

## OVERALL PURPOSE OF OES COMPLIANCE

The overarching purpose of the OES Compliance Program is to ensure that all stakeholders who take-part in the OES Program adhere to the Waste Diversion Transition Act (WDTA) and Program Rules and to ensure that end-of-life electronics (EOLE) that are collected through the OES Program are recycled in a safe, secure and environmentally-sound manner.

OES provides program administration services to Stewards, Remitters and contracts with collection sites, transporters, processors and reusers/refurbishers to handle the EOLE.

## GUIDING PRINCIPLES FOR OES

The following guiding principles are followed in the performance of OES' compliance program:

Key Element	Core Components
<b>Values</b>	<ul style="list-style-type: none"> <li>Fairness</li> <li>Efficiency</li> <li>Objectivity</li> <li>Confidentiality</li> <li>Responsiveness</li> <li>Consistency</li> </ul>
<b>Professional Conduct</b>	<ul style="list-style-type: none"> <li>Integrity</li> <li>Respect</li> <li>Knowledge</li> <li>Objectivity</li> </ul>
<b>Standards of Compliance Officers &amp; Field Representatives</b>	<ul style="list-style-type: none"> <li>Always introduce one's self as part of OES organization to ensure awareness of program representation</li> <li>Provide general information regarding the inspection, audit or enforcement process, including referencing the program criteria</li> <li>Identify RRCEA or Program rules which stipulate the authority for inspections / reviews, when necessary.</li> <li>Provide follow up communication of issues or concerns determined as a result of inspections / reviews conducted</li> <li>Provide contact information should further questions arise or communication be required.</li> </ul>

## COMPLIANCE APPROACH

OES is committed to ensuring that end-of-life electronics collected through its program are recycled in a manner that fulfills the Program Plan and ensures safe, secure recycling of Ontario EOLE.

Through compliance efforts, OES ensures that service providers comply with program requirements as approved by Waste Diversion Ontario originally, and now carried on by RPRA. The compliance program endeavours to ensure a level playing field by having all service providers adhere to the requirements of the program plan including ensuring only Ontario sourced, obligated material is being claimed for reimbursement through the OES program and that the service provider meets the standards in place to ensure safe and secure handling of the EOLE.

Compliance is supported by an effective risk management approach. As needed, OES employs a range of approaches to deliver on the compliance that remains consistent with the terms and conditions of our agreements, the program plan and related rules. OES applies consistency in the execution of compliance efforts to ensure fairness amongst participants.

Compliance efforts are taken to ensure that the following Program assertions are adhered to:

Assertion:	Description:
<b>Occurrence</b>	The transactions recorded have actually taken place.
<b>Completeness</b>	All transactions that should have been recorded have been recorded
<b>Accuracy</b>	The transactions were recorded at the appropriate amounts
<b>Cut-off</b>	The transactions have been recorded in the appropriate period
<b>Classification</b>	The transactions have been recorded in the appropriate caption

## COMPLIANCE TOOLS

OES uses a variety of tools to support the efficiency and effectiveness of program compliance requirements. Compliance tools utilized include but are not limited to, the following:

- Physical on-site assessments of stakeholder locations
- Review of transportation bill of lading (BOLs)
- Review of source documentation to support transactions
- Statistical analysis of tonnage volumes
- Random sampling of stakeholder transactions
- Audit checklists
- Follow up on reported issues or complaints
- Additional review of **high risk offenders** to ensure corrective action is being adhered to

## SUPPORTING DOCUMENTATION

### COLLECTORS

Reference(s)	<ul style="list-style-type: none"> <li>• <a href="#">Sample Collection Site Operators Agreement</a></li> <li>• <a href="#">Collection Site Manual</a></li> <li>• <a href="#">OES Website</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Municipal Collection Site Checklist</a></li> <li>• <a href="#">Non-Municipal Collection Site Checklist</a></li> </ul>
--------------	---	--

### GENERATORS

Reference(s)	<ul style="list-style-type: none"> <li>• <a href="#">Processor Incentive Agreement</a></li> <li>• <a href="#">Processor Incentive (PI) Guidebook</a></li> <li>• <a href="#">OES Generator Guidebook for MTS</a></li> <li>• <a href="#">OES Website</a></li> </ul>
--------------	---

### PROCESSORS

Reference(s)	<ul style="list-style-type: none"> <li>• <a href="#">Processor Incentive Agreement</a></li> <li>• <a href="#">Processor Incentive (PI) Guidebook</a></li> <li>• <a href="#">OES Website</a></li> </ul>
--------------	--

### TRANSPORTERS, CONSOLIDATORS & RE-PACKERS

Reference(s)	<ul style="list-style-type: none"> <li>• <a href="#">Contractual Agreements</a></li> <li>• <a href="#">OES Website</a></li> </ul>
--------------	---

### RE-USE AND REFURBISHERS

Reference(s)	<ul style="list-style-type: none"> <li>• <a href="#">Reuse and Refurbishment Standard</a></li> <li>• <a href="#">Reuse and Refurbishment Auditor's Checklist</a></li> <li>• <a href="#">OES Website</a></li> </ul>
--------------	--