Samsung Recycling Direct (“SRD”) Policies and Guidelines

Samsung relies on recycling vendors to provide top-of-the-line customer service for return of products at the end-of-life. The Samsung Recycling Direct program insures that recycling vendors are operating consistently across North America and in a manner consistent with the Samsung brand. Recycling vendors opt into this program by being selected by Samsung for e-waste management. This document outlines guidelines and policies related to the Samsung Recycling Direct program covering the following topics:

1. Materials of Concern
2. Further Material and Handling Considerations
3. Collection, Materials Flow, and Fees
4. Worker Safety
5. Packaging
6. Fixed Drop-off Locations/Collection sites
7. Recycler Scorecards
8. Reporting and Record Keeping
9. Requirements for Downstream Vendors Auditing
10. Managing the Collection Network
11. Event Productions

The integrity of Samsung’s recycling program is an essential element to its success. Providers must adhere to zero tolerance with respect to these policies. Samsung’s recycling vendors acknowledge that a breach of these guidelines and policies shall constitute a breach of the Master Agreement. Samsung considers collection partners to be part of an elite collection network, and ambassadors of the Samsung brand. Consequently, all partners must ensure that program presentation is provided in a professional and courteous manner.

1. Materials of Concern

Electronic equipment contains materials of concern that can be exposed through the recycling process. Samsung recycling vendors must adhere to the ISO 17011 e-Steward Standard for Responsible Recycling and Reuse of Electronic Equipment (e-Steward Standard). The SRD program has been designed to responsibly manage materials of concern so that the environment and people are protected against the potentially harmful effects of these materials.

Recycling vendors and their partners, agents, and subcontractors, including all downstream vendors must meet the e-Steward Standard for all material processed on behalf of Samsung. Samsung’s recycling vendors are selected for their ability to adhere to the United Nations’ Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal Protocol (Basel Protocol). This is to ensure that Samsung’s e-waste downstream processing will:

- Not export hazardous electronic wastes to developing countries;
- Not use forced child labor or prison labor;
- Not dump toxic materials in municipal landfills;
- Not melt or burn electronic equipment in open fires;
- Not incinerate materials which contain mercury, halogenated materials, and/or beryllium;
- Not export hazardous electronic waste to developing nations (as defined by the Basel Protocol); and
- Not improperly landfill these materials (as defined by the e-Stewards Standard).

Samsung’s downstream e-waste materials of concern include, but are not limited to:

- Batteries;
- Cathode ray tubes (CRT);
- Circuit boards and switches;
- Polychlorinated biphenyls;
- Ink and Toner Cartridges; and
- Any other parts, materials, assemblies, housings, cables, and wires which contain substances listed in the e-Stewards standard (arsenic, barium, beryllium, cadmium, chromium, lead, mercury, selenium).

2. **Further Material and Handling Considerations**

Reuse/Refurbishment: The SRD program allows recycling vendors to find opportunities to reuse and/or recover materials equipment as an alternative to final disposal. This includes electronic equipment refurbishments (after wiping memory and other precautions listed in the e-Steward Standard), manually dismantling, repairing, remanufacturing, repurposing and harvesting parts.

Security: To insure consumer data will be protected, all devices will have memory data responsibly destroyed or wiped in accordance with NIST SP 800-88 and criterion 4.4.6.3 of the e-Steward Standard.

Final disposal: Appropriate final disposal is defined as operations that do not lead to the possibility of materials recovery, recycling, reclamation, direct use, or alternative uses (i.e. Basel Protocol Annex IV Part A). This includes deposit in landfills and/or incinerators (including incinerators with energy recovery), and safe, monitored retrievable storage.

3. **Collection, Materials Flow, and Fees**

The recycling vendor agrees that once materials enter the collection venue, all materials must remain in a secure, dry location until transported to the recycling vendor. The recycling vendor will assist the collection venues with any materials that require special handling needs to insure a safe and secure inventory of SRD materials. Upon request, the recycling vendor will retrieve materials from the collection facility. Once the electronic waste materials enter the recycling vendor’s facility none of the materials shall be diverted outside of the SRD channels. All downstream e-waste will be managed in accordance with the e-Steward Standard.

Participating products* that arrive at collection venues or at the recycling vendor from residential and non-commercial drop-offs will be considered SRD program qualified electronic waste materials that will flow into the SRD e-waste. Participating products* can be dropped-off at no fee to consumers. Recycling vendor will cover the collector’s costs for collection facility handling of participating Samsung branded equipment. Where applicable laws allow, this volume should be included in Samsung compliance volumes on a state-by-state basis.

Samsung affiliates and partners will be allowed to give scrap to SRD collection venues and recycling vendor locations. The Samsung affiliates and partners will drop off collection point that is most convenient or can request pick-up from the recycling vendor. The recycling vendor must accept this material and process it in a way consistent with the SRD Policies and Guidelines.

*Participating products: Products covered by SRD will vary slightly state-by-state. The Samsung Recycling Direct program does not accept home appliances, except for locations specifically contracted to handle these products.

4. **Worker Safety**

As a Samsung partner, the recycling vendor and collection venues shall agree to maintain the facilities in a neat and clean manner. Collection facilities must remain at all times safe for workers and residents and provide sufficient lighting and access. Facility must follow local, state and federal law, and worker safety must be met in accordance with relevant environmental, health and safety standards and best practices.

5. **Packaging**

Recycling vendor agrees that its collection network and main facilities will collect any Samsung packaging materials, which are normally associated with recent sales, and process them through their respective Samsung Recycling Direct (SRD) channels for responsible reuse or recycling.

6. **Fixed Drop-off Locations/Collection sites**
Consumers shall be provided with locations for e-waste drop-off for responsible end-of-life disposal. Recycling vendors will provide these sites in accordance with federal, state, and local laws. Consumers should be courteously received. Collection locations shall be easily accessible, with locations listed online, customer service phone numbers, and directions on how to reach the facility. The facility shall be designed to create a pleasant drop-off experience. This means easy drive-up access, assistance with heavy deliveries, information about product categories covered under the program and general knowledge of drop-off alternatives for any products not covered by the program. Employees shall be knowledgeable and able to answer collection information on behalf of Samsung.

7. **Recycler Scorecards**

Recyclers will be evaluated on an annual basis to ensure that operations are meeting internationally accepted standards for e-waste management and following the SRD Policies and Guidelines. Recyclers will also be evaluated for continual innovation in safe e-waste disposal and management of toxic chemicals/materials. Samsung must approve end-of-life technologies. Recyclers are expected to maintain positive relationships with industry associations and their supplier network.

8. **Reporting and Record Keeping**

Recycling vendors will support Samsung’s needs for information/data to fulfill state reporting requirements. Recycler should stay abreast to state-by-state legislative developments, and remain in compliance with the federal, state, and local e-waste laws.

9. **Requirements for Downstream Vendors Auditing**

Recycling vendor agrees to audit their network in order to ensure they meet Samsung Recycling Direct Policies and Guidelines. This includes collection, logistics, security, products for reuse, breakdown, and final disposal. Downstream auditing shall include evidence that downstream vendors are meeting environmental, health, and safety standards required in the e-Stewards Standard and the ban of exporting hazardous waste outlined in the Basel Protocol. The recycling vendor should also evaluate the downstream vendors to ensure they are an appropriate member of the Samsung collection network and are appropriately representing the SRD program and its efforts to protect the environment and society.

Downstream auditing may be conducted onsite or through paperwork, and should be signed off by the SRD recycler to demonstrate the recycling vendor’s agreement with the results. The recycling vendor’s downstream audits shall be performed annually and be provided to the SRD auditor at Samsung’s annual inspection of the recycling vendor.

10. **Managing the Collection Network**

Samsung requires that the recycling vendor collect the following from each of its designated collection partners:

1. Complete name, address, and phone number of facility;
2. Venue operating hours;
3. Agreement that phone inquiries about program will be handled in accordance with the Customer Service section of the Samsung Policies and Guidelines document (below);
4. Agreement to handle consumer drop-offs in accordance with these policies;
5. Agreement to maintain collection log for purpose of responsible materials management and reimbursement;
6. Signed agreement to uphold the shared values of protecting the environment and society for future generations, both in North America and in developing countries; and agreement to the Ban Amendment principles noted previously;
7. Signed agreement to uphold all elements noted in this document;
8. Any special instructions for safe access to the property and to drop off location; and
9. Photograph(s) of drop off location area and the collection facility.
The following represents a summary of the reimbursement process:

1. Samsung will only accept invoices from the recycling vendor for products that are recycled by the recycling vendor.
2. The recycling vendor will reimburse the collection facility directly for collection of participating brand electronics parts and equipment (Samsung will not directly reimburse the collection facility);
3. The recycling vendor shall arrange logistics, reimbursement, collection requirements, and all other matters directly with collection venues;
4. The collection venue (or transporter) must provide a material collection log or bill of lading to the recycling vendor as part of the reimbursement process for each load. The recycling vendor must be able to include a copy of this log as part of the reimbursement process, when submitting invoices to Samsung. All recycling vendors must keep proper business records for 3 years to show material transfers from collection venues:
   a) Name and address of venue;
   b) Description of products shipped (summary of product types); and
   c) Product specifications (total weight).

11. Event Productions

E-waste recycling events conducted on behalf of Samsung should be professional, clean, polite and follow best practices for e-waste drives. Special measures should be taken by recyclers to ensure participant and worker above and beyond the day-to-day health and safety requirements. Other considerations include traffic safety, logistics, courteous customer friendly conduct, employee appearance and event presentation.

Employee Safety at events shall include:
- Adequate space for safe operations; and
- Adequate support for lifting and moving heavy objects.

Safety of Participants at events shall include:
- Adequate area for participants to drop off material;
- Safe distance from potentially dangerous structures and equipment;
- Convenient collection drop-off location; and
- Assistance with heavy items.

Traffic Safety at events shall be:
- Organized and safe; with
- Minimal impact to normal vehicle traffic.

Logistics:
- Events shall be planned in advance to minimize risk and insure smooth execution;
- When trucks are full they shall be moved to a new location and replaced with an empty truck;
- Participants shall be guided in an orderly fashion through the collection event;
- Adequate number of trucks available at the event; and
- Event shall have appropriate communication and marketing to attract attendants (to be coordinated with and approved by Samsung).

Courteous customer friendly conduct and dress code:
- Recycling attendants shall be courteous and respectful to participants;
- Attendants shall be helpful and able to reasonably support participant needs;
- Employees shall wear Samsung T-Shirts (if requested and provided by Samsung); and
- Attendants shall wear suitable shoes.
Event Presentation:

- Event location shall be welcoming, clean, safe, and friendly;
- Banners are neatly applied to truck and area as appropriate; and
- Trucks are in good appearance and condition.

As part of the agreement, all Samsung Recycling Direct advertising must only be generated through Samsung Recycling Direct, unless otherwise directed by Samsung. Any press inquiries must be directed to Samsung. Occasionally, Samsung may contact the collection facility for possible involvement in a collection event.