certified for all used electronic equipment, components and materials managed and all processes and activities undertaken at the facility, as well as any external processes, activities and locations under the control of IT Supply Solutions and associated with its certification, including all:
 - 1) R2 Core Requirements in this Section 1, and
 - 2) R2 Process Requirements in Section 2 applicable to its scope of operations.
- d) IT Supply Solutions shall document and have published on the R2 Certificate:
 - 1) An accurate statement of the scope of operations covered under the R2 Certification reflective of all processes and activities undertaken for the used electronic equipment, components and materials managed, and
 - 2) All applicable R2 Process Requirements to which it has been certified, and
 - 3) Authorized allowances in accordance with the R2 Code of Practices, and
 - 4) All legal names and legal entities associated with the certifiable activities operating at or in conjunction with IT Supply Solutions.
- e) IT Supply Solutions shall maintain and communicate publicly on an ongoing basis a current listing of all additional locations owned and/or operated by IT Supply

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Solutions that are not R2 Certified and are used to manage used or end-of-life electronic equipment, components, or materials.

- f) IT Supply Solutions shall not have been included by SERI, within the previous 24 months of any certification audit, in a list of organizations maintained by SERI on its website that have been found to have engaged in deceptive marketing, illegal acts or other fraudulent activities which could reasonably lead to a false impression that IT Supply Solutions was certified to the R2 Standard during that period.

IT Supply Solutions has defined and documented the scope of its quality, environmental, health and safety management system as follows:

7067 Production Court, Florence, KY 41042

RIOS Scope: Full-Service End-of-life Electronics Recycling including Collection, Sorting, Testing, Refurbishment and Data Destruction.

Key processes done at the main site are: Sort, Data Wiping and Destruction, Repair and Refurbishment.

R2 Scope - Downstream Vendor Management, Logical and Physical Data Sanitization, and Testing and Repairing of Used Electronic Equipment, and components.

Note: Per SERI, using all-encompassing words such as “consumer electronics” or “used electronics” shall only be used if the R2 facility is qualified to sort, and process, numerous types of electronics.

Applicability

Appendix	Applicable?
A - Downstream Recycling Chain	YES
B – Data Sanitization	YES
C – Test and Repair	YES
D – Specialty Electronics Reuse	NO
E – Materials Recovery	NO
F – Brokering	NO

Allowances

None

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Legal names and legal entities associated with the certifiable activities

IT Supply Solutions

Additional locations owned and/or operated by IT Supply Solutions that are not R2 Certified and are used to manage used or end-of-life electronic equipment, components, or materials.
This list is posted on the IT Supply Solutions website.

None

Related and Supporting Documents

1.1.1-F Process Flow Diagram
1.1.2-F Interaction of Processes Diagram
6.0.1-F Management Review Meeting Agenda & Minutes

2.1.1 RIOS Outcomes (RIOS 1.1.1)

IT Supply Solutions shall implement a QEH&S management system which:

- a) Prevents adverse quality, environmental, and health and safety outcomes;
- b) Promotes improved product or service quality; positive environmental results, and worker health and safety;
- c) Systematically manages its risks, opportunities, and stakeholder and legal requirements in an organized and controlled manner;
- d) Manages change to proactively address impacts to quality, environment, and health and safety;
- e) Monitors and measures QEH&S performance; and
- f) Identifies and corrects causes of nonconformance to improve IT Supply Solutions' QEH&S performance.

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2.1.2 QEHS Management System (RIOS 1.1, R2 3.0)

- a) IT Supply Solutions shall be certified by an accredited Certification Body, to one or more of the approved EHSMS standards, to plan and manage the environmental, health and safety aspects of its operations.
- b) IT Supply Solutions shall fully integrate the requirements of this R2 Standard into the QEH&SMS, including maintaining all documents and records necessary to demonstrate conformance with each of the R2 Requirements, and review the system at least annually through internal audits.
- c) IT Supply Solutions shall ensure that all documents and records required to demonstrate conformance with this R2 Standard are readily available at the certified facility and maintained for a minimum of three years.
- d) IT Supply Solutions shall:
 - 1) Demonstrate the expertise, knowledge, and technical capability to process each type of electronic equipment, component, and material it accepts in a manner that takes into account legal compliance as well as the need to protect the health and safety of workers, the public, and the environment, and
 - 2) Identify, analyze, and demonstrate effective control of important environmental impacts, and health and safety risks that it can control and those that it can influence, both internal to IT Supply Solutions' facility and through its recycling chain activities, and
 - 3) Maintain a process to periodically evaluate the risk of exposure to hazardous substances such as mercury, lead, beryllium, cadmium, PCBs, phosphor compounds, flame retardants, silica dust, and hexavalent chromium through processing or handling of electronic equipment, components, and materials, and
 - 4) Maintain processes to visually inspect equipment and components received and handled for any conditions or damage that may result in adverse environmental, health or safety incidents during handling, storage or processing of the equipment, and controls for the containment, segregation, and storage of items requiring special handling, and

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- 5) Adhere to good housekeeping standards, including keeping all work and storage areas clean and orderly. Housekeeping for all areas of the facility shall be planned, regularly implemented, and monitored, and
- 6) Provide sanitary facilities for workers, and
- 7) Prevent the consumption of food and beverages in areas not maintained free of contaminants, and
- 8) Provide the same level of care to the entire workforce, including staff, volunteers, consultants, temporary workers, and anyone else performing activities under its direction, and
- 9) Designate a qualified employee(s) or contract worker(s) to coordinate its efforts to promote worker health and safety, and environmental protection. This designated individual(s) shall be identified to all employees and two-way communication shall be proactive and effective between employees and this individual regarding potential hazards and how best to address them.

Related and Supporting Documents

See operational control procedures and forms

2.2 QEH&S Infrastructure (RIOS 1.2, R2 3.0)

2.2.1 Management Structure (RIOS 1.2.1)

Senior Management shall establish, document, and communicate a hierarchy of roles and responsibilities for the effective operation of the QEH&S management system.

- a) Senior Management shall identify the senior manager responsible for health and safety for all Recycler activities.
- b) Senior Management shall identify the QEH&S management representative(s) responsible for the QEH&S management system.

Senior Management has designated the Director of Operations, a member of senior management, to ensure health and safety is properly addressed and managed within the QEH&SMS.

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Senior Management has designated the Director of Operations as the QEH&S Management Representative and they will assume all roles, responsibilities, and authorities defined throughout the QEH&SMS including;

- a) ensuring that the processes and QEH&SMS are established, implemented and maintained in accordance with the requirements of these Standards,
- b) reporting to IT Supply Solutions' top management on the performance of the QEH&SMS for review, including recommendations for improvement.

Related and Supporting Documents

1.2.1.1-F Responsibility Matrix

1.2.1.2-F Organization Chart

2.2.2 Resources (RIOS 1.2.2)

Senior Management shall determine and ensure the necessary resources for the effective implementation, operation and continual improvement of the QEH&S management system.

Resource needs shall consider:

- existing internal resources, including competent workers;
- need for external resources of outside providers;
- financial resources;
- infrastructure;

Related and Supporting Documents

1.2.2.1-F Resource Plan

2.2.3 Senior Management (RIOS 1.2.3)

Senior Management of the organization shall demonstrate leadership and commitment by:

- a) Planning
 - ensuring policies are established and applied to the QEH&S management system;
 - ensuring the QEH&S management system is consistent and integrated with the business operations;
 - ensuring QEH&S goals are established relevant to the Recycler's operations;

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- ensuring that hazard identification, evaluation, and control is applied to the entire scope of the QEH&S management system; and
 - allocating resources, supporting management, and directing personnel to ensure the effective implementation, maintenance, and continual improvement of the QEH&S management system;
- b) Implementation
- ensuring outside providers and suppliers are incorporated into the plans and policies of the QEH&S management system; and
 - supporting and communicating the organization's commitment to the QEH&S management system;
- c) Monitoring Performance and Continual Improvement
- monitoring the effectiveness of the QEH&S management system and ensuring the QEH&S management system achieves the intended results; and
 - promoting continual improvement of the QEH&S management system;

Related and Supporting Documents

1.2.1.1-F Responsibility Matrix

1.2.1.2-F Organization Chart

2.3 Document and Recordkeeping Controls (RIOS 1.3, R2 3.0)

The QEH&S management system developed by IT Supply Solutions shall:

- a) Be maintained in paper or electronic format.
- b) Establish documentation where required by the standards or necessary for the operation of the QEH&S management system.
- c) Provide direction to related documentation necessary to conform to the requirements of the standards.
- d) Establish records, as required by the standards or to demonstrate conformance with the requirements of the standards.

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2.3.1 Control of Documents (RIOS 1.3.1, R2 3.0)

IT Supply Solutions shall establish written plans to ensure that all documents within the QEH&S management system are:

- established and maintained;
- include information to uniquely identify, describe, and control the document through revisions;
- be legible and dated;
- approved prior to use;
- be available in approved formats;
- current and available at the point of use;
- protected from loss;
- reviewed, revised, and updated, as necessary, with changes controlled;
- removed from use when obsolete, and if kept for any purpose, clearly identified as obsolete; and
- identified and distribution controlled if from external parties;

Related and Supporting Documents

1.3.1-P Document and Record Control Procedure

1.3.2-F Master List of Documents

2.3.2 Control of Records (RIOS 1.3.2, R2 3.0)

- a) IT Supply Solutions shall establish written plans to ensure that all records within the QEH&S management system are:
 - established and maintained;
 - legible;
 - identifiable, traceable to the pertinent process, and readily retrievable; and
 - stored and protected from damage or loss;
- b) Record retention times shall be established in writing and be consistent with relevant stakeholder and legal requirements.

Related and Supporting Documents

1.3.1-P Document and Record Control Procedure

1.3.3-F Records Management Table

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3 Policy (RIOS 2.0, R2 3.0)

Senior Management shall establish and implement a written QEH&S policy(s) that:

- is relevant to the scope of the Recycler's operations;
- considers environmental impacts of the Recycler's operations and outputs;
- considers health and safety risks of the Recycler's operations and outputs;
- include(s) commitments to:
 - comply with all relevant QEH&S legal requirements;
 - comply with all relevant stakeholder requirements;
 - continually improve performance;
 - the prevention of workplace injuries and illness; and
 - the prevention of pollution;
- provide(s) a framework for establishing QEH&S goals; and
- demonstrate(s) Senior Management's commitment to customer satisfaction;

The QEH&S policy shall be:

- a) communicated to, understood by, and applied by workers;
- b) made available to the stakeholders;
- c) reviewed at least annually by Senior Management and updated as necessary;

IT Supply Solutions' top management has defined IT Supply Solutions' Quality, Environmental, Health and Safety Policy and has ensured that, within the defined scope of its quality, environmental, health and safety management system, it is documented, implemented, maintained, reviewed for continuing suitability, communicated to all persons working for or on behalf of IT Supply Solutions and is available to the public via the IT Supply Solutions website at www.itsupplysolutions.com.

Related and Supporting Documents

2.1-P Quality, Environmental, Health and Safety Policy

3.1

4 Planning (RIOS 3.0, R2 3.0)

4.1 Identifying the RIOS Footprint (RIOS 3.1)

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IT Supply Solutions shall proactively identify and document their RIOS footprint to facilitate goals, controls, and monitoring consistent with their RIOS footprint.

- a) IT Supply Solutions shall document the process for determining the RIOS footprint.
- b) The RIOS footprint shall consider:
 - the activities, products, and services of the Recycler, including those of outside providers that can be influenced by the Recycler, including but not limited to:
 - purchasing and acquisition of source materials;
 - on-site processing operations and activities;
 - transportation, distribution, and delivery;
 - changes in operational processes, products, or equipment;
 - both negative and positive impacts;
 - actual and potential conditions;
 - routine and non-routine activities including emergencies;
 - relevant stakeholder requirements and views; and
 - legal requirements
- c) The RIOS footprint shall remain current, be reviewed at least annually and be updated before planned changes to the system occur.

Related and Supporting Documents

3.1.1.1-P RIOS Footprint Procedure

3.1.1.2-F QEH&S Risks, Aspects and Hazards List

4.1.1 Important Quality Risks (RIOS 3.1.1)

IT Supply Solutions shall identify risks to product and service quality.

- a) Controls shall be planned and documented for each quality risk to manage the risk.
- b) Controls shall be integrated in the QEH&S management system, implemented, and monitored for effectiveness.
- c) IT Supply Solutions shall plan quality controls for:
 - qualification of suppliers, outside providers and customers, where applicable;
 - material and product tracking and traceability, if required; and
 - control of customer property, if applicable;

Related and Supporting Documents

0-P QEHSMS Manual - 1.2.docx

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3.1.1.1-P RIOS Footprint Procedure

3.1.1.2-F QEH&S Risks, Aspects and Hazards List

4.1.2 Important Environmental Impacts (RIOS 3.1.2)

IT Supply Solutions shall evaluate environmental factors and potential impacts to identify those important environmental impacts of their operations.

- a) Criteria used in determining actual or potential environmental impacts, and the results of evaluation shall be documented in the RIOS footprint.
- b) The environmental impacts of all activities, products and services within the scope of the QEH&S management system, including outside providers and activities listed in 3.1 shall be evaluated.
- c) Important environmental impacts shall be controlled, monitored and evaluated.

Related and Supporting Documents

3.1.1.1-P RIOS Footprint Procedure

3.1.1.2-F QEH&S Risks, Aspects and Hazards List

4.1.3 Important Health & Safety Risks (RIOS 3.1.3)

IT Supply Solutions shall identify the health and safety hazards associated with their operations and RIOS footprint.

- a) In determining important risks, IT Supply Solutions shall consider activities listed in 3.1 and:
 - the nature of the workforce, contractors, and other visitors to the workplace;
 - the nature of the processes;
 - source materials;
 - past performance of the Recycler related to each risk;
- b) IT Supply Solutions shall identify controls to eliminate or reduce important health and safety risks to an acceptable tolerance. Controls shall be documented as defined in section 4.6 and monitored and evaluated as defined in section 5.1.

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Related and Supporting Documents

- 3.1.1.1-P RIOS Footprint Procedure
- 3.1.1.2-F QEH&S Risks, Aspects and Hazards List
- 3.1.1.3-P PPE Hazard Assessment Procedure
- 3.1.1.4-F PPE Hazard Assessment Form

4.1.4 Legal and Other Requirements (RIOS 3.1.4, R2 4.0)

IT Supply Solutions shall identify, document and have access to their QEH&S legal requirements and determine how QEH&S legal requirements apply to their operations. Controls to manage requirements shall be documented and integrated into the QEH&S management system, including implementation and monitoring of effectiveness.

- a) IT Supply Solutions shall develop a legal compliance plan to maintain full compliance with all environmental, health, safety, and data security legal and other requirements applicable to its operations, as well as full compliance with all applicable import and export laws covering shipments of electronic equipment, components and materials. This plan shall be included as a section of its QEH&SMS.
- b) Facility Compliance: The plan shall identify and document the environmental, health, safety, and data security legal requirements that cover IT Supply Solutions' operations both at the facility and all associated off-site locations where activities within the scope of certification are occurring, and define the controls, competence, and monitoring activities to maintain full compliance.
- c) Import/Export Compliance: The plan shall also identify and document the applicable legal requirements of the exporting, transit, and importing countries to demonstrate the legality of all international shipments of:
 - 1) Electronic equipment, components, and materials directly transferred by IT Supply Solutions, and
 - 2) R2 Controlled Streams, including shipments made by downstream vendors, to final disposition or the first R2 Facility.
- d) Monitoring Compliance: IT Supply Solutions shall:
 - 1) Identify and implement the actions and controls required to ensure compliance with all requirements, and

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- 2) Maintain the legal compliance plan, consistent with changes in the requirements and the FM Management Plan, and
 - 3) Periodically audit its compliance with legal requirements by a competent auditor knowledgeable in the operations and applicable requirements, and
 - 4) Take corrective action to promptly stop and resolve any issues of non-compliance; and
 - 5) Notify the Certification Body within 30 days of receiving any regulatory order or notice of violation that requires any action to address the violation and follow up with the issuing agency.
- e) Child and Forced Labor: IT Supply Solutions shall not use child labor, as defined by the International Labor Organization (ILO) or forced labor, where the worker cannot leave or terminate employment freely.
- f) Prison Labor: The use of prisoners is only acceptable if it is voluntary, compensated beyond room and board, and skills are taught for gainful employment after release.
- g) Non-Discrimination Policy: IT Supply Solutions shall document a non-discrimination policy stating the fair and equal treatment of all workers, regardless of aspects such as, but not limited to, age, gender, race, religion, or sexual orientation, including compensation in compliance with applicable wage laws. The policy shall define the process to report, investigate and respond to discrimination complaints, and shall be periodically communicated to all staff.

Related and Supporting Documents

- 3.1.4.1-P Legal and Other Requirement Identification Procedure
- 3.1.4.2-F Legal and Other Requirements Summary List
- 3.1.4.3-F Import Export Requirements Summary List
- 3.1.4.4-F EHS Compliance Calendar
- 3.1.4.5-P Non-Discrimination Policy

4.1.5 Product, Service and Customer Requirements (RIOS 3.1.5)

IT Supply Solutions shall establish plan(s) to identify and document product, service and customer requirements. Plans shall:

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- a) Define specifications and supplier requirements for source material as inputs.
- b) Define specifications and outside provider requirements for outsourced products.
- c) Determine required product and service specifications, including applicable legal requirements.
- d) Determine customer requirements for acceptance of the product or service.
- e) Determine the resources needed to meet product or service requirements.
- f) Consider the Recycler's capability of providing products or services to the defined requirements.
- g) Define methods to verify, validate, monitor, measure, inspect, or test products for production or shipment.
- h) Generate records to demonstrate product or service conformity.

Related and Supporting Documents

3.1.5.1-P Supplier Source Control Procedure
3.1.5.2-P Outside Provider Procedure
3.1.5.3-F Outside Provider Questionnaire
3.1.5.4-F Approved Outside Provider List
3.1.5.5-P Customer Requirements Procedure
1.2.2.1-F Resource Plan
5.1.1-P Monitoring and Measurement Procedure

4.1.6 Other Stakeholder Requirements (RIOS 3.1.6)

IT Supply Solutions shall identify and document other QEH&S requirements associated with commitments they make to stakeholders. IT Supply Solutions shall:

- a) Identify stakeholders that are relevant to the Footprint within the QEH&S management system.
- b) Document relevant requirements of these stakeholders, including :
 - obligations to stakeholders;
 - compliance with regulations; and
 - conformance with voluntary commitments, such as standards;

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- c) Determine how these requirements apply to their operations.
- d) Document and integrate controls to manage stakeholder requirements in the QEH&S management system, including implementation and monitoring of effectiveness, and
- e) Monitor and review these stakeholders' requirements and update as requirements and obligations change. Review shall be documented at least annually.

Related and Supporting Documents

3.1.6.1-P Stakeholder Requirements Procedure
3.1.6.2-F Stakeholder Requirements Summary List
3.1.4.2-F Legal and Other Requirements Summary List
5.1.1-P Monitoring and Measurement Procedure

4.2 Improvement Planning (RIOS 3.2)

4.3

IT Supply Solutions shall continually improve the suitability, adequacy and effectiveness of the QEH&S management system to prevent non-conformities and improve product and service quality.

Related and Supporting documents

3.2.1-F Goals Program Form

4.3.1 Establishing Goals (RIOS 3.2.1)

In order to achieve QEH&S improvement, Senior Management shall establish written QEH&S goals. Goals may apply to the entire operations or may be specific to a particular function, responsibility, product, or service.

- a) Goals shall be:
 - measurable as appropriate;
 - monitored;
 - communicated; and
 - updated as needed;

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- b) In establishing goals, IT Supply Solutions shall consider:
- QEH&S policies;
 - RIOS footprint;
 - technological options;
 - financial considerations;
 - operational and business requirements;
 - legal requirements;
 - views of stakeholders;
 - opportunities for improvement from its monitoring and measuring activities;
 - enhancement of customer satisfaction; and
 - enhancement of product and service quality

Related and Supporting documents

3.2.1-F Goals Program Form

4.3.2 Plans for Goal Achievement (RIOS 3.2.2)

IT Supply Solutions shall integrate actions to achieve goals within the QEH&S management system. Each goal shall have written plans that:

- describe what will be done;
- identify resources required for completion;
- assign responsibility for tasks;
- assign due dates for tasks; and
- define how the results will be evaluated;

Related and Supporting documents

3.2.1-F Goals Program Form

4.4 Change Management (RIOS 3.3)

IT Supply Solutions shall document a written plan for changes that impact the QEH&S management system.

- a) Changes shall be documented and evaluated to determine potential QEH&S impacts in the RIOS Footprint prior to implementation.

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- b) Change management plans shall update the QEH&S management system to control important risks.

Related and Supporting documents

3.3.1-P Change Management Procedure

3.3.2-F Change Management Form

5 Implementation (RIOS 4.0, R2 3.0)

5.1 Recycler Knowledge (RIOS 4.1)

5.1.1 Competence (RIOS 4.1.1)

For work activities that can affect the quality of the Recycler's products or services; or have important environmental impacts; or have important health and safety risks, IT Supply Solutions shall:

- a) Determine the required competence of person(s) performing or responsible for the activity.
- b) Ensure that these persons(s) are competent based upon education, training, skills or experience.
- c) Keep records of competence.
- d) Acquire competence, where needed, with external resources or provide training.
- e) Verify the effectiveness of competency training.
- f) Required training shall consider:
 - different levels of responsibility, ability, literacy, and required work activities;
 - RIOS footprint;
 - QEH&S controls;
 - roles and responsibilities; and
 - frequency;

Related and Supporting Documents

4.1.1-P Competence and Awareness Procedure

4.1.2-F Training Needs Matrix

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4.1.3-F Training and Competency Record

5.1.2 Awareness (RIOS 4.1.2)

IT Supply Solutions shall document and implement plans to ensure that workers are aware of:

- the QEH&S policy(s);
- QEH&S roles and responsibilities within the QEH&S management system;
- QEH&S impacts of their work activities;
- relevant QEH&S goals;
- QEH&S performance results;
- emergency response plans;
- the importance of meeting supplier, customer, and legal requirements;
- how they contribute to the effectiveness of the QEH&S management system;
- the potential consequences of nonconformance to the QEH&S management system; and
- the benefits of improved QEH&S performance;

Related and Supporting Documents

4.1.1-P Competence and Awareness Procedure

4.1.2-F Training Needs Matrix

4.1.3-F Training and Competency Record

5.2 Communication (RIOS 4.2)

Senior Management shall document communication plans to define how to communicate internally, and with external parties, customers, outside providers, and suppliers. Records of communication shall be kept.

Related and Supporting Documents

4.2.1-P Communication Procedure

5.2.1 Internal Communication (RIOS 4.2.1)

Internal communications plans in the QEH&S management system shall:

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- a) Ensure important QEH&S management system information is effectively communicated between workers and management, including feedback and consultation from workers.
- b) Require timely reporting of newly identified hazards, incidents, or near misses based on the level of severity.
- c) Provide information about QEH&S management system effectiveness.

Related and Supporting Documents

4.2.1-P Communication Procedure

5.2.2 Customer Communication (RIOS 4.2.2)

IT Supply Solutions shall plan and communicate with customers regarding:

- QEH&S requirements including customer qualification requirements, if applicable;
- feedback and complaints; and
- assessments of customer satisfaction;

Related and Supporting Documents

4.2.1-P Communication Procedure

5.2.3 Supplier Communication (RIOS 4.2.3)

IT Supply Solutions shall plan and communicate with suppliers regarding:

- source control requirements for the purchase or acquisition of source materials;
- material that is not acceptable source material prior to receipt; and
- lost or improper processing of supplier property;

Related and Supporting Documents

4.2.1-P Communication Procedure

3.1.5.1-P Supplier Source Control Procedure

4.3-1.1-F Not Accepted List

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5.2.4 Outside Provider Communication (RIOS 4.2.4)

IT Supply Solutions shall plan and communicate QEH&S requirements with outside providers including:

- written specifications for outsourced products and services;
- outside provider's responsibilities in the Recycler's QEH&S management system; and
- monitoring activities and QEH&S controls applied to the outside provider;

Related and Supporting Documents

4.2.1-P Communication Procedure
3.1.5.2-P Outside Provider Procedure
4.2.4.1-F Visitor and Contractor Sign In Log
4.2.4.2-F Visitor and Contractor EHS Requirements

5.2.5 External Communication (RIOS 4.2.5)

IT Supply Solutions shall:

- a) Plan for and respond to external inquiries about the QEH&S management system.
- b) Communicate relevant information, including emergency plans, to visitors and stakeholders about the QEH&S management system.

Related and Supporting Documents

4.2.1-P Communication Procedure
4.2.5.1-F External Communication Log
4.2.4.1-F Visitor and Contractor Sign In Log
4.2.4.2-F Visitor and Contractor EHS Requirements

5.3 Operational Control (RIOS 4.3)

IT Supply Solutions shall consider their operations and activities relevant to their RIOS footprint and goals to establish operational controls to manage their QEH&S risks and impacts. Processes and documented plans shall be established, implemented and maintained to ensure operations and activities are performed in a controlled manner.

Related and Supporting Documents

0-P QEHSMS Manual - 1.2.docx

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- 3.1.1.2-F QEH&S Risks, Aspects and Hazards List
- 4.3-P Sales and Production Procedure
- 4.3-1-P Receiving Procedure
- 4.3-2-P Sorting, Categorization and Processing Procedure
- 4.3-3-P Dismantling Procedure
- 4.3-4-P UW Battery Storage and Shipping Procedure
- 4.3-5-P Material Storage and Shipping Procedure
- 4.3-6-P Overflow Material Storage Procedure

5.3.1 Source Material (RIOS 4.3.1)

IT Supply Solutions shall establish processes to control source materials.

- a) IT Supply Solutions shall specify criteria and implement controls for the acceptance of source material. The type and extent of control is based on the source materials impact on QEH&S, including the IT Supply Solutions ability to meet customer requirements.
- b) IT Supply Solutions shall document processes for the identification and control of any QEH&S supplier requirements for IT Supply Solutions to process source material.
- c) Source material that is not accepted shall be identified and controlled to prevent QEH&S impacts while in the Recycler's control.
- d) Source material that is not accepted shall be returned to the supplier or managed in accordance with the standards.
- e) Records of source material control shall be kept.

Related and Supporting Documents

3.1.5.1-P Supplier Source Control Procedure

5.3.2 Outsourced Providers, Products and Services (RIOS 4.3.2)

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Outsourced products or services shall be controlled to conform to the standard(s) requirements of the Recycler.

- a) Specifications for outsourced products and services shall be documented in writing.
- b) QEH&S controls of outside providers, outsourced products, or services shall be implemented and monitored to conform to the standards. The type and extent of control is based on the outsourced providers and outsourced products or services impact on QEH&S.
- c) Records of evaluation, selection, and monitoring shall be kept.

Related and Supporting Documents

3.1.5.2-P Outside Provider Procedure
3.1.5.3-F Outside Provider Questionnaire
3.1.5.4-F Approved Outside Provider List

5.4 Quality Controls (RIOS 4.4)

- a) Product and service specifications and customer requirements shall be documented, approved, and changes controlled in the QEH&S management system.
- b) Documented production and service instructions shall be provided to workers.
- c) Monitoring and measurement controls for quality shall be implemented at relevant points in the process.

Related and Supporting Documents

4.3-P Sales and Production Procedure
See controls column on the Quality Risk Assessment Tab of 3.1.1-F QEH&S Risks, Aspects and Hazards Worksheet
See 4.3 operational control procedures and forms

5.5 Environmental Controls (RIOS 4.5)

IT Supply Solutions shall control those operations and activities that are associated with the identified important actual or potential environmental impacts (in 3.1.2) in the RIOS Footprint

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and where the implementation of controls is necessary (including legally required) to limit adverse environmental impacts.

- a) IT Supply Solutions shall document and implement controls for all important environmental impacts, stipulating operating criteria in the plan.
- b) Environmental controls shall be established for all activities, source materials, products and services within the scope of the QEH&S management system that are identified in the RIOS Footprint as having an important environmental impact.

Related and Supporting Documents

See 4.3 operational control procedures and forms

5.6 Health and Safety Controls (RIOS 4.6)

IT Supply Solutions shall control those operations and activities that are associated with the identified hazards (in 3.1.3) in the RIOS Footprint and where the implementation of controls is necessary (or required legally) to manage the health and safety risks.

- a) IT Supply Solutions shall implement health and safety controls in the following order of priority:
 - elimination;
 - substitution;
 - engineering controls;
 - signage/warnings and other administrative controls; and
 - personal protective equipment;
- b) Health and safety controls shall be established for all activities, products and services within the scope of the QEH&S management system including health and safety hazards related to source materials, outsourced products and services, on-site contractor activities, off-site activities, chemicals, and operational equipment.

Related and Supporting Documents

See 4.3 and 4.6 operational control procedures and forms

5.7 Emergency Preparedness and Response (RIOS 4.7)

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IT Supply Solutions shall establish written plans to identify the potential for and response to incidents and emergency situations (including exceptional releases, accidents, spills, fires, explosions, and other out-of-the-ordinary events that pose risks to worker safety, public health, or the environment).

- a) Emergency plans shall include preventing and mitigating the adverse environmental impacts in the RIOS Footprint and injuries and illnesses that may be associated with each.
- b) The Recycler shall periodically test these plans to the extent practical.
- c) The Recycler shall review, and where necessary, revise its emergency plans after tests, incidents, or emergency situations.
- d) Emergency plans shall be communicated in accordance with the communication plans in the QEH&S management system.

Related and Supporting Documents

4.7.1-P Emergency Preparedness and Response Procedure

4.7.2-F Emergency Drill Record

Emergency Procedures (located in 4.6.1-P Health and Safety Manual)

4.6.4-F Emergency Contact List

4.6.5-F Facility Map

5.8 Hierarchy of Responsible Management Strategies (R2 2.0)

- a) IT Supply Solutions shall develop in writing and adhere to a policy stating how it 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.
- b) IT Supply Solutions shall evaluate and sort equipment, components, and materials in accordance with the policy and Core Requirement 6, and take all practical steps to direct items for processing in the following order of preference outlined in the Hierarchy of Responsible Management Policy.

Related and Supporting Documents

4.3-2-P Sorting, Categorization and Processing Procedure

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5.9 Tracking Throughput (R2 5.0)

- a) For all inbound electronic equipment, components, and materials controlled by IT Supply Solutions through physical possession, title, or other contractual agreement, IT Supply Solutions shall:
 - 1) Maintain bills of lading or other commercially-accepted records, and
 - 2) Ensure records have accurate dates, detailed descriptions including types and quantities, and supplier names, and
 - 3) Maintain a summary report of all transactions.
- b) For all electronic equipment, components, and materials controlled by IT Supply Solutions, IT Supply Solutions shall:
 - 1) Track, manage, and maintain accurate records of the quantity of R2 Controlled Streams in IT Supply Solutions' control from receipt through processing, storage, and shipment, and
 - 2) Maintain total inventory levels below the defined limits in conformance with IT Supply Solutions' legal requirements, closure plan, and financial assurance, and
 - 3) Not store R2 Controlled Streams, or materials with a negative value, for longer than one year, except where:
 - A. Components have been evaluated and inventoried in accordance with Appendix C – Test and Repair, or
 - B. Complete applications for regulatory permits or other authorizations for the export of the R2 Controlled Stream to the verified downstream vendor have been applied for within the usual issuing timeframe, but not yet received from the governing authority, and where storage is otherwise legally permissible.
- c) For all outbound electronic equipment, components, and materials, controlled by IT Supply Solutions, IT Supply Solutions shall:
 - 1) Maintain bills of lading, or other commercially-accepted records, and

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- 2) Ensure records have accurate dates, accurate dates, detailed descriptions including types and quantities, and customer or downstream vendor names, and
- 3) Maintain a summary report of all transactions.

Related and Supporting Documents

Inbound Summary Log (generated in ERP)

Outbound Summary Log (generated in ERP)

5.10 Sorting, Categorization, and Processing (R2 6.0)

a) Documentation:

IT Supply Solutions shall develop and maintain a documented process to evaluate, sort and categorize electronic equipment, components, and materials controlled and processed. This process shall:

- 1) Conform with the hierarchy in Core Requirement 2; and
- 2) Include the applicable categories from the R2 Equipment Categorization (REC) or maintain a documented correlation of existing categories in use to those defined in the REC, to demonstrate the levels of functionality, data sanitization status and physical condition of the items; and
- 3) Identify all data storage devices; and
- 4) Define the instructions and criteria to determine if the equipment and components are capable of reuse based on physical condition, functionality, and value in the destination market; and
- 5) Include steps to re-evaluate R2 Controlled Streams when processing changes the category of the stream.

b) Categorize:

- 1) All equipment, components, and materials controlled by IT Supply Solutions shall be identified with its corresponding R2 equipment categories from the REC, or equivalent correlated internal categories.

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- 2) All equipment, components, and materials shall be managed as an R2 Controlled Stream that requires further processing in accordance with the R2 requirements, unless it:
 - A. Has been processed and categorized by another certified R2 Facility, in which case the provided REC categorization can be recognized, or
 - B. Has been processed and categorized by a non-R2 facility and the R2 Facility has implemented a documented evaluation and sampling process to verify the categorization, or
 - C. Can be demonstrated with appropriate test and/or verification records to be sanitized and functional, or
 - D. No longer meets the definition of an R2 Controlled Stream.

c) Evaluate:

IT Supply Solutions shall evaluate all equipment and components in accordance with the defined process to determine the capability of reuse and direct evaluated equipment, components, and materials to the appropriate next process.

d) Process:

- 1) All equipment and components shall be evaluated for data, including connected user accounts and services, and identified with the corresponding data sanitization status from the REC.
- 2) All equipment and components that may contain data shall be secured and controlled to prevent unintended access or theft of data, until processed in accordance with Core Requirement 7 for data security.
- 3) IT Supply Solutions shall not reuse, sell, or donate equipment or components prohibited by written and binding commercial agreements with those from whom the equipment or components were received. Equipment and components not allowed to be sold or donated for reuse shall conform to Core Requirement 7 for data security and Appendix E – Materials Recovery.
- 4) Equipment or components that are evaluated and determined to be capable of reuse shall be:

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- A. Identified with unique identifier for each piece of whole equipment, or grouped in batches and assigned a unique batch identifier for non-serialized equipment or components, and
- B. Tested, refurbished and/or repaired internally according to Appendix C – Test and Repair, or
- C. Transferred to a downstream vendor qualified in accordance with Appendix A – Downstream Recycling Chain, for testing, repair, and refurbishing, or
- D. Processed in accordance with Appendix D – Specialty Electronics Reuse.

5) Equipment and components not capable of reuse and other materials for recovery shall be:

- A. Processed by IT Supply Solutions in accordance with Appendix E – Materials Recovery, or
- B. Transferred to a downstream vendor qualified in accordance with Appendix A – Downstream Recycling Chain.

e) Output:

- 1) Any equipment or components evaluated and determined to be an Unrestricted Stream as defined in the REC, shall:
 - A. Be clearly identified and managed separately from R2 Controlled Streams, and
 - B. Have demonstrated justification for the unrestricted classification, and
 - C. Have adequate records maintained tracking the type of stream, any reason for return, and evidence of all transfers.
- 2) Prior to transferring functioning products IT Supply Solutions shall:
 - A. Identify and disclose the appropriate REC, or equivalent correlated internal categories, for Functioning Product, Data Sanitization Status, and either the Cosmetic Condition or provide other detailed description of the cosmetic condition of the equipment or components to the buyer, and

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- B. Reference the unique identifier(s) in commercial sales and shipping records, and
- C. Prior to any international shipment, verify import/export compliance of each shipment in accordance with its legal compliance plan in Core Requirement 4 that affirms the international shipment is legal, and
- D. Package and protect equipment and components in such a way as to prevent damage during shipment in accordance with Core Requirement 10, and
- E. Make the product return policy available to potential buyers prior to sale in accordance with Appendix C – Test and Repair.

3) Collectible and Specialty Electronics may be transferred:

- A. In accordance with Section (e)(2) of Core Requirement 6, without testing if sales do not exceed 1% of total individual units by quantity sold on a rolling 12-month average, and equipment may be returned by the buyer if not wanted under a documented warranty/return policy at no charge to the buyer, or
- B. In accordance with Appendix D – Specialty Electronics Reuse as applicable to Verified Specialty Electronics.

Related and Supporting Documents

4.3-2-P Sorting, Categorization and Processing Procedure
4.3-7-F Technical Cut Line
4.3-8-F REC Cross Reference Table - Cosmetic
4.3-9-F REC Cross Reference Table - Functional
4.3-10-P Return Policy and Product Return Plan
4.3-11-F RMA Log

5.11 Data Security (R2 7.0)

a) Documentation:

- 1) IT Supply Solutions shall document and maintain a Data Sanitization Plan and procedures, including defining the following:

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- A. Security controls to protect data in IT Supply Solutions' control, including declarations of secured areas dedicated to data sanitization with access limited to authorized individuals, and
- B. Types of data storage devices accepted that may contain data, and
- C. Types of data to be sanitized, and
- D. Declaration of general information that does not need to be sanitized, and
- E. Potential associations to network services that could automatically repopulate data on the device, and
- F. Written contractual requirements not to sanitize data on user's data storage devices when requested, and
- G. Applicable legal, supplier, and other requirements for data sanitization including applicable data breach and privacy regulations, and
- H. Where legal, supplier, and other requirements are addressed in written policies and procedures to ensure conformance, and
- I. Methods for data sanitization for each type of data storage device, and
- J. Planned durations to sanitize data from the time of receipt, and
- K. Downstream vendors or contractors that perform data sanitization in accordance with this plan, if data sanitization is not performed internally, and, where applicable, those downstream vendors whose services will be provided in another country, and
- L. Records to be maintained to demonstrate the effectiveness of the sanitization and verification activities, and
- M. Process for authorizing and monitoring workers, visitors, and others permitted to have access to equipment and components containing data.

2) IT Supply Solutions shall document and maintain a written data security policy that:

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- A. Prohibits unauthorized individuals from accessing or handling equipment containing data, and
- B. Assigns a competent Data Protection Representative with the overall responsibility and authority for IT Supply Solutions' data security and legal compliance, including oversight of all related duties otherwise assigned, and
- C. Mandates reporting of known and suspected breaches of security and data to the Data Protection Representative, and
- D. Requires completed training and confidentiality agreements prior to individual authorization to handle equipment containing data, and
- E. Identifies penalties for non-compliance with the policy, including personal liability.

- 3) All workers shall be trained regularly and verified to be competent on these policies and procedures for data security, consistent with their level of authorization.

b) Security:

- 1) IT Supply Solutions shall implement and maintain a security program that controls access to all or parts of the facility in a manner and to a degree appropriate given the type of electronic equipment handled, sensitivity of data on storage devices, and the needs of the suppliers served. This security program should consider risk of theft and unauthorized access to the facility and equipment.
- 2) IT Supply Solutions shall develop and implement levels of security authorizations to control access for employees, visitors, and contract workers based on the types of equipment received, the sensitivity of the data handled, and the legal, supplier and other requirements applicable to the facility. Authorizations shall be granted by the Data Protection Representative and based on documented evaluations allowed by law.
- 3) Secured areas shall be clearly identified and labeled with signage to warn against unauthorized access.
- 4) Appropriate security controls shall be implemented and monitored to limit access to equipment based on established security authorizations and the workers' need for access.

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5) For individuals granted security authorization, IT Supply Solutions shall maintain in writing individual acknowledgements of the responsibility to prevent disclosure of data; and to report any theft of equipment or data, or data breaches; and to disclose any incidents that may change their security authorization.

6) An incident response procedure shall be created and implemented to investigate potential data or security breaches, and to notify affected suppliers, legal authorities and other interested parties as required by law, of any potential or actual breaches.

c) Process:

1) For the receiving of any equipment or components that may contain data, IT Supply Solutions shall provide to the supplier conformation of:

- A. Receipt of equipment or components containing data, and
- B. The method of data sanitization to be used, and
- C. Whether data sanitization will be performed internally or by a downstream vendor.

2) Equipment and components containing data shall be sanitized in a timely and effective manner, in accordance with one of the following methods, as disclosed to the supplier:

- A. Sanitize the data on the data storage devices in accordance with Appendix B – Data Sanitization, or
- B. Physically destroy the data storage media in accordance with an applicable method defined in Appendix A of the NIST Guidelines for Media Sanitization: Special Publication 800-88 (rev.1), and verify destruction in accordance with a defined process to demonstrate 100% effectiveness of the destruction process, or
- C. Ship/transfer data storage devices under written contract to a downstream vendor that has been verified in accordance with to Appendix A – Downstream Recycling Chain, with the capabilities to sanitize data from the type of equipment shipped in accordance with the planned method disclosed to the supplier.

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- 3) Internal data security and sanitization audits shall be performed at minimum annually by a competent and independent auditor to validate the data sanitization processes are effective and conforming to the R2 Standard, legal requirements, and the data sanitization plan.

d) Notifications:

- 1) IT Supply Solutions shall maintain a process to provide information to suppliers where requested of the following:
 - A. Changes in downstream vendors to process supplier's equipment and components containing data, and
 - B. Breaches in security.

Related and Supporting Documents

- 4.11.1-P Data Sanitization Plan
- 4.11.2-P Data Security Policy
- 4.11.3-F Confidentiality Agreement
- 4.11.4-P Security Procedure
- 4.11.5-F Data Security and Sanitization Audit Form
- 4.11.6-F Receipt of Data Containing Equipment
- 5.2.1-P Incident Investigation, Nonconformity and Corrective Procedure

5.12 Focus Materials (R2 8.0)

Development and Adherence to an FM Management Plan

- a) IT Supply Solutions shall analyze, plan, regularly review, and update as necessary how the FMs that pass through its facility or control will be properly managed both on-site and down the recycling chain (and include this analysis and plan as the FM Management Plan section of its QEH&SMS). The FM Management Plan shall state how IT Supply Solutions and its downstream vendors shall conform to the applicable requirements of the R2 Standard including:
 - 1) The demonstrated expertise and capabilities required to process each type of electronic equipment containing an FM, and

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- 2) The planned methods and demonstrated capacity needed to process each type of electronic equipment containing an FM, and
- 3) When not the final point of processing, a flowchart of the downstream recycling chain selected according to Appendix A – Downstream Recycling Chain, including identification of international movements, to either final disposition or the first downstream R2 Certified facility.

Non-Focus Materials Requiring Specific Management

- b) IT Supply Solutions shall manage print cartridges in accordance with Core Requirement 2 through print cartridge remanufacturers, recyclers, or Original Equipment Manufacturers (OEM), in facilities that meet all applicable regulatory requirements to receive these print cartridges, and that use technology designed to safely and effectively manage ink and toner print cartridges.
- c) IT Supply Solutions shall manage all equipment, components, and materials that pass through its facility or control that do not contain Focus Materials or are not electronic equipment, in accordance with Core Requirement 2, and otherwise integrated into the QEH&SMS, to ensure handling that is in full legal compliance, protective of the environment, and protective of worker and public health and safety.

Related and Supporting Documents

4.12.1-P Focus Material Management Plan

5.13 Facility Requirements (R2 9.0)

- a) IT Supply Solutions shall conduct all processing operations indoors unless the risks of the outdoor operations have been assessed and controls established to prevent uncontrolled releases to the environment.
- b) IT Supply Solutions shall store all R2 Controlled Streams, in a manner that:
 - 1) Protects them from reasonably foreseeable adverse weather conditions, and
 - 2) In accordance with the established legal compliance plan, and
 - 3) Provides security from unauthorized access, and
 - 4) Is in clearly labeled containers and/or storage areas.

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- c) IT Supply Solutions shall store all equipment destined for reuse in an enclosed environment protected from the elements, unless intended for outdoor use.
- d) IT Supply Solutions shall demonstrate that it has evaluated the risks related to the scope of its operations, including any changes in operations and volume of material processed, and that it has used the evaluation to obtain insurance or reserves that it can demonstrate is appropriate to cover liabilities arising from all activities and locations in which it operates. Insurance or reserves shall include:
 - 1) Coverage for treatment of work-related injury and illnesses of workers, and
 - 2) Any process insurance requirements specified elsewhere in this R2 Standard.
- e) IT Supply Solutions shall develop and maintain a current, written plan that provides for the closure of the facility in the event of abandonment. The plan shall:
 - 1) include the use of appropriate commercial businesses to manage any electronic equipment, components and materials under IT Supply Solutions' control, and
 - 2) Consider the risks identified, including equipment and materials that could be received under IT Supply Solutions' certification scope, and applicable law, and
 - 3) Include reasonably foreseeable costs in the financial instrument for processing remaining inventory, sampling for environmental contamination, and possible site remediation to restore the premises to sellable condition, and
 - 4) Establish a financial instrument to provide the necessary funds for closure, including in the event of abandonment, consistent with applicable law and the closure plan, and
 - 5) Include any process or other closure requirements specified elsewhere in this R2 Standard.
- f) Financial instruments to assure closure in the event of abandonment are not required if:
 - 1) The total cost to properly close the facility in the event of abandonment is less than \$10,000 United States Dollars, and
 - 2) The size of all buildings owned, leased, or used by IT Supply Solutions is less than 1,000 square meters, and

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- 3) The facility prohibits and never accepts equipment or materials containing mercury, CRT glass, lithium primary batteries, or polychlorinated bi-phenyls.

Related and Supporting Documents

4.3-4-P UW Battery Storage and Shipping Procedure
4.3-5-P Material Storage and Shipping Procedure
Certificate of Insurance (External Document)
4.13.1-P Closure Plan
4.13.2-F Closure Cost Estimate Worksheet

5.14 Transport (R2 10.0)

IT Supply Solutions shall ensure that:

- a) All electronic equipment, components, and materials to be transported are packed appropriately:
 - 1) Considering the risk they could pose during transportation to data security, health, safety or the environment, and
 - 2) To the level of care warranted by its intended use, and
 - 3) To secure in accordance with Core Requirement 7, and
 - 4) To comply with any legal requirements identified in Core Requirement 4.
- b) When electronic equipment or components containing data are transported:
 - 1) Defined security measures are implemented as planned and transportation is tracked as appropriate for the sensitivity of the data on the devices and the requirements of the suppliers served, and
 - 2) Contracts are enforced with the transporter with a level of service that conforms to these requirements, and
 - 3) Additional security controls are used to conceal the package contents from public view and prevent unintended access during transportation.

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- c) All shipping documentation, labeling, and import/export declarations use accurate codes, descriptions, and required declarations consistent with regulatory requirements for the equipment, components, and materials being transported.
- d) Transporters meet the legal requirements under Core Requirement 4 to transport the electronic equipment, components, and materials.

Related and Supporting Documents

- 4.14.1-P Transporter Qualification Procedure
- 4.14.2-F Transporter Letter
- 4.14.3-F Transporter Checklist

6 Checking and Corrective Action (RIOS 5.0, R2 3.0)

6.1 Monitoring and Measurement (RIOS 5.1)

IT Supply Solutions shall establish plans to monitor, measure, and record characteristics of their operations that are important to ensuring effective QEH&S performance, achievement of goals, and conformity to product and service requirements. Plans shall define the measurements, methods, criteria, indicators, and the timing of monitoring activities. Monitoring and measurement data shall be analyzed to evaluate the effectiveness of the management system and assess continual improvement.

Related and Supporting Documents

- 5.1.1-P Monitoring and Measurement Procedure

6.1.1 Activities Requiring Monitoring or Measurement (RIOS 5.1.1)

- a) Important elements of the RIOS Footprint (see 3.1) including:
 - quality risks;
 - environmental impacts;
 - health and safety risks;
 - legal requirements;
 - product and customer requirements, including non-conforming products and customer feedback; and
 - relevant stakeholder requirements;

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- b) Progress on goals (see 3.2) and change management. (see 3.3)
- c) Operational controls. (see 4.3)

Related and Supporting Documents

5.1.1-P Monitoring and Measurement Procedure

6.1.2 QEH&S Compliance (RIOS 5.1.2, R2 4.0)

IT Supply Solutions shall establish a written plan to evaluate compliance, at least annually, to applicable QEH&S legal requirements and other relevant stakeholder requirements. Compliance evaluation plans shall consider the auditor's competency in legal requirements. Results shall be recorded and actions taken to correct non-compliance.

Related and Supporting Documents

5.1.2.1-P Evaluation of QEH&S Compliance Procedure

3.1.4.4-F EHS Compliance Calendar

3.1.4.2-F Legal and Other Requirements Summary List

6.1.3 Maintenance and Calibration of Monitoring Equipment (RIOS 5.1.3)

- a) IT Supply Solutions shall document the necessary QEH&S monitoring and measurement equipment.
- b) Monitoring and measurement equipment shall be maintained and calibrated or verified to ensure it functions properly.
- c) Calibration and verification shall identify the standard used.
- d) Maintenance and calibration records shall be kept.

Related and Supporting Documents

5.1.1-P Monitoring and Measurement Procedure

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6.1.4 Analysis of Monitoring and Measurement Results (RIOS 5.1.4)

IT Supply Solutions shall analyze monitoring and measurement results to identify areas of underperformance to intended results, including areas of potential nonconformance and opportunities for improvement. Results of analysis shall be an input into management reviews.

Related and Supporting Documents

5.1.1-P Monitoring and Measurement Procedure

6.2 Nonconformance and Corrective Action (RIOS 5.2)

IT Supply Solutions shall ensure appropriate investigations into incidents and nonconformance and take actions to correct underperformance of the QEH&S management system to prevent nonconformances.

Related and Supporting Documents

5.2.1-P Incident Investigation, Nonconformity and Corrective Action Procedure

5.2.2-F Corrective Action Report

5.2.3-F Corrective Action Log

4.6.7-F Incident Report Form

4.6.8-F Incident Report Log

6.2.1 Control of Nonconforming Product (RIOS 5.2.1)

IT Supply Solutions shall establish documented plans to ensure that product that does not conform to product specifications or customer requirements is identified and controlled to prevent its unintended delivery or use.

- a) Nonconforming product shall be corrected, released with concessions, re-classified or used for other purposes.
- b) Records of nonconforming product and subsequent actions shall be maintained.

Related and Supporting Documents

5.2.1-P Incident Investigation, Nonconformity and Corrective Action Procedure

5.2.2-F Corrective Action Report

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5.2.3-F Corrective Action Log

6.2.2 EH&S Incident Investigations (RIOS 5.2.2)

- a) EH&S Incident investigations shall include incidents, emergencies, and near misses.
- b) IT Supply Solutions shall establish plans to record, investigate, and analyze EH&S incidents to determine root cause.
- c) Investigation shall identify the criteria for correction, corrective action, and prevention of recurrence.

Related and Supporting Documents

5.2.1-P Incident Investigation, Nonconformity and Corrective Action Procedure

4.6.7-F Incident Report Form

4.6.8-F Incident Report Log

6.2.3 Nonconformance and Corrective Action (RIOS 5.2.3)

IT Supply Solutions shall establish written plans to address and eliminate the causes of non-conformances and potential nonconformances in the QEH&S management system.

- a) Corrective actions are required, but not limited to, the following when:
 - feedback and complaints identify nonconformances;
 - determined as the result of an incident investigation;
 - internal nonconformances are identified by workers; or
 - external audits or reviews identify nonconformances;
- b) Written corrective action plans shall:
 - identify the root cause(s) of the nonconformance and take action to prevent its recurrence;
 - implement corrective action that is adequate to the QEH&S impact and assigns responsibilities and timelines;
 - record actions taken and the results achieved; and
 - review the effectiveness of corrective actions;

Related and Supporting Documents

0-P QEHSMS Manual - 1.2.docx

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- 5.2.1-P Incident Investigation, Nonconformity and Corrective Action Procedure
- 5.2.2-F Corrective Action Report
- 5.2.3-F Corrective Action Log

6.3 Internal Audits (RIOS 5.3)

IT Supply Solutions shall establish a written plan to evaluate:

- the QEH&S management system's conformance to the Standards;
 - the proper implementation of the QEH&S management system; and
 - the effectiveness of the QEH&S management system;
- a) The internal audit plan(s) shall consider:
 - frequency;
 - methods of audit;
 - audit criteria and scope;
 - relative importance of QEH&S processes and impacts;
 - changes impacting the Recycler's operations;
 - results from previous audits;
 - audit responsibilities;
 - auditor competency, objectivity, and independence;
 - recording and reporting of results; and
 - addressing nonconformances;
 - b) Auditors shall not audit their own responsibilities.
 - c) Audits shall occur at least annually and ensure that the QEH&S management system has been fully evaluated prior to certification or recertification.
 - d) IT Supply Solutions shall use the results of internal audits to take corrective action.

Related and Supporting Documents

5.3.1-P Internal Audit Procedure

7 Management Review (RIOS 6.0, R2 3.0)

Senior Management shall review the QEH&S management system at least annually to ensure its adequacy and effectiveness.

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- a) Input to management review shall include:
 - Internal audit (see 5.3) results;
 - QEH&S compliance audit (see 5.1.2) results;
 - feedback from customers and stakeholders;
 - progress on goals;
 - status of incident investigations and corrective actions;
 - follow-up actions from previous management reviews;
 - changes in scope;
 - important quality impacts;
 - important environmental impacts;
 - important health and safety risks;
 - QEH&S performance including analysis of monitoring and measurement results; and
 - recommendations for improvement;
- b) Output from management review shall include decisions and actions regarding the future direction of the QEH&S management system, including:
 - targeted product and service improvements;
 - continual improvement opportunities;
 - resource needs;
 - risks to the QEH&S management system; and
 - changes needed to the QEH&S policy(s), goals and the QEH&S management system;
- c) Relevant QEH&S performance and output information from management review shall be communicated in accordance with documented communication plans. (see 4.2)
- d) Records shall be kept of the results of management review.

Related and Supporting Documents

6.0.1-F Management Review Meeting Agenda & Minutes

8 Revision History

Document Revision History			
Issu	Description of Change	Date	Approved By

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e			
1.0	Original	11-16-18	Management
1.1	Added Safety and Health meeting to the 2x year mgt agenda	06-15-21	Management
1.2	Updated with R2v3 requirements	06-14-21	Management

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9 Appendix A – Downstream Recycling Chain

- (1) IT Supply Solutions shall manage the movement of R2 Controlled Streams through their downstream recycling chain, to final disposition or the first R2 facility, using the REC, and confirm conformance by each downstream vendor to this Appendix A.
- (2) If the equipment, components, or materials handled have a negative value, then IT Supply Solutions shall:
 - (a) Maintain pollution liability insurance addressing these risks, and
 - (b) Include this equipment, components, and materials in the closure plan and financial instrument calculations in accordance with Core Requirement 9.

Transboundary Movements

- (3) Prior to any international shipment, IT Supply Solutions shall verify import/export compliance of each shipment in accordance with its legal compliance plan in Core Requirement 4 that affirms the international shipment is legal. Verification shall document:
 - (a) If the equipment, components, or materials are a regulated waste under the regulations of the export, transit, and import countries, and
 - (b) If determined to be a regulated waste, determine if the waste is hazardous, and
 - (c) Other information or documentation required by applicable law.

Transparency

- (4) IT Supply Solutions shall:
 - (a) Track and demonstrate the complete downstream recycling chain of all R2 Controlled Streams to final disposition, or
 - (b) Register with SERI, the portion of the downstream recycling chain that it manages, including all R2 Controlled Streams to final disposition or the first R2 Facility, to enable mapping of the entire chain, and register any changes prior to shipment.
- (5) IT Supply Solutions shall provide, to each supplier to IT Supply Solutions that owns or arranges for transfer of equipment, components or materials to IT Supply Solutions, upon

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request and subject to agreed upon confidentiality restrictions:

- (a) The names and locations of all downstream vendors in the recycling chain that handle said supplier's R2 Controlled Streams, and
 - (b) Notification prior to shipping the supplier's R2 Controlled Streams to a new or changed downstream vendor.
- (6) IT Supply Solutions shall verify with commercially-accepted records that R2 Controlled Steams are received at the next downstream vendor's facility.

Downstream Vendor Qualification

- (7) If a downstream vendor is R2 Certified, then verification that the R2 Certification is active with a certification scope, including applicable Process Requirements, consistent with the equipment, components, and material received and the processes performed, shall qualify the downstream vendor to receive shipments without further downstream tracking and verification, which is alternately addressed through the downstream vendor's R2 Certification.
- (8) If a downstream vendor is not R2 Certified, IT Supply Solutions shall determine before shipment and reasonably confirm at least annually and document, through audits or other formal review, that each downstream vendor receiving an R2 Controlled Stream through the entire recycling chain continues to conform to the requirements of this section for as long as it receives R2 Controlled Stream directly or indirectly from IT Supply Solutions. IT Supply Solutions shall verify that the downstream vendor:
- (a) Demonstrates their capabilities and conforms to IT Supply Solutions' FM Management Plan in Core Requirement 8(a), and
 - (b) Adheres to a documented system to manage environmental, health, and safety risks and legal requirements. The management system shall include, at a minimum, the components of Core Requirement 3(d), Core Requirement 4, other than 4(d)(5) and 4(g), and
 - (c) Has demonstrated knowledge of, and has taken measures to comply with applicable environmental, health and safety legal requirements as identified in its compliance plan and maintains a current list of its permits and copies of each, and
 - (d) If performing data sanitization:
 - (1) Smelts or incinerates data devices and media for final destruction, and provides

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written confirmation of processing of all devices, or

(2) Is annually audited by a competent auditor, that is:

- (A) Independent of both IT Supply Solutions and the organization being audited, and
- (B) Has demonstrated knowledge of data security best management practices and data sanitization processes; and
- (C) Has demonstrated knowledge of management systems auditing; and
- (D) Has successfully completed a SERI approved data sanitization training with maintenance through annual refresher training, and

(3) Confirmed through the annual audit to be operating in conformance with all requirements of Core Requirement 7 and Appendix B – Data Sanitization; and

(4) Provides records of proof of sanitization of all data containing equipment and components, and

(5) Transfers all R2 Controlled Streams to:

- (A) An R2 Certified Facility, or
- (B) A non-R2 facility qualified to this Appendix A by IT Supply Solutions, and

(e) If testing, refurbishing, or repairing the equipment or components received for reuse:

(1) Tests, refurbishes, and repairs equipment and components in accordance with Core Requirement 6 and Appendix C – Test and Repair, and

(2) For equipment and components received from IT Supply Solutions, only sells or donates Functional category equipment and components according to the REC, and

(3) Transfers all R2 Controlled Streams to:

- (A) An R2 Certified Facility, or
- (B) A non-R2 facility qualified to this Appendix A by IT Supply Solutions, and

(f) If processing an R2 Controlled Stream for materials recovery, operates in conformance

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with Appendix E – Materials Recovery, and

(g) If brokering, operates in conformance with Appendix F – Brokering (1)(c) and (2), and

(h) Tracks throughput to demonstrate with records:

(1) Receipt and acceptance of R2 Controlled Streams from each shipment from IT Supply Solutions, and

(2) Shipments of R2 Controlled Streams to downstream vendors, and

(3) R2 Controlled Streams and materials with a negative value are not stored for longer than one year.

Related and Supporting Documents

4.12.1-P Focus Material Management Plan

A.A.1-P Downstream Vendor Selection Program

A.A.2-F Downstream Vendor Questionnaire

A.A.3-F Downstream Recycling Chain Flowchart

A.A.4-F R2 Desk Audit Checklist

A.A.5-F R2 On-Site Audit Checklist

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10 Appendix B – Data Sanitization

- (1) IT Supply Solutions shall add to its Data Sanitization Plan and procedures in Core Requirement 7 the following:
 - (a) Methods to distinguish sanitized devices from devices containing data, and
 - (b) Documented quality controls to assess and verify the effectiveness of the data sanitization processes on an ongoing basis, and confirm that:
 - (1) All devices have been properly processed, where the output is consistent with the planned sanitization method and data has been successfully sanitized from the data storage device, or
 - (2) Corrective actions are taken to manage any processed devices where sanitization cannot be confirmed and address any other issues in the sanitization process, and
 - (c) Monitoring activities to ensure continued effectiveness of the execution of this plan, and
 - (d) Competency requirements to perform sanitization and verification.
- (2) For traceability, records shall be kept of the unique identifier of each data storage device or tracking through other means from the point of control by IT Supply Solutions through the sanitization process.
- (3) Data sanitization workers shall be trained and evaluated, including any necessary updates as processes, data storage devices, and sanitization methods change, to be competent to perform the specific methods for data sanitization and processes to which they have been authorized.
- (4) All markings associating a device with its previous user shall be removed or destroyed.
- (5) Effective security controls that are appropriate to the most sensitive classification of media accepted at the facility shall be implemented, tested, and maintained. These security controls shall include:
 - (a) Physical Security controls including locked and alarmed access points during both working and after hours, and
 - (b) Enclosed work and storage spaces that are secured, and

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- (c) Closed circuit camera systems with at least 60 days of recordings covering all areas of the facility where equipment or components containing data are received, stored, or passed through, and
 - (d) Active monitoring of security cameras, access points, and other security controls for secured areas, and
 - (e) Regular tests of the effectiveness of these security controls, and
 - (f) Inventory tracking to identify the physical location of any recorded data storage device at any time while in IT Supply Solutions' control.
- (6) Data sanitization services delivered outside of IT Supply Solutions' certified facility shall be performed in conformance with this Appendix B and Core Requirement 7.

PHYSICAL SANITIZATION (Destruction)

- (7) Where physically sanitized, data storage devices shall be physically destroyed in accordance with:
- (a) An applicable method defined in Table 1 - Physical Destruction Methods, or
 - (b) The National Security Agency (NSA) Storage Device Sanitization Manual using equipment listed on the Evaluated Products List, or
 - (c) Any other method of physical destruction that has been independently verified by a competent expert and determined to be an effective means of sanitization.

Table 1 - Physical Destruction Methods

Data Storage Device	Method	Criteria
Magnetic Tape	Degauss*	
	Incineration	Reduced to ash

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Magnetic Hard Disk Drive	Degauss* & Crush	Media must be both degaussed and crushed with a hard disk crusher.
	Shred/Physical Destruction	Platters reduced to fragments
	Incineration	Fully melted to metals
Diskettes	Degauss* & Physically Destroy	Media must be degaussed and physically destroyed
	Shred/Disintegration	Magnetic disk reduced to fragments
	Incineration	Reduced to ash
Optical Disks (CD, DVD, Blu-Ray disks)	Shred/Disintegration	Disk reduced to fragments
	Incineration	Reduced to ash
Solid State Storage (SIM Card, SDRAM, Flash Drive, Circuit Board containing non-volatile flash memory, Solid-State Drive, Cell Phone, Tablet, etc.)	Shred/Disintegration	Chips reduced to fragments
	Crush	SSD crusher designed to crush chip sets
	Incineration	Reduced to ash
Hard Copy Storage (paper, film, etc.)	Shredding	Media reduced to fragments by cross cut shredder, pulverizer or disintegrator
	Incineration	Reduced to ash
Other	Any NSA approved method for the data storage device	Criteria specified by NSA for the device and method

** Degausser must be rated by the manufacturer for the type of media on which it is being used.*

- (8) If customer, legal, or sensitivity of information requirements necessitate more stringent destruction methods, the most stringent requirements shall be implemented.

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- (9) Video recordings of the physical destruction of all media shall be maintained for at least 60 days.

LOGICAL SANITIZATION (Erasure)

- (10) Where logically sanitized, electronic records of data sanitization created by the software used to sanitize the data shall be maintained for each unique identifier of the data storage media.
- (11) Data sanitization software used shall be:
- (a) Configured to sanitize all user-addressable locations on the data storage media containing data that was not original when the device was purchased, and
 - (b) Configured to fail the media if any user-addressable locations cannot be sanitized, and
 - (c) Maintained with software patches, and
 - (d) Verified to be a currently supported version before use.
- (12) All logins, passwords, locks, or any other connections to a remote service shall be removed and no longer connected to the device.
- (13) A minimum of 5% of logically sanitized data storage media shall be routinely sampled by a competent and independent party to demonstrate data is not recoverable by commercial software, and where continued sampling results demonstrate:
- (a) No issues with the sanitization process, subsequent sample sizes may be decreased to no less than 1%, with continued routine sampling; or
 - (b) Nonconformity or other sanitization issues, corrective actions are promptly initiated and nonconforming product appropriately managed, and sampling is increased until no further issues are identified.
- (14) If logical sanitization is unsuccessful or cannot be verified, then the item or data-bearing component must be physically destroyed in accordance with the requirements above.

QUALITY CONTROL

- (15) Quality controls shall be implemented to verify that received equipment and components containing data:

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- (a) were processed as planned, and
 - (b) quantities processed match quantities received, and
 - (c) suppliers are notified of any discrepancies.
- (16) After verification of (15)(a)-(c) above, data storage devices shall be approved for release by the Data Protection Representative and records retained.
- (17) When quality control issues are detected, corrective actions shall be implemented in accordance with the data sanitization plan.

Related and Supporting Documents

- 4.11.1-P Data Sanitization Plan
- 4.11.2-P Data Security Policy
- 4.11.3-F Confidentiality Agreement
- 4.11.4-P Security Procedure
- 4.11.5-F Data Security and Sanitization Audit Form
- 4.11.6-F Receipt of Data Containing Equipment
- A.B.1-P Data Sanitization Procedure
- A.B.2-P Data Sanitization Quality Control Procedure
- A.B.3-F Data Sanitization Quality Control Log

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11 Appendix C – Test and Repair

- (1) IT Supply Solutions, certifying to Appendix C – Test and Repair, shall also be certified, by an accredited Certification Body, throughout the duration of its R2 certification, to an approved quality management system (QMS) standard with a scope that includes all the equipment, components and processes to which this Appendix C applies.
- (2) IT Supply Solutions shall document an R2 Reuse Plan, that shall include:
 - (a) Written instructions for each of the requirements in this section applicable to the scope of operations of IT Supply Solutions, and
 - (b) Competency requirements for workers testing, repairing, and verifying equipment and components, and
 - (c) Product safety plans to demonstrate the actions IT Supply Solutions undertakes to investigate and verify that equipment and components are safe to reuse, including procedures to check for conditions affecting product safety, and responding to recalls, and
 - (d) Test plans to verify the functions of the equipment or components are working, including:
 - (1) Defining the functions by each equipment type tested, and
 - (2) Testing methods and test equipment for each function, and
 - (3) Pass and fail test criteria for each function, and
 - (4) Methods of documenting and storing test results, and
 - (5) Categorization of equipment based on test results in accordance with the REC, and
 - (e) Quality assurance plans to ensure the effectiveness of tests, including:
 - (1) Methods to verify the accuracy of test methods and testing equipment, and
 - (2) Measurements to monitor the quality of reusable equipment and components, and
 - (3) Management of equipment or components that fail testing to prevent their unintended use, and

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- (4) Verification of assigned categories in accordance with the test results for each test performed on each unit, and
 - (5) Verification that data has been sanitized in accordance with Appendix B – Data Sanitization, and
 - (f) Product return policy and plan appropriate to the final destinations of the equipment and components being reused.
- (3) IT Supply Solutions shall test, repair, and refurbish R2 Controlled Streams within one year of receipt from suppliers, or evaluate and inventory components for future use in repairing other equipment.
- (4) IT Supply Solutions shall implement and execute the R2 Reuse Plan to produce functional equipment for reuse and manage non-functional equipment for materials recovery. IT Supply Solutions shall:
 - (a) Ensure data is sanitized on the equipment or components being tested in accordance with Appendix B – Data Sanitization, and
 - (b) Ensure workers are competent in testing the functionality of the electronic equipment and effective test methods, and
 - (c) Test, repair, clean, refurbish and configure equipment and components according to the R2 Reuse Plan to determine the functional category in accordance with the REC, and
 - (d) Execute the product safety plans to assess safety of all functional equipment and components, and
 - (e) Generate and maintain records of test results for each function tested for each unique identifier assigned, and
 - (f) For equipment or components that do not meet a REC functioning product category when tested:
 - (1) Identify the equipment or components as non- functioning products, and
 - (2) Repair the equipment or component and repeat testing after repair, or
 - (3) Harvest the reusable components, or

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- (4) Evaluate the equipment in accordance with Core Requirement 6 to continue processing, and
- (g) For equipment or components that meet a functioning product category in the REC when tested:
 - (1) Identify and disclose the appropriate REC, or equivalent correlated internal categories, for Functioning Product, Data Sanitization Status, and either the Cosmetic Condition or provide other detailed description of the cosmetic condition, and
 - (2) Execute the quality assurance plans to confirm the assigned categories, and
 - (3) Based on the new category assigned after test and/or repair, manage the equipment in accordance with Core Requirement 6 to continue processing.

Related and Supporting Documents

A.C.1-P R2 Reuse Plan
A.C.2-F Testing Quality Control Log
A.C.3-F Product Recall List
4.3-10-P Return Policy and Product Return Plan