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## **ENVIRONMENTAL, QUALITY, HEALTH, & SAFETY POLICY**

WINDFIELD ALLOY and its staff are committed to the protection of the environment, to meeting customer expectations for quality products and services and to health and safety in every aspect of our operations and personnel.

The executive management will ensure that this commitment is kept to the highest priority and that our services are performed with the highest quality standard and in the most environmentally friendly and health and safety oriented manner.

The executive management will ensure to the best of its ability that all vendors for downstream materials will adhere to the same environmental and quality standards and protections of the environment and the health and safety of its employees as we do and to ensure that all buyers, purchasers and downstream vendors will be expected to protect the environment of developing countries by following good product stewardship guidelines.

- WINDFIELD ALLOY is committed to continual improvement, prevention of pollution and the prevention of injury and ill health.
- WINDFIELD ALLOY is committed to complying with all legal and other requirements, including the Basel Convention, Basel Amendment, OECD Decisions and national laws of import and export countries.
- WINDFIELD ALLOY is committed to monitoring and fulfilling our Environmental, Quality, Health and Safety objectives and targets and continually improving our management system.
- WINDFIELD ALLOY is accountable to managing Hazardous e-Waste Materials throughout the recycling chain to final disposition with due diligence to protect the environment and worker health.
- WINDFIELD ALLOY is committed to social accountability values including the prohibition of prison and minor.
- WINDFIELD ALLOY is committed to providing workers a workplace free from harassment and discrimination.
- WINDFIELD ALLOY is committed to providing workers a workplace free from harmful pollutants and hazardous conditions.
- WINDFIELD ALLOY is committed to educating our customers on data security issues and protecting their data throughout the recycling chain.

WINDFIELD ALLOY is committed to communicating and reinforcing this policy throughout our company, as well as, to our customers, our suppliers and to the public.

A copy of this policy is available to any interested party.



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## Anti-discrimination policy

Windfield Alloy's anti-discrimination policy explains how we prevent discrimination and protect our employees, customers and stakeholders from offensive and harmful behaviors. This policy supports our overall commitment to create a safe, fair and equitable workplace for everyone.

Windfield Alloy complies with all Federal, State and local anti-discrimination laws. We explicitly prohibit offensive behavior (e.g. derogatory comments towards colleagues of a specific gender or ethnicity.)

### Scope

This policy applies to all employees, contractors, visitors, customers and stakeholders.

### Policy elements

Our anti-discrimination and anti-harassment policies go hand-in-hand. We will not tolerate any kind of discrimination or harassment that creates a hostile and unpleasant environment for employees. Discrimination is any negative action or attitude directed toward someone because of protected characteristics, like race and gender. Other protected characteristics are:

- Age
- Religion
- Ethnicity/ nationality
- Disability/ medical history
- Marriage / civil partnership
- Pregnancy / maternity/ paternity
- Gender identity/ sexual orientation

Employees who harass their colleagues will go through our disciplinary process and we may reprimand, demote or terminate them depending on the severity of their offence.

We will not be lenient in cases of assault, sexual harassment or workplace violence, whether physical or psychological. We will terminate employees who behave like this immediately.

### What to do in cases of discrimination

If you are the victim of discriminatory behavior or harassment (or if you suspect that others are being discriminated or harassed) please talk to HR (Brandon Tetler) or your workplace representative (William



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Hale) as soon as possible. HR is responsible for hearing your claim, investigating the issue and determining punishment.

Windfield Alloy encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of Windfield Alloy to promptly and thoroughly investigate such reports. Windfield Alloy prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

## **Wage Policy**

Windfield Alloy is committed to complying with all Federal, State and local laws regarding the payment of wages, including minimum wage and overtime wages.

If you feel that you are not being paid properly or that an error has occurred please contact Payroll (Nicole Hillard) or HR (Brandon Tetler)