This table outlines how each provision of R2:2013 is implemented in the management system, including what records of conformance are generated. Replace the example information listed with documents, records, and information specific to your management system.

| ***R2 Requirement*** | ***Implementation Description***  ***(How is the requirement being met?)*** | ***Supporting Document***  ***(What procedures support the requirement?)*** | ***Records***  ***(What evidence is maintained of conformance?)*** |
| --- | --- | --- | --- |
| 1.a | Collect, Sort, and Recycle used electronics. | Scope Statement |  |
| 1.b | Implemented RIOS and certifying to RIOS in an integrated audit with R2. | See ISO 14001/OHSAS 18001 or RIOS documents | RIOS Certificate |
| 1.c | EHS Management System created based on RIOS | Management Review Procedure, Internal Audit Procedure, EHS Manual | RIOS Certificate, Audit Reports, Management Review Meeting Minutes |
| 1.c.1 | Created corporate goals for quality, environmental, and health & safety | Objectives and Targets (or Goals) List | Quality Goal Worksheet  Environmental Goal Worksheet  Health & Safety Goal Worksheet |
| 1.c.2 | This list is intended to describe each activity that meets each requirement of the R2 Standard. | R2 List of Activities | N/A |
| 2 | All equipment is sorted after receipt based on the Technical Cutline to identify electronics for reuse. Remaining electronics are sorted for processing by a downstream vendor or for manual disassembly. | Hierarchy of Responsible Management Strategies Policy  Technical Cutline | Sort Report in Inventory Management System. |
| 3.a | Legal compliance plan is documented in the Legal and Other Requirements Procedure. The plan includes steps for updating, evaluating, and maintaining legal requirements. It also includes a plan for evaluating compliance by the facility. Compliance audits are conducted annually by XXX. Import/Export legality is included in each downstream vendor due diligence information. | Legal and Other Requirements Procedure  List of Legal Requirements  Facility Inspection Checklist  Downstream Due Diligence Form |  |
| 3.a.1 | Legal and other requirements are identified during implementation and reviewed at least annually for changes. Changes are also made based on the Change Management Procedure. | List of Legal and Other Requirements  Change Management Procedure | Change Management Evaluation  Conference attendance  Trade publications |
| 3.a.2 | Import/Export requirements are integrated into the evaluation of each downstream vendor. Internal import/export requirements are documented on the List of Import/Export Requirements. Research is conducted with the help of an industry consultant to determine the legality of potential import/exports. | List of Import/Export Requirements  Downstream due diligence procedure | Import/Export List  Due Diligence Report |
| 3.a.3 | The EHS Manual specifies an annual compliance audit process to evaluate the facility’s compliance with each legal requirement listed, as well as verifying the list is accurate. On a regular basis, the facility is inspected internally for compliance. Issues with non-compliance are documented as corrective actions. | Evaluation of Compliance Procedure  Nonconformity, Corrective and Preventive Action Procedure | Compliance Audit Report  Facility Inspection  Corrective Action Report |
| 3.a.3 | Changes in legal requirements are monitored through trade publications and industry conferences. Reviews of legal requirements are conducted at least annually by the EHS manager. The list of Legal and Other Requirements includes information about the reporting, training, and monitoring requirements required to comply with each legal requirement. | Monitoring Procedure  List of Legal and Other Requirements. | Subscription to trade publications  Receipts of attendance at industry conferences  Training Records  Reports for legal requirements  Monitoring records |
| 4.a | This is a culmination of all elements of the EH&S Management System. XXX has documented our competencies and capabilities and identified equipment which we cannot accept. | Environmental Health and Safety Manual  Prohibited Materials List | Competency records |
| 4.b | All employees are allocated 30 minutes at the end of each shift to clean up their work area. Materials are stored in designated and labeled locations. A monthly inspection is conducted to verify housekeeping as well as compliance. | Monthly Facility Inspection Form  HR Manual  R2 Operations Manual | Monthly Facility Inspection Report |
| 4.c | A change management process is utilized to ensure to ensure environmental risks and safety hazards are identified and planned for prior to the change occurring. Risks are assessed in the aspects evaluations as part of the EHSMS. | Hazard Identification Procedure  Change Management Form  Aspects Evaluation Form | Change Management Form  Aspects Evaluation |
| 4.d | The aspects evaluation cross references the controls utilized to mitigate each risk. Procedures are created where necessary to implement controls. | Operational Control Procedures for identified Hazards  Aspects Evaluation  Illness & Injury Prevention Program (IIPP) | EHS Management System  Training Records |
| 4.e | Monitoring activities are listed in the EHS Manual and implemented by various personnel on the scheduled basis. | Industrial Hygiene Program  Monitoring Procedure  EHS Manual | Fire Extinguisher Inspection Records  Hearing Study  Air Monitoring Study |
| 4.h | Potential emergencies are documented with plans to prevent and respond in our Emergency Preparedness Procedure. Probable emergencies at our facility include fire, flood, and spills. All employees are trained on the procedure and we routinely conduct emergency drills | Emergency Preparedness and Response Procedure  Emergency Drill Evaluation Form | Emergency Drill Evaluations  Training Records |
| 5.a-d | The FM Management Plan specifies requirements for mercury retorting by downstream vendors. XXX removes all FMs and toner cartridges prior to sending downstream for shredding. Polychlorinated BiPhenyls are prohibited from entering our facility. However, containment materials and labels are on-hand should any be found in mixed electronics loads. | Focus Material Management Plan  Dismantling Procedure | FM Management Plan  Shipping Records  Approved vendors  Work instructions |
| 5.e-h | Downstream vendors that receive Focus Materials or equipment containing Focus Materials are qualified by our EHS Manager prior to shipment. We only use R2 Certified downstream vendors. | Downstream Vendor Due Diligence Program | Approved Vendor List  Due diligence records |
| 6 | Equipment is sorted according to our current technical cut-line which separates recyclable and reusable equipment. Reusable equipment is sent to our lab for testing and possible repair. Our Lab only tests/repairs desktops and laptops. We only sell R2/Ready for Resale products, not R2/Ready for Reuse. All other equipment is evaluated by our technicians to determine whether it is capable or repair and worth repairing by an outsourced partner. We only use R2 Certified refurbishers in accordance with 6.c.3 | Reusable Equipment and Components Procedure(s)  Quality Assurance Plan  Product Return Plan  Desktop Testing Work Instruction  Laptop Testing Work Instruction  Technical CutLine  R2/Ready for Repair Evaluation Form | Approved Vendors List  Desktop Test Record  Laptop Test Record  R2/Ready for Repair Evaluation |
| 7.a | Records of shipments are kept with BOLs, sales orders, and corresponding invoices. A summary is maintained in the inbound/outbound log. | Shipping Procedure | Inbound Log  Outbound Log  BOLs  Invoices  Sales Order |
| 7.b | A downstream vendor flowchart is provided to each customer with a signed non-disclosure agreement. | List of Approved Downstream Vendors | Signed NDA |
| 8.a-b | Data destruction procedures are written an based on the NIST 800-88 Revision 1 Guidelines. | Data Destruction Procedure(s) |  |
| 8.c | Employees involved in sorting are trained to identify media containing data. Employees sanitizing or destroying media are trained on work instructions annually | Sorting Work Instruction  Hard Drive Wiping Work Instruction  Media Shredding Work Instruction | Employee Training Records |
| 8.d | A qualified 3rd party auditor conducts an annual data destruction audit of our processes, including methods to try to recover data from wiped media. | Data Validation Procedure | Data destruction audit report |
| 8.e | Every wiped media device is verified by a second technician to ensure it was effective. Physically destroyed devices are also verified by another employee prior to placing in Gaylord. Destroyed media is documented by serial number, date, and technician on the log. | Quality Control Procedure | Data Destruction Log  Data Wiping Log |
| 8.f | Security controls to the level of HIPAA compliance are implemented. Details of security controls are documented in the Security Procedure | Security Procedure | Monitoring Records  Criminal Checks  Inspection Reports  Drug Test Results |
| 8.g | Commercial software is utilized for data destruction which generates an electronic record of successful sanitization. Physical destruction requires a manual record. The person destroying the media scans each device serial number into a spreadsheet that is maintained for all destroyed media. | Data Sanitization Work Instruction  Physical Destruction Work Instruction | Software Log  Physical Destruction Log |
| 8.h | Cellular phones that cannot be reused are sent to a downstream vendor for shredding and precious metals recovery. Phones are secured in a closed Gaylord that is wrapped in black plastic and sealed with tamper proof tape. Upon receipt, the downstream vendor sends pictures and verifies the tape is intact. The Gaylord is shipped on next day delivery. | Downstream Vendor Due Diligence Program | Data Destruction Vendor Audit Report  Receipt records  Data destruction records |
| 9 | All materials are stored inside with the exception of a metals roll-off bin outside. Inside materials are packaged in Gaylords and stored in racks. Reusable laptops are packaged in slotted boxes designed for laptops. Desktops for reuse are stacked vertically on a pallet, 6 layers high. Universal Wastes are clearly labeled and stored in closed, intact containers. | Storage Procedure  Facility Inspection Form  Packaging Work Instructions  Universal Waste Procedures | Storm Water Permit  Facility Inspections  Universal Waste Log |
| 10 | We accept HIPAA qualified electronics and maintain a security program in line with HIPAA requirements. Equipment is FOB our dock, so acceptance occurs at our facility. No collection sites are used and we do not have our own trucks for pickup. | Security Procedure | Security Inspection Reports  Training Records |
| 11.a | The identified risks were determined in our Aspects evaluation. | EHS Manual | Aspects evaluation |
| 11.a | A pollution liability policy for $5M and workman’s comp policy for $1M/$2M are in effect. | EHS Manual | Certificate of Insurance |
| 11.b | A documented closure plan has been created. The landlord of the facility is named as the administrator of closure. Closure plans include removal and recycling of all remaining materials and sampling the site for any contamination. The administrator will hire the resources to perform these tasks. A financial instrument has been established in the form of a surety bond payable to the landlord. The financial instrument amount is calculated based on the maximum storage of the facility and the current CRT recycling cost. | Closure Plan | Closure Cost Estimate Calculation  Surety Bond |
| 12 | The shipping manager is trained on Department of Transportation regulation for the shipment of hazardous materials (batteries, mercury). Transporters are selected by a transport broker. The broker is qualified to meet the requirements of Provision 12 | Transport Procedure  Downstream Due Diligence Procedure | Transporter Due Diligence  BOLs  Training Records |
| 13 | Most records are generated and/or stored electronically on the company’s DropBox site. Some records are kept in paper format in the office filing cabinet. | Control of Documents and Records Procedure |  |