

Electronics Recycler's Pledge of True Stewardship

We, the undersigned recycling company, agree to uphold the following as a pledge of true stewardship of electronic wastes:

- I. We will not allow any hazardous e-waste* we handle or control to be sent to solid waste (non-hazardous waste) landfills or incinerators for disposal or energy recovery, either directly or through intermediaries.
- II. Consistent with decisions of the international Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, we will not allow the export of hazardous e-waste we handle or control to be exported from developed to developing countries**, either directly or through intermediaries, throughout final disposition.
- III. We will not allow any e-waste we handle to be sent to prisons for recycling either directly or through intermediaries.
- IV. We assure that we have an "environmental management system" in place that is either certified or otherwise adequate for the nature and size of the company's operations, and that our operation meets best practices.
- V. We commit to ensuring that the entire recycling chain, including downstream intermediaries and recovery operations such as smelters, are meeting all applicable environmental and health regulations. Every effort will be made to only make use of those facilities (e.g. smelters), which provide the most efficient and least polluting recovery services available globally.
- VI. We agree to provide visible tracking of hazardous e-waste throughout the product recycling chain. The tracking information should show the final disposition of all hazardous e-waste materials. If there is a concern about trade secrets, an independent auditor acceptable to parties concerned can be used to verify compliance with this pledge.
- VII. We agree to provide adequate assurance (e.g. bonds) to cover environmental and other costs of the closure of our facility, and additionally to provide liability insurance for accidents and incidents involving wastes under our control and ownership. Additionally we will ensure due diligence throughout the product chain.
- VIII. We further agree to support design for environment and toxics use reduction programs and/or legislation for electronic products.

* **Hazardous electronic waste** means electronic equipment, parts, and materials derived from them destined for recycling or disposal but not for direct reuse, that consists of lead- or beryllium-containing circuit boards, cathode ray tubes (CRTs), CRT glass (processed and unprocessed), as well as computers, monitors, peripherals and other electronics containing such circuit boards and

or CRTs. It will also include batteries containing lead, mercury, and/or cadmium; and mercury-, beryllium- and PCB-containing components, lamps and devices. The definition of "hazardous electronic waste" will not include non-hazardous wastes such as copper unless it is contaminated with a Basel Convention hazardous waste such as lead, cadmium, beryllium, PCBs, mercury, etc. (constituents listed in Basel Annex I). The definition of "hazardous electronic waste" includes non-working parts or devices exported for repair unless assurances exist that hazardous components (such as CRTs or circuit boards) will not be disposed of in the importing country as a result. The definition of "hazardous electronic waste" does not include working equipment and parts that are fully tested, certified and labeled as fully functional, and that are not intended for disposal or recycling, but for donation, re-use or resale. The term 'hazardous electronic waste' as used in this Pledge does not pertain to, nor is synonymous with any current legal US or other national definitions of 'hazardous waste', but is meant for the purposes of this Pledge only. If the electronic equipment or material is to be used as a direct feedstock in manufacturing without further processing or preparation (e.g. cleaned CRT cullet), then a 'competent authority' of the importing country may make a determination that the material is not a waste, and therefore not a hazardous electronic waste. Such a determination provided in writing by the legitimate competent authority and provided to the holders of this pledge will be required to exercise this exemption.

**** Developing countries:** Following the definitions of the Basel Convention and its Basel Ban Amendment, developing countries are any country not belonging to either the European Union, the Organization for Economic Cooperation and Development (OECD) or Liechtenstein. For a complete list of OECD countries see http://www.ban.org/country_status/country_status.html and find countries shaded in gray, or go to www.oecd.org.

Signed Carol Weinstein

Name of signer (print) Carol Weinstein

Title CFO

Company WWS Associates dba 2trg

Date 11/19/09

Name and Address of Company:

2trg
11093 Kenwood Rd.
Cincinnati, OH 45242

CEO/President/Exec Director contact info

The following information will only be used by BAN and ETBC to communicate with your company regarding e-Stewards program:

Acting

CEO/President/ED's Name (please print) Carol Weinstein

Phone number: 513-761-5333

E-mail Address: cweinstein@2trg.com

Phone: 513-761-5333 Fax: 513-761-1049

E-mail cweinstein@2trg.com

Website: www.2trg.com

Basel Action Network (BAN)

122 S. Jackson St., Suite 320
Seattle, Washington 98104 USA

Phone: 206.652.5555,

Fax: 206.652.5750

Email: inform@ban.org

Website: www.ban.org

Electronics TakeBack Coalition (ETBC)

60 29th St. #230
San Francisco, CA 94110

Email: info@etakeback.org

Website: www.electronicstakeback.com