

CODE OF CONDUCT

Version January 2013

PREAMBLE

The Board of ETIRA wants to update and formalize the joint guidelines for each ETIRA member, for the implementation of standards of good conduct and good behaviour, with the intention to develop and professionalize the remanufacturing and collection of consumables for printing.

ETIRA has maintained a Code of Conduct since 2002, but since then the market has changed dramatically. In particular the large invasion of Europe by patent-infringing newbuilt cartridges required a redefining of each Member's obligations under the Code.

Objective of this update of the 2002 version of the Code of Conduct is to add requirements and redefine obligations, all in the context of a continuing process of improvement of the European remanufacturing industry's business practices. The below rules and practices that each member must subscribe to and apply, constitute the "CODE OF CONDUCT" of ETIRA.

The Board of ETIRA is convinced that the values and the rules formalized in the Code of Conduct will progressively contribute to development of a united and fraternal spirit within ETIRA.

Definitions:

Remanufacturing : the industrial process whereby electronic products or components are restored to a defined condition in function and form that is comparable to, or better than, a new unit. The unit's composition and design is not changed significantly. During this process, the product (or some of its components) passes through a number of manufacturing steps, e.g. inspection, disassembly, cleaning, part replacement/refurbishment, reassembly and testing to ensure it meets the desired product standards.

Clone: as defined in the latest version of the "ETIRA Guide to Clones"

Counterfeits: as defined in the latest version of the "ETIRA Guide to Clones"

COMMITMENT BY EACH MEMBER:

Each member acts in his own name and commits himself to fully comply with the provisions of the Code. Compliance with the Code is a prior and compulsory condition to be or become an ETIRA member. Non-compliance with the Code may result in involuntary ending of membership of ETIRA.

BEST PRACTICE:

Under this Code of Conduct, all the ETIRA members commit to:

1/ Social and Environmental Responsibility

Human rights:

ETIRA members promote and respect international laws regarding human rights, and ensure that their company does not become an accomplice in human rights infringements.

Labour law:

ETIRA members are invited to:

- respect freedom of association and recognize the right to collective bargaining ,
- eradicate all sort of hard labour,
- commit to the non-use of child labour and support its abolition,
- eradicate discrimination in employment and profession.

Environment:

ETIRA members are invited to:

- take environmental issues seriously
- undertake initiatives to promote a greater environmental respect,
- encourage the development of technologies respectful of the environment.

The fight against corruption :

ETIRA members are invited to act against corruption under all aspects, and not limited to racketeering and undeclared transactions.

Relationships within the remanufacturing channel :

Each Member commits to promote the principles defined in the Code, and will endeavour to have them adopted by their partners in the remanufacturing industry who are not ETIRA members.

2/ Quality

Each Member should be proud of being an ETIRA member, as this is the recognition of his professionalism and because he has the desire to reinforce consumer interest to buy and use remanufactured cartridges.

Therefore, each ETIRA member, in order to promote his activity, will implement a quality management system and use the best continuing quality improvement tools for his products and/or services. To achieve this aim, he will rely, among other, on the existing international standards and certifications.

The remanufacturer members of ETIRA will offer their clients a minimum appropriate warranty period after the production date of their finished products.

3/ Regulations

Each ETIRA member has to respect the different laws and regulations applicable to his activity in his country and at an international level, whatever the area concerned.

He must maintain a system of regulation watch to anticipate the necessary measures allowing him to meet all legal requirements at all times, in particular regarding the management of waste and waste legislation applicable to cartridges.

ETIRA members are facing unfair competition and a proliferation of patent-infringing newbuilt cartridges not manufactured by the printer manufacturer hereafter called "clones", which represents a real threat for the future and the positive image of the industry.

To ensure highest quality remanufacturing of printer cartridges in a professional way, ETIRA members must take all necessary measures to respect intellectual property and trademark rights when they collect and remanufacture their cartridges, and commit to fight the proliferation of counterfeiting and clones.

In the event that a signatory member intentionally markets counterfeit products or clones, or labels clones as "remanufactured", the Board of ETIRA may decide to withdraw the membership.

The texts on labels and the different information on packaging should comply with regulations and with the content of the packaging.

4/ Environment

Remanufactured cartridges allow for a reduction of environmental impacts compared to newbuilt cartridges. This is a real advantage and a point of differentiation of the remanufacturing industry.

Therefore, the protection of the environment and the promotion of sustainable development should be at the heart of any ETIRA member's business concerns

Therefore, Members commit themselves to implement and promote with their partners, practices respectful of the environment, in particular:

- For the members who are remanufacturers: the development of collection programmes for the cartridges they place on the market. Collection activities may be outsourced.
- For all the members: by handling end of life cartridges with methods respectful of European regulations, encouraging material recycling or incineration with energy collection.

Provisions taken by the members should progressively lead to a full ban on waste disposal and incineration of end-of-life cartridges without energy collection.

5/ Safety / Consumer health

The risks linked to consumer health must absolutely be taken into account during the development of remanufactured cartridges.

ETIRA members should put in place the necessary controls and means to reduce and if possible, eradicate risks.

The substances used in inks and toner powders in particular, must respect the EU's REACH legislation and be subject to prior controls to assess their human health impacts and the potentially hazardous substances must be eradicated as much as possible. Also, labeling on finished products should meet the regulations. Members who collect cartridges must take all the necessary measures to ensure that their collection boxes are designed to avoid pollution or leakage during handling and transport.

Remanufacturers and collectors of laser cartridges mainly, should design and implement handling and production tools taking into account the safety, protection and health of their employees during all steps in the production process.

Production plants must meet the legal obligations which are applicable locally, regionally, nationally and at EU level. In case of doubt regarding the applicability of a regulation, the maximum precautionary principle must be taken as guideline.