

Code of Conduct

Guidelines on ethical conduct in connection with the transport, handling, treatment, repair and sale of WEEE and batteries for Elretur

Elretur

Elretur is Denmark's largest producer responsibility scheme for WEEE (collective scheme), representing many different industries and types of companies. We handle the producer responsibility for electrical and electronic equipment (EEE) and batteries.

Elretur guarantee legitimate waste streams, quality of data and records for authorities. We ensure waste of electrical and electronic equipment (WEEE) a new life through reuse (PFR) and/or material recycling.

Elretur contribute to increased and improved recycling and reuse. We do this by:

- putting accountability front and centre
- creating value for our members
- contributing to a sustainable end of life for our members' products
- using efficient and proven solutions as well as innovative technologies

¹⁾ CSR, circular economy, ESG and SDG

In other words, Elretur ensure accountable and cost-effective collection and handling of the electronic and battery waste that is delivered to e.g., the Danish recycling centres.

At Elretur, accountability is an embedded element. The significance of this for our partners is described in this Supplier Code of Conduct (CoC).

Covered partners and general provisions

Elretur consider all operators and repairers who have an agreement or contract with Elretur to be partners covered by this CoC. All covered partners must therefore incorporate Elretur's CoC into their business processes and routines, and pass on the content to relevant employees.

Elretur's CoC covers all our partners' activities in relation to the treatment of WEEE and/or batteries. This applies regardless of whether the activity is carried out by the partner itself or by its subcontractors.

The latest version of our CoC can be found on our website (www.elretur.dk/en/codeofconduct).

The CoC may only be deviated from in special and justified cases. Elretur must approve any deviations.

If an external or internal stakeholder becomes aware of matters that are not in accordance with this CoC, they can report this directly to Elretur's CEO (www.elretur.dk).

Basis

Legislation

Our partners must comply with applicable international, national and local legislation, regulations and industry standards. In this context, special emphasis is placed on the WEEE and Batteries directives, environmental and waste legislation as well as underlying executive orders. Elretur's CoC should be regarded as a supplement to such legislation, regulations and standards, and must not be used to lessen the effect of norms, standards or local agreements.

Rules and conventions

Our partners must live up to the ten principles of the UN Global Compact and related conventions. In addition, we expect our partners, as far as possible, to contribute to and/or work for the minimisation of negative impacts on the relevant UN Global Goals.¹ The ten principles of the UN Global Compact are:

HUMAN RIGHTS²

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2

make sure that they are not complicit in human rights abuses.

LABOUR³

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; and

Principle 4

the elimination of all forms of forced and compulsory labour; and

Principle 5

the effective abolition of child labour; and

Principle 6

the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7

Businesses should support a precautionary approach to environmental challenges; and

Principle 8

undertake initiatives to promote greater environmental responsibility; and

Principle 9

encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

Special areas of attention

In the following, we have highlighted a number of important areas of particular relevance to the treatment of WEEE and batteries to which our partners, in addition to the above, should pay special attention insofar as ethical business conduct is concerned.

Environment

Recycling and reuse are integral parts of Elretur's daily work. In collaboration with our members, we contribute to the UN's Global Goals, in particular goal 11 (Sustainable Cities and Communities), goal 12 (Responsible Consumption and Production) and goal 14 (Life Below Water).

This requires our partners to integrate environmental considerations into their businesses and continuously strive for improvements in order to mitigate and minimise any negative impacts of their business on the environment. Partners must use environmental management systems that contribute to the achievement of this purpose. In addition, partners must, as far as possible, actively contribute to increasing the reuse and recycling of materials from WEEE and batteries, including implementing environmentally friendly technologies.

Partners must ensure traceability and accessible documentation regarding the treatment of WEEE and battery waste from Elretur. Where possible, this documentation should be reflected in RepTool.

Partners are expected to act responsibly in both economic and environmental matters so as to achieve an appropriate and responsible balance between these two considerations.

Environmental protection

Applicable laws and regulations on environmental protection must be complied with.

In connection with the collection, handling, processing, transport and sale of WEEE and batteries, partners must implement procedures that prevent and address any environmental issues that may arise in relation to their activities and that affect the surrounding community and environment.

Any chemicals must be handled in an environmentally sound manner, and hazardous waste must be handled, stored and disposed of in accordance with legislation and other regulations.

Sustainable treatment and sale

Partners must integrate sustainability into their businesses. The circular economy must also be an important parameter in business routines, aspiring to the basic principle of getting the maximum practical, environmental and

economic value out of the WEEE, including the materials, by keeping resources in circulation for as long as possible. This can be done, for example, by extending the life of products through reuse, upcycling, or material recycling.

In their choice of sales channels, partners must consider environmental impact. A special point of attention in this respect is consideration of the effect of sales in relation to the displacement of the product or material that the sold material or unit replaces. In the case of reuse, this means that where the sales consist of components or units, a documented assessment must be carried out to establish that the process to which the replaced component is subjected does not entail that the reuse of the WEEE in question ends up having a negative impact on the environment. This assessment can be based on a general assessment and does not have to be prepared for each individual unit sold. The selection of units for reuse must also consider the products' life expectancy, as well as environmental and energy impacts, so that products that contribute negatively to the circular economy are not selected.

When selling materials for the purpose of material recycling, the aim must be for these to be included in the production of new products where the alternative would be a drain on virgin raw materials.

This documentation can be general and does not therefore have to be prepared for each individual sale. When a chosen environmental treatment with a view to extracting for example rare earths means that other elements are wasted, there must also be a documented assessment of the basis for this choice. This assessment can be based on a general assessment and does not therefore have to be prepared for each individual environmental treatment.

Our partners must, as far as possible, support the circular economy through data and digitisation by ensuring traceability and documentation. Where possible, this documentation should be reflected in RepTool.

Partners must therefore be in possession of receipts, certificates and documents for the entire quantity of WEEE handled, including the disposal of any residual materials. This material is the basis for the RepTool reporting and must be accessible to Elretur.

Permits

Partners must have the necessary permits for collection, transport, handling, treatment, repair, sale or disposal of WEEE (UEEE/REEE) and batteries. In addition, all cross-border transportations must have the necessary permits, including notifications.

Partners must have the necessary permits for handling, use and storage of any chemicals and hazardous substances.

Working environment and safety

Partners must ensure a safe and healthy working environment for all employees. At a minimum, it must satisfy local legislation and international standards. Partners must ensure that they draft written policies and procedures for health and safety at work, and ensure their observance.

Transport (environment)

Partners must comply with all applicable rules and standards for transportation, including rules regarding safety and the environment.

Europe (road transport)

Partners must actively work to reduce emissions of particulate matter from vehicles. In Europe, this means that only lorries which comply with the EU-NORM6 are used (which means the lorries in question must have been acquired after 31 August 2015 (31 August 2014)). For lorries that were acquired before 2015 and which satisfy, as a minimum, the EU-NORM 5a, there must be a phasing-out plan with the goal of disposing of the vehicle by 30 June 2022. We also encourage our partners to consider incorporating driving efficiency into their planning in relation to e.g. fuel consumption and type (electricity, biodiesel, dual fuel, biogas), use of double decks, volume trailers, dollies or modular concept, as well as behavioural follow-up in relation to energy-efficient driving techniques.

Outside Europe (road transport)

Road transport outside Europe that does not comply with the EU-NORM6 must, in addition to meeting local standards, be selected so that driving efficiency is incorporated into the planning in relation to e.g. fuel consumption and type (truck, biodiesel, dual fuel, biogas), use of double decks, volume trailers, dollies or modular concept as well as behavioural follow-up in relation to energy-efficient driving techniques.

Sea transport

When choosing sea transport, the IMO's rules on the use of fuel in coastal areas must be complied with, and the ship must have the necessary technologies for flue gas cleaning etc. (including scrubbers) in the event that sulphur-containing fuels are used in international waters.

Audits (visits)

Elretur reserves the right to inspect and monitor partners at any time to ensure compliance with this CoC.

Elretur must therefore have access to partners' facilities and processes. Access will usually be agreed in advance. In the event of Elretur carrying out an unannounced visit, Elretur will notify the partner of the nature of Elretur's business and what it wishes to inspect. A report will always be drawn up after a visit.

This access to partners' facilities also applies to Elretur's members, though this will typically take place together with Elretur.

Subcontractors may also be accessed, which means that partners must make it clear to any subcontractor that Elretur has the right to inspect the subcontractor's facilities or parts thereof.

Partners must draw up visit reports if they visit their subcontractors without Elretur. The part of the visit report that covers the points in this CoC must be accessible to Elretur, including any photos.

Other areas of attention

Child labour and forced/compulsory labour

Partners must not be directly or indirectly involved in child labour or forced/compulsory labour. Not being involved in child labour means, among other things, the following:

- All employees are 13 years of age or older.
- Employees between the ages of 13 and 15 only perform light work.
- Employees between the ages of 13 and 15 work a maximum of two hours a day.
- Parents of employees who are between the ages of 13 and 15, or who are subject to compulsory education, are informed about the work and the conditions under which the work is performed.
- The minimum age for full-time employment is 15 years (or, where allowed under local law in accordance with the ILO derogation for developing countries, 14 years).
- Employees under the age of 18 do not perform hazardous work or work at night.
- All apprentices at the company are over 15 years old and work as part of their education.

Discrimination

Partners may not directly or indirectly act offensively or discriminate on the basis of race, colour, gender, language, religion, political or other beliefs, age, nationality, social or ethnic background, financial means, sexual orientation, origin or other status.

Corruption and bribery

Elretur's partners must not directly or indirectly use or benefit from any form of corruption or bribery.

General Data Protection Regulation (GDPR)

Partners must ensure that data-bearing WEEE is treated such that sensitive personal data does not come into the possession of third parties. The GDPR is described in Elretur's data processor agreement, which must be signed by all partners upon entering into an agreement.

Notes

Note 1

Paris Agreement 2015

Note 2

- UN Guidelines on Human Rights
- UN Convention on Civil and Political Rights
- UN Convention on Economic, Social and Cultural Rights
- UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment

Note 3

- UN Convention on the Status of Refugees
- UN Convention on the Elimination of All Forms of Racial Discrimination
- UN Convention on the Elimination of All Forms of Discrimination against Women
- UN Convention on the Rights of the Child
- UN Convention on the Rights of Persons with Disabilities

October 2020