Quality, Environmental, Health and Safety Policy

The nature of our operations at Kawabata American, Inc. has a positive impact on the environment through the conservation of metals, plastic and other non-renewable resources and the proper management of used and end-of-life electronic equipment. Consistent with these core operations, it is Kawabata's overall goal to accomplish its business objectives while striving for an injury-free workplace, minimizing pollution, and providing quality products to our customers. It is our intention to:

- Develop and maintain quality, environmental, health & safety and security programs that conform to the best practices within the scrap and electronics recycling industry;
- Comply with all relevant environmental, health & safety laws and regulations, including federal, state and local and other requirements;
- Comply with all relevant regulations of the countries importing equipment, components, or materials containing FMs that have passed through our facility or control;
- Comply with customer and product requirements and industry guidelines, including the Responsible Recycling (R2) practices;
- Manage used and end-of-life electronics equipment, components and materials based on a hierarchy of first, reuse/refurbish; second, materials recovery; and finally, energy recovery/disposal;
- Manage the R2 focus materials that pass through our facility or control in a manner protective of worker health and safety, public health and the environment;
- Prevent workplace injuries by providing a safe environment for employees, contractors, visitors, volunteer workers, temporary workers and anyone else performing activities under our direction;
- Investigate any workplace accidents, illnesses and near-misses, and promptly correct any unsafe condition or practice,
- Promote prevention of pollution in all of our operations, including the elimination of electronics waste from landfills;
- Work with our entire recycling chain including downstream vendors, suppliers, customers and contractors to fulfill our environmental, health & safety goals; and
- Continually improve our quality, environmental, and health & safety programs and resulting performance.

We recognize that the responsibilities for quality, environment, health & safety and security are shared, requiring cooperation, not only between employees and their supervisors, but among and between all those who assume the various roles within the company.

Kawabata will continually improve its QEH&S system and performance. This will include the setting of QEH&S goals, taking into consideration our QEH&S footprint and our business, financial, operational and legal requirements as well as the views of interested parties.

President

Keiichi Kawabata