



**Responsible
Recycling**

R2 Code of Practices

R2 Certification Process Requirements

Version 1.0

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I. Introduction

This document is applicable to Accreditation Bodies (ABs), Certification Bodies (CBs), auditors, R2 certified companies, companies applying for R2 certification and any and all other participants in the R2 Standard Program. It contains requirements designed to facilitate R2 audit consistency, including requirements related to R2 Solutions' oversight of the R2 certification process. It also contains requirements for annual licensing agreements between R2 Solutions and companies as a pre-requisite for certification, and to maintain certification, to the R2 Standard.¹

This document is effective as of the date on its cover page and shall be incorporated into Accreditation Body requirements, such as ANAB Accreditation Rule 34.

This document may be revised from time to time by R2 Solutions to address concerns or make clarifications or improvements. Appropriate notice shall be provided prior to the effective date of any revisions to the document. Check www.r2solutions.org for the most recent version.

II. Expected Outcomes of Certification to the R2 Standard

An electronics recycling company that is R2 certified in accordance with this Code of Practices will benefit by achieving higher profit margins and additional market share through improvements in its operating systems and processes, and the status bestowed by certification. An R2-certified company will be able to assure its upstream clients and customers that it takes appropriate measures at its facility to protect the environment, worker and public health, and data security. Furthermore, an R2-certified company will be able to make the same assurances about each of its "Focus Material" downstream vendors throughout the recycling chain to final disposition. All of an upstream client's or customer's retired IT assets will be refurbished or recycled responsibly and legally, no matter where in the world the services are provided. Finally, and importantly, certification provides assurance that all import and export laws will be complied with.

¹ "R2" and the "R2 Standard" as used herein refer to all versions of the R2 Standard that are available for certification at the time of reading (R2:2013 and, until December, 2013, R2:2008).

III. Related Documents

Other documents containing requirements for, or related to, the R2 certification process include the current versions of:

- ANAB Accreditation Rule 34 (and the relevant requirements of any other authorized ABs)
- ISO/IEC 17011
- ISO/IEC 17021
- IAF Mandatory Documents as applicable (e.g. currently MDs 1, 2, 4, 5, 7, and 11)
- MA 6000, ANAB Accreditation Manual
- R2:2013 (and R2:2008 until December, 2013)
- ISO 14001, OHSAS 18001, and RIOS© (and any additional EHS management system standards approved in the future by R2 Solutions – see www.r2solutions.org)
- The R2 Guidance v. 2013 (and v. 2008 until December, 2013)
- The R2 Checklist v. 2013 (and v. 2008 until December, 2013)

IV. Accreditation Bodies

A. Authorization

Only International Accreditation Forum (IAF) multilateral recognition arrangement signatory accreditation bodies (ABs) meeting the requirements of this Code of Practices and authorized by R2 Solutions may accredit CBs.

IAF multilateral recognition arrangement signatory ABs can get authorization from R2 Solutions by presenting a plan for approval describing how its accreditation activities fully incorporate the requirements set forth in this Code of Practices and ISO/IEC 17011.

In conducting all of its accreditation activities, including activities relating to oversight, the ABs shall verify that this Code of Practices has been followed.

(This Code of Practices references the ANSI-ASQ National Accreditation Board (ANAB) and ANAB Accreditation Rule 34 (AR34) as specific examples of an AB and AR.)

B. Initial Assessment for Accreditation of Certification Bodies

Rules shall be established by the AB for the initial assessment of a CB to ensure competency and implementation of this Code of Practices. At a minimum these rules shall cover:

1. Documentation review,
2. Office assessments, and
3. Witness audits of both R2 Stage 1 and R2 Stage 2 audits.

R2 Solutions shall have the option to accompany an AB for office assessments and witness audits.

C. Ongoing Surveillance

Rules shall be established by the AB for ongoing surveillance of a CB which shall include at a minimum:

1. A review of a CB's conformance to the requirements of this Code of Practices.
2. An annual office assessment and review of certification records.
3. An annual witness audit of an R2 audit.
4. Additional witness audits as needed to investigate complaints against a CB, with the option for R2 Solutions to accompany the AB.

V. Certification Bodies

CBs shall conform to all the requirements specified in ISO/IEC 17021 and this Code of Practices. If any conflict between these requirements exists, this Code of Practices shall control.

A. Accreditation

1. Accreditation by an R2-Authorized AB

CBs must be accredited by an R2 Solutions-authorized IAF multilateral recognition arrangement signatory AB. CBs must also, separately, be authorized by R2 Solutions.

2. Prerequisites

CBs issuing R2 certifications shall have been accredited by an IAF multilateral recognition arrangement signatory AB to issue ISO 14001 environmental management system and ISO 9001 quality management system, or RIOS, certifications for at least one year prior to applying for accreditation for R2.

3. Accreditation for Environmental, Health and Safety Certifications Required by R2

CBs issuing Environmental, Health and Safety (EH&S) certifications to satisfy Provision 1 of R2:2013 (e.g. ISO 14001 and OHSAS 18001, or RIOS) shall be accredited by an IAF multilateral recognition arrangement signatory AB for the EH&S certification(s) issued.

B. Personnel Training

R2 Solutions will approve training materials and training courses. Each accredited CB shall ensure that all its program management, sales, and auditor personnel who play key roles in the CB's offering of R2 certification take and pass an approved training course. (R2 Solutions has developed an approved set of training materials and will provide a "train the trainer" course.)

The CB will maintain up-to-date records of all personnel (employed and contracted) who play key roles in R2 certifications (e.g. program managers, sales people, and auditors), the training required by this Code of Practices, and the dates of successful completion of each person's training.

Minimum CB Training Requirements

Training	Program Managers	Sales People	Auditors
Initial	Yes	Yes	Yes
Repeat	Every 2 Years	Every 2 Years	Every 2 Years
Continuing Education²	Each off year – 2 hours minimum	Each off year – 2 hours minimum	Each off year – 4 hours minimum

Specific Personnel Competencies:

In addition to the competency requirements of ISO/IEC 17021, CB personnel will meet the following requirements:

² R2 Solutions may require training on specific topics to ensure program consistency and integrity.

1. Program Managers

The CB's R2 program manager shall demonstrate knowledge of the R2 Standard; Focus Materials; ISO 14001, ISO 9001, occupational health & safety best practices (e.g. OHSAS 18001), and/or RIOS; and the electronics recycling industry. In addition, the R2 program manager shall demonstrate competency concerning the R2 Code of Practices, import/export laws, and general legal requirements for the industry. The R2 program manager shall demonstrate the ability to discuss technical-level questions the CB's clients and auditors may have regarding the application and management of the R2 certification program.

2. Audit Team

- a. Auditors must have competency regarding the environmental, health and safety management system standard(s) used by the candidate for R2 certification (e.g. ISO 14001 and OHSAS 18001, or RIOS).
- b. Auditors must demonstrate knowledge of
 - i. Focus Materials, their presence in used electronic equipment, and applicable export/import laws of importing countries throughout the world.
 - ii. Applicable environmental and health and safety laws and regulations as they apply to the electronics refurbishing and recycling industry.
- c. Auditors must demonstrate a detailed understanding of the electronics recycling and refurbishment industries, in accordance with ISO/IEC 17021's determination of competence criteria.
- d. Auditors must be independent of all consulting services for preparing the certification candidate or developing their management system.

3. Application Reviewers/Sales People

Those performing application reviews shall demonstrate the knowledge for quoting the proper auditor time for the applicant organization in accordance with this Code of Practices and IAF Mandatory Document Five (MD5). Additionally, the application reviewer shall demonstrate industry knowledge to clearly identify and articulate a draft written scope certifiable under R2.

C. Management of the Certification Process

1. Licensing Agreement with R2 Solutions

In order to become R2 certified an applicant company must have a licensing agreement in effect with R2 Solutions. A licensing agreement must also be in effect for an R2 certified company obtaining surveillance audits for continued R2

certification. The CB shall verify that a licensing agreement is in effect during any audits. Failure to demonstrate that a licensing agreement with R2 Solutions is in effect during any audit will require withholding or possible suspension of the R2 Certificate (see section IV.C.8-Maintaining Certification, for more regarding such suspension of an R2 certification).

2. Scope of Certification

Prior to accepting a new candidate for R2 certification, the CB will determine whether the candidate's scope of business can reasonably be audited for conformance to the R2 Standard. Scope evaluation shall include at a minimum considerations such as the types of operating activities, possible allowances (see Section VI of this document), operating locations, and organizational structure. If any questions relating to the scope arise, the CB shall confer with R2 Solutions and/or their AB before starting the R2 audit.

3. Audit Time Requirements

The tables below show the minimum audit times for R2 Certification. *These times are in addition to the audit times for the required EH&S Certification(s) under Provision 1 of the R2 Standard.* The total audit time is the total times for both the R2 and EH&S certifications. For R2 audits, time calculations shall be rounded up to the next ½ day increment. No reductions in time for R2 Certification are permitted below these minimums, whether audited alone or in conjunction with other standards.

Total Stage 1 & Stage 2 minimum combined time

Criteria	Description	Minimum Audit Time Allocation	
		Employees	Audit Days
Baseline	R2 minimum audit times are based on the total effective personnel (those involved in R2 scope activities). Time is allotted for a sampling of personnel and verification of R2 Requirements that are not otherwise covered in the EH&S Certifications.	1-20	+1.5
		21-50	+2.0
		51 - 100	+3.0
		Each +50	+1.0
Campus (see Allowances Section below)	Additional time is added for evaluation of each facility included in the campus certification.	0.25 Auditor days added for each additional building. Effective personnel in all buildings in the campus are considered in baseline calculation above.	

Criteria	Description	Minimum Audit Time Allocation		
Downstream Vendors ³	Additional time shall be added to the initial audit (Stage 1 + Stage 2 combined) based on the size of downstream vendor recycling chains. The recycling chain shall include all subsequent tier downstream vendors handling FMs, including refurbishers and other outsourced providers, such as data destruction.	Vendors	R2 Certified Vendor	Non-R2 Certified Vendor
		0 – 5	1 Hour	2 Hours
		6 – 10	1.5 Hours	4 Hours
		10 – 15	2 Hours	6 Hours
		15 – 20	2.5 Hours	8 Hours
		+5 Increments	+0.5 Hours	+2 Hours
Multi-Site	Onsite time for evaluation of each remote site in a multi-site sampling certification during Stage 2.	Add minimum time in accordance with baseline requirements for each additional site. If a remote site has different downstream vendors than those evaluated in the controlling site, then add minimum time for each in accordance with downstream vendor time requirements.		

Surveillance audit minimum time

Criteria	Description	Minimum Annual Audit Time Allocation
Baseline	Time required to assess the performance of the organization to the R2 specific requirements in the audit plan (described below) that are not otherwise covered in the EH&S Certifications.	1/3 of Baseline Stage 1 & Stage 2 Audit time.

³ In multi-site certifications, all downstream vendors shall be included for all remote sites during the controlling site audit. This does not remove the evaluation during the remote site audits, but should not duplicate the time requirements

Criteria	Description	Minimum Annual Audit Time Allocation		
		Vendors (number sampled)	R2 Certified Vendor	Non-R2 Certified Vendor
Downstream Vendors ⁴	Additional time shall be added to the surveillance based on the size of downstream vendor recycling chains. The CB/auditor shall sample enough subsequent tier downstream vendors handling FMs to account for the majority of volumes of each FM processed, including refurbishers and other “outsource” providers, such as data destruction.	0 – 5	1 Hour	2 Hours
		6 – 10	1.5 Hours	4 Hours
		10 -15	2 Hours	6 Hours
		15 – 20	2.5 Hours	8 Hours
		+5 Increments	+0.5 Hours	+2 Hours
Non-Conformances	Non-conformances identified on previous audits will require additional time added on subsequent audits to ensure that the correction is effective. If the CB conducts interim onsite verifications, and corrective actions are deemed effective, then this shall not apply to the subsequent audit.	Add at least 0.25 hour for each minor ⁵ non-conformance and 1 hour for each major non-conformance identified on the previous audit, or between audits. If CB does not distinguish between major and minor, a minimum of 0.50 hour per identified non-conformance shall be added. If this time totals 2 hours or less, then audit days may be extended beyond the standard 8 hour day to avoid carryover into an additional day.		
Multi-Site	A minimum sampling of 1/3 of remote sites shall be completed during each surveillance audit year to ensure all sites are visited during subsequent audit years in the certification cycle. Controlling sites ⁶ (corporate site) shall be visited during each audit year.	1/3 of Baseline time from initial Stage 1 & Stage 2 audit for controlling site and each sampling site. If a remote site has different downstream vendors than those evaluated in the controlling site, then add minimum time for each site in accordance with downstream vendor requirements.		

⁴ In multi-site certifications, a sample of all downstream vendors shall be included for all remote sites during the controlling site audit. This does not remove the evaluation during the remote site audits, but should not duplicate the time requirements.

⁵ Major and minor non-conformance are suggested and defined in ISO/IEC 17021

⁶ A controlling site is the location where the management system is primarily administered; this is usually the headquarters, but does not have to be.

Recertification Audits

Criteria	Description	Minimum Audit Time Allocation		
Baseline	Time required to assess the performance of the organization to the R2 specific requirements included in the Audit Plan that are not otherwise covered in the EH&S Certifications.	2/3 of Baseline Stage 1 & Stage 2 Audit time.		
Downstream Vendors ⁵	Additional time shall be added to the re-certification audits based on the number of downstream FM vendors. The CB/auditor shall sample enough subsequent tier downstream vendors handling FMs to account for the majority of volumes of each FM processed, including refurbishers and other “outsource” providers, such as data destruction.	FM Vendors	R2 Certified Vendor	Non-R2 Certified Vendor
		0 - 5	1 Hour	2 Hours
		6 - 10	1.5 Hours	4 Hours
		10 -15	2 Hours	6 Hours
		15 - 20	2.5 Hours	8 Hours
		+5 Increments	+0.5 Hours	+2 Hours
Non-Conformances	Non-conformances identified on previous audits, or between audits, will require additional time added on subsequent audits to ensure that the correction is effective. If the CB conducts interim onsite verifications then this shall not apply to the subsequent audit.	Add at least 0.25 hour for each minor ⁷ non-conformance and 1 hour for each major non-conformance identified on the previous audit. If CB does not distinguish between major and minor, a minimum of 0.50 hour per identified non-conformance shall be added. If this time totals 2 hours or less, then audit days may be extended beyond the standard 8 hour day to avoid carryover into an additional day.		
Multi-Site	A minimum sampling of 1/3 of remote sites shall be completed during each surveillance audit year to ensure all sites are visited during subsequent audit years in the certification cycle. Controlling sites (corporate site) shall be visited during each audit year.	2/3 of Baseline time from initial Stage 1 & Stage 2 audit for each sampling site. If a remote site has different downstreams than those evaluated in the controlling site, then add minimum time for each site in accordance with downstream vendors requirements.		

⁷ Major and minor non-conformance as described in ISO/IEC 17021 Section 9.1.15.

4. Audit Plans

The CB shall prepare an audit plan based on requirements in ISO/IEC 17021 Section 9.1.2.1. The scope of the certification shall be documented in the audit plan.

Audit plans must direct the certification candidate to gather all relevant documentation necessary to establish conformity with the R2 Standard, including but not limited to: legal compliance, insurance certificates or equivalent, operating procedures, EH&S plans, downstream vendor information and audits, and proof of a current licensing agreement with R2 Solutions.

Initial audit plans (Stage 1 and 2) will outline how the CB will audit each provision of the R2 Standard to determine conformity.

Surveillance audits will be conducted annually. Surveillance audits shall include a review of the matters that can lead to certification suspension under section V.B.8.b of this Code of Practices.

For multi-site certificates, each remote facility will be audited on the initial certification stage 2 audit, including the controlling site. At a minimum, the controlling site and one operating site (if the controlling site is not an operating site) must be visited during the stage 1 audit. Annual surveillance audits must adhere to the sampling methods in IAF Mandatory Document One (IAF MD1) and the minimum audit time tables. All downstream vendors for all sites will be part of any audit of the controlling site.

The recertification audit plan shall include evaluation of the continued fulfillment of each requirement of the R2 Standard.

When the organization to be certified (the certification candidate) cannot meet all provisions internally and subsequently outsources requirements to another organization then the outsource organization must be reviewed to ensure applicable provisions of the R2 Standard are being met as part of the Stage 2 and Recertification audits for the certification candidate. The certification candidate must demonstrate control of the function, even though it is performed by another organization. The certification candidate must maintain records of conformance. Contracts between the certification candidate and the outsource organization must allow for this certification audit activity to occur. Additional charges may be imposed by the CB on the certification candidate to facilitate full auditing of the provisions performed by the outsource organization.

5. Audits and Audit Reports

The CB audit team shall visit the certification candidate facility(s) to conduct an on-site audit of the operational areas related to the R2 Standard per the audit plan, and shall review all documentation relevant to establishing conformity with the R2 Standard. The team will then issue a Stage 1 audit report detailing the findings of this Stage 1 audit and identifying areas of concern (probable non-conformity at the Stage 2 audit if not corrected). If any of the following concerns are identified during the Stage 1 audit, a minimum 6-week interval is required prior to the Stage 2 audit.

- a. More than 10 concerns identified in total (or less if some are significant enough to be deemed to warrant a 6-week interval by the CB)
- b. More than 5 concerns in any one Provision of the R2 Standard.
- c. Less than 100% of approved downstream vendors are audited by the certification candidate or designee.
- d. Less than 3 months of records to verify conformance to the R2 Standard.

When a delay is mandated by the above criteria, the certification candidate shall demonstrate to the CB that the concern has been addressed and is ready for review during the Stage 2 audit. Upon resolution of concerns, organizations will proceed to the Stage 2 certification audit, by which they will be evaluated for full conformance to the R2 Standard. On surveillance years, the organization may be evaluated to key portions of the R2 Standard. The recertification audit will again be an evaluation of full conformance to the R2 Standard.

For each area of non-conformity, the certification candidate must determine the root cause, and complete corrective actions, demonstration of which may be made by documentation and/or a second site visit, depending on the severity of the non-conformity involved.

For non-conformances relating to outsourcing of processes to other organizations, the determination of effectiveness by the CB may require the CB to visit the outsource organization.

6. Issuance of Certification and Notice to R2 Solutions

- a. The CB shall verify that the certification candidate's licensing agreement with R2 Solutions is current during any audits.
- b. Once the requirements of the R2 Standard and relevant certification requirements (e.g. this Code of Practices) have been demonstrated and any identified nonconformities have been managed per ISO 17021:11, 9.1.15, the

- CB may initiate the certification decision process and issue an R2 Certification.
- c. Multi-site certifications shall clearly identify the controlling site. Each site listing will clearly demonstrate any differences in scope of activities between sites. Each site must be fully audited before added to the multi-site certificate.
 - d. Campus certifications shall clearly identify the main processing location and follow any IAF guidance.
 - e. If any allowances as defined in Section VI of this Code of Practices are used, each allowance will be documented on the certificate.
 - f. The following statement shall be included on each certificate: “The organization has been audited by a certification body that is in conformance with ISO/IEC 17021 requirements and applicable Accreditation Body requirements. The organization is found to be in conformance with the R2 Standard as applied by the R2 Code of Practices.”
 - g. CB’s are responsible for ensuring the scope is accurate, congruent with electronics reuse and recycling, and inclusive of all electronics recycling activity performed by the organization applicable to provisions of the R2 Standard.
 - h. R2 Solutions will be notified of the issuance of a certification within 5 business days of the issuance of such certification.

7. Issuance of Multi-Site Sampling Certifications

- a. IAF MD1 requirements will be followed unless superseded by this Code of Practices.
- b. Multi-site certifications must have one EH&S Management system and shared documented processes among all locations in the multi-site certification to ensure consistent execution.
- c. All downstream vendors for certified sites must be reviewed in the three-year certification cycle of the controlling office. Primary focus during each audit shall be placed on those downstream vendors that accounts for the majority of each FM by volume processed.
- d. All sites listed on a multi-site certification must be visited and fully audited as part of the initial certification.
- e. New sites must be fully audited before being added to the multi-site certification
- f. Each remote site must be visited by the CB and audited at least once every 3 years, irrespective of the sampling requirements.
- g. Selection of sites to be sampled will first be based on Section V of this document and IAF MD1 and then the consideration of results of internal audits, compliance evaluations, and complaints.

8. Maintaining Certification

To maintain certification all R2 certified facilities will be audited in accordance with ISO/IEC 17021 and this Code of Practices.

- a. Process for Complaint Resolution - Each CB shall establish and execute a written process for receiving, managing, resolving, and communicating results of investigations to complaints, including communicating in a timely manner with R2 Solutions both the complaint and its resolution.
- b. Non-conformances Requiring Suspension - Non-conformances may rise to a level serious enough to require suspension to maintain the integrity of the R2 Certification program. Although certification is meant to be a process of continuous improvement, the list below sets forth activities requiring suspension of R2 Certification. This list is intended to be representative, but not a complete list. Suspension may also be instituted within the normal processes of the CB.

Suspension is only implemented after due process, CB written policy is executed, and non-conformances are confirmed. A nonconformance may be the result of scheduled audits by the CB or the result of investigation into a complaint in accordance with the CB's complaints process. CB's may re-instate the R2 certification only after corrective action is implemented and verified as effective.

1. Knowingly misrepresenting Focus Material shipments, domestic or international, including shipments to other vendors not qualified under the R2 Standard, in contradiction to the information provided to customers and/or the CB.
2. Non-functioning equipment knowingly sold and misrepresented to customers or the CB in contradiction of R2 Standard requirements under Provision 6.
3. When R2-certified companies continue to operate in non-compliance, beyond the standard time to take corrective action, of legal requirements, such as permitting, after being notified of concerns of compliance by the CB or regulatory body.
4. Failure to demonstrate a current licensing agreement with R2 Solutions in a timely manner to a CB during the audit process.
5. Facility closure or discontinuation of R2 scope activities.
6. Misrepresentation of the certification status of any facility affiliated with the company.

9. Client Contracts

Each CB shall include in client contracts for R2 Certification provisions to allow the sharing of information with R2 Solutions under reasonable request for quality control and with industry accepted confidential business information controls in place for the certification candidate. The client contracts shall also allow R2 Solutions to be witness to audits upon reasonable notice to the client.

D. R2 Solutions Oversight of the Certification Process

CBs shall agree to a reasonable level of R2 Solutions oversight of the CB's management of the R2 certification process. Such oversight may include R2 Solutions review of CB audit plans, reports and other documentation generated or collected throughout the certification process; R2 Solutions witnessing of CB audits; email notifications to R2 Solutions of the initiation of a complaint process including the nature of complaint, and of its resolution; and any other activities appropriate to R2 Solutions' role in maintaining the integrity of the R2 Certification program.

E. Logo Usage Rules for Certification Bodies

Only accredited CBs with a signed and current licensing agreement are authorized by R2 Solutions to use the R2 logo.

VI. Certified Company Licensing Agreement with R2 Solutions

A. Requirements

To obtain and maintain a licensing agreement with R2 Solutions, a company must:

- a. Engage in electronics reuse and recycling activities such as refurbishing, collecting, reselling, processing, demanufacturing, recovering assets, or brokering of electronics equipment or components.
- b. Remain current in its payments to R2 Solutions for the licensing fee.
- c. Abide by all requirements relating to use of the R2 Logo.
- d. Otherwise conform to the licensing agreement.

B. Required for Certification and Scheduling of Audits

Prior to issuance of an R2 Certificate, and to maintain its certification, an electronics recycler must have a current licensing agreement with R2 Solutions. Failure to demonstrate the existence of a current licensing agreement in a timely manner during any

audit will constitute a non-conformance which if not corrected will lead to suspension of the R2 Certificate or failure to be issued certification.

C. Logo Usage Rules for R2 Certified Members

Upon final certification, R2 Solutions licensees are authorized to use the R2 Logo in accordance with ISO /IEC 17021 and the following rules. CBs will audit organizations for recertification in relation to adherence to the following.

1. Use only in relation with the specific facility certified and not be displayed in a manner that could be perceived as implying the entire company is R2 certified if it is not.

If all the organization's eligible facilities are certified, the R2 logo may be used on company publications without delineation. When all facilities are not certified:

- i. The R2 logo may only be displayed in conjunction with the site(s) certified.
 - ii. R2 logos may not be displayed on corporate websites or other media that are not specific to the location(s) certified.
2. Use only in relation with the activities or scope certified. When all operating activities are not certified:
 - i. The R2 logo may only be displayed in conjunction with the activity(s) certified
 - ii. R2 logo may not be displayed on corporate websites or other media which are not specific to the scope certified.
3. Displayed in a size that is clear and readable.
4. Hyperlinked to <http://www.r2solutions.org>
5. Unaltered in any manner other than size, except that it may be displayed in black and white.

The R2 Logo shall be promptly removed from all publications upon suspension, expiration, or withdrawal of active R2 Certification, including but not limited to website usage, email signatures, printed marketing, business cards, etc.

VII. Allowances

Scope and allowances will be reviewed by the Certification Body during initial certification audits and confirmed throughout the certification. Allowances shall not change the requirements of the R2 Standard, but shall remove the applicable requirement from the

scope of certification and associated audits for certain types of organizations (see allowance types below). In the certificate, the CB must document allowances using the exact headings below. The following allowances are permissible in applying the R2 Standard requirements.

A. Broker Allowance

Brokers shall be any company that does not physically handle equipment or materials, has no physical storage or processing at their location, but takes legal possession of materials or equipment covered within the scope of R2 standard. Any processing performed while the broker owns the material is considered outsourcing and therefore becomes the responsibility of the broker. Any outsourced activity within the scope of the R2 standard is also subject to a CB audit. The following allowances may be made: Provision 4 for onsite processing will not apply; and Section 11(b) for proper closure of the facility will not apply (11(a) does apply). An allowance for Provision 9 may be granted and must be determined by the auditor. Section 5e and Provision 6 shall apply to all Broker transactions. All other provisions apply.

B. Campus Allowance

A campus is where a company has physically separate addresses in the same metropolitan area that are used together as one interconnected operation. To qualify as a campus interactions between physically separate addresses, these must be under the same management structure and EH&S management system. The following allowance may be made: multiple addresses in the same geographic location can be certified together under one certificate.

C. Co-Location Allowance

Co-location means two or more legally separate entities sharing the same physical address. Co-located businesses can be subsidiaries of a larger organization or completely independent of each other. Organizations that are co-located may become independently certified if: (a) Product can be physically separated and secured; (b) the co-located organizations do not share any portion of the same scope of processing; and (c) the EH&S management system is fully applied and managed by the certification candidate organization. Equipment or materials may transfer between entities only if the recipient is treated as a downstream vendor. The following allowance may be made: a company can achieve certification even if co-located with a company not seeking certification if they meet the allowance's criteria.

D. Focus Materials (FM) Processor Allowance

An FM Processor is an organization that only provides specific processing of a Focus Material in the recycling chain and does not provide full electronics recycling or refurbishment. FM Processors are downstream vendors of electronics recyclers and refurbishers. Examples include but are not limited to: battery recyclers, smelters, and mercury retorters. The following allowances may be made:

1. Provision 8 for data destruction will not apply to such organization if equipment or material received has been sanitized of data consistent with R2 requirements prior to receipt.

2. Provision 6 for reuse will not apply to such an organization if reusable equipment has been sent to a facility that conforms to the refurbishment requirements in Provision 6 prior to receipt of the equipment.

VIII. Communications

R2 Solutions shall direct interested parties to contact a CB or an AB when inquiries are relevant to them; and shall communicate to CBs or ABs (as appropriate):

1. A list of current active members in good standing.
2. Inquiries or complaints received by R2 Solutions.

A. Accreditation Bodies

Accreditation Bodies are required to communicate within 30 days of the close of each month the following to R2 Solutions:

1. Applicants and new R2 accredited CBs
2. Status changes in R2 accreditation of CBs
3. Changes in R2 accreditation rules
4. Notice, updates, and results of complaints of R2 accredited CBs
5. CB Non-conformances, and corrective actions relevant to the R2 program

The AB will notify R2 Solutions upon receipt of any appeal of any AB action or decision by an accredited CB. The AB shall inform R2 Solutions at the time it is forming a panel to hear an appeal; at this point R2 Solutions may choose to appoint an individual to participate as a non-voting member of the AB appeal panel.

B. Certification Bodies

CBs are required to communicate the following within 30 days (except as otherwise noted) to R2 Solutions:

1. New R2 certifications including PDF copies of the certificate (this must be done within 5 days of the issuance of the certification)
2. Suspended or revoked R2 certifications (this must be done within 5 days of the issuance of the certification)
3. Complaints filed by interested parties about R2 certified organizations
4. Results of investigations into R2 complaints
5. Any notice of violation from a regulatory body of the CB's R2 Certified clients when CB becomes aware of the notice
6. Major non-conformances, as defined within this Code of Practices or referenced in section 9.1.15(b) of ISO/IEC 17021.