



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

1.0 Purpose

The purpose of this Standard is to define minimum requirements for Dell’s electronics disposition programs.

2.0 Applicability

These requirements apply to all Dell Environmental Partners (EPs) providing electronics Disposition, Refurbishment, Repair and Reuse services. Dell reserves the right to unilaterally amend, supplement, or change these requirements.

This performance standard pertains to all retired, excess and obsolete Electronics Waste generated by Dell’s global operations and programs including but not limited to; retired corporate equipment, takeback, return programs and manufacturing/assembly operations.

3.0 Requirements

All applicable laws and regulations will be followed. If any requirement in this document is contrary to applicable law or regulation, the applicable law or regulation will supersede that requirement.

In addition:

3.1 Environmental Partner On-boarding/Sustaining

3.1.1 All Dell Environmental Partners who provide electronics disposition services shall be on-boarded through Dell’s globally standardized on-boarding and sustaining process, including:

3.1.1.1 A comprehensive environmental, health, safety, security, logistics, downstream channel, and data security audit using Dell’s prescribed audit protocol conducted by a third party.

3.1.1.2 All EPs shall be audited at least annually to ensure conformity with Dell’s Electronics Disposition Policy and Environmental Partner Performance Standards

3.1.1.3 A comprehensive financial and business processes review.

3.2 Master TakeBack Agreement

3.2.1 Compliance

3.2.1.1 EPs shall sign and comply with all requirements of the Dell Master TakeBack Agreement (MTBA).

3.2.1.2 EPs shall comply with Dell’s Electronics Disposition Policy and this Standard.

3.2.1.3 EPs shall comply with all requirements set forth the following documents:

3.2.1.3.1 Electronics Industry Code of Conduct (EICC)



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

- 3.2.1.4 EPs shall obtain and maintain all operating permits, licenses and authorizations required to carry out electronics disposition operations.
- 3.2.1.5 EPs shall require and ensure that that their downstream vendors comply with this Standard.
- 3.2.1.6 EPs shall maintain ISO 9001 at time of onboarding, and ISO 14001 and OSHAS 18001 certifications within one year of Agreement execution date
- 3.2.2 Insurance
 - 3.2.2.1 EP shall obtain and maintain, with insurance companies acceptable to DELL, the minimum insurance coverage set forth below unless these are superseded by national insurance requirements. Limits shown are in United States ("U.S.") Dollars unless otherwise specified. If Provider obtains the required insurance coverage outside of the country(ies) or region(s) where the stated currency is applicable, insurance obtained in equivalent local currency shall meet the stated requirement:
 - 3.2.2.1.1 Statutory workers compensation insurance or similar non-subscribers insurance in the state or jurisdictions in which EPs operate and employer's liability insurance with limits of not less than US\$500,000: (i) for each accident; and (ii) for each employee for occupational disease; or (iii) policy limit for disease.
 - 3.2.2.1.2 Commercial General Liability insurance with limits for bodily injury and property damage liability of not less than US\$1,000,000, personal injury each occurrence, US\$2,000,000 general aggregate and products/completed operations coverage which shall include premises/operations liability, independent contractors liability, and broad form contractual liability.
 - 3.2.2.1.3 Business automobile liability insurance with a limit of not less than US\$1,000,000 per occurrence for bodily injury and property damage liability written to cover all owned, hired and non-owned autos arising out of the use thereof by or on behalf of the EP and it's employees.
 - 3.2.2.1.4 Casualty Insurance with respect to the Equipment and/or Materials for "all risks" of physical loss or damage, including, without limitation, loss by fire



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

(including extended coverage), theft, collision and other such risks as are customarily carried by prudent operators of businesses similar to that in which EP is engaged and in an amount not less than the full replacement value of the Equipment and/or Material.

- 3.2.2.1.5 Contractor’s Operations and Professional Services Environmental insurance, including coverage for Professional Liability and Contractor’s Pollution Liability with a limit of not less than US\$10 million per occurrence and in the aggregate. This policy shall include a waiver of subrogation favor of Dell, be endorsed to include Dell as an Additional Insured, and shall state that such insurance is primary insurance as respects any insurance carried by Dell.
- 3.2.2.1.6 Cyberliability/Data Privacy and Security, including data protection liability insurance with limits of not less than US\$5,000,000 per occurrence and in the aggregate.
- 3.2.2.1.7 Employers liability insurance with limits of not less than US\$10 million for EP located in the UK and Ireland. \$500,000 (five hundred thousand dollars) for other countries

3.2.3 Data Security

- 3.2.3.1 Data on Equipment shall be responsibly and appropriately handled and processed by EPs.
- 3.2.3.2 EPs shall store all data-containing devices in a secured, access controlled location.
- 3.2.3.3 EPs shall maintain documentation and shall at request provide this documentation to Dell.

3.2.4 Site Security

- 3.2.4.1 EPs shall maintain systems to ensure the security and control of all Equipment and Material storage, processing and disposition activities associated with electronics disposition activities carried out on Dells behalf.
- 3.2.4.2 EPs shall perform pre-employment screens for all employees carrying out Dell electronics disposition activities.



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

3.2.4.3 EPs shall maintain systems to ensure that only authorized employees have access to electronics disposition activities carried out on Dell's behalf.

3.2.5 Disposition Operations

3.2.5.1 All disposition operations shall be carried out in a timely manner utilizing environmentally sound management practices.

3.2.5.2 No forced bonded (included debt bondage) indentured labor, prison or child labor will be utilized for any handling of the material covered under this standard.

3.2.5.3 All disposition operations shall be carried out in accordance with Dell's Reuse Hierarchy.

3.2.5.4 Electronic Waste processed through Dell's Disposition channel shall be tracked and documented. Electronic Wastes shall be managed throughout the entire chain of custody until final disposition.

3.2.5.5 Reuse

3.2.5.5.1 All Equipment with potential Reuse capacity shall be fully tested, and Functional when sold, remarketed or distributed as a refurbished product.

3.2.5.5.2 Products that are Non-Functional shall not be marketed or distributed as refurbished for Reuse or shipped either domestically or internationally.

3.2.5.5.3 Data on refurbished Equipment shall be responsibly handled by EPs by employing effective tools and processes. Equipment that fails to meet this Standard or is presorted to be recycled must be immediately rendered inoperable and destroyed by Physical Destruction

3.2.5.6 Resource Recovery

3.2.5.6.1 EPs shall endeavor to use processes that maximize the recovery of recyclable Materials and shall document the evaluation and determination of process options

3.2.5.6.2 EPs shall employ environmentally responsible processes and practices as defined in this standard in the recycling of Materials.

3.2.5.6.3 Materials Recovery Requirements



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

3.2.5.6.3.1 Mercury lamps shall be processed by vendors capable of and experienced in the environmentally sound management and recycling of mercury. Mercury-containing Equipment and/or Materials shall be disposed of in the most environmentally appropriate way available.

3.2.5.6.3.2 Printed circuit boards shall be processed in a facility engaging best available technology and authorized by the country where it is located to recover precious and heavy metals.

3.2.5.6.3.3 Cathode Ray Tubes (CRTs) shall be processed by a leaded-glass recycler or smelter capable of and authorized by the country where it is located to process leaded glass.

3.2.5.6.3.4 Batteries shall be processed by recyclers in a facility engaging best available technology and authorized by the country where it is located to recover metals present in batteries.

3.2.5.6.3.5 Every reasonable effort will be made to control all Electronic Wastes and to minimize Electronic Wastes from entering landfills or incinerators. Where the only available option is landfill it must be in an appropriately designated and licensed site.

3.2.5.7 Disposal

3.2.5.7.1 EPs shall employ environmentally responsible processes and practices as specified in this standard in the disposal of wastes.

3.2.5.7.2 No Equipment or Materials shall be exported from developed countries to developing countries for disposal.

3.2.6 Export

3.2.6.1 Prior to export from EP processing facility, all Equipment and Material shall be tested and physically divided into



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

three categories: (1) reusable (remarketing, repaired & refurbished); (2) recyclable (processed ready as raw material, feedstock); or (3) electronic waste. A visual inspection is not a sufficient test to determine whether Equipment and Materials is reusable/ repairable/ refurbishable.

- 3.2.6.2 No Equipment or Materials that are co-mingled between the three categories described in 3.2.6.1 shall be exported.
- 3.2.6.3 No Equipment or Materials classified per 3.2.6.1 as recyclable or disposable/waste shall be sold to Brokers.
- 3.2.6.4 No Equipment or Materials that are classified per 3.2.6.1 as electronic waste shall be exported from developed (OECD) countries to developing countries (countries designated as non-OECD). Dell does not permit Electronic Waste to be exported from developed (OECD/EU) to developing (non-OECD/EU) countries either directly or through intermediaries.
- 3.2.6.5 Prior to the EP shipping any Equipment or Material which falls into the third category in 3.2.6.1, the EP shall verify and document that all required permits, licenses and authorizations are in place. All exports and imports of Electronic Waste handled by Dell and its authorized environmental partners will comply with existing international waste trade agreements and legal requirements.
- 3.2.6.6 EP shall obtain all permits, licenses and authorizations required for export prior to initiating any shipment of Materials.
- 3.2.6.7 EP shall not sell, lease or otherwise transfer Equipment or Material to restricted end-users or to restricted countries.
- 3.2.6.8 EP shall not sell, lease or otherwise transfer Equipment or Material to end-user engaged in activities related to weapons of mass destruction, including activities related to the design, development, production or use of nuclear weapons, materials, or facilities, missiles or the support of missile projects, and chemical or biological weapons.
- 3.2.7 Materials Tracking
 - 3.2.7.1 EPs shall track and document refurbished and end-of-life electronics throughout the complete product disposition channels.
 - 3.2.7.2 Tracking information shall show the final disposition of all recyclable materials and wastes.



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

3.2.7.3 Refurbished electronics shall be tracked to first point of reuse over which EP has had direct oversight.

3.2.7.4 EPs shall maintain, and make available to Dell on request, source documents (i.e., waybills, shipping documents, invoices) verifying all Materials transfers.

3.2.8 Subcontractors

3.2.8.1 EPs shall require through contracts that all subcontractors (including downstream materials vendors) comply with this Standard.

3.2.8.2 EPs shall maintain documentation to demonstrate that subcontractors comply with this Standard.

3.2.8.3 EPs shall conduct and document annual audits to this Standard of all subcontractors utilized in providing electronics disposition services to Dell.

3.2.8.4 EPs shall make the results of subcontractor audits available to Dell on request.

3.2.8.5 EPs shall require that all subcontractors utilized by their subcontractors comply with this Standard.

3.3 Audit and Inspection

3.3.1 EP shall grant to Dell, or its designee, access to, and copies of, any information requested by Dell with respect to EPs performance of electronics disposition services, including but not limited to information related to downstream activities.

3.3.2 Dell, or its designee, shall have the right at any time to enter onto EPs premises without notice during normal business hours, for the purpose of auditing EP's compliance with this Standard.

3.3.3 EP shall make available to Dell, or its designee, for purposes of such audits (a) EPs books and records of account, records relating to environmental health and safety and any other related records requested by Dell; (b) its receiving, staging, storing, refurbishing, marketing, data cleansing and reselling facilities; and (c) physical inventories of Equipment and/or Material held by EP.

3.3.4 Audits will extend to investigation of the materials downstream process, including but not limited to mass balancing of material transfers between EP and all of its subsequent sub-contractors and Vendors.

3.3.5 EP shall have access to and documentation to verify material final destination at all times and shall contractually require that its



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

subcontractors and vendors have access to the final destination of all materials that they process at all times.

- 3.3.6 EP shall comply with this Standard and require its subcontractors and vendors to comply with any such requests for information by Dell.
- 3.3.7 EP shall conduct and document annual audits of its own sub-contractors and provide evidence of such to Dell upon request.

4.0 Definitions



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

Term	Definition
Broker	Vendor who acts as an intermediate agent in an electronics disposition transaction but does not carry out any value-added services (testing, grading, sorting, recycling, etc.) as part of the transaction.
Dell Reuse Hierarchy	Most preferred method of Reuse is whole system Reuse. When that is not feasible, Refurbishment of whole system for Reuse is next priority. If both are not economically feasible, Repair or component-level piece part Reuse is next preferred method of Reuse. If none of these methods are feasible, commodity materials Reuse is preferred. Not until all of the above methods are exhausted shall the disposal be considered.
Disposition	Includes all activities associated with handling end of first use* and end of life electronic devices *end of first use electronics means any electronic product or part that is still functional and turned over to an EP for repurposing by the first owner.
Disposition Channel	The route of end of first use* Electronics that begins with Dell or Dell Customer and reaches the Refurbishment, Repair and Reuse or Recycling facility for processing and continues through to resale, Reuse or final Disposition as reusable raw material or final waste
Electronic Waste	Dell defines Electronic Waste as non-working electronic parts or devices, irrespective of material composition. Electronic Waste does not include: <ul style="list-style-type: none"> a. Basel Convention non-hazardous wastes; b. Working equipment and parts that are tested, certified and labeled as working and that are not intended for disposal or recycling, but for donation, Reuse or resale; c. Components being returned under warranty to the original equipment manufacturer; d. Dell products and components** intended for Repair in an authorized Dell Repair Center Materials that are to be used as a direct feedstock in manufacturing without further processing or preparation, and the "Competent Authority" of an importing country makes a written determination that the material is acceptable. "Competent Authority" means the entity (usually a government agency) that is responsible for overseeing its country's compliance with the Basel Convention. ** intended to be current RoHS-compliant product worldwide
End-of-Life Electronics	Any electronic product or part that can no longer be used as intended and that contains material that may be recycled or processed in order to reclaim a substance for further use.
Equipment	Whole units of electronics, accessories and parts.
Functional	Devices that function in the way originally intended by the manufacturer following a testing or Refurbishment process where essential functions are tested.



Environmental Partner Performance Standard	Document #	ED-STD-01
	Revision #	A04
	Revision Date	10/15/2014

<i>Intermediaries</i>	Any broker, treatment operator or agent that facilitates the transfer of product, material or waste of any form from the owner or holder to a third party.
<i>Materials</i>	Any new, used, defective and/or scrap Equipment parts, electronic equipment and components, sub-assemblies and other equipment and parts including, but not limited to, PC's, sub-assemblies and/or parts from PC's, external or peripheral PC devices (e.g. hard drives, keyboards, video cards, memory), electronic equipment and components and any other surplus equipment.
<i>Minimum Technology Specifications</i>	Minimum standards for which an end-of-first use* electronic product can be adequately Reused with current compatible peripherals and in line with its core useful purpose. *end of first use electronics means any electronic product or part that is still functional and turned over to an EP for repurposing by the first owner.
<i>Non-Functional</i>	Any device that does not function in the way originally intended by the manufacturer following a testing or Refurbishment process where essential functions are tested.
<i>Recycling</i>	A process where electrical and electronic equipment not suitable for Refurbishment, Repair and/or Reuse should be processed for material recovery of scarce resources and reusable raw materials and appropriate treatment of environmentally sensitive materials.
<i>Refurbishment</i>	A process that includes, but is not limited to, disassembly or physical modifications to the equipment, part removal and upgrades in order to render the whole unit available for Reuse.
<i>Repair</i>	Repair is the process of only fixing a specified fault or series of faults to render the product or component available for Reuse.
<i>Reuse</i>	A process of using again a used electrical or electronic device or component directly following a functionality test or possibly after Refurbishment or Repair. Processes to enable Reuse may be limited to performing non-intrusive operation verification, data clearing, and software installation.
<i>Sorting</i>	The process for differentiating materials or equipment for the purposes of identifying what is refurbishable, reusable and/or recyclable.