

# EH&S Policy



The nature of BCS Recycling Specialists operations has positive impacts on the environment through the conservation of metals, plastic and other non-renewable resources and the proper management of used and end-of-life electronic equipment. Consistent with these core operations, it is BCS Recycling Specialists' overall goal to accomplish its business objectives while striving for an injury-free workplace, minimizing pollution, and providing quality products to our customers.

It is our intention to:

- Develop and maintain quality, environmental, health & safety and security programs that conform to the best practices within the scrap and electronics recycling industry;
- Comply with all relevant environmental, health & safety laws and regulations, including federal, state and local and other requirements;
- Comply with all relevant regulations of the countries importing equipment, components, or materials containing FMs that have passed through our facility or control;
- Comply with customer and product requirements and industry guidelines, including the Responsible Recycling (R2) practices;
- Manage used and end-of-life electronics equipment, components and materials based on a hierarchy of first, reuse/refurbish; second, materials recovery; and finally, energy recovery/disposal;
- Manage the R2 focus materials that pass through our facility or control in a manner protective of worker health and safety, public health and the environment;
- Prevent workplace injuries by providing a safe environment for employees, contractors, visitors, volunteer workers, temporary workers and anyone else performing activities under our direction;
- Investigate any workplace accidents, illnesses and near-misses, and promptly correct any unsafe condition or practice,
- Promote prevention of pollution in all of our operations, including the elimination of electronic waste from landfills;
- Work with our entire recycling chain including downstream vendors, suppliers, customers and contractors to fulfill our environmental, health & safety goals; and
- Continually improve our quality, environmental, and health & safety programs and resulting performance.

We recognize that the responsibilities for quality, environment, health & safety and security are shared, requiring cooperation, not only between employees and their supervisors, but among and between all those who assume the various roles within the company.

BCS Recycling Specialists will continually improve the EH&S system and performance. This will include the setting of EH&S goals, taking into consideration our EH&S aspects and impacts from our business, financial, operational and legal requirements as well as the views of interested parties.



## Responsible Recycling (R2) Policy

The BCS Recycling Specialists R2 Responsible Recycling Policy is designed to effectively manage used and end-of-life electronics equipment. It is the policy of BCS Recycling Specialists to maintain a hierarchy of “reuse, recover, dispose,” based on responsible management strategies incorporating “Plan, Do, Check, Act” methodologies, resulting in continual improvement for materials management both on site and throughout the Recycling Chain.

The BCS Recycling Specialists R2 Responsible Recycling Policy will:

- Comply with the environmental, health, and safety legal requirements relating to its operations, and for assuring it only exports equipment and components containing Focus Materials to countries that legally accept them.
- Adhere to a Focus Material Plan for managing how the R2 Focus Materials (FMs) pass through the BCS Recycling Specialists facility and throughout the Recycling Chain.
- Identify Environmental Health and Safety hazards.
- Assess any on-site occupational and environmental risks.
- Develop and deploy plans in conjunction with local responders for responding to and reporting exceptional releases, accidents, spills, fires, explosions, and other out-of-the-ordinary events that pose risks to worker safety, public health, or the environment.

The Management of BCS Recycling Specialists accepts total responsibility for implementation of this environmental policy and communication thereof to employees, clients, regulators, and the public as necessary.