

Hazardous Waste Collection & Recycling Policy

June 11, 2025

1. Purpose Scope and Users

To ensure our compliance with the Environmental Protection Agency's Resource Conservation and Recovery Act (RCRA) regulations, ASGN Headquarters has instituted a hazardous waste recycling program to ensure the five types of universal waste are disposed of properly.

This document applies to all parts of the organization and locations of ASGN Headquarters. Users of this document are all employees of ASGN Headquarters.

2. Hazardous Waste Policy

Hazardous Waste is any chemical or product that is toxic, poisonous, combustible, corrosive, irritant, or flammable. Hazardous Waste includes but is not limited to:

- Electronic waste or "e-waste" (including computers, photocopy machines, monitors, keyboards, mice, cables, cell phones)
- Toner Cartridges
- Batteries
- Fluorescent light bulbs and tubes
- Paint

Electronic Devices, Computers, and Other Hazardous Materials

E-waste is electronics nearing or past the end of their useful life. E-waste is considered dangerous, as certain components of some electronic products contain materials that are hazardous, depending on their condition and density. The hazardous content of these materials poses a threat to human health and the environment. If improperly disposed of, discarded e-waste and other hazardous waste can leach and other toxic substances into the soil and groundwater.

At ASGN's Headquarters, e-waste and other hazardous waste are collected by Tech4Troops or other 501(c)(3) non-profit organizations approved by the VP of Facilities (each such organization a "Recycling Partner"). All ASGN Headquarters computer equipment must be provided to a Recycling Partner for either re-use for military veterans or disposal. A Recycling Partner shall have an ISO 14001:2015 certificate and provide certification of disposal through First America Metal Corporation or other ISO 14001-certified partner. This pertains to ALL computer equipment no matter what the condition.

Depleted batteries are also considered hazardous waste and must be stored in a location marked as Haz Mat or Hazardous Waste. A Recycling Partner will then collect and properly dispose of the batteries. Similarly, photocopy machines and toner cartridges must be collected

and provided to a Recycling Partner. Fluorescent lightbulbs and paint are handled by building facilities and the building management team for proper disposal.

3. Why We Recycle Hazardous Waste

Electronics Recycling Conserves Resources

Most discarded electronics can be reused, refurbished, or recycled in an environmentally sound manner so that they are less harmful to the ecosystem. These materials can be used to make new products, thus reducing the need to mine for new raw materials. For instance, various metals can be recovered from computer circuit boards and other electronics, and the plastics and glass found in computer monitors and televisions can be recycled.

Electronics Recycling Supports the Community

Donations of old electronics play an important role in the provision of refurbished products, such as computers and mobile phones, which can support low-income families, schools, and non-profit organizations. It also helps individuals gain access to technology that they could not have otherwise afforded.

Electronics Recycling Helps Protect Public Health and the Environment

Many electronics have toxic or hazardous materials such as mercury and lead, which can be harmful to the environment if not disposed properly. Reusing and recycling electronics safely helps in keeping the hazardous materials from harming humans or the environment. For example, computer monitors, circuit boards and batteries often contain cadmium, lead, mercury and chromium.

4. Guiding Principles for Managing E-Waste

Our organization is committed to the following principles in managing e-waste:

- **Environmental Responsibility:** Minimize the environmental impact of e-waste through proper disposal methods.
- **Compliance:** Adhere to local, national, and international e-waste regulations and standards.
- **Sustainability:** Promote recycling, reusing, and refurbishing electronic devices, whenever possible.

5. Procedures for E-Waste Disposal

Collection and Storage

E-waste should be collected and stored in IT designated areas (storage /data rooms) to prevent contamination and ensure safe handling. Employees are responsible for placing e-waste in these areas promptly.

Assessment and Sorting

All e-waste will be assessed and sorted by trained personnel to determine whether items can be reused, refurbished, or recycled. Items that are beyond repair will be identified for disposal.

Recycling and Disposal

E-waste will be handled by authorized recycling and disposal partners who comply with domestic and international e-waste management standards. This includes adherence to the Basel convention, which controls the transboundary movements of hazardous wastes and their disposal, as well as the Restriction of Hazardous Substances in Electrical and Electronic Equipment (RoHS) Directive and the Waste Electrical and Electronic Equipment (WEEE) legislation.

Documentation and Reporting

All e-waste disposal activities must be documented, including the type and quantity of e-waste, the method of disposal, and the recycling or disposal partners involved. Regular reports will be generated by our recycling partners and kept on file at ASGN Headquarters to ensure transparency and compliance.

6. Employee Training and Awareness

Training sessions will be conducted to educate employees on the importance of proper hazardous waste or e-waste disposal by the procedures outlined in this policy. Awareness campaigns will be launched to promote responsible hazardous and e-waste management practices.

7. Emergency Response

Spill kits must be available in all hazardous waste storage areas (IT Data Center and specific designated areas). Spills or releases must be reported immediately to the Hazardous Waste Coordinator. Emergency response procedures must be followed, including notifying appropriate regulatory agencies if required.

8. Compliance and Monitoring

Audits will be conducted to ensure compliance with hazardous waste regulations and internal policies. Non-compliance will result in corrective action, including retraining or disciplinary measures.



9. Policy Review and Updates

This policy will be reviewed annually to ensure its effectiveness and relevance. Updates will be made as necessary to comply with new regulations and standards.

10. Contact Information

For questions or concerns regarding this policy, contact Tara Lowe, Vice President, Real Estate and Facilities, ASGN and Apex Systems, at tlowe@apexsystems.com. By following this policy, our organization aims to contribute to a cleaner environment and demonstrate our commitment to sustainable practices.