



**URBAN E RECYCLING
COMPANY COMPLIANCE PLAN
OCTOBER 2021**

A Letter from the President...

TO ALL FELLOW URBAN E RECYCLING ASSOCIATES,

URBAN E RECYCLING is committed to the highest standards of ethics, integrity, and accountability as we carry out our mission to make proper disposal of electronic waste convenient & also secure by shredding hard drives.

We are each responsible for adhering to the laws, regulations, and policies that govern our organization. It is both our organizational and individual responsibility.

URBAN E RECYCLING’s Compliance Program helps us to ensure we are operating in full compliance with these legal and regulatory requirements. It serves as a foundation to promote proper conduct and emphasize our commitment to ethical behavior. It reminds us that operational excellence must be accompanied by personal and organizational integrity.

The Compliance Program applies to all work situations, from conflicts of interest to development and implementation of security, from interactions with customers to handling confidential information. This is your guide. For more detailed information, please refer to the URBAN E RECYCLING Program Policies & Procedures.

It is our responsibility to know and understand the Compliance Program and related policies that govern our work. We are all accountable.

Thank you for your cooperation and commitment to URBAN E RECYCLING!

Dell Rabinowitz – President

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Approved by	Approved by	Reviewed by
_____ Dell Rabinowitz President	_____ Greg Rabinowitz VP/Chief Op Officer	_____ Paul Bugnacki Safety & Compliance Manager

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1. URBAN E RECYCLING COMPANY COMPLIANCE PLAN: INTRODUCTION

ABOUT URBAN E RECYCLING

History

Since 2009, URBAN E RECYCLING has been serving the Tampa Bay area, offering a free solution for businesses and individuals who need to dispose of computers, cellphones, laptops, telecom systems, and other office electronics, securely and responsibly. There are now three locations, (Tamps, Bradenton, and Orlando) employing 25 people, which can handle pickups from across the entire State of Florida. The business breaks down equipment, separating materials in the warehouse, scans in hard-drive serial numbers, shreds all data-containing devices, then offers a certificate of data-destruction to the customer. We pick up e-waste at all Florida Area businesses for NO CHARGE. In fact, there are no charges for any of our services.

Mission

Urban E Recycling's mission is to make proper disposal of electronic waste convenient & also secure by shredding hard drives.

Vision

Urban E Recycling envisions the day when no electronics go to the landfill.

Values

Urban E Recycling values transparency and accountability of our work. We also believe that most individuals and businesses will do the right thing if we make it convenient for them.

Services include:

- Pick Up
- Data Destruction by Shredding Hard Drives
- Certification of Data Destruction
- Responsible Recycling

We believe that business and environmental responsibility go hand in hand. With the overwhelming speed of changing technology, we make sure your outdated or non-used electronics will be recycled safely, ethically and responsibly. Data destruction by shredding hard drives are included in our services. We do this for no charge to encourage proper recycling of computers

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2. URBAN E RECYCLING COMPANY COMPLIANCE PLAN: OFFICERS



DELL RABINOWITZ
Co-founder, President & CEO

Responsible for creating innovative marketing strategies to build the Urban E Recycling brand & to increased awareness. Dell is a member of the South Tampa Chamber, Temple Terrace Chamber, Tampa Bay Tech Forum, Working Women of Tampa Bay, Tampa Bay Tech Forum, Women Supporting Women of Tampa Bay, AFCEA, and AFCOM, Manatee Chamber of Commerce, NAWBO, WBENC, and PowerGals. Serving on several boards, and a recent member for Women of United Way.



GREG RABINOWITZ
Co-founder, V.P & Operations Director and owner.

Management of and day-to-day operations and direction to all departments except marketing. Greg has extensive experience with metal and computer recycling. He is also an expert in logistics and negotiations. He is a supporter of many community projects.

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URBAN E RECYCLING COMPANY COMPLIANCE PROGRAM

URBAN E RECYCLING is fully committed to conducting all activities in full compliance with the highest level of ethics and integrity. Prioritizing transparency and being accountable and open in all our business practices is a core value at URBAN E RECYCLING. Accordingly, The URBAN E RECYCLING Officers have implemented this Company Compliance Program. URBAN E RECYCLING is fully committed to conducting all activities in full compliance with the highest level of ethics and integrity.”

The URBAN E RECYCLING Officers provide oversight to URBAN E RECYCLING’s Compliance Program to ensure our commitment to our clients and our work, and to comply with the numerous laws, regulations, and policies that govern our conduct in all URBAN E RECYCLING activities. We understand that failure by an individual or the organization to comply with our legal or ethical obligations, even if inadvertent, can lead to civil or criminal liability.

This URBAN E RECYCLING Compliance Plan is intended as a guide for the conduct of URBAN E RECYCLING, its employees, and business contacts. More specifically, it provides an overview of the URBAN E RECYCLING Compliance Program Policies & Procedures; summarizes the significant federal laws governing our operations; and defines the conduct expected of URBAN E RECYCLING employees and related businesses in connection with regulatory requirements and guidance issued to URBAN E RECYCLING by the State of Florida. Moreover, it contains guidance on how employees and Covered Persons may inquire and resolve questions regarding potential legal or ethical issues, including the various mechanisms for internally reporting possible violations under URBAN E RECYCLING’s non-retaliation policy.

3 URBAN E RECYCLING COMPANY COMPLIANCE PLAN: ELEMENTS

The URBAN E RECYCLING Compliance Program embodies many interwoven activities—also referred to as elements—including the following:

- 3.1 Governance and Oversight
- 3.2 Written Compliance Guidance
- 3.3 Education and Training
- 3.4 Open Lines of Communication, including a Hotline
- 3.5 Auditing & Monitoring
- 3.6 Investigation of Complaints/Responses to Detected Offenses/Corrective Action
- 3.7 Enforcement and Disciplinary Action/Exclusions Screening
- 3.8 Customers

All employees and Covered Persons are responsible for understanding and complying with the applicable laws, government guidance, and URBAN E RECYCLING protocols that impact their job or duties.

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3.1 OVERSIGHT

Officers

As the organization's governing body, the Officers have oversight responsibility for URBAN E RECYCLING's compliance with federal, state, and local laws and regulations, as well as ethical obligations. In conjunction with the appointed Compliance Officer, the Officers reviews compliance program functions, regulatory risks, and methods for achieving organization-wide accountability to achieve compliance goals and effectiveness.

The Compliance Manager is responsible for the day-to-day management and administration of this Plan. The Compliance Manager is primarily responsible for overseeing compliance within the organization and ensuring adherence to applicable laws, regulatory requirements, policies, and procedures. The Compliance Manager functions as an independent and objective professional who reports to the Officers.

URBAN E RECYCLING Compliance Management Team has been charged by the Officers with the responsibility to (1) contribute to the Compliance Program's effectiveness; and (2) assist the Compliance Manager in the administration of the Plan.

The CMT is chaired by the Compliance Officer, who is responsible for reporting the compliance activities of the organization, maintaining the minutes of the meetings, and ensuring that decisions are implemented in a timely fashion.

3.2 WRITTEN COMPLIANCE GUIDANCE

Policies and Procedures

Detailed compliance policies and procedures supporting the operations of URBAN E RECYCLING 's Compliance Program are readily accessible to all employees and Covered Persons through a shared file system.

Code of Business Conduct and Ethics ("Code of Ethics")

URBAN E RECYCLING is committed to complying with all applicable federal healthcare laws, regulations, Advisory Opinions, and guidelines. Toward that goal, URBAN E RECYCLING has developed and implemented a Code of Ethics. The Code is an overarching standard for conducting all business activities with the highest degree of ethics and integrity. It is supported by the standards and guidelines set forth throughout this Compliance Program. These policies and procedures also require employees to report concerns and establish internal controls to contain identified compliance risk areas.

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Code of Ethics Policy

This Urban E Recycling **Code of Ethics** policy is a set of principles for all employees to adhere to when conducting business to ensure compliance with Company standards while staying aligned with the Company mission. This policy is the way all employees should approach dilemmas based on standards by which we hold our employees accountable. This policy also outlines the ethical principles that govern our decisions and behaviors. It helps all Urban E Recycling employees decide if certain behaviors are appropriate and acceptable when dealing with customers, clients, each other, and outside agencies.

Distribution:
UER Main Office: e-file, hardcopy in S&H Logbook, CEO file, Compliance Officer file.

Urban E Recycling Code of Ethics:

- **Unshaken Integrity** - Employees will always be honest and truthful in the workplace.
- **Rigorous Respect** - Employees will respect other's rights, choices, property, and lives.
- **Binding Teamwork** – Employees will work together to get the job done.
Management will continuously work as a support team for all employees.
- **Always Considerate** - Employees will put the needs of customers and each other first.
- **Neutrality Norm** - Management will make objective career decisions for direct reports.
These decisions will never based on favoritism or personal relationships.
- **Empowered Empathy** – Employees will be empowered to this key to feeling connected to the world, the people around us, non-human animals, the environment, and all else around us.

3.3 EDUCATION AND TRAINING

The purpose of compliance training is to communicate standards and procedures in a meaningful and effective manner that explains the requirements of the compliance program, applicable laws, and how they impact our daily operations.

Orientation

All newly hired employees and Covered Persons must complete an intensive, three-hour training as part of URBAN E RECYCLING 's orientation program.

Topics are as follows:

New Employee Orientation Checklist	
URBAN E RECYCLING	
All Locations	
	
Employee Name:	
Date of Hire:	
Employee #:	
Facility Location:	
Position:	

Human Resources - Policies & Benefits	Date Completed	Initials	Other	Date Completed	Initials
Drug / Alcohol Screening			Process Op Procedures (as needed)		
Physical					
Background Screening			Handouts	Date Completed	Initials
Federal I-9			21 Safety Rules		
Employment Agreement			Employee Manual - UER		
W-4 Federal					
Safety Shoe / PPE Authorization form			Discussions	Date Completed	Initials
Safety Glasses /Shoes / Gloves Policy			Location of AED, First aid kits, Eyewash, Fire Extinguishers		
E A P			Plant tour of Safety equipment		
Holidays			Safety Orientation Checklist (Next Page)		
Vacation			Formal Driver Trg / Test (if Driver)		
Attendance policy			Environmental Awareness		
Personal Holiday / Perfect Attendance ?					
Tuition Assistance N/A			Computer	Date Completed	Initials
Progressive Discipline policy			Lessons - N/A		
Code of Business Conduct			Other: List below		
Return to Work					
Personal Computer / Mobile Equipment Policy			Safety Orientation	Date Completed	Signature
E E O			Emergency Preparedness		
Harassment			OSHA: Electrical Hazards		
Record Availability			OSHA: Fire Protection		
Security Emergency Procedures / access #'s distributed			OSHA: Flammable and Combustible Liquids		
Hazardous / Non-Haz Materials Overview			OSHA: Hazard Communication		
			OSHA: Bloodborne Pathogens		
E-Training	Date Completed	Initials	OSHA: Personal Protective Equipment		
Network ID			OSHA: Safety and Health Programs		
Email ID			OSHA: Walking and Working Surfaces		
Orientation to Websites, Word, Other			OSHA: Forklift Overview		
Training Online User / N/A			Safety Rules - New 1/1/2021		
			Lockout/Tagout		
Quality	Date Completed	Initials	Security		
Quality Overview			Safety Training	Date Completed	Initials
Role in Quality			Forklifts (if Forklift operator)		
Customer Needs / Security			Practical Hands on	Date Completed	Initials
Product Quality Specifications			Forklift		
Customer Certifications					
			Closing / Sign-off	Date Completed	Signature
Team Concept	Date Completed	Initials	Employee:		
METS Team Structure			Supervisor:		
Meeting Requirements			Safety / Training Manager:		
Performance Evaluation			HR Manager:		
			Facility Manager:		

Annual Training

All employees and Covered Persons are required to participate in annual compliance training. Topics include, Safety, HIPAA, and those listed above in the Orientation session.

Specialty Training

Additional operational compliance training sessions are targeted to specific departments. Employees receive training that is specific to their job responsibilities and to their obligations under the Compliance Program.

The Compliance Officer, in conjunction with other URBAN E RECYCLING employees and consultants, will periodically update URBAN E RECYCLING's training procedures to ensure that all sessions and materials are reflective of the most recent developments, including new or modified decisions in the law. All employees and Covered Persons will certify their participation

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in URBAN E RECYCLING 's training programs. Employees who refuse or otherwise fail to participate in URBAN E RECYCLING training programs will be subject to disciplinary action.

3.4 OPEN LINES OF COMMUNICATION

URBAN E RECYCLING 's compliance success depends on our ability to recognize potential problems, our individual decisions to avoid those problems, and our collective effort to identify and remedy existing problems.

REPORTING

Maintaining compliance and reporting potential non-compliance is an essential part of all URBAN E RECYCLING employees' job functions and the duties of all URBAN E RECYCLING supervisors, managers, and Officers. Compliance and reporting non-compliance are non-delegable duties.

If you become aware of an issue or have a concern:

- Speak to your supervisor or a member of the compliance management team.
- Report your concern to Paul Bugnacki, Compliance Officer, at Urban E Recycling.

Both confidential resources are available 365 days a year, seven days a week, and 24 hours a day, and you can choose to be anonymous.

Below are important things to consider when reporting a concern:

An employee need not be certain that a violation has occurred before making a report; reasonable belief that a violation may have occurred is sufficient.

- Reporting enables URBAN E RECYCLING to investigate potential problems quickly and to take prompt action to address them.
- URBAN E RECYCLING will not retaliate against any employee who reports a compliance concern in good faith.
- Maintaining compliance and reporting potential non-compliance is an essential part of all URBAN E RECYCLING employees' job functions and the duties of all URBAN E RECYCLING supervisors, managers, and Officers.
- Retaliation against any employee, consultant, vendor, or other Covered Person, who in good faith seeks advice, raises a concern, reports misconduct, or provides information in an investigation is strictly prohibited. Examples of prohibited retaliation include denial of benefits, termination, demotion, suspension, threats, harassment, or discrimination. If any individual, regardless of his or her position at URBAN E RECYCLING, retaliates against an individual who has truthfully and in good faith reported a potential violation, URBAN E RECYCLING will take appropriate action. If you believe that you or another individual has been retaliated against for seeking advice, raising a concern, reporting misconduct, or providing information in an investigation, you should contact the Compliance Officer immediately. Failure to report erroneous/fraudulent behavior is a violation of the Compliance Program.

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3.5 AUDITING

URBAN E RECYCLING conducts periodic audits designed to assess current systems, processes, policies, and procedures. Audits include periodic internal or annual external audits of appropriate departments to assess levels of compliance with this Compliance Plan. If an audit identifies potential compliance risks, URBAN E RECYCLING is proactive to mitigate such risks. In the event potential violations of this Compliance Plan are revealed, corrective action is developed and implemented. The Compliance Officer may consult with Officers regarding questions raised by the audit report. Among the issues that may be addressed when a violation is reported are the following:

- Should an internal investigation be conducted?
- Should Officers conduct the investigation?
- What is the appropriate corrective action?
- Should a disclosure be made to an appropriate government agency?

3.6 INVESTIGATIONS / RESPONSES

URBAN E RECYCLING is committed to conducting thorough, fair, and impartial internal investigations of reported and perceived errors, abuses, and violations. Internal investigations related to compliance will be conducted by URBAN E RECYCLING's Compliance Officer in a professional and expeditious manner, maintaining confidentiality to the extent practicable under the circumstances. All URBAN E RECYCLING employees must fully cooperate with internal investigations. When URBAN E RECYCLING completes an internal investigation, URBAN E RECYCLING will—to the extent appropriate—inform the person reporting the alleged violation of the results of the investigation and of URBAN E RECYCLING 's determination.

Response and Prevention

URBAN E RECYCLING ensures that all compliance investigations finding irregular behavior will include a mitigation plan including, if applicable, corrective action (e.g., disciplinary action and/or notice to the government). When investigations show no irregularity but present potential areas of risk, URBAN E RECYCLING will develop proactive solutions. These include, but are not limited to, education and training, and policy and/or operational changes.

URBAN E RECYCLING is committed to conducting thorough, fair, and impartial internal investigations of reported and perceived errors, abuses, and violations.

Self-reporting to Government Agencies

Under certain specific circumstances, the Officers and Compliance Officer, may consider voluntary disclosures to governmental agencies. All decisions regarding self-reporting will be reviewed by the Officers prior to any voluntary disclosure.

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3.7 ENFORCEMENT AND DISCIPLINARY ACTIONS

URBAN E RECYCLING recognizes the necessity to enforce the standards and procedures of its Compliance Plan and to discipline those who violate the Plan or negligently fail to detect an offense. Based on the facts and circumstances of the offense, the Compliance Officer will recommend to the CEO disciplinary action for those who fail to adhere to the standards of this Plan. Such a recommendation shall be consistent with HR progressive disciplinary action policies and procedures. The recommendation for disciplinary action may include termination or—for consultants or major vendors—contract termination. The decision to execute such action(s) shall be implemented consistently across the organization.

3.8 CUSTOMERS

Interaction with Customers

URBAN E RECYCLING shall operate independently from all Customers. Customers shall not be eligible to serve on URBAN E RECYCLING 's Compliance Management Team.

Other Applicable Laws

Privacy and Confidentiality

URBAN E RECYCLING has established policies and procedures to which all of its workforce is expected to adhere when using or disclosing information that may be considered Protected Information as that term is defined under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"). While URBAN E RECYCLING is not formally subject to HIPAA, it recognizes the importance of confidentiality in the provision of its services and has implemented systems and practices to ensure strict confidentiality of customer data / information.

More specifically, URBAN E RECYCLING does not share confidential Customer information with other Customers or any unauthorized parties.

4. URBAN E RECYCLING COMPANY COMPLIANCE PLAN: LAWS / REGs

Federal Laws, Regulations, Guidance, and Prohibited Activities

This section provides a summary of the key applicable laws and regulatory documents that guide URBAN E RECYCLING —through its systems, practices, policies, and procedures—to advance compliant and ethical business decisions and activities.

URBAN E RECYCLING operates in accordance with all applicable federal, state, and local laws and regulations.

Individuals found in violation of applicable laws will be subject to employment-related sanctions, such as suspension or termination.

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PROHIBITED ACTIVITIES

The following provides specific activities that URBAN E RECYCLING has identified to ensure compliance with the aforementioned federal laws, regulations, and guidance. Any employee found to be receiving, accepting or condoning a bribe, kickback, or other unlawful payment, or attempting to initiate such activities, will be subject to termination and possible criminal proceedings. Any employee found to be attempting fraud or engaging in fraud will be liable to termination and possible criminal proceedings. All employees have a responsibility to report any actual or attempted bribery, kickback, fraud, waste, or abuse to URBAN E RECYCLING.

DATA SECURITY

All employees must adhere to URBAN E RECYCLING's policies, and contracts if applicable, in this regard. If you become aware of unauthorized or inappropriate disclosure by URBAN E RECYCLING personnel of confidential information, you should immediately contact your supervisor or the Compliance Officer.

To ensure confidential information is secure, documents or data devices containing sensitive data, including information concerning Customers, must not be left in public view or in an unsecured location. We also must pay particular attention to the manner in which we enter, secure, and store computer data. Given the nature of URBAN E RECYCLING's business, the potential for a breach of security exists and must be considered at all times.

If you observe individuals you do not recognize using computers or other URBAN E RECYCLING technology, immediately report this to your supervisor or the Compliance Officer.

5 URBAN E RECYCLING COMPANY COMPLIANCE PLAN: CONCLUSION

Conclusion

URBAN E RECYCLING's commitment to Company compliance begins and ends with each individual. Understanding our legal and ethical obligations is essential for us all to support a culture of compliance throughout our organization. The information contained in this Compliance Plan serves as a foundation to promote proper conduct and to emphasize our duty to ethical behavior.

All of us have an important role to play to ensure that public confidence remains strong, so that together we can fulfill our mission to provide proper disposal of electronic waste convenient & also secure by shredding hard drives.