

**FINAL**  
**Evidentiary Report of e-Stewards® Critical Non-Conformity**

**RDI, Inc.**

**June 12, 2025**

**Case Number:** 05-08-25-02

**Observation Location(s):** 4101 W 42<sup>nd</sup> Place, Chicago IL 60632

**Date of Observation(s):** Multiple Dates of Shipment – YTD 2025

**Appendices:**

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**Sections of the e-Stewards Standard (v4.1) and Critical Non-Conformity (CNC) Policy Violated:**

	Section	Requirement	Finding Indicated	Likely Class of Violation
1	<b>6.1.3.1 International Waste Trade Agreements and National Laws (including Sanctioned Interpretation #9)</b>	<p>“a) The Organization’s compliance obligations shall include a duty to not violate or abet the violation of any national laws, multilateral waste trade agreements, and/or treaty obligations relevant to the Transboundary Movement of waste, both within the Organization and throughout its downstream Recycling Chain.</p> <p>b) For the purposes of this standard, all HEW is considered hazardous waste as defined in the Basel Convention, and as such shall be managed in accordance with the Convention’s requirements. Where countries that have not ratified the Basel Convention are involved in the trade, the prohibition on trade between Parties and non-Parties applies in the absence of a valid Article 11 agreement allowing such trade.</p>	BAN provided shipping data of identified 19 shipments made by RDI Inc. in 2025 that would logically be expected to contain e-waste fractions going to Malaysia – a non-Annex VII Basel country from the US – an OECD non-Basel party. RDI, while asked, has not explained or denied these exports, nor been able to tell us what was in the shipments. The HS codes attributed to these shipments, as they appear in the trade	<b>Critical Non-Conformity</b>



			explained to BAN how it might not have been intentional.	
2	<b>Critical Non-Conformity Policy Section 1.3.2.1 (d)</b>	<p>“A non-conformity taking place by a licensed e-Stewards organization or by a prospective e-Stewards organization is defined as a Critical Non-Conformity when one or more of the following takes place:...</p> <p>d. Willful efforts to deceive the conformity assurance program of the e-Stewards certification program, including activities to:...</p> <p>2) Prevent auditors from obtaining information or records...”</p>	During the inspection occurring during the Stage 2 audit for RDI, repeated requests were made for accompanying documentation or evidence for the shipments in question. All that was produced were non-original BOLs with minimal information for 4 of the 19 shipments.	<b>Critical Non-Conformity</b>
3	<b>Critical Non-Conformity Policy Section 1.3.2.2</b>	<p>“The following conduct shall also be considered a CNC should it take place by a licensed or prospective e-Stewards Recycler/Refurbisher, its owner or by individuals on their executive team at any time in the last 5-year period of continuous ownership, or the 5-year period prior to contracting with an e-Stewards certification body:...</p> <p>b. Repeated instances (at least 2 times in the course of the last 5 years) of willful misrepresentation (dishonesty) as determined by the Executive Director, to customers, government officials, auditors, certification bodies, and/or BAN staff.”</p>	Repeated instances of using false shipping declarations in the course of the identified 19 shipments made in 2025, and for several past years is a serious matter of willful misrepresentation.	<b>Critical Non-Conformity</b>

### **Case Description:**

The e-Stewards Standard and Certification Program utilizes GPS trackers and unannounced inspections as methods in our Performance Verification program. We also make use of commercial tracking data to determine destinations of shipments made by current or prospective e-Stewards or their downstream vendors.

During a review of commercial tracking data made available to us from Material Research L3C, it was revealed that there were 19 shipments made from RDI to unspecified downstream vendor(s) located in Malaysia between the dates of January 3<sup>rd</sup>, 2025 and March 7<sup>th</sup>, 2025. Given the information known about RDI's accepted items and processes, it can reasonably be assumed that shipments made downstream from RDI likely contain Materials of Concern, and potentially, Hazardous E-Wastes as defined under the e-Stewards Standard..

Further, the data extracted revealed a pattern of RDI Inc.'s use of HS Codes unlikely to be utilized in the end-of-life electronics industry including those for unwrought aluminum, spongy ferrous products, and silver ore. The descriptions of which, are provided below:

- I. HS Code 729390: Ferrous products obtained by direct reduction of iron ore and other spongy ferrous products, in lumps, pellets, or similar forms; iron having minimum purity by weight of 99.4%, in lumps, pellets, or similar forms – other.
- II. HS Code 760110: Unwrought aluminum – aluminum, not alloyed: ingots.
- III. HS Code 760120: Unwrought aluminium - aluminium alloys: ingots.
- IV. HS Code 261610: Precious metal ores and concentrates, silver ores and concentrates.

These types of commodities are not consistent with the services indicated as provided by RDI on their website. As RDI also is known to currently possess an R2V3 Certificate, which is only given to companies engaged in electronic waste management, we are of the belief that the proper HS codes should all be a derivation of HS 8549 and that the above HS codes, which were used in the 19 shipments identified, are incorrect. We cannot determine the motivation for using such codes without discussion with RDI, but it does appear due to the repeated nature, that the use of these incorrect codes is deliberate.

HS Codes, or Harmonized System codes, are required for a standardized, internationally recognized system for classifying goods in international trade. This standardization is crucial for customs authorities to determine duties, taxes, and regulations, ensuring compliance and accurate tracking. These codes are intended for labeling all goods in precise detail, making it easier to identify products internationally. Intentionally falsifying HS codes is considered a form of fraud and is potentially a criminal offense. Further, under the e-Stewards standard, it would be considered a form of egregious dishonesty, which when repeated, can be considered a critical non-conformity (CNC).

### **Witness Audit & Subsequent Request for Information:**

Based on the above noted concerns, BAN as Administrator of the e-Stewards program, decided to exercise its right to witness the Stage 2 audit to be able to ask more questions. BAN elected Selena Turnock for this task as e-Stewards Certification Director. For this purpose, we notified the CB on record and let them know we would be attending the audit for the portion having to do with the transboundary movement of Materials of Concern (MOCs). During this witnessed audit, Ms. Turnock sent a list of maritime Bill of Lading numbers of the 19, 2025 exports we found in commercial trade data. These were sent to the Senior Operations Manager, Ms. Jenny Cheng, with a request for RDI to provide additional corresponding information regarding these shipments including any of the following: corresponding pictures taken during the loading process; sales orders; original BOLs with signatures/descriptions of materials; inventory lists, consignees and addresses etc.

From the moment of request by BAN, 4 hours elapsed before any information was provided during the visit. When Ms. Cheng did appear with some documentation, what was handed over were non-original BOLs with minimal information on them which included a generic material description such as "metal", "copper", or "whole units", gross

weight, the name of the supposed downstream vendor (no address provided), destination country labeled as Malaysia, the date, booking number, and trailer number. No other documentation was provided before the end of the day. When the booking numbers were cross-checked in available trade data sources, we found these to be authentic, but only served to corroborate that materials of some kind, presumably e-waste, were in fact exported to Malaysia.

An email was then sent to Ms. Cheng at the end of the business day, providing more of the Materials Research L3C data information for the 19 identified shipments to allow for easier identification, and again requesting the answers to the following:

1. Are there pictures of the containers/material during or after loading?
2. Are there material or inventory lists or sales orders that correspond with these shipments, showing pallet/gaylord counts with material descriptions?
3. What company is the downstream vendor/final destination for each shipment?
4. What is their address?
5. Is there consent from the competent authority for import or transit country(ies)?
6. How is RDI confident that the downstream vendor is a compliant destination? (i.e. what is your due diligence process for determining these vendors can legally accept this material?)

BAN gave RDI a deadline of May 15<sup>th</sup>, 2025 to provide a response. A follow-up letter was sent on May 14<sup>th</sup> as a reminder to provide the information requested. In response, BAN received an email from the Senior Operations Manager stating:

*"Following our recent corporate discussions, we have decided not to move forward with the registration process for the e-Stewards certification at this time."*

Another letter from Ms. Turnock was sent to the Senior Operations Manager and the CEO of RDI Inc. by BAN detailing the likelihood of a Critical Non-Conformity (CNC), and requesting RDI's engagement in drafting the CNC Evidentiary Report. This letter also requested whether the company wished to engage in conversation regarding business practices, compliance with industry standards and international transboundary movement regulations, and a potential pathway ahead for the company to achieve e-Stewards Certification. As of June 11<sup>th</sup>, 2025, no response has been received from RDI Inc.

### **Conclusion:**

In conclusion, BAN believes based on the available evidence, that RDI Inc. wilfully exported e-wastes to developing countries and in particular Malaysia, a country that has banned all import of e-waste, in violation of the e-Stewards Standard and Critical Non-Conformity Policy. We also believe that RDI has willfully used false HS codes in their shipping documentation that is required to be submitted to the US government. These repeated acts of willful misrepresentation are also an offense indicated as a Critical Non-Conformity, and therefore, RDI is deemed ineligible from entering the e-Stewards Program for a period of two years.

### **Next Steps:**

BAN attempted once more to engage RDI to determine whether the company wished to contest the above findings and sanctions. No response was provided by the organization by the deadline of June 11<sup>th</sup>, 2025. BAN has therefore published the Final Evidentiary Report and Letter of Outcome in accordance with the e-Stewards Critical Non-Conformity Policy. The final report is published on the e-Stewards website and key stakeholders will be notified of the findings.

## APPENDIX 1: Material Research L3C Data

Bill of Lading Nbr.	Date	HS Description	Shipper Declared	Shipper Declared Address	US Port	Metric Tons	Full Container Description	Vessel	Carrier	Country of Final destination
EGLV401510145196	3/7/25	720390 - OTHR SPONGY FERROUS PRDCTS MIN PURITY 99.94 PCT FE	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	20.01	FERROUS PRODUCT HS CODE: 7203.90.0000 FREIGHT PREPAID # EMAIL: JQ- HARRY@JQIMPORT.COM, JQIMPORT168@JQIMPORT.COM BSIU8401178/240783/37 PKG/20006KGS	THESEUS	EVERGREEN LINE	MALAYSIA
EGLV401510103019	3/7/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	37.31	PRECIOUS METAL HS CODE: 7601.10.0000 # EMAIL: HOTRADE8899@GMAIL.COM EGHU9239149/240789/37 PACKAGE/19425KGS EITU1120560/240943/38 PACKAGE/17885KGS	THESEUS	EVERGREEN LINE	MALAYSIA
EGLV401510099101	3/7/25	390319 - POLYSTYRENE NESOI, IN PRIMARY FORMS	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	36.84	PS FLAKES HS CODE: 3903.19.2000 # EMAIL: SUBSTANTIALCS@GMAIL.COM TXGU5543328/240833/240790 /40 PKG/17888KGS EMCU8461623/240930/240792 /40 PKG/18952KGS	THESEUS	EVERGREEN LINE	MALAYSIA
EGLV401510044314	3/1/25	261610 - SILVER ORES AND CONCENTRATES	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	20.31	PRECIOUS METAL HS CODE: 2616.10.0000 FREIGHT PREPAID # TEL: 0102028676 (MR TAN) EMAIL: HOTRADE8899@GMAIL.COM EGHU8472027/240788/39 PACKAGE/20311KGS	TOLEDO TRIUMPH	EVERGREEN LINE	MALAYSIA
EGLV401510002239	3/1/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CTC LOGISTICS (LA.) INC.	C/O RDI INC 4101 W 42ND PL CHICAGO, IL 60632 CHICAGO IL 60632 US	NORFOLK,VA	19.74	SAY TOTAL: 1M40HC ALUMINIUM MATERIAL HS CODE: 7601.10.0000 # EMAIL: JQ- HARRY@JQIMPORT.COM JQIMPORT168@JQIMPORT.COM	TOLEDO TRIUMPH	EVERGREEN LINE	MALAYSIA
EGLV401510044306	2/28/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	20.31	1X40"HC ALUMINIUM MATERIAL HS CODE: 7601.10.0000 # EMAIL: ELEGANTPRODEVELOPMENTS8@GMAIL.COM IMP.PEN@HUGEWORLD.MY, TEL: 011-3725 6950 TGBU4295250/240831/40 PACKAGE/20310KGS	TOKYO TRIUMPH	EVERGREEN LINE	MALAYSIA
EGLV401510094711	2/18/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	16.72	ALUMINIUM MATERIAL HS CODE: 7601.10.0000 # HANYANGINTERNATIONALS8@GMAIL.COM / IMP.PEN@TOPASIA.MY EMCU1767503/240925/225323 /40 PACKAGE/16718KGS	TAURUS	EVERGREEN LINE	MALAYSIA
EGLV401510021284	2/18/25	760120 - ALUMINUM ALLOYS, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	21.96	1X40"HC ALUMINIUM ALLOY HS CODE: 7601.20.0000 EGSU1410285/240927/225301 /27 PKG/21957KGS	TAURUS	EVERGREEN LINE	MALAYSIA

Source: Material Research L3C. Details regarding the 19 shipments made by RDI Inc., located in Chicago, in 2025. (Continued below)

Bill of Lading Nbr.	Date	HS Description	Shipper Declared	Shipper Declared Address	US Port	Metric Tons	Full Container Description	Vessel	Carrier	Country of Final destination
EGLV401510078847	2/6/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	34.77	ALUMINIUM MATERIAL HS CODE: 7601.10.0000 # TEL: 0102028676 (MR TAN) EMAIL: HOTRADE8899@GMAIL.COM EGHU8327395/240946/40 PACKAGE/17800KGS EMCU9922381/240947/004253 /40 PACKAGE/16968KGS	TITAN	EVERGREEN LINE	MALAYSIA
EGLV404540074348	1/26/25	760120 - ALUMINUM ALLOYS, UNWROUGHT	CTC LOGISTICS (LA) INC.	C/O RDI INC 4101 W 42ND PL CHICAGO, IL 60632 CHICAGO IL 60632 US	NORFOLK,VA	52.74	ALUMINIUM MATERIAL HS CODE: 7601.20.0000 SAY TOTAL: 3#40HC NO SED REQUIRED # +6011-2628 3042 EMAIL: OPERATIONS@SEGANINET, GREATGLOBAL88@GMAIL.COM	EVER LEADER	EVERGREEN LINE	MALAYSIA
EGLV404540049769	1/26/25	760120 - ALUMINUM ALLOYS, UNWROUGHT	CTC LOGISTICS (LA) INC.	C/O RDI INC 4101 W 42ND PL CHICAGO, IL 60632 CHICAGO IL 60632 US	NORFOLK,VA	36.59	OCEAN FREIGHT PREPAID SHIPPER'S LOAD & COUNT: SAY TOTAL: 2#40HC NO SED REQUIRED DESCRIPTION: ALUMINIUM MATERIAL HS CODE: 7601.20.0000 # +6011-2628 3042 EMAIL: OPERATIONS@SEGANINET, GREATGLOBAL88@GMAIL.COM	EVER LEADER	EVERGREEN LINE	MALAYSIA
EGLV404441392279	1/26/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CTC LOGISTICS (LA) INC.	C/O RDI INC 4101 W 42ND PL CHICAGO, IL 60632 CHICAGO IL 60632 US	NORFOLK,VA	32.97	ALUMINIUM MATERIAL HS CODE: 7601.10.0000 SAY TOTAL: 2#40HC # EMAIL: HOTRADE8899@GMAIL.COM	EVER LEADER	EVERGREEN LINE	MALAYSIA
EGLV401510060093	1/26/25	760120 - ALUMINUM ALLOYS, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	17.05	1X40'HC ALUMINIUM MATERIAL HS CODE: 7601.20.0000 # GREATGLOBAL88@GMAIL.COM TEL: +603-3322 1803 , +6011-2628 3042 EMCU8584649/241000/660163 /41 PKG/17048KGS	EVER LEADER	EVERGREEN LINE	MALAYSIA
EGLV401510060077	1/26/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	38.35	2X40'HC ALUMINIUM MATERIAL HS CODE: 7601.10.0000 FREIGHT PREPAID # TEL: 0102028676 (MR TAN) EMAIL: HOTRADE8899@GMAIL.COM EMCU8382606/660236/034891 /41 PACKAGE/19058KGS TIUUS218200/240991/034897 /43 PACKAGE/19289KGS	EVER LEADER	EVERGREEN LINE	MALAYSIA
EGLV401510043075	1/26/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	35.33	2X40'HC ALUMINIUM MATERIAL HS CODE: 7601.10.0000 ETUJ1477347/660238/660166/40 PKG /17564KGS EGSU9384156/660231/42 PKG/17766KGS # EMAIL: HAIYANGINTERNATIONALSB@GMAIL.COM / IMP.PEN@TOPASIA.MY	EVER LEADER	EVERGREEN LINE	MALAYSIA

Bill of Lading Nbr.	Date	HS Description	Shipper Declared	Shipper Declared Address	US Port	Metric Tons	Full Container Description	Vessel	Carrier	Country of Final destination
EGLV401510021268	1/26/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O : RDI INC 20270 EAST CARREY RD, WALNUT CA 91789 US	NORFOLK,VA	17.70	1X40'HC ALUMINIUM MATERIAL HS CODE: 7601.10.0000 # GMAIL.COM / IMP.PEN@TOPASIA.MY TLLU5929854/240992/660152 /40 PACKAGE/17702KGS	EVER LEADER	EVERGREEN LINE	MALAYSIA
EGLV404540029725	1/15/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CTC LOGISTICS (LA) INC.	C/O RDI INC 4101 W 42ND PL CHICAGO, IL 60632 CHICAGO IL 60632 US	NORFOLK,VA	36.53	SAY TOTAL: 2#40HC NO SED REQUIRED DESCRIPTION: ALUMINIUM MATERIAL HS CODE: 7601.10.0000 # EMAIL: HOTRADE8899@GMAIL.COM	TAIPEI TRIUMPH	EVERGREEN LINE	MALAYSIA
EGLV401510018712	1/11/25	760110 - ALUMINUM, NOT ALLOYED, UNWROUGHT	CARGO EXPRESS SHIPPING INC	C/O: RDI INC 20270 EAST CARREY RD. WALNUT CA 91789 US	LOS ANGELES,CA	16.72	ALUMINIUM MATERIAL HS CODE: 7601.10.0000 #HAIYANGINTERNATIONALSB@GMAIL.COM / IMP.PEN@TOPASIA.MY	EVER MODE	EVERGREEN LINE	MALAYSIA
EGLV404441354768	1/3/25	760120 - ALUMINUM ALLOYS, UNWROUGHT	CTC LOGISTICS (LA) INC.	C/O RDI INC 4101 W 42ND PL CHICAGO, IL 60632 CHICAGO IL 60632 US	NORFOLK,VA	36.76	SAY TOTAL: 2#40HC DESCRIPTION: ALUMINIUM MATERIAL HS CODE: 7601.20.0000 # 3042 EMAIL: OPERATIONS@SEGANINET, GREATGLOBAL88@GMAIL.COM	EVER FEAT	EVERGREEN LINE	MALAYSIA

Source: Material Research L3C. Details regarding shipments made by RDI Inc. located in Chicago in 2025.

## APPENDIX 2: Email Chain between Ms. Jenny Cheng and Ms. Selena Turnock

**Wednesday, June 4, 2025 at 15:38:24 Central Daylight Time**

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**Subject:** Re: e-Stewards BOL Requests  
**Date:** Friday, May 16, 2025 at 11:53:06 AM Central Daylight Time  
**From:** Jenny Cheng  
**To:** Selena Turnock  
**Attachments:** image001.jpg, image002.jpg

Hi Selena,

Thanks for the reminder and shows up for our stage 2 audit.

Following our recent corporate discussions, we have decided not to move forward with the registration process for the e-Stewards certification at this time. We sincerely appreciate the time and effort your team has dedicated throughout this process.

Best,  
Jenny

On Wed, May 14, 2025 at 5:55 PM Selena Turnock <[Selena@e-stewards.org](mailto:Selena@e-stewards.org)> wrote:

Good afternoon Jenny,

Just a reminder that we will need this information requested in full by tomorrow. If you have any questions, or require any assistance, please let me know as soon as possible.

Thank you,

Selena Turnock  
Certification Director  
**e-Stewards**

Website: [www.e-stewards.org](http://www.e-stewards.org)  
e-Mail: [selena@e-stewards.org](mailto:selena@e-stewards.org)  
Tel: +1 206-436-8595, Fax: +1 206-652-5750



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**From:** Selena Turnock <[Selena@e-stewards.org](mailto:Selena@e-stewards.org)>  
**Date:** Thursday, May 8, 2025 at 4:01 PM  
**To:** Jenny Cheng <[jennyc@rdirecycling.com](mailto:jennyc@rdirecycling.com)>  
**Subject:** Re: e-Stewards BOL Requests

Hi Jenny!

Thank you for providing me with the documentation you brought earlier. If possible, I really need to see the original BOLs (signed), as well as any photos, sales orders, or inventory lists that correspond with each of these shipments to better understand the material that is being sent. What I am looking to verify for each shipment is the below:

1. Are there pictures of the containers/material during or after loading?
2. Are there material or inventory lists or sales orders that correspond with these shipments, showing pallet/gaylord counts with material descriptions?
3. What company is the downstream vendor/final destination for each shipment?
4. What is their address?
5. Is there consent from the competent authority for import or transit country(ies)?
6. How is RDI confident that the downstream vendor is a compliant destination? (I.e. what is your due diligence process for determining these vendors can legally accept this material?)

I have attached a spreadsheet that has additional information for each shipment I am referencing. I inserted a few columns at the end (far right) where you can add in requested information as well. I input the information from each of the BOLs you already supplied for the corresponding shipments, but feel free to update those as necessary as well.

I understand that you are additionally addressing your auditor's requests, and that is priority of course, so if you are able to get me this information even after the close of the audit, that would be greatly appreciated. I will need this information no later than next **Thursday, the 15<sup>th</sup>**.

Thank you!

Selena Turnock

Certification Director

**e-Stewards**

Website: [www.e-stewards.org](http://www.e-stewards.org)

e-Mail: [selena@e-stewards.org](mailto:selena@e-stewards.org)

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**From:** Selena Turnock <[Selena@e-stewards.org](mailto:Selena@e-stewards.org)>

**Date:** Thursday, May 8, 2025 at 9:14 AM

**To:** Jenny Cheng <[jennyc@rdirecycling.com](mailto:jennyc@rdirecycling.com)>

**Subject:** e-Stewards BOL Requests

Jenny,

If possible, could you please provide me with the documentation (internal material sheets, BOLs,

shipping documentation/records, destination records, etc.) for the attached BOLs listed?

Thank you!

Selena Turnock

Certification Director

**e-Stewards**

Website: [www.e-stewards.org](http://www.e-stewards.org)

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**Jenny Cheng**  
**Senior Operation Manager**

**RDI. INC**  
**4101 West 42nd Place, Chicago, IL 60632 United States**

**Main:** 1(773) 280-9388  
**Direct:** 1(773) 362-4929  
**E-mail:** [jennyc@rdirecycling.com](mailto:jennyc@rdirecycling.com)  
**Website:** [www.rdiloop.com](http://www.rdiloop.com)

### APPENDIX 3: Pathway Letter to RDI Inc. from BAN



600 1st Ave, Suite 114  
Seattle, Washington 98104  
Telephone 206 652-5555, Fax 206 652-5750  
web: [www.e-stewards.org](http://www.e-stewards.org)

May 21, 2025

Mr. Daniel Tu  
CEO  
RDI, Inc.  
4101 W 42<sup>nd</sup> Place  
Chicago, IL 60632

Dear Mr. Tu,

I am reaching out on behalf of the Basel Action Network (BAN), the administrator of the e-Stewards Standard and Certification Program. Thank you for recently hosting us during a portion of RDI Inc.'s e-Stewards Stage 2 Audit at your Chicago facility.

As you may be aware, several concerns regarding the export of electronic waste were raised with your Senior Operations Manager, Ms. Jenny Cheng, during the witness audit. In our subsequent report, BAN identified 19 shipments made since the beginning of 2025 that may be in violation of Article 4A of the Basel Convention. These shipments may also suggest a pattern of misrepresentation regarding shipment details by RDI Inc.

We requested additional information regarding these shipments from Ms. Cheng, but did not receive a response by the designated deadline. Instead, we were informed of RDI Inc.'s decision to withdraw from the e-Stewards Certification process. In accordance with our policy, when a prospective or current e-Stewards candidate has evidence of a finding in violation of our Critical Non-Conformity (CNC) policy, we document the finding(s) and inform relevant stakeholders. In this process, we prefer to the client to be sure that what we report is correct and their point of view is included. In that light, we hope you will consider engaging in drafting the Evidentiary Report. In any case we will send it to you upon completion.

However, apart from the CNC reporting, in the spirit of collaboration and shared goals of fostering responsible, ethical, and legally compliant electronics waste management, BAN would like to explore whether RDI Inc. is open to engaging in a constructive dialogue with an aim to identify a potential pathway to e-Stewards Certification for your organization.

This pathway would likely involve working closely with BAN under defined assurances, oversight, and training to ensure your business practices fully align with the e-Stewards Standard, the R2v3 Standard which you currently hold, and applicable international laws.

If this opportunity is of interest, we would welcome the chance to discuss it further. In sum, please let us know if you wish to engage with e-Stewards in creating the Evidentiary Report on the CNC violations we have identified, and also let us know if you should wish to discuss a pathway forward where RDI could still achieve e-Stewards Certification.

Sincerely,

Selena Turnock

Selena Turnock  
e-Stewards Certification Director

cc. Ms. Jenny Cheng, RDI Inc., Senior Operation Manager

**APPENDIX 4: Second Notice Letter to RDI Inc. from BAN**



600 1st Ave, Suite 114  
Seattle, Washington 98104  
Telephone 206 652-5555, Fax 206 652-5750  
web: [www.e-stewards.org](http://www.e-stewards.org)

June 9, 2025

Mr. Daniel Tu  
CEO  
RDI, Inc.  
4101 W 42<sup>nd</sup> Place  
Chicago, IL 60632

Dear Mr. Tu,

As you know, following BAN's engagement with RDI in the lead-up to achieving e-Stewards Certification, we discovered some evidence of concerning export activity. This prompted our team to alert you of this information, and ask further questions about what we had learned. At that juncture, we were notified that RDI suddenly declined to pursue e-Stewards Certification.

As e-Stewards is a voluntary standard, it is RDI's choice to discontinue, although we at BAN hoped to engage further to learn if RDI would be interested in finding a pathway to certification that was compliant with both the e-Stewards Standard and with international law, which we noted in the letter sent on May 21, 2025. We also in that letter, mentioned that we would be proceeding with writing up the case in an evidentiary report (ER), in accordance with the e-Stewards Critical Non-Conformity policy, which we intend to publish once final. It is our hope that you will read the report we have drafted, and correct or refute anything you believe we may have not correctly stated. Supporting documentation or evidence that disproves any of the allegations is required.

We have not yet heard a reply to the letter sent on May 21<sup>st</sup>. Nevertheless, as promised, here enclosed is the Draft Evidentiary Report which will become the final report if we do not hear from you by Wednesday morning, June 11<sup>th</sup>, 2025. This report will be placed on our website and key stakeholders, e-Stewards customers, and processors will be notified.

Again, it remains our sincere hope that we may continue dialogue with you. Please contact us by the Wednesday morning deadline with a view to a) publishing an accurate report, b) discussing a program to achieve export compliance and c) at the appropriate time, re-application to the e-Stewards program.

We await your reply.

Hayley Palmer  
Hayley Palmer  
Executive Director, Basel Action Network

Selena Turnock  
Selena Turnock  
Certifications Director, e-Stewards

CC: Jenny Cheng, Senior Operations Manager, RDI