

Samsung Electronics America, Inc.
E-Waste Disposition Policy
Binding on all SEA Providers/Vendors of asset, commodities, logistics management, repair, and/or
recycling services for various “end of life” electronic products and materials

1. Purpose

These requirements aim to support a circular economy, protect consumer data security and minimize environmental impacts from electronic waste [e-waste] generated by Samsung Electronics America, Inc.’s (herein referred to as “SEA” or “Samsung”) operations, programs and vendor partnerships, including, but not limited to customer trade-in and take-back programs, repair and service programs, reverse logistics and internally generated e-waste, electronic scrap and appliance sales and haul away programs. The purpose of this Electronic Products Disposition Policy (“Policy”) is to ensure that recovered electronic products and appliances received by or on behalf of SEA sales, service and internal operations are managed consistently and responsibly from collection through to final disposition, avoiding illegal export, landfill and incineration with an emphasis on reuse, upcycling and recycling.

2. Scope

The requirements of this Policy apply to all SEA employees, Providers and their authorized partners performing collection, handling, transport, storage, repair, brokering or recycling of recovered electronic equipment, scrap electronic parts, and appliances. All such SEA vendors, authorized parties and employees shall comply with these requirements.

3. General Compliance and E-Steward Certification Requirement

- A. Samsung requires that all recycling vendors and their downstream partners are operating in a manner consistent with all applicable laws, industry best practices and Samsung policy. We seek safe and responsible recycling and reuse of materials and components in legitimate, responsibly managed secondary markets while recognizing that some materials containing hazardous substances are better retired than reintroduced via reuse.
- B. Vendors shall comply with all applicable international, federal, state, county and local laws, ordinances, regulations, and codes, including procurement of any required permits or certificates, and shall maintain a record documenting compliance with legal and regulatory obligations applying to all activities undertaken on their site. Vendors shall establish and maintain a quality management system in order to identify and comply with legal requirements that are applicable to the environmental, health and safety aspects of all activities, services and processes. Vendors shall maintain all required records for demonstrating compliance with applicable law and maintain all required permits and approvals required by federal, state, and local governments related to their operations. Vendors shall also require that their subcontractors comply with this Policy and provide evidence of same upon request.

- C. Suspected violations of this Policy or law and any incidents that involve security, health, safety, environmental or labor issues that could negatively impact Samsung, its agents or employees, or other stakeholders must be reported to the relevant Samsung vendor manager immediately.
- D. All recycling of electronics and/or components performed by or on behalf of SEA and its vendors shall be fulfilled exclusively through recycling partners who are certified to the e-Steward Standard. Samsung promotes responsible recycling and the handling of materials of concern, defined by the Basel Convention on Transboundary Waste and the Ban Amendment and requires its Providers to do the same, according to the following principles:
 - 1. No unauthorized export to non-OECD (developing) countries
 - 2. No unauthorized landfilling
 - 3. No unauthorized incineration or waste-to-energy
 - 4. No use of child or forced labor
- E. Additionally, contractual agreements between SEA vendor's and their subcontractors must require the subcontractor to comply with the e-Stewards Standard. Any loss or removal of e-Stewards certification by any vendor, subcontractor or facility must be communicated to the relevant Samsung vendor manager within twenty-four (24) hours, and that vendor, subcontractor or facility will be excluded from performing recycling services for Samsung.
- F. If an electronics recycling vendor is unable to obtain e-Stewards certification they must at least obtain R2 certification for all of their managed operational sites, including those not handling SEA materials, and demonstrate adherence to the Basel Convention on the Export of Transboundary Waste, including its Annexes and Ban amendment, before the contract is accepted.
- G. All recycling of appliances performed by or on behalf of SEA and its vendors shall be fulfilled exclusively through recycling vendors who are certified to the Recycling Industry Operating Standard (RIOS). All appliances dismantled before disposal must have the refrigerant removed and recovered before it is sent to a scrap metal recycler. In accordance with the UA EPA Clean Air Act, section 608, requiring the safe disposal, including recycling, of products containing Ozone Depleting Substances (ODSs), appliance recyclers must either:
 - 1. Recover ODSs from appliance; or
 - 2. Obtain signed statement that ODSs have been previously removed from the appliance.
- H. Vendors must submit a downstream disposition flowchart of all processed, disposed or brokered material. Any significant changes shall be reported to SEA in a timely manner.

4. Environment Management System

- A. Recycling vendors shall implement a third-party certified Environment Management System to address environmental and health and safety performance. The Environmental Management System may be ISO 14001 certification (EMS or EMAS), an

independent Environment Management System (e.g. RIOS), or a national certified management system.

- B. Providers shall document environmental and safety work processes, store these records, and make them accessible to their employees.

5. Monitoring / Record Keeping

All Vendors shall keep business records for at least three (3) years to show material transfers and to document assurances as to the proper disposition of electronic waste, electronic equipment, and appliances. The following must be monitored and recorded:

- A. The operational processes and the operational risk assessment of the treatment facility (example: hazardous waste management)
- B. Environmental emissions from the site
- C. The emissions of hazardous materials and pollutants during waste handling and disposition processes
- D. The movement and storage of waste, especially hazardous wastes
- E. The operations of a materials 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 (in addition to e-Stewards certification requirement)

- A. The 1st tier Vendor shall audit downstream processors of electronic waste through to 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 tier 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. Closure Plan

- 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 (2) years.

9. Information Security

- A. All data-containing devices must be fully erased. If devices cannot be fully sanitized, drives and storage memory shall be destroyed to prevent data recovery. All data-containing devices must be sanitized in strict alignment with NIST SP 800-88 or equivalent industry standard such that pre-existing saved information from previous product owner/operator will not be available for further access. NAID AAA Certification is preferred for data destruction service providers to assure compliance with data protection regulations and security requirements.
- B. Vendors shall maintain documents verifying destruction of data devices including device serial numbers and date of destruction when requested by the relevant SEA vendor manager.

10. Material Handling Requirements and Definitions

SEA vendors:

1. Shall not store or stockpile waste electronics longer than one (1) year, unless evidence of extenuating circumstances is provided and retained, in which case storage is permissible for up to two (2) years maximum; Shall not incinerate hazardous electronic materials; Shall not export hazardous electronic waste (defined in a manner consistent with the Basel Convention and Basel Ban Amendment definition of hazardous electronic waste) to developing countries; Shall not landfill hazardous electronic waste in solid waste landfills, or otherwise improperly landfill these materials.
2. SEA recycling partners agree to uphold standards and practices noted above in all their business operations and locations. Further, SEA 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, computers (both desktop and laptops), and scrap electronic parts.

Appliances:

Appliance refers to Samsung items other than Covered Electronic Devices (CEDs) including, but not limited to, refrigerators, stoves, cooktops, washing machines, clothes dryers, dishwashers, vacuum cleaners, and scrap electronic parts.

Hazardous Electronic Waste Materials:

Some materials of concern (MOC) within electronics products can become potentially harmful or hazardous electronic waste materials during the recycling process of the product. Waste can also be created during shipment, repair or refurbishment processes. The SEA recycling 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.

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
- Electronic equipment or parts for which the hazardous characteristics and constituents are not known
- Electronic equipment that are listed in the Basel Convention's Annex VIII
- Electronic equipment that contains or is contaminated with any other hazardous materials listed in Basel Convention Annex I while possessing an Annex III hazardous characteristic
- Electronic equipment that are deemed hazardous waste for importation by any country involved in an applicable transboundary movement regardless of destination, type of processing or disposal operation involved, or condition of equipment
- 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, are unsorted, contain flammable organic solvents, or for which the chemistry is unknown
- Mercury, asbestos, 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
- Waste materials or components containing radioactive substances emitting radiation
- Any Electronic Equipment (including circuit boards, lamps, switches, assemblies, housings, plastics, cables, and wires) that contains any of the following substances in levels exceeding threshold limits indicated below (per 40 CFR 266 Appendix 1311)
 - Arsenic 5.0 mg/L
 - Barium 100 mg/L
 - Beryllium 0.007 mg/L
 - Cadmium 1.0 mg/L
 - Chromium 5.0 mg/L
 - Lead 5.0 mg/L
 - Mercury 0.2 mg/L
 - Selenium 1.0 mg/L

- Hazardous Electronic Waste does not refer to non-hazardous fractions such as copper, aluminum, or steel alloys (waste streams listed in the Basel Convention Annex IX) unless that material is contaminated with materials or substances listed above
- Problematic Components or Materials:
 - Plastics with halogenated additives or constituents, including brominated flame retardants other than those listed on Annex VIII of the Basel Convention
 - Plastics listed in Annex II of the Basel Convention (Y48)
 - Electronic Waste listed on Annex II of the Basel Convention (Y49 – as of January 1, 2025)

End

Revision History

July 2025	Revision
March 2025	Revision
Sept 2011	Initial publication