Evidentiary Report of e-Stewards® Critical Non-Conformity
FINAL
eGreen IT Solutions

February 20, 2023

Case Number: 11-1-22-01

Observation Locations/Sources:

- e-Stewards Performance Verification (PV) program, which included:
  - GPS trackers installed in two hazardous e-waste devices, both delivered to eGreen IT Solutions in Phoenix, AZ, and
  - An unscheduled virtual PV audit and resulting internal report
- Global satellite data for two GPS trackers
- 2022 Downstream Disposition Chart from eGreen IT Solutions
- Multiple documents and emails from Karin Harris of eGreen IT Solutions in response to draft Evidentiary Report

Dates of Observations: June 7, 2021 – February 13, 2023

Appendices:

APPENDIX 1: Data (Dates, Locations, and Satellite Photos) Pertaining to Tracker # PV062343 to the Philippines

APPENDIX 2: Data (Dates, Locations, and Satellite Photos) Pertaining to Tracker #PV081145 to Malaysia

APPENDIX 3: eGreen IT Solution’s Downstream Disposition Chart (non-essential information deleted)

APPENDIX 4: eGreen’s Desk Audit Checklist for Olgin Efune Recycling Company (OERC), dated 3/20/2021

APPENDIX 5: Excerpts from eGreen’s Downstream Provider Questionnaire for OERC, dated 7/4/22

APPENDIX 6: Two of eGreen’s Outbound Reports indicating printers transferred to OERC

APPENDIX 7: Excerpt of email from eGreen to OERC, referencing Malaysia, dated 10/10/22
<table>
<thead>
<tr>
<th>Citation from V4.0 Standard</th>
<th>Requirement</th>
<th>Finding</th>
<th>Determinations Regarding Non-Conformity</th>
</tr>
</thead>
</table>
| 1 8.7 Control of Transboundary Movement | a) The Organization shall manage all whole EE that has not been disassembled or shredded as HEW (Hazardous e-Waste), unless there is documented evidence to the contrary accompanying the relevant shipment. | Two computer printers containing Materials of Concern, (MOCs) were fitted with internal GPS trackers and delivered to eGreen IT Solutions (see Appendices 1 and 2). The two printers went from eGreen to Olgin Efune Recycling Company (OERC) in Phoenix, AZ before ending up in the Philippines and Malaysia, respectively. [See NOTE in Case Description below this table, 4th paragraph, for discussion about intact trackers.] | 8.7 Likely a MAJOR non-conformity of the standard  
CNC 1.3.2.1 a. CRITICAL NON-CONFORMITY |
| 1.3.2 Critical Non-Conformity Policy | b) The Organization shall ensure each transboundary shipment throughout the Recycling Chain meets all applicable requirements of this standard, including the compliance obligations identified in 6.1.3.1. [International Waste Trade Agreements] | In addition to the two printers with trackers, it is apparent from the aggregate of the following records that during the 20 months that eGreen unsuccessfully attempted to approve OERC as an Immediate Downstream Processor (IDP) for MOCs, eGreen shipped multiple shipments of printers to them, and at least by 7/4/22 knew OERC exported printers to Malaysia, violating 8.7 of the Standard and 1.3.2.1 a. of the CNC Policy: | |
| | 1.3.2.1 a. Willful violation of the import/export provisions of the Standard such that hazardous electronic waste is intended to be exported from a member country of the OECD, EU, or Liechtenstein and to any country outside of that group. | • Appendix 4: eGreen’s Desk Audit Checklist for OERC, dated 3/20/2021. eGreen indicates they did not approve OERC at this point, due to “waiting for further downstream information for final approval”. Three months later the first printer with a tracker went to the Philippines from eGreen; | |
Appendix 5: Excerpts from eGreen’s Downstream Provider Questionnaire for OERC, dated 7/4/22. Sixteen months after beginning their IDP approval process, eGreen still had not approved OERC, but could see that printers were being “shipped as is” to Malaysia;

Appendix 6: eGreen’s Outbound Reports indicate that 1982 pounds of printers were shipped directly to OERC as early as 6/10/21 and at least through 12/13/21, when they could not be approved due to problems with their downstream;

Appendix 7: Excerpt of email from eGreen to OERC, dated 10/10/22, in which Karin Harris implies it is acceptable for OERC to send eGreen’s MOCs to Malaysia. While already shipping printers to OERC without IDP approval, this email from Karin Harris says:

“Here are the items we send [ostensibly elsewhere; the long list includes printers]. What needs to be understood is the process of processing the items. As the [downstream] chart stands right now, it indicates that OERC doesn’t do anything with any electronics and sends them all to Majestic Corporation [in Malaysia] for processing. If this is true, then we would need to know what Majestic does with the following materials:

- Boards
In accordance with 6.1.3.1 of the Standard, Materials of Concern from e-Stewards facilities/control are not allowed to be exported to non-OECD (developing) countries either directly or via downstream vendors.

The fact that two separate tracker-enabled printers went from eGreen IT Solutions to one or more non-Basel Annex VII countries over at least a six-month period indicates a pattern of behavior and willfulness, in violation of 1.3.2.1 of the CNC Policy. And there is a high likelihood of at least two shipments of printers (sent to OERC around the same time as the two trackers) followed OERC’s export pathways.

### 8.8.1 Downstream Accountability

<table>
<thead>
<tr>
<th><strong>8.8.1 Downstream Disposition Chart</strong></th>
<th><strong>The Organization shall establish, implement, and maintain the processes necessary to ensure all MOCs are managed in conformity with this section of the Standard.</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>8.8.1.1 Downstream Disposition Chart</strong></td>
<td><strong>The Organization shall create and keep current a downstream disposition chart documenting the Recycling Chain for all MOCs that move through the Organization’s Control, noting any alternative uses or processes.</strong></td>
</tr>
<tr>
<td>eGreen’s Downstream Disposition Chart [excerpted in Appendix 3] does not indicate that any printers are being transferred to OERC or exported by them out of the US, e.g., to Malaysia or the Philippines. Meanwhile, eGreen’s Outbound Reports (see Appendix 6) indicate at least two shipments of printers (1982 lbs.) went to OERC over six months.</td>
<td>Instead, OERC is only listed in eGreen’s chart as the end of the recycling chain for eGreen’s</td>
</tr>
<tr>
<td></td>
<td>8.8.2 Downstream Accountability</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>3</strong></td>
<td><strong>1.3.2.1 Critical Non-Conformity Policy</strong></td>
</tr>
<tr>
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<tr>
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</tr>
</tbody>
</table>
**Case Description**

**BACKGROUND:** After initially launching the e-Stewards certification program, the Basel Action Network (BAN) set up additional layers of oversight for the e-Stewards Certification program. The first was the Critical Non-Conformity (CNC) Policy, which added a layer of requirements above and beyond what accredited certification bodies and their auditors can do. In addition, all e-Stewards recyclers and refurbishers are subject to the Performance Verification (PV) program. All e-Stewards processors have been informed of and participate in the PV program. The PV program now includes not only unannounced on-site (or virtual during COVID) inspections, but also GPS monitoring program. This latter aspect of the PV program involves the embedding of GPS trackers into hazardous e-waste devices, such as printers containing circuit boards, which are then placed into the waste stream and...
tracked around the world, via satellite, with BAN’s EarthEye technology. For more information about the PV program, go to https://e-stewards.org/learn-more/for-recyclers/overview/performance-verification-program/. For more information about the EarthEye program, go to https://www.eartheye.org/.

As part of its ongoing e-Stewards Performance Verification program, on June 7th, 2021, a BAN operative deployed a HP printer (Serial Number: CN99HH34B4) enabled with a GPS tracker (PV062343) to eGreen IT Solutions, LLC located at 11034 N 23rd Dr #107, Phoenix, AZ 85029. The device sent a signal from eGreen IT Solutions, LLC until June 10th, 2021, when it then moved to Olgin Efune Recycling Company (OERC) located at 2449 W Madison St, Phoenix and stayed there from June 10th - Aug. 3rd. It then moved to IQA Metal located at 13825 Norton Ave, Chino, CA 91710 and stayed there from Aug. 4th - Aug 19th. It was then exported to TXD Electronics Corporation located at Subic Bay Freeport Zone, Zambales, Philippines. The first signal sent from TXD Electronics Corporation was on Nov. 19th and the last signal sent from that location was on November 22nd, 2021. GPS coordinates: 14.822364, 120.303901. See Appendix 1 for detailed data and Google satellite photographs of each downstream location pertaining to Tracker #1.

A BAN operative then deployed a second Lexmark printer on Dec. 9th, 2021 (Serial Number: 4448249901TWR) enabled with a GPS tracker (PV081145) to eGreen IT Solutions, LLC located at 11034 N 23rd Dr #107, Phoenix, AZ 85029. The device sent a signal from eGreen IT Solutions, LLC until Dec. 13th, 2021, where it then moved to Olgin Efune Recycling Company located at 2449 W Madison St, Phoenix and stayed there from Dec. 13th, 2021 - Jan. 13th, 2022. It then moved to IQA Metal located at 13825 Norton Ave, Chino, CA 91710 and stayed there from Jan. 13th - March 8th. It was then exported to Malaysia and signaled from what looks to be an e-waste processor located at 7 Jalan Bukit Kemuning, Shah Alam, Selangor, Malaysia (GPS Coordinates: 3.014519, 101.519811) from May 18th - May 21st before moving to a greenspace located at 22 Jalan Damar 9, Pelabuhan Klang, Selangor, Malaysia, where it was still signaling as of May 2022 (GPS coordinates: 2.982474, 101.432718). See Appendix 2 for detailed data and Google satellite photographs of each downstream location pertaining to Tracker #2.

NOTE: Tracking devices installed inside printers do not survive mechanical shredding intact. Most are not still functioning after manual disassembly, as there are multiple components to a tracker (including batteries) that typically get separated. But in this case, two intact trackers made their way at two different times from eGreen to Malaysia and to the Philippines, respectively, through the same downstream vendors in the US, greatly increasing the likelihood that the two printers were intact when they were exported. Indeed, eGreen’s downstream vendor for some printers, OERC, informed eGreen that printers were “shipped as is” to Malaysia (see Appendix 5).

Section 6.1.3.1 of the Standard referenced in Section 8.7 makes it clear that exports of Materials of Concern (MOC) waste to non-Annex VII Basel (developing) countries is forbidden under the e-Stewards Standard and the responsibility for ensuring this is borne by the e-Stewards Certified processor -- in this case eGreen IT Solutions.

Once two trackers in MOCs confirmed possible violations of the e-Stewards CNC Policy, and as required in that policy, eGreen IT Solutions was presented with the above evidence collected by BAN, in this case the destinations of two printers with trackers, in a DRAFT Evidentiary Report. eGreen was given multiple opportunities to provide countering evidence and explanations. During this process, however, not only was there a lack of evidence of adequate downstream due diligence and
transboundary movement controls as required by the e-Stewards Standard, but new evidence of wide-spread violations was provided by eGreen IT Solutions.

Specifically, beyond the two trackers, additional evidence or the lack thereof included:

1. eGreen explained that they began a process to approve Olgin Efune Recycling Company (OERC) to accept eGreen’s ‘e-scrap’ (MOCs) as early as March 2021, but eGreen never completed their approval of OERC even up to 21 months later when eGreen was confronted with the Draft CNC Evidentiary Report in early November 2022. And yet, at some point eGreen began shipping at least printers to OERC (see two Outbound Reports in Appendix 6, dated in June and December 2021). And on 12/5/22, Karin Harris of eGreen said in an email to BAN, “No, we would not have the documents required by the standard for an approved downstream vendor because I did not “Approve” them for focus materials.”

2. Karin Harris did not approve OERC in March 2021 due to “waiting for further downstream information for final approval” (see Appendix 4), therefore eGreen was apparently aware of downstream problems prior to the June 2021 shipment of 1126 lbs. and the December 2021 shipment of 856 lbs. of printers to OERC (see Appendix 6).

3. Still trying to approve OERC for MOCs in July 2022, eGreen received OERC’s Downstream Provider Questionnaire dated 7/4/22 (see Appendix 5) indicating that OERC shipped printers “as is” to the Majestic Corporation in Port Klang West, Malaysia, underscoring eGreen’s concerns from 17 months earlier.

4. Regarding Malaysia, eGreen also provided an email chain between Karin Harris of eGreen and Brad Efune of OERC (see Appendix 7). In a 10/10/22 email to Mr. Efune, Ms. Harris 1) appears to acknowledge (twenty months after starting her approval process) that OERC does no processing of any electronics and instead sends them to a company located in Malaysia, and 2) appears to be comfortable with her MOCs being processed in Malaysia (in violation of the Standard), as along as eGreen can learn ‘what Majestic does with’ some of the Materials of Concern.

5. No evidence of sampling of OERC’s downstream shipping documents (8.8.2.6) were provided to BAN, nor evidence of completing the remainder of requirements in the downstream due diligence section of the Standard (8.8.2), e.g. a required onsite audit prior to the first shipment of MOCs going to a new IDP and internally-approved annual desk audits. The contract with OERC dated 3/15/21 was wholly inadequate for an IDP managing MOCs, and appears to be based on an old version of the e-Stewards Standard (V 3.1).

6. eGreen’s certification body performed a formal audit in late Feb/early March 2022 and determined a nonconformity for downstream due diligence, stating (among other things) that “Initial Due Diligence and subsequent annual desk audits could not be located for [nine downstream providers were listed]”. Although this non-conformity was eventually closed out with a plan, this audit result indicates a pattern of failure to perform adequate due diligence.

7. No proof of the sanitization of data or the absence of data on the two printers sent to OERC was provided to BAN. Proof of data sanitization or destruction is required.
Conclusions and Remedy

This investigation began with evidence obtained from two trackers placed in two printers and dropped off at eGreen IT Solutions in Phoenix, AZ six months apart. These two printers ended up in the Philippines and Malaysia respectively (see Appendices 1 and 2) in violation of the e-Stewards Standard's export rules. When BAN presented eGreen with a DRAFT Evidentiary Report as required in the e-Stewards Critical Non-Conformity Policy, eGreen’s responses included new evidence of additional and repeated wrongdoing – essentially of transferring 1982 pounds of printers (MOCs) to Olgin Efune Recycling Company (OERC), without ever approving them as an Immediate Downstream Processor for those restricted materials. Such approval of any company that will manage an e-Steward’s MOCs is required prior to sending even the first shipment to them. Subsequently, BAN gave eGreen multiple opportunities to provide counter evidence and/or missing documentation, without receiving satisfactory evidence or explanations regarding printers.

Based on eGreen’s Outbound Reports of shipments to OERC and ambiguous emails between eGreen and OERC, it initially appeared that MOCs other than printers may have also been shipped to the unapproved OERC. However, eGreen appealed that portion of the earlier Evidentiary Report; in response, BAN requested specific evidence to refute the inclusion of additional MOCs (besides printers), and ultimately revised the ER to exclude other MOCs.

However, based on evidence obtained, repeated efforts inviting eGreen to provide counter-evidence or missing documents, and the e-Stewards CNC Policy, BAN’s Executive Director has determined that the following Critical Non-Conformities have occurred:

1. Willful violation of the export restrictions (8.7 Control of Transboundary Movement) in the Standard

Subsection 1.3.2.1 a. of the CNC Policy identifies ‘willful violation of the import/export provisions of the Standard’ as a critical non-conformity. Records provided by eGreen indicate they could not approve Olgin Efune Recycling Company (OERC) in March 2021 as an Immediate Downstream Provider for Materials of Concern as they were “waiting for further downstream information for final approval”, and still had not approved them by November 2022 when eGreen was served with the Draft CNC Evidentiary Report. Meanwhile, at least two shipments including 1982 lbs. of printers went from eGreen to OERC in June and December of 2021, at the same time two trackers went from eGreen through OERC to developing countries.

2. Willful, long-term violation of 8.8.2 Downstream Due Diligence

While eGreen unsuccessfully attempted to approve OERC as an Immediate Downstream Processor for their MOCs over the course of 21 months, eGreen transferred multiple shipments of printers to them (see Appendix 6) in violation of the Standard. eGreen was unable to provide BAN with an initial onsite audit report, completed annual desk audits, an adequate contract with OERC, etc. But eGreen did provide a Downstream Processor Questionnaire from OERC indicating they shipped printers “as is” to Malaysia.

Furthermore, eGreen’s certification body audit report and BAN’s Performance Verification audit report both identified and communicated to eGreen its nonconformities with downstream due diligence requirements in 2022 and 2021 respectively.
Subsection 1.3.2.1 e. of the CNC Policy includes the following as cause for a finding of a CNC: “e. Actions other than those above, which, as judged by the Executive Director of BAN to have, or are likely to, seriously endanger the credibility and viability of BAN or the e-Stewards program. This may include a pattern of repeat major nonconformities, such as repeated failure to perform adequate downstream accountability requirements.”

The failure to perform adequate due diligence on downstream vendors and control transboundary movement of toxic materials not only resulted in the violation of international waste trade laws, but also likely caused long-term impacts on both workers and the environment in the recipient developing countries. These impacts violate the central purpose for the e-Stewards program.

As a result of these two Critical Non-Conformities, and consistent with section 1.5.1 a) of the CNC Policy, BAN has determined that eGreen IT Solutions’ e-Stewards license will be withdrawn for a minimum of two years. It will remain withdrawn after the two-year period unless and until BAN and an accredited e-Stewards certification body approve eGreen’s complete recertification, including verifying evidence that downstream due diligence, top management commitment, adequate resources, and the entire Stewardship Management System are operating consistent with the applicable Standard at that time.

It was also decided that a public announcement of the Critical Non-Conformities and the decision to withdraw eGreen IT Solutions’ e-Stewards license and therefore certification is necessary so that customers and other interested parties will be notified of the change in eGreen IT Solutions’ status.

END
## APPENDIX 1

Data (Dates, Locations, and Satellite Photos) Pertaining to Tracker # PV062343

**eGreen IT Solutions, LLC**

<table>
<thead>
<tr>
<th>GPS Tracker Number</th>
<th>Type of e-Waste</th>
<th>Date of Deployment</th>
<th>Date of Arrival</th>
<th>Location of Tracker</th>
<th>Chain of Export Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>PV062343</td>
<td>HP Printer (serial # CN99HH 34B4)</td>
<td>June 7, 2021</td>
<td>June 10 - Aug. 3, 2021</td>
<td>Arizona, USA</td>
<td>eGreen IT Solutions LLC/11034 N 23rd Dr #107 Phoenix, AZ 85029</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Aug. 4 - Aug. 18, 2021</td>
<td>Arizona, USA</td>
<td>Olgin Efune Recycling Company 2449 W Madison St Phoenix, AZ 85009 GPS 33.444351, 112.111375</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Nov. 19 - Nov. 22, 2021</td>
<td>California, USA</td>
<td>IQA Metal 13825 Norton Ave Chino, CA 91710 GPS 34.002273, 117.710099</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Zambales, Philippines TXD Electronics Corporation Subic Bay Freeport Zone Zambales, Philippines GPS 14.822364, 120.303901</td>
<td></td>
</tr>
</tbody>
</table>
Google Satellite view of Olgin Efune Recycling Company, Phoenix, Arizona
Google Satellite view of IQA Metals, Chino, California
Google Satellite view of TXD Electronics Corporation, Zambales, Philippines
## APPENDIX 2

Data (Dates, Locations, and Satellite Photos) Pertaining to Tracker #PV081145

**eGreen IT Solutions, LLC**

<table>
<thead>
<tr>
<th>GPS Tracker Number</th>
<th>Type of e-Waste</th>
<th>Date of Deployment</th>
<th>Date of Arrival</th>
<th>Location of Tracker</th>
<th>Chain of Export Summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>PV081145</td>
<td>Lexmark Printer</td>
<td>Dec. 9, 2021</td>
<td>Dec. 13, 2021 - Jan. 13, 2022</td>
<td>Arizona, USA</td>
<td>eGreen IT Solutions LLC/11034 N 23rd Dr #107 Phoenix, AZ 85029</td>
</tr>
<tr>
<td></td>
<td>(serial # 444824 9901TW R)</td>
<td></td>
<td></td>
<td>Arizona, USA</td>
<td>Olgin Efune Recycling Company 2449 W Madison St Phoenix, AZ 85009 GPS 33.444351, 112.111375</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Jan. 13 - March 8, 2022</td>
<td></td>
<td>California, USA</td>
<td>IQA Metal 13825 Norton Ave Chino, CA 91710 GPS 34.002273, 117.710099</td>
</tr>
<tr>
<td></td>
<td></td>
<td>May 18 - May 21, 2022</td>
<td></td>
<td>Selangor, Malaysia</td>
<td>7 Jalan Bukit Kemuning, Shah Alam, Selangor, MY GPS 3.014519, 101.519811</td>
</tr>
<tr>
<td></td>
<td></td>
<td>May 22, 2022</td>
<td></td>
<td>Selangor, Malaysia</td>
<td>22 Jalan Damar 9, Pelabuhan Klang, Selangor, MY GPS 2.982474, 101.432718</td>
</tr>
</tbody>
</table>
Google Satellite view of Olgin Efune Recycling Company, Phoenix, Arizona
Google Satellite view of IQA Metals, Chino, California
Google Satellite view of the Malaysian 1st site, Selangor, Malaysia
Google Satellite view of the Malaysian 2\textsuperscript{nd} site, Selangor, Malaysia
APPENDIX 3

eGreen IT Solutions Downstream Disposition Chart (non-essential information deleted)

<table>
<thead>
<tr>
<th>Tier</th>
<th>Downstream Provider Name</th>
<th>Materials Handled</th>
<th>Contact Info</th>
<th>Physical address of Processing or Final Disposal facility</th>
<th>Address for the headquarters office</th>
<th>Type of Operations</th>
<th>Alternative Uses?</th>
<th>e-Steward Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Broadway Metal Recycling</td>
<td>Battery, Circuit Boards, LCDs (working), Printers</td>
<td>Dustin Martin</td>
<td>3330 W Broadway Rd Phoenix, AZ 85041</td>
<td>R2 Scrap Yard</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>3</td>
<td>LS-Nikko</td>
<td>Printers</td>
<td>Dustin Martin</td>
<td>20th Floor ASEM Tower, Trade Center, 517 Yeongdong-Daero Gangnam-GU, Seoul, Seoul, Korea (South)</td>
<td>Shredding, Smelting</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>1</td>
<td>Olgin-Efune</td>
<td>Ferrous &amp; Non-Ferrous</td>
<td>Reyes Rendon</td>
<td>2449 W Madison St Phoenix, AZ 85009</td>
<td>Final</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>
Desk Audit Checklist

Name of Downstream Provider: Olgin E- Tune Recycling

1. Downstream Provider Questionnaire
   a. Sent the Downstream Provider Questionnaire: 3-15-2021
   b. Received and filed signed Downstream Provider Questionnaire: 3-15-2021

2. MOC Management Plan
   1) Evidence Downstream Provider follows Stewardship Policy: Could not provide adequate information
   2) Evidence Downstream Provider meets e-Stewards Responsible management of EE requirements: Saw their shredder – Inquiry - printers
   3) Evidence Downstream Provider meets e-Stewards Reuse and Refurbishment requirements: NA – no product that eGreen sends is for reuse nor refurbishment
   4) Evidence Downstream Provider meets e-Stewards Materials Recovery and Final Disposition requirements: Olgin is final processor
   5) Evidence Downstream Provider meets e-Stewards Transboundary Movement requirements: NA
   6) Evidence Downstream Provider meets e-Stewards Downstream due diligence: NA
3. Evidence Downstream Provider effectively implements environmental, health, and safety controls, as well as monitoring to prevent exposure and release of toxic substances such as lead, mercury, and cadmium, either by maintaining accredited ESHMS certification or documented system to manage legal and regulatory requirements, environmental, health, and safety risks and continually evaluating and improving that system and reducing the negative EH&S impacts of their operations accordingly.
   a. Certification: _______________________________ (Attach evidence)
   b. Other: _______________________________ (Attach evidence)

4. Summary:

   Approved ________________

   Not Approved \( \times \) – waiting for further downstream information for final approval –

   Date of Completed Desk Audit: 3-20-2021

   Completed By: KH

   If Approved, date added to the Downstream Disposition Chart ________________
Appendix 5

Excerpts from eGreen’s Downstream Provider Questionnaire for OERC, dated 7/4/22, in eGreen’s ongoing unsuccessful attempt to approve OERC as an Immediate Downstream Provider, while sending printers to them.

**Downstream Provider Questionnaire**

<table>
<thead>
<tr>
<th>VENDOR COMPANY INFORMATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name: Olgin Efune Recycling Company</td>
</tr>
<tr>
<td>Facility Address: 2449 W Madison St, Phoenix, AZ 85009</td>
</tr>
<tr>
<td>Mailing Address (if different from above):</td>
</tr>
<tr>
<td>Contact Name: Brad Efune</td>
</tr>
<tr>
<td>Phone: 602-531-3519</td>
</tr>
<tr>
<td>E-Mail: <a href="mailto:brad@oerc.com">brad@oerc.com</a></td>
</tr>
</tbody>
</table>

(See more excerpts from same Questionnaire below)
MATERIALS PROCESSED for eGreen IT Solutions:
Check all that are applicable;
- PCBs capacitors/PCB ballasts (polychlorinated biphenyls)
- Mercury
- Mercury containing devices (fluorescent tubes, laptops, LCD displays, LCD televisions)
- CRT of CRT Glass (monitors, televisions, misc. equipment)
- Batteries
- Circuit Boards
- Material containing Circuit boards (computer towers, printers, keyboards, mice, fax machines, copiers, etc.)
- Other: ________________
- Other: ________________

Monthly Capacity: (In Pounds):
Roughly 15,000 lbs

PROCESS INFORMATION
Please describe the processes used to handle eGreen IT Solutions’ materials:

1. Material is received at OERC facility
2. Material is transferred to E Scrap or Non Ferrous scrap department depending on the material type
3. E Scrap is dismantled or prepared for shipment as is
4. Non Ferrous scrap is processed and prepared for shipment
5. Material is shipped out for final melting and recycling processes

PROCESS INFORMATION
Please indicate all materials generated by the processing of eGreen IT Solutions’ material and the sub-vendors used to process the material further.

<table>
<thead>
<tr>
<th>Material Generated</th>
<th>How are the materials processed or disposed? (Include Processing technology, if applicable.)</th>
<th>Material Final Destination (Include vendor name and address)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Circuit Boards</td>
<td>They are manually taken out of PC towers and sent for smelting in Asia</td>
<td>Mitsubishi Mining and Metals-Yokohama, Japan</td>
</tr>
<tr>
<td>Power Supplies &amp; Computer Fan</td>
<td>Manually taken out from PC Tower and sent to Asia for further processing</td>
<td>Majestic Corporation – Port Klang West, Malaysia</td>
</tr>
<tr>
<td>Ferrous</td>
<td>Manually taken out from PC Towers</td>
<td>CMC Steel, Mesa Arizona</td>
</tr>
<tr>
<td>Printers</td>
<td>Shipped as is</td>
<td>Majestic Corporation – Port Klang West, Malaysia</td>
</tr>
<tr>
<td>Insulated Copper Wire</td>
<td>Shipped as is</td>
<td>Majestic Corporation – Port Klang West, Malaysia</td>
</tr>
</tbody>
</table>

Form Completed By: (Name and Title)  
Brad Efune – President  
Signature:  
Date: 07/04/22
Appendix 6

A few of eGreen’s Outbound Reports indicating MOCs transferred to Olgin Efune Recycling Company (OERC), which was never approved as an IDP

[Image of an Outbound Report]

Order Details:
- **Customer:** Olgin-Efune Recycling Co
- **Date:** 06/10/2021 03:05 PM
- **Account Rep:** Karin Harris
- **Customer Contract #**
- **Status:** Settlement Complete
- **Shipping Method:** Our Trucking

**Pallets:** 9

<table>
<thead>
<tr>
<th>Product</th>
<th>LOT ID</th>
<th>Packaging</th>
<th>Unit Count</th>
<th>Gross Weight</th>
<th>Tare</th>
<th>Net</th>
</tr>
</thead>
<tbody>
<tr>
<td>Printer - Mixed</td>
<td>8120</td>
<td>Pallet</td>
<td>0</td>
<td>852.00 lbs</td>
<td>35.00 lbs</td>
<td>817.00 lbs</td>
</tr>
<tr>
<td>DAL - Aluminum - Dirty</td>
<td>8134</td>
<td>Pallet</td>
<td>0</td>
<td>519.00 lbs</td>
<td>35.00 lbs</td>
<td>484.00 lbs</td>
</tr>
<tr>
<td>Transformer - Adapter</td>
<td>8136</td>
<td>Pallet</td>
<td>0</td>
<td>537.00 lbs</td>
<td>35.00 lbs</td>
<td>502.00 lbs</td>
</tr>
<tr>
<td>MIX - Metal - Mixed</td>
<td>8118</td>
<td>Gaylord</td>
<td>0</td>
<td>605.00 lbs</td>
<td>68.00 lbs</td>
<td>537.00 lbs</td>
</tr>
<tr>
<td>MTR - Motors - Low Grade</td>
<td>8137</td>
<td>Gaylord</td>
<td>0</td>
<td>619.00 lbs</td>
<td>68.00 lbs</td>
<td>551.00 lbs</td>
</tr>
<tr>
<td>WIR - #2 Ins Wire</td>
<td>8148</td>
<td>Gaylord</td>
<td>0</td>
<td>565.00 lbs</td>
<td>68.00 lbs</td>
<td>527.00 lbs</td>
</tr>
<tr>
<td>COP - #2 Copper</td>
<td>8149</td>
<td>Gaylord</td>
<td>0</td>
<td>347.00 lbs</td>
<td>68.00 lbs</td>
<td>279.00 lbs</td>
</tr>
<tr>
<td>PRS - Printers</td>
<td>8052</td>
<td>Loose</td>
<td>1</td>
<td>300.00 lbs</td>
<td>0.00 lbs</td>
<td>300.00 lbs</td>
</tr>
<tr>
<td>Metal - Fe</td>
<td>8150</td>
<td>Loose</td>
<td>3</td>
<td>300.00 lbs</td>
<td>0.00 lbs</td>
<td>300.00 lbs</td>
</tr>
</tbody>
</table>

**Gross Weight:** 4683.00 lbs
**Tare Weight:** 377.00 lbs
**Net Weight:** 4306.00 lbs

**Receiver:** Karin Harris

**Loading Complete:** 06/10/2021 03:05 PM
Outbound Report
OUT-10286

P: 602 944-4151
11034 N 23rd Dr - Ste 107
Phoenix, AZ 85029, USA

ORDER #: OUT-10286
Customer: Ogin-Efune Recycling Co
Date: 12/13/2021 07:57 AM
Order Date: 12/13/2021
Account Rep: Karin Harris
Customer Contract #: 
Status: Settlement Complete
Shipping Method: Our Trucking

Pickup Address: eGreen IT Solutions LLC
admin admin
11034 N 23rd Drive
Suite 107
Phoenix, AZ 85029
USA
P: 602 944-4151

Ship To: Ogin-Efune Recycling Co
Reyes Rendon
2449 W Madison St
Phoenix, AZ 85009
USA
P: 602.595.6977

Pallets: 10

<table>
<thead>
<tr>
<th>Product</th>
<th>LOT ID</th>
<th>Packaging</th>
<th>Unit Count</th>
<th>Gross Weight</th>
<th>Tare</th>
<th>Net</th>
</tr>
</thead>
<tbody>
<tr>
<td>PCS - Computers - Incomplete Whole Computers</td>
<td>11532</td>
<td>Pallet</td>
<td>0</td>
<td>1000.00 lbs</td>
<td>35.00 lbs</td>
<td>965.00 lbs</td>
</tr>
<tr>
<td>UPS - Uninterrupted Power Supplies</td>
<td>11546</td>
<td>Pallet</td>
<td>0</td>
<td>1441.00 lbs</td>
<td>35.00 lbs</td>
<td>1406.00 lbs</td>
</tr>
<tr>
<td>PRS - Printers</td>
<td>11549</td>
<td>Pallet</td>
<td>0</td>
<td>891.00 lbs</td>
<td>35.00 lbs</td>
<td>856.00 lbs</td>
</tr>
<tr>
<td>PCS - Computers - Incomplete Whole Computers</td>
<td>11561</td>
<td>Pallet</td>
<td>0</td>
<td>1020.00 lbs</td>
<td>35.00 lbs</td>
<td>985.00 lbs</td>
</tr>
<tr>
<td>PCS - Computers - Incomplete Whole Computers</td>
<td>11565</td>
<td>Pallet</td>
<td>0</td>
<td>1072.00 lbs</td>
<td>35.00 lbs</td>
<td>1037.00 lbs</td>
</tr>
<tr>
<td>MIX - Metal - Mixed</td>
<td>11514</td>
<td>Gaylord</td>
<td>0</td>
<td>538.00 lbs</td>
<td>68.00 lbs</td>
<td>470.00 lbs</td>
</tr>
<tr>
<td>CAL - Aluminum - Clean</td>
<td>11515</td>
<td>Gaylord</td>
<td>0</td>
<td>402.00 lbs</td>
<td>68.00 lbs</td>
<td>334.00 lbs</td>
</tr>
<tr>
<td>PCB - Broken - All in Ones</td>
<td>11516</td>
<td>Gaylord</td>
<td>0</td>
<td>814.00 lbs</td>
<td>68.00 lbs</td>
<td>746.00 lbs</td>
</tr>
<tr>
<td>TFS - Transformer</td>
<td>11533</td>
<td>Gaylord</td>
<td>0</td>
<td>973.00 lbs</td>
<td>68.00 lbs</td>
<td>905.00 lbs</td>
</tr>
<tr>
<td>MIX - Metal - Mixed</td>
<td>11557</td>
<td>Loose</td>
<td>6</td>
<td>1037.00 lbs</td>
<td>0.00 lbs</td>
<td>1037.00 lbs</td>
</tr>
</tbody>
</table>

Gross Weight: 9188.00 lbs
Tare Weight: 447.00 lbs
Net Weight: 8741.00 lbs

Receiver: Karin Harris
Loading Complete: 12/13/2021 07:57 AM
Good Morning Brad!

Hope you are doing well. Wanted to circle back around. Our internal audit is coming up so I have to get on it. The spreadsheet is coming along but needs more information to substantiate complete responsibility.

Here are the items we send. What needs to be understood is the process of processing the items. As the chart stands right now, it indicates that OERC doesn’t do anything with any electronics and sends them all to Majestic Corporation for processing. If this is true, then we would need to know what Majestic does with the following materials:

- Boards
- Spent Lamps or Lamps from LCD Monitors
- Plastics from the items
- Batteries (button batteries - lithium ion)

The determination of what materials are handled by OERC depends on what is done with the product.

What is the process for:

- LCD Monitors (broken yields plastic, mercury lamps, boards)
- Mid-Grade Electronic Scrap
- Business Phones
- Whole Laptops
- Sealed Lead Acid Batteries - UPS – whole units
- Whole Computers (CPUs)
- Network Equipment
- Servers
- Printers

Let me know.

Respectfully,
Karin

Karin L Harris
President/Owner
eGreen IT Solution LLC
11034 N 23rd Drive – Suite 107
Phoenix, AZ 85029