



**Destruction Service
Policies & Procedures
Manual**

M & K Recovery Group
 Destruction Services Policies & Procedures Manual

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I. General Employment Policies

All employees must sign a confidentiality agreement, which requires them under penalty of prosecution, to keep private any information regarding The Company or its clients. This includes the name of the client as well as any information regarding the client of their customers that may be learned in the course of providing service.

Additionally, they must complete a drug screening process and undergo a background investigation to be conducted by a professional agency. The background check may include credit, motor vehicle, and criminal and employment history.

Any employee found possessing alcohol or illegal drugs on The Company's premises will be immediately suspended or terminated at management's discretion. The employee is required to inform their supervisor if they are taking prescribed medications that may affect their performance or safety during work hours.

There is a 90-day probationary period for all newly hired employees. During this time, the employee will be evaluated on their ability to adapt to the policies and procedures of The Company while respecting management and the existing workforce. The Company reserves the right to dismiss any employee with or without cause, documented or otherwise, during this probationary period.

All employees are expected to act with respect to their associates, superiors and visitors at all times. Any incident of disrespect will be documented in the offending employee's personnel file.

On occasion, employees will encounter the employees of a client. In all cases, be polite and diligent about your work.

Employees should conduct themselves in a manner that is consistent with the confidentiality agreement when they are off-duty. This means that the employee will not discuss the nature of the information with which they come in contact or the names of the clients. Any offenses may result in termination of employment at the management's discretion.

All employees are expected to keep themselves clean and well groomed. Incidents of uncleanness or poor hygiene as determined by the management will be documented in the offending employee's personnel file. If a pattern of uncleanness or poor hygiene unfolds, the chronic offender may be dismissed on these grounds at management's discretion.

All employees are to be neatly dressed according to the standards of their job description. No loose clothing, neckties or jewelry should be worn while operating machinery. Employees working in the warehouse are required to wear steel-toe shoes and company-supplied shirts. Required safety equipment shall be worn while operating machinery.

Employees shall be issued a picture ID badge, which remains the property of The Company. If it is required to be on duty away from the premises of The Company employee must wear their ID badge so that it is visible. If an ID badge is lost or stolen, the employee must report it immediately and a new badge will be issued. Upon resignation or termination, an employee must surrender their ID badge.

II. Facility Security Policies

Only the management will be allowed to have keys to the facility.

Perimeter doors to the facility will be secured at all times.

Visitors must be escorted by an access employee. All visitors must register the time they arrive, the purpose of their visit, the company that they representing, and the time of their departure. No visitor is to be left unattended in the destruction facility, nor may they touch, read, or otherwise peruse materials staged in the destruction facility. All visitors shall be issued a visitors badge.

Persons arriving at the destruction facility to witness materials being destroyed will be governed by the same policies as visitors.

Persons arriving at the destruction facility for a scheduled tour will be governed by the same policies as visitors.

Every employee should be aware of any unauthorized access to the facility. Any employee noticing a visitor who is not being escorted by an appropriate access employee should immediately notify their supervisor. The unauthorized visitor should then be escorted to the administrative office to establish if the visitor is a current customer, potential customer, or unwanted visitor.

Any employee discovered to be reading confidential material entrusted to The Company at any time will be immediately disciplined or terminated at management's discretion.

The outside lights are to be automatically set to be on from dusk to dawn, and inside security lights are to be left on whenever the facility is unattended. It is the responsibility of the supervisor to see that all the lights are in working order.

Closed circuit internal video security is provided to monitor all activity of the secured areas of the building. In addition, recorded closed circuit video monitoring is used to monitor activity in the secured area of the building during the working hours. All monitoring data and tapes shall be saved for a minimum of 90-days.

Employees are forbidden from possessing firearms and/or weapons on the premises of The Company. Any employee found violating this policy may be suspended or terminated at management's discretion.

Employees should familiarize themselves with all safety policies. Any employee found violating the safety policies of The Company is subject to disciplinary action, including loss of work or termination.

All employees are to notify their Supervisor of any breach in the security or safety policies of The Company regardless of its source. Any employee found to have knowledge of a breach in safety or security as stated in The Company's policy manuals that does not report it will be dismissed.

III. Facility Operations Procedures

The Supervisor will complete a visual inspection of the facility at the beginning and end of each shift as part of his/ her duties. In particular, the Supervisor is to look for breaches in security and make sure that the floor is completely clean of debris at the beginning and end of each shift.

The Supervisor or appointed employee will inspect all conveyors, balers, shredders, shears and other equipment at the beginning and end of the shift to make sure they are in proper working order. The Supervisor is responsible for keeping all equipment operational and for arranging all necessary repairs and maintenance of equipment as warranted.

The Supervisor or appointed employee will inspect the forklift, checking that battery and fluid levels are maintained according to the manufacturer's recommendations.

IV. Maintenance of Custody

All materials to be destroyed are always attended by a company employee or physically secured from unauthorized access while in the custody of The Company before they are destroyed.

Refer to the Flow Chart, page 11

V. Destruction Process

Incoming containers will be assigned a lot number, labeled accordingly and a Destruction Lot Traveler will be started (seal number, if any, recorded). All materials will enter the destruction process immediately upon arrival at the destruction facility. Exceptions would include acts of God, breakdowns, or client instructions to retain the media for a period longer than (3) days. The production access employees responsible for sorting incoming materials will stage materials in the Pre-Destruction area by the order in which they arrive at the facility. Refer to the Flow Chart, page 11.

A client may need to witness the destruction of materials. Authorization for a witnessed destruction appointment may only be given by management. The Company will do its utmost to accommodate the client's needs in scheduling the appointment. During a witnessed destruction, all production employees are to focus on completing that task under the supervision of the Supervisor. The Supervisor is responsible for handling all witnessed destruction projects. Materials will be delivered to the facility either by a transportation company or by the client. If delivered by a transportation company, the materials should be securely stored until the client's representative arrives. The witness will be escorted to the designated area to watch the destruction process. The process shall not be started until the client's representative arrives and the containers are to remain locked and secured until the representative's arrival.

On occasion, materials that are considered non-informational bearing will arrive at the destruction facility. These materials, once sorted, should be set aside until the Supervisor examines it and approves it for processing and proper disposal.

Any tape reels, media cartridges, CD's and floppy disks will have their serial number scanned and recorded into the computer. The total amount received along with the serial numbers shall be provided to the client and to the supervisor. The media will then be shredded and disposed of according to its material composition. The shredded material shall be discarded securely so that it will stay in the container and not become loose. A certificate of destruction will be prepared for the client detailing customer lot number, date of destruction, quantity received and the weight of the product received.

Computer hard drives will have their serial numbers scanned and recorded into the computer. The total amount received along with the serial numbers shall be provided to the client and to the supervisor. The hard drives will then be prepared for destruction. The circuit board is removed and recycled. The remains of the drive are then shredded. A certificate of destruction will be prepared for the client detailing customer lot number, date of destruction, quantity received and the weight of the product received.

*Note- A destruction service contract or wavier must be on file prior to any hard drives or media being processed.

VI. Post-Destruction Process

The Supervisor will record the date the materials are destroyed on the lot processing log to be kept on file.

The containers that were emptied during the destruction process should be thoroughly inspected for remaining confidential materials and if found, those materials are to be removed, serial number recorded, and then the material is to be shredded.

Security containers that are to be returned to the client should be emptied into containers during sorting or directly into the destruction process if sorting is not required. The empty security containers should be inspected as described above and a seal number is attached and recorded in the Seal Number Log. Unused containers should be stored in the holding area. Client-owned containers will be emptied according to procedure and returned on the next scheduled pick-up.

VII. Closing Procedures

After all production employees have ended their shift, the Supervisor is responsible for touring the facility and completing the visual security check.

The Supervisor should make sure that all processed receiving paperwork is given to the appropriate individuals in the administrative office.



MATERIAL PROCESSING FLOW CHART

