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February 26, 2025

Mr. Ken Thomas
President
Universal Recycling Technologies
2535 Beloit Ave
Janesville, WI 53546

Dear Mr. Thomas,

Herein is the Letter of Outcome from the recent Critical Non-Conformity investigation regarding Universal Recycling Technologies' OSHA violations and respective fine.

The Basel Action Network was notified of a potential CNC trigger in the fall of 2024, and in accordance with the e-Stewards Critical Non-Conformity Policy, began an investigation to understand all facts of the case.

After careful review of all documentation and evidence, it was determined that while it appears that URT is taking practical steps to address the OSHA violations received to meet and perhaps exceed OSHA requirements, the final fine amount of \$129,048 exceeds the threshold defined within the e-Stewards Critical Non-Conformity Policy and thus constitutes a Critical Non-Conformity. This policy has been ratified by the e-Stewards Leadership Council and the BAN Board of Directors.

The e-Stewards CNC policy allows for the possibility of two consequences: either withdrawal from the program or suspension of an e-Stewards certificate for a defined period of time (30 day minimum required). After studying the situation and speaking to you, we do not believe that the conduct of URT meets the threshold of certification withdrawal. Instead, we will call for suspension of URT's e-Stewards Certificate, which may be reinstated at the conclusion of 30 days from the date agreed upon, and evidence of initiating and maintaining to completion the following corrective actions:

1. URT is to update and maintain a comprehensive compliance assessment, documenting all applicable laws under the scope of the Standard – including international laws and the laws of importing countries.
2. URT will establish and maintain a mechanism for educating staff as to the legal requirements of URT.
3. The above documentation of URT's compliance obligations shall be reviewed by a designated staff member at URT quarterly for 2 years, and then by Standard requirements thereafter. Compliance Trainings of staff should be conducted on a yearly basis.

During the suspension period, URT must cease the use of the e-Stewards marks and name in any reference to e-Stewards certification until the certificate is restored. During the 30-day period, the certification record on the e-Stewards website will indicate "Under Suspension".

URT retains the right to appeal this judgement and/or the corrective action(s) required, prior to the commencement of suspension. During the appeals process, no status report will be made public until the

appeal is over. In order to appeal, URT must provide BAN with a letter in writing providing the basis of the appeal. The basis may include information that counters or refutes the allegations or provides extenuating or mitigating circumstances. Ignorance of the certification requirements cannot be deemed a mitigating circumstance.

If evidence is provided to claim an extenuating or mitigating circumstance, a voluntary ad hoc committee formed by members of the Leadership Council will convene to review the appeal. If no such committee can be formed, the entire Leadership Council will be tasked with review. The LC review will involve, at a minimum, studying the Evidentiary Report and the appeals letter and evidence. A written recommendation to the BAN Board of Directors will be made, which will be the final arbiter of the appeal. All efforts will be made to conclude the appeal within 10 weeks of its filing.

We would like to take this opportunity to thank you for your cooperation and transparency in providing BAN with all requested information in a timely manner. We commend URT for the swift action in implementing controls to address the violations noted and ensure protections for its employees. As a long-standing e-Stewards certified organization, we look forward to resolving this matter with URT and ensuring the continued responsible management of end-of-life electronics.

Sincerely,



Jim Puckett
Founder/Chief of Strategic Direction
Basel Action Network



Selena Turnock
Certification Director
e-Stewards