Samsung WEEE Management Policy
(US and Canada)

1. Purpose

These requirements aim to minimize environmental impacts caused by all Electronic Waste generated by Samsung's US and Canadian operations and programs, including, but not limited to, corporate e-waste & equipment, take back and return programs, and manufacturing / assembly waste.

2. Scope

The requirements of this document apply to all e-waste relevant companies (“vendors”) which perform collection, storage and handling of waste electrical and electronic equipment to protect the environment and human health and safety. Vendors must agree to implement and comply with the Samsung requirements set forth in this document. All Samsung employees shall comply with these requirements.

3. General Compliance

A. Vendors must demonstrate to have a high operational level using state of the art environmental technologies which take into account the economical dimension.

B. Vendors shall comply with applicable national, state and local law, and maintain a record documenting compliance with legal and regulatory obligations applying to all activities undertaken on site. Vendors shall establish and maintain a procedure in order to identify legal requirements that are applicable to the environmental, health and safety aspects of all activities, services and processes undertaken at the facility. Records of the partner's activities and related legal provisions shall be controlled and valid permits required by all relevant authorities shall be maintained.

C. Vendors must notify any known or suspected violations of Samsung requirements. In addition, any occurrences that involve security, health, safety, environmental or labor issues that could negatively impact Samsung, workers or other stakeholders must be reported to the Samsung vendor manager without delay.

E. Properly Manage End-of-Life Electronics through recyclers who are committed to the e-Stewards process.

Samsung’s principles for responsible recycling include protection of people, the environment and developing countries. All recycling performed by Samsung Electronics in the US and Canada should be performed only through recycling partners who are either certified e-Steward Recyclers, or recyclers who are registered with e-Stewards and on a path towards certification.

The e-Stewards certification of Samsung recyclers acts as a Third Party validation that statements of responsible recycling made by Samsung, are true.
Samsung performs responsible recycling and handles materials of concern, defined by the Basel Ban and Ban Amendment, according to the following standards:

1. No export to non-OECD (developing) countries
2. No landfiling
3. No Incineration
4. No use of prison labor

4. Environment Management System

A. Vendors shall implement an Environment Management System to minimize the influence in the environment of contaminants which are generated by the recycling process.

Note: The Environmental Management System may be e.g. an ISO 14001 certification (EMS or EMAS), an independent Environment Management System, or a national certified management system.

B. Vendors shall document environmental and safety work processes, store these records, and be accessible to employees.

5. Monitoring / Record Keeping

All Vendors shall keep business records for 3 years to show transfers and to document assurances from vendors as to the disposal of waste electrical and electronic equipment. The following must be monitored and recorded:

A. The operational processes and the operational risk assessment of the treatment facility (ex: hazardous waste management)

B. Environmental emissions from the site

C. The emissions of hazardous materials and pollutants during waste disposal process

D. The movement and storage of waste, especially hazardous wastes.

E. The operations of a storage management system

F. Result of health and safety training to employees, the warehousing volume of waste, the recycling, recovery, disposal and delivery volume, material export details, emergency response plans, fire prevention and suppression procedures, equipment failure backup plan, etc.

6. Downstream monitoring (addition to e-Stewards)

A. The 1st Vendor shall audit downstream processors of electronic waste until the end of waste status of all fractions, to the final processor of the electronic waste.
B. Downstream audit reporting shall include Environmental Health and Safety attributes, as well as materials management; and corrective actions needed.

C. The downstream audit reports shall be performed annually. Downstream auditing may be conducted onsite or by documentary evidence, and should be signed off by the 1st Vendors.

7. Emergency response plan

A. Vendors shall provide and report, regularly updated, guidelines on how to deal with emergencies such as fire, explosion, accidents, unexpected emissions, and weather related emergencies.

B. Be in close communication with local emergency response authorities.

8. Insurance & Closure Plan

Vendors must possess the following insurances:
NOTE • General liability insurance, Environmental liability insurance, Financial assurance

A. Vendors shall establish closure plans documenting how materials will be managed and how the facility will be properly decommissioned at the time of closure. These plans must be maintained and updated at least every two years.

B. Vendors shall ensure that there exists adequate insurance to cover unexpected plant closures

9. Information Security

A. All data-containing devices such as hard drives, and recording media such as CDs, DVDs, tapes, or other similar items must either be fully erased, or destroyed by shredding, crushing, shearing, melting, incinerating, or perforating the memory resident material.

B. Vendors shall maintain documents verifying destruction of data devices including device serial numbers and date of destruction when requested by Samsung manager.

10. Child and Prison Labor

Vendors must not use child and prison labor to process e-waste.

11. Material Handling Requirements and Definitions

Consistent with the BAN Amendment, all Samsung partner recyclers:

- Will not incinerate hazardous electronic materials;
- Will not export hazardous electronic waste (defined in a manner consistent with the commonly accepted Basel Convention and Basel Ban Amendment definition of hazardous electronic waste) to developing countries;
• Will not landfill hazardous electronic waste in solid waste landfills, or otherwise improperly landfill these materials; and
• Will not utilize prison.

SRD recycling partners agree to uphold standards and practices noted above in all their business operations. Further, SRD recycling partners are responsible to uphold these principles of operation for electronics recycling, whether performing work related to Samsung or otherwise.

Definitions:

Covered Electronic Devices (CEDs): Waste electronics, including video display devices with a greater than four (4) inch viewing display (including computer monitors and televisions), cell phones, tablets, and computers (both desktop and laptops).

Hazardous Electronic Waste Materials: Some materials within electronics products become potentially harmful or hazardous electronic waste materials during the recycling process of the product. The Samsung Recycling Direct program has been designed to responsibly manage hazardous electronic waste materials so that the environment and people are protected against the potentially harmful effects of these materials.

Either as performed by Samsung Recycling Direct recycling partners, or their downstream vendors, hazardous electronic waste materials will not be incinerated, sent to solid waste landfills, or exported to non-OECD, or processed by prisoners.

Hazardous electronic waste materials include, but are not limited to:

- Whole products that have not been tested and certified as being fully functional; and not for disposal
- Cathode Ray Tubes (CRT)
- CRT Glass, and other leaded glass. However, cleaned CRT glass cullet, and other materials that are suitably prepared, and to be shipped for the purpose of direct feedstock for new production
material, may be exported to a non-OECD country if the importing country’s proper gov’t office authorizes the import of such material

- Batteries and components that contain lead, mercury, cadmium
- Mercury and/or beryllium containing components, lamps and switches
- Polychlorinated biphenyls (possibly in pre-1980’s televisions; components of concern would include closed transformers, sealed capacitors, or old PVC wire insulation)
- Circuit Boards

Further Materials and Handling:

All devices containing memory will be responsibly destroyed, or wiped according to NIST SP 800-88 or equivalent industry standard, by the recycler, such that pre-existing saved information from previous product owner/operator will not be available for further access.