

# TCO Certified — driving sustainable development in IT products

Established in 1992, TCO Certified is a global sustainability certification for IT products. Certificates are valid worldwide and can be used as proof in all countries, without the need for local adaptation. TCO Certified is currently available for twelve product categories: displays, notebooks, tablets, smartphones, desktops, all-in-one PCs, projectors, headsets, servers, network equipment, data storage products and imaging equipment. The organization behind TCO Certified is TCO Development.

#### Comprehensive criteria with a life cycle perspective

Certified products must meet comprehensive environmental and social criteria throughout the life cycle. The criteria are science-based and developed in an open process with TCO Development's international network of stakeholders which includes users, buyers, industry, NGOs, researchers and subject matter experts. To address the most pressing sustainability challenges and stay current with the latest technology developments, a new generation of TCO Certified is released every three years.

#### A third-party certification, independently verified

TCO Certified is a third-party certification, independent of the IT industry and buyers. It meets the requirements in ISO 14024 Ecolabel Type 1 and has been approved by the Global Ecolabelling Network as part of the GENICES peer review process. Independent verification organizations, accredited to ISO 17025, verify that products conform with all criteria in TCO Certified. Verification is done both before and after certification, throughout the full validity period of the certificates.

#### How to apply for certification

At tcocertified.com, you'll find a guide that explains the certification process and lists what you need to do to apply for certification of your products. Compliance with all criteria in TCO Certified is independently verified. It generally takes three to five weeks to receive the certificate, once all documents and the product sample are delivered to the verification organization.

#### Need help?

Need help getting started? Or, would you like us to explain the certification process in more detail? Our certification team is always here to help. Email us on certification@tcodevelopment.com. Our approved, independent verifiers around the world are also at your disposal, and are able to explain the criteria and certification process in your local language. Contact details are available at tcocertified.com.

# About this document

This is TCO Certified, generation 9, for imaging equipment, released in June 2022. Imaging equipment is defined as a product group used to produce a printed image through a marking process either from a digital image or from a hardcopy through a scanning/copying process. It can also include functionality to produce a digital image from a hard copy through a scanning/copying process. All power cables and external power supplies are considered a part of the imaging equipment.

#### Available for 12 product categories

TCO Certified is available for 12 product categories and they all have the same generation number: generation 9. A majority of the criteria are the same for all product categories.

#### The criteria include:

**Mandate:** A description of the requirements that needs to be fulfilled, and how conformity is verified. Forms and signatures for application are available in chapter 11 of this document.

**Definitions:** Explanations of important terms relevant to the criterion.

**References:** References to sources, presented in chapter 10. **Clarifications:** Further details and explanations of the mandate.

#### Compliance with criteria is independently verified

Compliance with the criteria is verified by verification organizations (verifiers) independent of both the certification body (TCO Development), the applicant and the brand owner. Each criterion includes a description of the proof that must be submitted to the verifier, and to TCO Development together with the application form. This may be a test report or a verification report:

- 1. A test report presents the results from tests conducted by a test facility accredited to ISO 17025, and is issued by that same facility.
- 2. A verification report is issued by a verifier approved by TCO Development and includes a summary and a result (pass or fail) based on either:
  - a test report issued by the same test facility,
  - a test report issued by a different test facility, or
  - certificates or other proof from the company or brand owner applying for the certificate.

#### **Editions of TCO Certified**

When we publish a new generation of TCO Certified, our ambition is always to maintain criteria levels until the next generation of TCO Certified is launched, which typically happens after three years. Several editions of the criteria document may be released, but will be considered only as updates within the ninth generation, with improved precision of the mandates, test methods and clarifications. To ensure that all currently certified products comply with the new edition of the criteria document, the criteria levels are never raised within a generation.

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# 1 Product and sustainability information

- The IT industry is complex and finding reliable data about products and manufacturing conditions can be a challenge.
- The lack of verified product claims can lead to unfair competition between brands as well as greenwash.
- Accurate and comparable information helps both brands and purchasers make informed decisions and measure their sustainability progress.

#### Transparency improves decision-making

To drive sustainable development in the complex IT industry, accurate and comparable information about products and manufacturing conditions is needed. Transparency around this type of data also helps purchasing organizations make more informed product choices, and measure and report the true sustainability impact of the certified models they actually buy. Another positive effect of giving purchasers and industry access to verified product claims is that it helps IT brands compare their sustainability performance with peers, and reduces the risk of unfair competition and greenwash.

#### Our approach: providing access to independently verified sustainability data

To increase transparency around certified products, more than 40 new Sustainability Performance Indicators (SPIs) are added in TCO Certified, generation 9. SPIs make it possible to identify products that are best-in-class from a sustainability perspective and exceed the requirements of TCO Certified. To ensure accurate reporting, gathered data is verified by independent experts.

#### Criteria in chapter 1 focus on:

- Requiring that sustainability data is reported and independently verified.
- Helping the end user to find information on TCO Certified, and what the certification includes
- Making sure that the product specification of certified products is correct.

### 1.1 Information to end users

#### **Background**

End users must clearly be able to identify which products are certified and what sustainability features the product fulfills.

#### **Applicability**

All product categories.

#### References

The license agreement between TCO Development and the applicant/brand owner.

#### 1.1.1 Mandate

- **a.** The information document for end users must be written in English or in the local language of the country where the product is to be sold. It must accompany the product in at least one of the following ways:
  - 1. As a separate printed or digital document.
  - 2. Included in a printed or digital user manual.
  - 3. As a separate digital document that is hosted on the brand owner's website. A direct link to the document must be included in the printed or digital user manual mentioned above.
- **b.** The product and its retail packaging must be labeled with the TCO Certified logo. See clarifications for details.
- **c.** "TCO Certified" must be mentioned on the brand owner's website(s) where the specific certified product is marketed and or sold.

#### Submit the following to an approved verifier:

• A completed and signed product form (chapter 11.3).

#### Submit the following together with the application to TCO Development:

A copy of the verification report(s) from a verifier approved by TCO Development.

#### 1.1.2 Clarification

Products that are designed to be installed in a rack (supporting framework to hold hardware modules, typically servers, data storage products and networking equipment) are excluded from "1.1.1 b - labeling of the product and packaging".

#### 1.1.1 A - information document for end users

No editorial changes to the information document for end users are accepted without consent from TCO Development. The information document for end users is available at tcocertified.com.

If the applicant is separate from the brand owner, the applicant must ensure that the brand owner agrees to fulfill their part of this requirement.

#### The mandate is fulfilled in one of the following ways:

- 1. As a separate printed or digital document
  The information document for end users in print or on digital media is placed together
  with the product in the packaging.
- 2. In a printed or digital user manual
  The information document for end users is included in a printed or digital user manual
  that accompanies the product when it is distributed to the end user. The content of the
  document, with the headline "TCO Certified", must be a separate chapter of the user
  manual and be included in the table of contents.
- 3. As a separate digital document that is hosted on the brand owner's website. The information document for end users is placed on the brand owner's website. A direct link to the information document is placed in the printed or digital user manual that accompanies the product when it is distributed to the end user. TCO Certified must be a separate headline in the user manual. The headline must be visible in the table of contents.

# 1.1.1 B - labeling of the product and packaging The TCO Certified logo must be displayed in one of the following ways: Alternative A

On a permanent or temporary label. Temporary labels must be affixed to the product with an adhesive or cling-type application. The packaging material that is supposed to be removed in order to get the full functionality of a product (such as a screen protector) is defined as packaging material and not the product in this mandate and thus may not be the place for the product logo.

- a. The logo must be visible on the top or front of the product. (The front of the product is defined as the surface seen when viewing the product from the front and may include the stand. The top is defined as the surface that is seen from the top and the back is the surface that is seen from the back.)
- **b.** The minimum size of the logo is 16mm in width and 10mm in height.
- **c.** If the logo is to be placed alongside other logos or graphic elements, a minimum of 2,5mm padding must be used on all sides of the TCO Certified logo.

#### Exception

If the top and front of the product don't have a contiguous and coplanar area (area used for display or touch input are excluded) which is at least 16mm in width or 10mm in height, then the logo may be placed on the back side of the product.

#### **Alternative B**

Via electronic labeling displayed on the screen in one of the below ways:

- **a.** During the startup of the product:

  The logo must cover at least 1% of the screen. The logo must be legible and be in color, black, or white; must appear at system start-up, and must be displayed for a minimum of 0,5 seconds.
- b. Via a shortcut on the desktop screen of the product. The shortcut must be in the form of the TCO Certified logo in color and clicking it should link to "the information document for end users" available at tcocertified.com.
- c. TCO Certified logo as a part of the product picture The TCO Certified logo is shown on the first product picture where the product is marketed on the brand owners web site. In the product specification on this page, TCO Certified is also listed with a link to the "information to end-user document" which is the document required under mandate 1.1 point 1.

TCO Development will consider alternative proposals for electronic labeling on a case-by-case basis.

#### The retail packaging of the product must be labeled with the TCO Certified logo:

- a. The minimum size of the logo must be 16mm in width and 10mm in height.
- **b.** If the logo is to be placed alongside other logos or graphic elements, a minimum of 2,5mm padding must be used on all sides of the TCO Certified logo.

The certificate owner and brand owner must also conform with all the other logo rules on color, design, marketing, etc., that are specified in the TCO Certified license agreement appendix 2. The following two paragraphs (§2.2 and §2.5 in appendix 2 of the license agreement) are replaced by the rules listed above if a conflict occurs:

#### Paragraphs that may be replaced

§2.5 The TCO Certified logo must at all times be reproduced in a quality that allows the text of the TCO Certified logo to be read under normal circumstances. Recommended minimum size for the trademarks TCO Certified and TCO Certified Edge can be found in "Using the TCO Certified brand" guide available at toocertified.com. If there are limitations and a smaller or different type of logo is used this must first be agreed on in writing with TCO Development.

#### 1.1.1 C - Mention of TCO Certified on the brand owner website

- The inclusion of "TCO Certified" only needs to be represented as TEXT i.e. a link to a specific page is not necessary.
- Instead of mentioning "TCO Certified" directly on the brand owners website(s), the brand owner can fulfill this requirement by including "TCO Certified" as TEXT in a product specific PDF file if it is accessible from the brand owner's website(s) where the specific certified product is marketed and or sold.

To fulfill this mandate the brand owner must submit a description on where and how the inclusion of "TCO Certified" as TEXT can be found for certified products. The description must include a general example of where the TEXT "TCO Certified" will be represented. The description must be submitted to the verification organization. If the location where TCO Certified will be mentioned as TEXT is changed, a new description must be submitted.

### 1.2 Product specification

#### **Background**

It is important to ensure that each product to be certified corresponds exactly to the product specification. Therefore, a physical sample of each product to be certified must be sent to an approved verifier, that examines it carefully to ensure that product marking and physical aspects conform with the reported information from the applicant or brand owner.

#### **Definition**

The marking label is a label with the product's electrical rating (voltage, frequency, current), the manufacturer's name, trademark or identification mark, and the manufacturer's model or type reference according to IEC 62368-1 clause 4.1.15.

#### **Applicability**

All product categories.

#### References

1.1.

#### 1.2.1 Mandate

- A product specification of the typical product.
- A marking label must be provided for the product.
- The total weight of the typical product configuration and power supply (without packaging) in kg must be reported.

#### Submit the following to an approved verifier:

- A copy of the marking label, for the product and all external power supplies.
- A completed and signed product form (chapter 11.3).

#### Submit the following together with the application to TCO Development:

- A copy of the verification report(s) from a verifier approved by TCO Development.
- The total weight of the typical product configuration and power supply (without packaging) in kg must be reported in TCO Certified Portal.

#### 1.2.2 Clarification

The template must be completed with the requested information about the product. A type key that includes an asterisk (\*) for unidentified characters, if any, in the model name and for other identification names must be submitted to the verifier. Only two \* may be used in the model type key and each \* must include two or more options.

The typical product configuration is defined as the product configuration which is expected to be manufactured in the largest number.

The total weight includes the product and any power supply unit and power cable needed to power the device.

#### Sustainability performance indicator(s):

Product weight is an indication of the amount of potential e-waste at end-of-life. By decreasing the product weight, e-waste can be reduced. The product weight (in kg) of the typical configuration of the product including any power supply but excluding packaging must be reported by the brand owner. A product weight tolerance of +/- 10% is accepted.

# 1.3 Sustainability performance indicators

#### **Background**

Sustainability is a long term goal and therefore a responsible way to work with sustainability is through a long term strategy. Improvements must often be phased in gradually and requires planning and preparation. The sustainability performance indicators will measure the development of products and brand owners, enabling new criteria levels in future generations of TCO Certified to be challenging but yet reasonable, and ensure that the most relevant parts of the product life cycle is covered.

The sustainability performance indicators also measure the sustainability benefits that the certified products create, and track this over time. A purchasing organization can use the sustainability performance indicators in sustainability reporting and, for example, implement climate compensation or other sustainability related measures connected to the sustainability impact of the product.

#### **Applicability**

Imaging equipment.

#### 1.3.1 Mandate

• All sustainability performance indicators must be evaluated.

#### Submit the following to an approved verifier:

• A completed and signed product form (chapter 11.3)

#### Submit the following together with the application to TCO Development:

- A copy of a verification report from a verifier approved by TCO Development.
- All sustainability performance indicators must be reported in TCO Certified Portal.

#### 1.3.2 Clarification

#### **New applications**

A verification report for the sustainability performance indicators must be issued by an approved verifier and the results must be reported to TCO Certified Portal.

#### Reassessments

Changes made to the product or its manufacturing may affect the sustainability performance indicators. The applicant can choose to do a re-assessment or not. To do a re-assessment, the necessary documentation (and in some cases the product) must be sent to a verifier that issues a verification report for the sustainability performance indicators and report the new data to TCO Certified Portal.

#### Quoting sustainability performance indicators in the marketing of a product

The following guidelines apply to all communications about sustainability performance indicators. Quoting or referring to the sustainability performance indicators in conjunction with the brand name TCO Certified is not allowed unless a written agreement to do so is made with TCO Development.

#### "Worst case" reporting

If the verifier has conducted a "worst case" testing and accepts a number of similar configurations of the product in the issued verification report based on these tests, the sustainability performance indicators may also be the same for all accepted configurations and thus represented by the worst case configuration.

#### 1.3.3 Sustainability Performance Indicators (SPI) list

The sustainability performance indicators are collected through the SAQ, submissions to TCO Development, or during the application process. All sustainability performance indicators must be evaluated. The results will be used to benchmark the performance of products within different aspects of the certification and to provide purchasers with information on sustainability benefits of certified products.

#### All SPIs marked with "X"

are collected annually either through the SAQ or together with annual submissions. (X = Always collected during annual reporting)

#### All SPIs marked with "Y"

are collected by the verification organization during application and product testing. (Y = Always collected during product testing/verification/application process)

#### All SPIs marked with "Z"

are considered beyond the scope of mandates in TCO Certified and are therefore not required for compliance with TCO Certified. Products will receive the lowest classification if no data is provided for the evaluation. By submitting the additional data, the product will always receive a better classification than if no data is submitted. It is possible to submit and re-evaluate these SPIs at any time the product is certified.

(Z = Additional information by the applicant/brand owner is needed)

The following is a summary of all the sustainability performance indicators collected.

#### SPI's described under product specification

• Y 1.2 The total weight of the product and power supply (without packaging)

#### SPI's described under socially responsible manufacturing criteria (Chapter 2)

- **X** 2.2 (SAQ 1.1) Level of brand owner communication of CoC in the supply chain
- X 2.2 (SAQ 2.1) The level of the supply chain identified
- X 2.2 (SAQ 2.2) The level of transparency for final assembly factories and smelters
- **X** 2.2 (SAQ 2.2) The percentage of publicly listed factories for certified products.
- **X** 2.2 (SAQ 3.1) The level of brand owner due diligence on suppliers not owned
- X 2.2 (SAQ 3.2) The level of brand owner audits and follow up on suppliers not owned

- X 2.2 (SAQ 4.1) Level of brand owner Initiatives to avoid child labour
- X 2.2 (SAQ 4.2) Level of brand owner remediation process for child labour
- **X** 2.2 (SAQ 5.1) Level of brand owner requirement on excessive temporary contracts
- X 2.2 (SAQ 5.2) Level of brand owner engagement in living wage programs
- X 2.2 (SAQ 6.1) Level of brand owner process to avoid excessive overtime
- X 2.2 (SAQ 7.1) The level of factories with trade union or worker representatives
- X 2.2 (SAQ 7.2) Level of brand owner involvement with union or worker representatives
- **X** 2.2 (SAQ 7.3) Level of brand owner work to counter union discrimination
- X 2.2 (SAQ 8.1) Level of brand owner work to improve management and worker dialogue

#### SPI's described under environmental responsible manufacturing criteria (Chapter 3)

- **X** 3.2 The energy efficiency indicators for each final assembly factory
- Y 3.4 Percentage of post consumer recycled plastics by weight versus the total weight of all plastics (Class A-G).
- Y 3.4 Percentage of identified post consumer recycled materials by weight versus the product weight (Class A-G).
- **Z** 3.5 Classification of PCF method (Class A-E)
- **Z** 3.5 Classification on availability of PCF (Class A-D)

#### SPI's described under product performance criteria (Chapter 5)

• **Y** 5.1 Energy efficiency

#### SPI's described under product lifetime extension criteria (Chapter 6)

- **Y** 6.1 Classification of warranty period (Class A-G)
- **Z** 6.1 Classification of extended warranty availability (Class A-G)
- **Z** 6.1 Classification of public repair policy (A-C)
- **Z** 6.2 Classification of fasteners and connectors (Class A-D)
- **Z** 6.2 Classification of necessary tools for repair/upgrade, (Class A-E)
- **Z** 6.2 Classification of availability of spare parts by target group (Class A-E)
- **Z** 6.2 Classification of availability of spare parts by duration of availability (Class A-D)
- **Z** 6.2 Classification of availability of comprehensive information (Class A-C)
- **Z** 6.2 Capability to use remanufactured cartridges and containers (Class A-C)
- **Z** 6.2 Functionality allowing firmware updates to be rolled back to previously installed versions. (Class A-C)

#### SPI's described under material recovery criteria (Chapter 8)

- **Z** 8.2 Membership in multi-stakeholder initiatives working towards solving the problems connected to e-waste (Class A-C)
- **X** 8.2 Use of internationally accredited reuse and recycling facilities (Class A-D)
- **Z** 8.2 Ratio of compensated versus manufactured products (Class A-G)

# 2 Socially responsible manufacturing

- Poor working conditions are common throughout the IT product supply chain.
- Child labor, forced labor, excessive overtime and hazardous substances are a risk to workers' health and lives.
- To drive social responsibility, a structured system for continuous improvements is needed, along with strict monitoring to ensure problems are solved.

#### Social risk is present throughout the supply chain

Much of IT product manufacturing is carried out in low-wage countries where the labor market lacks clear regulation and the protection of workers is insufficient. Poor working conditions occur throughout the supply chain. Sustainability risks include child labor, forced labor, and hazardous chemicals used in manufacturing. Excessive overtime leaves a worker with little to no time over for rest, recreation, family or further education. The mineral industry is connected to armed conflicts and human rights abuses, severe health problems for workers, and environmental degradation. As in many industries, the risk of bribery is also present. This must be counteracted as it hinders development, erodes justice, undermines human rights and interferes with the fair and efficient operation of markets.

#### Our approach: driving worker safety, human rights and closing non-conformities

Driving social responsibility throughout the complex IT product supply chain requires a clear and systematic approach. TCO Certified includes a framework that encourages proactive work and helps brand owners structure their work with sustainability. Corrective action plans must be developed and implemented within a set timeframe. To drive change where it's needed the most, monitoring of high-risk factories is intensified.

#### Criteria in chapter 2 focus on:

- Ensuring safer working conditions by requiring that the code of conduct is implemented throughout the supply chain.
- Guiding the industry to more sustainable practices with a structured system for continuous improvement.
- Requiring transparency about which sub-suppliers are being used to increase accountability.
- Taking the next step in combating corruption in the supply chain by requiring compliance with the more ambitious anti-bribery standard ISO 37001.
- Continuing independent verification of due diligence all the way to the source of the minerals, to ensure that minerals are sourced responsibly.
- Requiring that all process chemicals are assessed by an independent toxicologist and benchmarked as a safer alternative before being used in the manufacture of certified products. The same principle applies also to flame retardants and plasticizers, covered in chapter 7.

# 2.1 Supply chain responsibility

#### **Background**

Social responsibility is a continuing challenge throughout the IT supply chain. From raw materials extraction to final assembly, working hours, health and safety and forced labor are examples of industry-wide issues. However, for those who want to drive greater social responsibility, a major issue is the complexity of the IT product supply chain. It includes many suppliers that are spread all over the world.

The most basic aspect of social responsibility in the supply chains is to define who holds the responsibility. After this is done, the level of conformity and the implementation in the supply chains need to be defined. Finally, to make sure that problems are solved and improvements are made, independent verification and follow-up is crucial. Continued monitoring is essential, even after closure. TCO Certified offers a structured platform to guide industry progress:

- The responsibility for correcting non-conformities is placed on the brand owner which is at the top of the product value chain.
- Define minimum standards of the brand owner code of conduct covering the manufacturing of the certified product.
- We provide a control system to ensure that the brand owner takes the responsibility in the final assembly factories and supply chains of the certified product, and works in a structured way in accordance with the code of conduct.
- By including a system of consequences for continued non-conformities, we create an incentive for the brand owner to work proactively.

#### **Applicability**

All product categories.

#### References

2.1, 2.2, 2.3

#### 2.1.1 Mandate

By signing this mandate, the brand owner agrees to (1.) the Commitment and agrees to conduct (2) the Structured work. Additionally, TCO Development requires that the brand owner shows (3) Proof of the commitment and the structured work by allowing inspections in the final assembly factories and the supply chains of the certified product, by sharing audit reports and CAPs, and by providing other documented proof described below.

#### 1. Commitment

- The brand owner must have a public code of conduct for the manufacture of certified products, that is considered consistent with the following:
  - ILO's eight core conventions: 29, 87\*, 98\*, 100, 105, 111, 138 and 182.
  - The UN Convention on the Rights of the Child, Article 32.

 All applicable local and national health and safety and labor laws effective in the country of manufacture, and a maximum 60-hour workweek including overtime\*.

\*See clarifications, 1 and 2

#### 2. Structured work

- When applying for a new certificate, the brand owner must report all final assembly factories manufacturing the product model(s) that the application covers to TCO Certified Portal.
- The brand owner must supervise the implementation of the code of conduct at all final assembly factories that the brand owner is using to manufacture the certified product.
- The brand owner must ensure that corrective action plans are developed and implemented within reasonable time, for all non-conformities to the code of conduct that the brand owner is made aware of, at all final assembly factories where certified products are made, and in their supply chains.
- Final assembly factories that are registered to TCO Certified Portal must have a management system to identify their next tier major suppliers of parts and packaging for certified products.
- A code of conduct consistent with this mandate must be effectively communicated to the next tier major suppliers.
- The final assembly factory must have a self-reported risk assessment of their next tier major suppliers.

#### 3. Proof

- TCO Development may conduct/commission factory inspections (spot checks) at any final assembly factory manufacturing a certified product and may require full audit reports during the certification period in order to assess social commitment and advancement.
- The supply chain identification template must be submitted to TCO Certified Portal for each registered final assembly factory.
- TCO Development may annually select a factory from the list of major next tier suppliers it identifies as higher risk to submit one or more of the following:
  - o An independent audit report in accordance with RBA or SA8000 procedures.
  - o A completed Process Chemical Data Collection (PCDC) Tool.
  - o Proof of an independently verified OHS management system.
- TCO Development may also require seeing audit reports and corrective action plans from factories further up the supply chains of the certified product, to ensure that corrective actions have been successfully implemented.
- TCO Development additionally requires that supporting documentation be verified by an independent verifier, approved by TCO Development.

#### Submit the following to an approved verifier:

Once a year at the Senior Management Representative interview:

- The most recent version of the brand owner's public code of conduct communicated to the supply chains of the certified product. The code of conduct must be considered consistent with this mandate.
- Supporting Information on the routines of how management and workers in the final assembly factories are informed about the code of conduct.

 A completed and signed brand owner form covering the certified product. (Chapter 11.1.)

#### For each application:

A copy of the factory list in the CB certificate with the names and addresses of all final
assembly factories manufacturing the certified product model. If any of these
factories are not registered to TCO Certified Accepted Factory List, then the brand
owner must submit the factory identification template to register the final assembly
factory to the list or prove that the factory is not manufacturing the certified product
model

For each final assembly factory manufacturing the certified product:

- The most recent independent audit and a corrective action plan for each non-conformity. The audit interval is determined by the risk category of the factory. The risk category is determined by the verifier according to the mandate.
- The supply chain identification template must be completed and submitted to TCO Certified Portal

#### Submit the following, together with the application to TCO Development:

- A copy of a verification report from a verifier approved by TCO Development.
- A copy of an English version of the public code of conduct must be uploaded to TCO Certified Portal.
- An independent audit, and a corrective action plan for each non-conformity, must be reported to TCO Certified Portal, at an interval determined by the risk category of the factory, for all final assembly factories manufacturing the certified product.

#### 2.1.2 Clarification

#### **General clarifications**

The mandate is a social performance mandate and criteria are based on the eight ILO (International Labour Organization) core conventions and local legislation. The mandate requires that the brand owner comply with the minimum standards for code of conduct, inspection and corrective action engagement, regarding the situation at their own and/or their supplier factories manufacturing certified products.

- \* Collective bargaining and freedom of association: All workers must have the right to form, join and organize trade unions of their choice and to have them bargain collectively on their behalf with employers. In situations where this is restricted under law, employers must allow workers to freely and democratically elect their own representative(s) for the purpose of defending the rights and interests of workers.
- \* Local labor law: The limit and enforcement of local law regarding working hours differs tremendously across the world. To harmonize with other initiatives and to find a reasonable level for the industry, the criteria in TCO Certified sets a maximum 60 hour workweek, including overtime, as a global requirement regardless of the local law.

This criterion sets a global limit for weekly working hours that includes overtime based on ILO convention 1 (56 hours per work week including overtime). An additional four hours per workweek is given to harmonize with SAI and RBA. Therefore, workweeks including overtime

are not to exceed a total of 60 hours and that workers receive at least 1 day off every 7 consecutive days.

To monitor continued conformity during an agreed period of time, when considered necessary the factory will be required to submit workweek data to TCO Development using a workweek data template. For factories up to 15000 employees the tolerance for excessive working hours per week in TCO Certified is up to 2% of the total workforce working between 60 and 72 hours per week for minor, 2-15% for major and over 15% for priority. Any working hours above 72 hours per week is considered a priority.

#### The verification process

Proof documentation must be submitted to an independent verifier approved by TCO Development. It is the verifier's responsibility to request any additional documents necessary for the review. The verifier will evaluate the information received from the brand owner according to the principles described below (1-5).

#### 1. The code of conduct

The brand owner must have their code of conduct covering the supply chains of the certified product reviewed annually by an approved verifier. If the code of conduct has not changed since the previous annual review, then the brand owner does not have to submit it again. In this instance, the Senior Management Representative for supply chain responsibility must report this to an approved verifier.

- The code of conduct must be considered consistent with:
  - o ILO's eight core conventions: 29, 87\*, 98\*, 100, 105, 111, 138 and 182.
  - The UN Convention on the Rights of the Child, article 32.
  - All applicable local and national health and safety and labor laws effective in the country of manufacture, and a maximum 60-hour workweek including overtime\*.
- \* See clarifications under "General clarifications" above.
- The contents of the code of conduct must have been adopted by the brand owner's board and addressed by management.
- The code of conduct must relate to the manufacturing of the certified product.

#### 2. Information about the code of conduct

The brand owner must annually submit a description of how management and workers at all final assembly factories manufacturing certified products are informed about the code of conduct. It will be reviewed by an approved verifier. Proof of training classes or other means of worker training and how the factory measures the effectiveness of the worker training must be submitted for review. If there are no changes to the communication routine since the previous annual review, then the brand owner does not have to submit it again. In this instance the Senior Management Representative must report this to an approved verifier.

Examples may be that the brand owner:

has translated the code of conduct into local languages. This shows that the company
has made efforts to inform management and employees about the code's content in
their own language.

- has conducted training on the code for employees and/or management at final assembly factories of the certified product.
- has made suppliers of the certified product complete a questionnaire (self-assessment) on their understanding of, and conformity with, the code of conduct

#### 3. The brand owner form

The brand owner signs the brand owner form to confirm that one or all products that are included in the application to TCO Development complies with this criterion.

#### 4. Factory registration on TCO Certified Portal

For each certified product, all final assembly factories the brand owner is using to manufacture the certified product must be identified. Also, the final assembly factory's next tier major suppliers for parts and packaging of the certified product must be identified using the supply chain identification template provided by TCO Development. The approved verifier will ensure that final assembly factories are listed on TCO Certified Accepted Factory List and that a completed supply chain identification template has or will be submitted to TCO Certified Portal before the due date stated on the portal.

- Final assembly factories of the certified product must be registered to TCO Certified Accepted Factory List using the factory identification template for final assembly factories.
- The supply chain identification template must be submitted for each final assembly factory covering next tier major suppliers of parts and packaging for the certified product. The template shall primarily be completed by the responsible person at the final assembly factory to verify their supply chain management systems and cover all certified brand owners using the final assembly factory. If judged necessary by TCO Development the brand owner can be required to provide additional information on major next tier suppliers they have direct contracts with to fill in any data gaps. TCO Development may require the responsible person at the final assembly factory to work with an approved verifier to complete the template correctly.

  Data gaps in the template increases the risk for spot check action, such as independent social audits or submitting a Process Chemical Data Collection (PCDC)
- Each time a final assembly factory is removed, added or updated in any way, it is the brand owner's responsibility to ensure that this information is updated on TCO Certified Portal by submitting the correct documentation to an approved verifier.

#### 5. Independent social audit reports

The brand owner must ensure that TCO Certified Portal is continuously updated with the most recent independent initial audit report, and corrective action plans for all non-conformities that were found during this audit, from all final assembly factories manufacturing the certified product.

Brand owners or applicants/manufacturers must submit audit reports and corrective action plans to an approved verifier for upload to TCO Certified Portal. Consistency of the reports are ensured through annual spot-checks by TCO Development.

The audit interval is determined by the risk category of the factory.

- 1. Independent audits must be conducted by organizations accredited to ISO 17021 and carried out by SA8000 or RBA lead auditors. An independent party is considered to be a person or body that is recognized as being independent of the parties involved, regarding the issue in question.
- **2.** Types of accepted audits are:
  - a. SA8000,
  - b. RBA VAP,
  - **c.** Other audit types, if they are independently verified to be of equal quality to one of the accepted audits (a or b). This includes auditor qualification, audit process (e.g. triangulation of non-conformities), reporting and CAP. Verification will be conducted by an approved verifier before an alternative audit is accepted as proof.

#### Defining the factory risk category and audit intervals

If a newly added final assembly factory is not yet risk categorized, then TCO Certified Portal must be updated with either the latest independent audit report (less than 36 months old), a valid SA8000 certificate, or proof of an RBA recognition from the factory. The proof of an RBA recognition must be submitted with an initial audit report showing that working hours are under 60 hours per workweek. Initial audit reports must cover at least this criterion and be an accepted type of audit according to the definition in "Verification process" above. The factory will then be assigned a risk category 1, 2 or 3 depending on the latest audit results. A factory assigned risk category 1, 2 or 3 will reflect the interval, in years, during which a factory must conduct the next initial audit and submit the documentation proof to TCO Certified Portal.

Until the brand owner has submitted a factory audit report, the factory will automatically be categorized as risk category 1. (See below: "Audit report and factory risk categorization".) Brand owners that are new to TCO Certified, or apply for certification to a new product category will need to undergo an additional risk assessment in order for TCO Development to be sure factory audit requirements will be fulfilled within the given time. If the brand owner is considered a high risk for not fulfilling the initial audit requirements, then the brand owner is required to submit an audit report and a corrective action plan before the factory can be registered to TCO Certified Portal.

Factories will receive a better risk category categorization if they:

- are situated in lower risk countries.
- are involved in a social conformity certification and surveillance system that requires a minimum level of conformity before approval,
- have proven a high level of progress in non-conformity closure meaning that all non-minor non-conformities are closed.
- providing proof of well-functioning dialogue between the factory management and a democratically elected trade union or worker representatives. See clarification section: Qualification method and assessment of worker-management dialogue.

#### Lower risk countries

Some countries are considered as lower risk of social non-conformities by the SA8000 Country Risk Assessments Process, which is based on World Governance Indicators (WGI). These countries include but are not limited to: EU countries, USA and Japan. A full list is available here: <a href="mailto:saas document library">saas document library</a>.

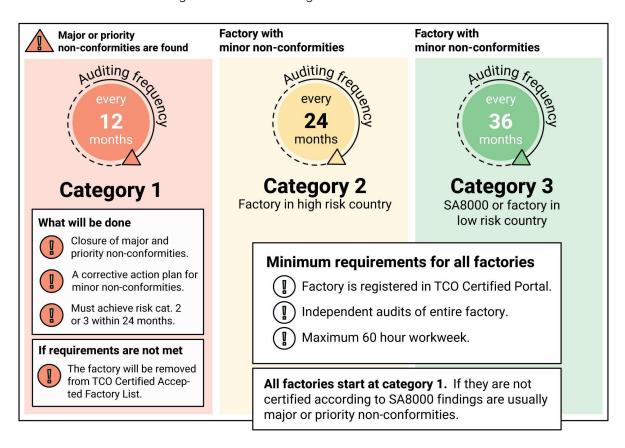
#### **TCO Certified Accepted Factory List**

All brand owners, applicants and verifiers who have access to TCO Certified Portal will have access to see TCO Certified Accepted Factory List. This list includes information such as the risk category, a list of audit non-conformities and due dates for submitting supporting documentation. The access to information for factories which are directly owned by a brand owner, is limited to that brand owner. This is an advantage for those factories that work proactively with sustainability issues, closing non-conformities and monitoring continued conformity. These factories will be considered a better choice to do business with than risk category 1 factories.

#### Audit report and factory risk categorization

Initial audits are required regularly. The audit interval is based on the factory risk category.

- An **initial audit** is covering the full scope of the factory and this criterion.
- A **closure audit** covers at least the open non-conformities from the latest initial audit.
- An initial audit is more comprehensive and is accepted as a closure audit.
- Audits older than 12 months are not accepted. However, they can be used for the initial risk categorization of new registered factories to TCO Certified Portal.



#### Initial risk categorization

• For all new factories on TCO Certified Portal, existing independent audits that are less than 36 months old must be uploaded to TCO Certified Portal for risk categorization. If no such audit exists, then the factory will be classified as risk category 1 by default.

#### Risk category 1 Initial audit

• For risk category 1, the factory must be audited every 12 months and a new initial audit must be uploaded to TCO Certified Portal during these 12 months. The start and end date of a new period is always on the date when the factory was first registered to TCO Certified Portal.

#### Corrective action plan

 When an audit has been uploaded it often includes some non-conformities. For each non-conformity to the mandate in TCO Certified, a corrective action plan must be uploaded to TCO Certified Portal. It must include closure deadlines, set by the audit program, for the completion of each corrective action.

#### Closure audit

• If there are major or priority non-conformities, a closure audit must be submitted within 12 months of the date the factory was registered to TCO Certified Portal. For minor non-conformities, the corrective action plan must be completed but it is not necessary to submit the closure audit.

#### Re-categorization

- When all non-conformities other than minor are closed, the factory will be categorized as risk category 2. If the factory is also placed in a lower risk country, or if it is certified according to SA8000, it will be categorized as 3 instead of 2.
- Otherwise the factory will continue to be categorized as risk category 1.

#### Final assistance

If the factory has been categorized as a risk category 1 for 24 months, then the factory
management will receive final assistance toward conformity through TCO Certified
Active Monitoring Program on toocertified.com. If the brand owner or factory decides
to not commit to the active monitoring program, the factory will be removed from TCO
Certified Accepted Factory List, and the factory will no longer be allowed to
manufacture products certified to TCO Certified.

#### Risk category 2

#### Initial audit

• For risk category 2, the factory must be audited every 24 months and a new initial audit must be uploaded to TCO Certified Portal during the first 12 months of every audit period. The start and end date of a new period is always on the date when the factory was first registered to TCO Certified Portal.

#### Corrective action plan

 When an audit has been uploaded it often includes some non-conformities. For each non-conformity to the mandate in TCO Certified, a corrective action plan must be uploaded to TCO Certified Portal. It must include closure deadlines, set by the audit program, for the completion of each corrective action.

#### Closure audit

• If there are major or priority non-conformities, a closure audit must also be uploaded to TCO Certified Portal <u>during the first 12 months of every audit period</u>. If the factory only has minor non-conformities, the corrective action plan must be completed but it is not necessary to upload the closure audit to TCO Certified Portal. The closure of minor non-conformities will be verified in the next initial audit.

#### **ATTENTION**

It is recommended to conduct the initial audit early in the first 12 month audit period, to have time to also provide the closure audit during the first 12 months. If the closure audit is provided later than 12 months after the start of the audit period, the factory may be re-categorized. This may happen even if the audit closure deadline in the corrective action plan allows for more time to close the non-conformities.

#### Re-categorization

- As long as all non-conformities other than minor are closed within the time specified in the corrective action plan, the factory will continue to be categorized as risk category
   If it is certified according to SA8000, it will be categorized as risk category 3 instead of 2.
- Otherwise, the factory will be categorized as risk category 1.

**Conformity option**: As proof of conformity to risk category 2 without the need to upload a closure audit report to TCO Certified Portal, factories that can prove they have received the status of Platinum, Gold or Silver under the RBA recognition program and provide additional proof that working hours are under 60 hours per workweek will be categorized risk category 2, or 3 if the factory is placed in a lower risk country. Silver level is only accepted if there are no major non-conformities to this criterion.

#### Risk category 3

#### Initial audit

• For risk category 3, the factory must be audited every 36 months and a new initial audit must be uploaded to TCO Certified Portal during the first 12 months of every audit period. The start and end date of a new period is always on the date when the factory was first registered to TCO Certified Portal.

#### Corrective action plan

- When an audit has been uploaded it often includes some non-conformities. For each non-conformity to the mandate in TCO Certified, a corrective action plan must be uploaded to TCO Certified Portal. It must include closure deadlines, set by the audit program, for the completion of each corrective action.
  - If the factory is SA8000 certified then the non-conformities are solved in accordance with the SA8000 certification procedure.

#### Closure audit

- If there are major or priority non-conformities, a closure audit must also be uploaded to TCO Certified Portal <u>during the first 12 months of every audit period</u>. If the factory only has minor non-conformities, the corrective action plan must be completed but it is not necessary to upload the closure audit to TCO Certified Portal. The closure of minor non-conformities will be verified in the next initial audit.
  - A valid SA8000 certificate is considered proof that major and priority non-conformities are being monitored during regular intervals by SAAS accredited verifiers, and that issues are being solved.

#### Re-categorization

- Factories certified according to SA8000 are categorized as risk category 3. If it is discovered that non-conformities other than minor still occur, the factory will be categorized as risk category 1.
- Factories that are not SA8000 certified but are situated in lower risk countries and have provided a satisfactory closure of all non-minor non-conformities within the first 12 months of the audit period can achieve risk category 3 status.
- Factories of risk category 2 can apply for re-categorization to risk category 3 by
  providing proof of well-functioning dialogue between the factory management and a
  democratically elected trade union or worker representatives. See the qualification
  method below.

#### Qualification method and assessment of worker-management dialogue

For factories at-risk category 1 it is very likely that the worker-management dialogue is not mature enough due to the number of persistent non-conformities. However, once a factory has managed to solve their major and priority non-conformities and achieved risk category 2, they may apply for risk category 3 re-categorization based on worker-management dialogue. To qualify for re-categorization to risk category 3 all the below verification points for a Trade union or non-union worker representation must be considered compliant without remarks.

#### Verification of the level of worker/management dialogue at the factory.

In order for a factory to be able to get re-categorization from risk category 2 to 3 based on the worker-management dialogue, the factory management, and worker representatives must together prove the following. The proof must be assessed during the factory audit every 3 years by an independent auditor approved by TCO Development. To become approved the auditor evaluating worker management dialogue must fulfill all the requirements of auditors in TCO Certified and must also have documented experience and deep understanding of trade union work

#### In the case of a Trade union (TU)

Criteria for assessing a Trade union (TU) presence at factories in high-risk countries for consideration for TCO Certified risk category 3 status.

Requirements on the trade union

- 1. The TU is not in any way interfered with or financed by the factory management and is independent from the local and national government.
- 2. The TU is financed by membership fees or donations from non-profit organizations and is non-profit
- 3. The TU has bargaining rights and acts on the behalf of employees in collective bargaining negotiations with employers.
- **4.** The TU should set and fulfill some or all of the goals it sets itself to win concessions for workers, such as: improve working conditions, working hours, wages and benefits

#### Requirements on the management

- 5. Factory management contributions are limited to providing meeting space/materials
- **6.** Payroll records etc show TU employees are not discriminated if they also work at the factory
- 7. No management interference with the TU representative meeting new consenting employees to explain their rights to freely join the TU and membership is open to all employees.
- **8.** The TU has the ability to call a strike, without restriction from government or company management.

#### Requirements on the worker - management dialogue

- 9. TU meets with management regularly for the purpose of furthering and defending the rights and interests of workers for mutual gains. TU meeting minutes and financial records are kept and made available.
- 10. TU representatives have access to
  - a. Risk assessments
  - **b.** Internal audits and monitoring of the organization
  - c. Relevant and appropriate aspects of management review
  - d. Opening and closing meetings of labor audits
  - **e**. Reporting back to workers on any corrective and preventive actions taken
  - **f.** Reporting back to Senior Management on the performance and benefits of actions taken to meet the corrective and preventative actions.

#### In case of a non-union worker representation

If the above union criteria are not possible to fulfill due to country laws restricting freedom of association and collective bargaining, workers shall be allowed to freely elect their own non-union representatives. (Note: worker representation should not be seen as a substitution for a union representative in organizations where workers freely choose to organize.) An organized committee of democratically elected worker representatives from non-management personnel is defined as a democratic trade union like system and must meet the following criteria:

- An organized committee consists of democratically elected representatives from non-management personnel and is independent from the local and national government.
- 2. The number of representatives shall be in proportion to the number of workers at the factory and must be in the range 1 for every 50-100 workers.
- 3. The worker committee has the right to represent the workers in collective negotiations with management.
- 4. The committee has set and fulfills some or all of the goals it sets itself to win concessions for workers, such as: improve working conditions, working hours, wages and benefits.

#### Requirements on the management

- **5**. Management has not intervened or interfered in any way in the nomination, election, operation, administration of the committee.
- **6.** Payroll records etc show worker representatives are not discriminated against if they also work at the factory. Workers representatives must be allowed to carry out their duties in the organized worker committee during normal working hours without any wage deductions.
- 7. The worker committee is free to fulfill their goals without being subjected to discrimination, harassment, intimidation, or retaliation for being representative(s) of workers or engaged in organizing workers, and that all workers have access to the representatives in the workplace and access to their services.
- **8.** Worker representatives have the possibility to meet all new consenting employees to explain their labor rights.
- 9. Committee members shall be allowed to attend relevant committee-training during normal working hours without getting wage deductions to help fulfill their duties
- 10. Factory management must provide meeting space/materials

#### Requirements on the worker - management dialogue

- 11. Committee meets with management regularly for the purpose of furthering and defending the rights and interests of workers for mutual gains. Meeting minutes and financial records are kept and made available to the committee.
- 12. The non-union committee have access to
  - a. Risk assessments
  - **b.** Internal audits and monitoring of the organization
  - c. Relevant and appropriate aspects of management review
  - d. Opening and closing meetings of labor audits, includes RBA and SA8000 audits

- **e**. Reporting back to workers on any corrective and preventive actions taken
- **f.** Reporting back to Senior Management on the performance and benefits of actions taken to meet the corrective and preventative actions..

#### Additional clarifications that are valid for all risk categories

- If the audit program and lead auditor accepts an offsite closure audit it will also be accepted in TCO Certified.
- If proven conditions change, such as when non-conformities are found during a spot check, the risk categorization will be re-assessed.
- A major non-compliance given to a control point in the audit report for the only reason that working hours do not meet the stricter local legislated levels than the 60 hour workweek permitted in TCO Certified, may have this rating altered to compliance on TCO Certified Portal on condition that the 60 hour working week requirement is met.
- Closure of priority findings within the CAP deadline will be monitored in particular by TCO Development through the spot check program.

#### Spot checks of supply chain responsibility

Spot checks are financed by TCO Development as long as no non-conformities are found. If non-conformities are found and further investigations are necessary, the cost for this must be covered by the license holder.

#### Audit reports and corrective action plans

Central to the spot check conformity program is the review of the factory audit report and corrective action plan conducted by a verifier approved by TCO Development. TCO Development will randomly select audit reports and corrective action plans on TCO Certified Portal to be spot checked. This is to ensure that the data uploaded to TCO Certified Portal is correct.

During the spot check conformity program, the corrective action plan will also be evaluated for effectiveness by the approved verifier. A judgment on the remedial effectiveness and a summary will be given in the verification report issued by the approved verifier. This summary is permitted to be shared with the clients of the factory.

#### On-site inspection initiated by TCO Development

TCO Development reserves the right to require full audit reports and conduct or commission on-site inspections at final assembly factories manufacturing the certified product, to verify that the brand owner is fulfilling the obligations in this criterion. The planning of social audits will be done in cooperation with the Senior Management Representatives appointed by the brand owner.

Social audits initiated by TCO Development will be realized on a judgment sample basis, in each case decided upon and financed by TCO Development. Results from the audits will be shared with the audited factory (both management and worker representatives) and all the brand owners listed as using the audited factory. This is in order to create a combined effort toward implementing the corrective action plan. For TCO Development, the spot checks and all other uploaded reports contain valuable

information on social performance, making it possible to translate non-conformities into metrics and then measure improvements through code of conduct and audit methodology.

#### The verifier approved for supply chain responsibility

Only an independent verifier approved by TCO Development has the authority to approve the following:

#### For each brand owner:

- Code of conduct.
- Communication of the code of conduct.
- Supporting documentation.
- Conduct interviews with a senior management representative.

#### Other assessments

• Review evidence that could prove that another audit protocol can be considered "equal quality to other approved audit protocols". This includes but is not limited to; auditor qualification, audit process, reporting and corrective action plan.

The list of approved verifiers is found at tcocertified.com.

# 2.2 Supply chain transparency

#### **Background**

Supply chain transparency includes two vital parts: a) the extent to which information about a company and its sourcing locations is made public to end-users and stakeholders and b) the company's process of taking action through supply chain visibility, to manage it effectively. Companies struggle to achieve supply chain transparency since they lack a solid process and structure to manage risks and monitor behavior in their extended supplier network. Without visibility into their supply chains, brand owners create a blind spot where damage to reputation can emerge.

Transparency toward an independent party provides a company not only with the possibility to measure its own performance in key areas against their peers, but also a way to share and gain knowledge about solutions. Supply chain transparency requires a solid management system, where improvements are achieved by acting on responses to shared information.

#### **Applicability**

All product categories.

#### 2.2.1 Mandate

The brand owner must appoint a Senior Management Representative (SMR) for supply chain responsibility for the certified product, who reports directly to senior management. Irrespective of other duties, this person must have the authority to ensure that the certified product meets the supply chain criteria in TCO Certified.

The SMR must annually complete TCO Development's self-assessment questionnaire (SAQ) and complete a follow-up interview with an approved verifier.

#### Submit the following to an approved verifier:

- A completed and signed self-assessment questionnaire (SAQ)
- A completed and signed brand owner form covering the certified product (chapter 11.1)

#### Submit the following together with the application to TCO Development:

- A copy of a verification report from a verifier approved by TCO Development.
- The report from the SMR interview including the verified self-assessment questionnaire (SAQ).

#### 2.2.2 Clarifications

#### **General clarifications**

The aim of the mandate is to create transparency between TCO Development and senior management at the brand owner company of the certified product.

#### Senior Management Representative (SMR) details

The required details of the SMR must appear in TCO Certified Portal and the SMR must be available for dialogue in English with TCO Development and verifiers throughout the validity of all the brand owner's certificates.

If the appointed SMR is changed, then details of the new SMR must be updated in TCO Certified Portal. TCO Development must be informed immediately.

The SMR must ensure that TCO Certified Portal is up to date covering:

- Name, title, telephone number and email address of the SMR.
- A date, with a period of less than 12 months, of the completed and / or planned SMR interview with the name of the approved verifier.

#### **SMR** interview

The interview with the SMR must be done with one of the verifiers approved by TCO Development. It is booked and paid for by the SMR. The purpose is to ensure that the appointed person has the necessary authority and is working in a structured way to implement the brand owner's code of conduct. Primarily, the interview will cover the self-assessment questionnaire (SAQ) answers about supply chain management. All questions in the SAQ must be answered and submitted to the verifier prior to the interview. During the part of the interview that covers the SAQ, the SMR will be required to explain in more detail the brand owner's work toward a socially responsible supply chain of the certified product and provide supporting documentation where needed. It is recommended that SMRs involve colleagues in the meeting who can provide necessary expertise in the areas covered by the SAQ.

The interview will likely be an online meeting. If for some reason it is not possible to have an online meeting or if the interview does not obtain an acceptable quality due to language difficulties, then the verifier may require a face to face interview.

The report from this interview is then uploaded to TCO Certified Portal. TCO Development have the right to participate at the interview with the SMR. In this case TCO Development will cover their own expenses.

#### About the self-assessment questionnaire (SAQ) and result benchmarking

The SAQ is a set of questions aimed at gaining transparency into the brand owner's risk management in the supply chain of the certified product. This includes areas such as child labor, worker representation, unions, ethics and minerals.

The SMR is responsible for answering all questions and providing supporting documentation where needed. The SMR must follow the SAQ guidelines when answering. Each answer must be given according to the following three levels of commitment that can be proven. Answers are color benchmarked for easy reference: invested (green), involved (yellow) or interested (red).

There is no minimum graded level required to be fulfilled, since the SAQ is only intended to gather information on the actual level of social commitment and assist in the development of future generations of TCO Certified criteria. Feedback to the brand owner is given in the form of a report and table that shows the brand owner's final grading (after the interview) in comparison to other certifying brand owners (all brand names will remain anonymous). This will help the brand owner identify areas for improvement and measure their progress within the industry.

Result data will also be used to risk assess factories of the certified product for the spot-check program. In this program, TCO Development orders annual factory audits according to the code of conduct by independent auditors at a number of final assembly factories where certified products are manufactured.

The questionnaire and guidelines for the assessment are public and available for download at too certified.com.

#### Clarification of sustainability performance indicator(s)

One or more "sustainability performance indicators" (chapter 1.3) are collected for this criterion. There is no mandatory level for these indicators but they must be verified and reported according to the description below.

#### Public factory list

The percentage of final assembly factories manufacturing certified products which are publically listed on the brand owners website must be reported in TCO Certified Portal, annually. (0% may be reported if the number is unknown).

In order to count a final assembly factory as publicly listed it must be made public on the brand owner website under a heading "Supply Chain" or similar. The factory information must show at least the supplier name, factory full address and type of products produced at the factory. Additional information on whether the supplier has produced a GRI-based sustainability report is optional.

### 2.3 Anti-bribery management system

#### **Background**

Bribery is a widespread phenomenon. It raises serious moral, economic and political concerns, undermines good governance, hinders development and distorts competition. It erodes justice, undermines human rights and is an obstacle to the relief of poverty. It also increases the cost of doing business, introduces uncertainties into commercial transactions, increases the cost of goods and services, diminishes the quality of products and services, which may lead to loss of life and property, destroys trust in institutions and interferes with the fair and efficient operation of markets.

Organizations have a responsibility to prevent all forms of corruption within their businesses and their supply chains. To do so, organizations must align their business policy, monitoring and enforcement mechanisms with internationally recognized best practices against all forms of bribery.

With TCO Certified, brand owners that apply for product certification are interviewed by an independent reviewer, who assesses the brand owner's anti-bribery management system, to ensure that it meets the requirements of ISO 37001.

#### **Applicability**

All product categories.

#### References

2.4.

#### 2.3.1 Mandate

The brand owner must have internal processes and routines in place to prevent and respond to all forms of bribery, covering all business activities connected to the certified product. This includes making sure that the supply chain proves alignment with the anti-bribery management system standard ISO 37001.

#### Submit the following to an approved verifier:

- A completed and signed brand owner form covering the certified product (chapter 11.1).
- An ISO 37001 certificate, or a booked date for the self-assessment questionnaire (SAQ) and follow-up interview with an approved verifier.

#### Submit the following together with the application to TCO Development:

• A copy of a verification report from a verifier approved by TCO Development.

### 2.3.2 Clarification

The brand owner's anti-bribery management system covering all business activities connected to the certified product including the supply chain must be considered to be aligned with ISO 37001. If an ISO 37001 certificate is not available as proof, the brand owner has the option to complete the self-assessment questionnaire (SAQ) and take part in a follow-up verification interview with an approved verifier. A date for the interview must be set before the verifier can issue a verification report to TCO Development.

A follow-up review of the brand owner anti-bribery management system will be in the form of a self-assessment questionnaire (SAQ) and included in the first interview with the assigned Senior Management Representative (SMR) for supply chain responsibility.

Each answer of the SAQ will be graded using a color. Green is pass, yellow is room for improvement and red is non-compliance. A completed SAQ and required supporting documentation must be submitted to the verifier prior to the interview. These will be verified in the online interview between the verifier and the brand owner SMR and any experts responsible for anti-bribery the SMR wishes to include.

### **Verification guidelines**

- If all answers are scored green (except 12.1) in the first annual interview, then there's no need to include the anti-bribery interview in the following annual cycle.
- If any point is yellow (except 12.1), only these need to be covered in the following annual interview, to check if the brand owner has improved to green level.
- If any point is red, a corrective action plan must be submitted and the point will be included in the following annual interview and must then be either yellow or green.
- Only question 12.1 can be graded red indefinitely, since the interview is considered an independent verification of the anti-bribery management system.

# 2.4 Responsibly sourced minerals

### **Background**

Minerals such as tin, tantalum, tungsten, gold and cobalt are connected to armed conflicts and human rights abuses in the regions of the world where they are extracted. Unsafe mining methods also lead to severe health problems for workers, and environmental degradation in local communities. Since the mineral supply chain can include hundreds of suppliers, from mines and smelters to final production, it is a challenge to make informed choices about mineral sourcing, from extraction to finished product.

TCO Certified drives more responsible mineral sourcing in all countries where the mining industry and trade are present. Suppliers must adopt a responsible approach to mineral sourcing, irrespective of where in the world they operate. TCO Certified goes beyond the current definition of conflict minerals and requires that brand owners include cobalt as part of their due diligence process. To drive widespread, positive impacts at a faster rate, due diligence and risk reporting is standardized, with focus on long-term, continuous improvement.

### **Applicability**

All product categories.

### References

2.5, 2.6, 2.7, 2.8

### 2.4.1 Mandate

The brand owner must:

- Have a strict supply chain policy for responsible minerals sourcing, for the certified product that can be considered to cover at least 3TG and cobalt. The policy must be both public and communicated to the supply chain.
- Have a process to identify smelters and refiners of at least 3TG and cobalt for the certified product.
- Annually submit the completed responsibly sourced minerals template.

### Submit the following to an approved verifier:

- The most recent version of the public responsibly sourced minerals policy and a description of how it is communicated to the supply chain of the certified product.
- A description of the brand owner's structured work on identifying risk areas in the supply chain of the certified product with supporting documentation.
- The responsibly sourced minerals template must be completed and submitted to TCO Certified Portal before the brand owner annual due date stated on the portal.
- A completed and signed brand owner form covering the certified product (chapter 11.1).

### Submit the following together with the application to TCO Development:

- A copy of a verification report from a verifier approved by TCO Development.
- A copy of the responsibly sourced minerals policy, in English. (Must be uploaded to TCO Certified Portal.)

### 2.4.2 Clarifications

### Responsibly sourced minerals policy

The responsibly sourced minerals policy is an essential statement by the brand owner. It reflects the brand owner's commitment toward responsible sourcing of minerals and the expectations that their raw material suppliers adhere to the policy.

### Verification guidelines

The verifier must be able to verify that the responsibly sourced minerals policy can be considered to cover at least 3TG and cobalt for the certified product, is public, and also that it is clear how the policy communicated to suppliers.

- "Public" means that the policy is visible on the brand owner website, or is included in the brand owner's annual sustainability or responsible minerals report.
- "Communicated" could be as part of a contract and/or in a written agreement with suppliers.

### To verify the level of strictness, the policy must require at least the following:

- That suppliers conform with the policy.
- That suppliers neither directly nor indirectly finance armed groups in conflict-affected regions.
- That suppliers neither tolerate nor contribute to human rights abuses that include forced labor, child labor and environmental degradation.
- A commitment to supporting responsible sourcing from those regions in which specific mining operations may present risk.

### Structured work on identifying risk areas

The brand owner must carry out structured work to identify if at least 3TG and cobalt are present anywhere in the supply chain of the certified product, with the goal to identify the smelters and refiners.

Identifying risk areas is a process that helps map the chain of custody of risk minerals down to the smelters and refiners within the supply chain. This is commonly done by a minerals reporting template such as a conflict minerals reporting template and a cobalt reporting template being systematically sent through the supply chain. This transfer of information facilitates the identification of high-risk smelters and refiners.

### Verification guidelines

The verifier has been provided a description of how the brand owner identifies risk areas in its supply chain of the certified product. The verifier can also require a copy of the completed template as further evidence of compliance. See below examples:

- Using an established conflict minerals reporting template as part of the brand owner's due diligence process. As a random follow up at the request of TCO Development, completed examples of the template are to be submitted to the verifier.
- A public list of smelters and refiners on the brand owner website is considered verification that the brand owner has identified the list through using a minerals reporting template.

### Regulated smelters and refiners

Brand owners are required to annually submit information of the smelter and refiner facilities identified as the source of 3TG and cobalt in the supply chain of the certified product. The required information identifies those facilities that are conformant, active or otherwise registered through independent verification for their mineral sourcing due-diligence process.

### Verification guidelines

The verifier is provided with the responsibly sourced minerals template with the required columns covering information on the identified smelters and refiners identified as the source of 3TG and cobalt in the supply chains of the certified products.

The template section; 'Regulated facilities' requires that the brand owner is transparent about which 3TG and cobalt smelter and refiner facilities are comformant or active with RMAP or registered on the EU 'white list'.

For the template section 'facility details', the brand owner has the option to add a link for their public report that covers 3TG, Cobalt and the 'required' information. If there is no public report or only some of the minerals are covered in the report, then the brand owner must complete the template with the additional required information that is not found in their public report.

### More information:

- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("the Guidance"), available at oecd.org. Brand owners require suppliers to disclose their sourcing origins of conflict minerals by using a questionnaire template such as the responsible minerals initiative (RMI), conflict minerals reporting template (CMRT) or similar in order to prevent the potential use of risk minerals.
- Member of the responsible minerals initiative (RMI). Members contribute to a number of tools and resources including the conflict minerals reporting template; supporting in-region sourcing schemes and the Responsible Minerals Assurance Process (RMAP).
- Responsible Minerals Assurance Process (RMAP) helps companies make informed choices about responsibly sourced minerals in their supply chains. Independent third-party assessments of smelter/refiner management systems and sourcing practices are used to validate conformance with RMAP standards. The assessment employs a risk-based approach to validate smelters' company-level management processes for responsible mineral procurement.
  - The RMAP standards are developed to meet the requirements of the OECD Due Diligence Guidance, the Regulation (EU) 2017/821 of the European Parliament and the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act.
- EU 'white list' of smelters and refiners. The regulation (EU) 2017/821 works to promote the responsible sourcing of smelters and refiners of tin, tantalum, tungsten and gold, whether they are based inside the EU or not. This is because EU importers will be required to identify the smelters and refiners in their supply chains and check whether they have the correct due diligence practices in place. Whenever EU importers find smelters and refiners' practices to be insufficient or associated with risks, they will have to manage and report on this.

To help companies, the European Commission is creating a so-called 'white list' of global smelters and refiners which source responsibly.

# 2.5 Process chemicals management

### **Background**

Scientific research shows that workers that come into contact with chemical substances used in the manufacture of IT products are more likely to suffer from cancer, reproductive damage, birth defects and other serious illnesses.

The use of chemicals such as benzene and n-hexane (industrial cleaning solvents), that have well-documented toxic human health effects, have been restricted in some parts of the world, but are often used by the manufacturing industry in developing countries where legislation is weaker and workers are less protected. These chemicals need to be phased out of production, and not be replaced with equally hazardous substances.

To replace chemicals with safer alternatives, process chemicals and their suitable safer alternatives must be identified and independently assessed by an approved toxicologist. The Personal Protective Equipment (PPE), training and exposure monitoring provided to the workers who risk chemical exposure also needs to be reviewed and improved.

### **Applicability**

All product categories.

### References

2.9, 2.10

### 2.5.1 Mandate

Each final assembly factory manufacturing the certified product:

- must have a structured health and safety management system in place that is independently certified to ISO 45001.
- must only use cleaning solvents necessary for product and PCB process cleaning that contain individual chemicals or mixtures that appear on the TCO Certified Accepted Substance List for process chemicals.
- All substances of a mixture must be accounted for. Non-accepted substances must not exceed concentration levels of 0.1% by weight of the chemical product.

### Submit the following to an approved verifier:

- A copy of the ISO 45001 certificate for each final assembly factory manufacturing the certified product.
- A completed Process Chemical Data Collection (PCDC) Tool for each final assembly factory manufacturing the certified product. The chemical data must cover cleaning solvents used for product cleaning and PCB process cleaning at the production lines where certified products are manufactured. The scope of chemical data to be submitted is stated in the Process Chemical Data Collection (PCDC) Tool, that can be downloaded at toocertified.com.
- A completed and signed factory form (chapter 11.2).

### Submit the following together with the application to TCO Development:

- A copy of a verification report from a verifier approved by TCO Development.
- A copy or access to a copy kept on a database of the complete assessment report conducted and issued by an approved licensed profiler independent of the approved screened chemistry program.
- The process chemical data template must be reported in TCO Certified Portal.

### 2.5.2 Clarification

The process chemicals that appear on TCO Certified Accepted Substance List are commonly used by final assembly factories to clean display panels, product enclosures and printed circuit boards (PCBs) and SMT machinery. They have been identified by TCO Development during the previous generation of TCO Certified. PCB cleaners are relevant since many final assembly factories include surface-mount technology (SMT) production lines that cover solder machines, stencils, flux, ovens, PCBs, glues and tools.

These processes must only use cleaners that are listed on TCO Certified Accepted Substance List. To be included on the list, chemicals must be independently assessed, and receive a GreenScreen® benchmark score of 2, 3 or 4. Alternatively chemical mixtures that are GreenScreen certified (gold or platinum) by a licensed GreenScreen Profiler are accepted. Chemicals on the list without an approved benchmark or certification will receive a sunset date for when they will be removed from the list. Before the sunset date, the chemical may be used on production lines where products certified according to TCO Certified are made. This gives the supplier/s time to have an independent assessment of the chemical, or to replace it with an approved benchmarked or certified alternative from the list.

From the date when the factory is registered on the TCO Certified Accepted Factory List, a factory has up to 12 months to make sure that the cleaning chemicals used on production lines where certified products are made are listed as safer alternatives on TCO Certified Accepted Substance List.

TCO Development and Clean Production Action (CPA) must have access to a copy of the GreenScreen assessment report before the substance can be added to TCO Certified Accepted Substance List, available at tcocertified.com.

### Proof of health and safety management system conformity

The applicant must upload a valid ISO 45001 certificate to TCO Certified Portal. The certificate must be issued by a certification body that is accredited to issue the certification. Factories that do not yet have a certified health and safety management system according to ISO 45001, may apply to TCO Development for an extended time period of up to 24 months to complete certification by annually submitting an extension application on the status of the certification. This application and status template can be obtained from TCO Development. TCO Development has the right to deny the applicant an extended period of time if there is reason to believe the factory will not be able to achieve the ISO 45001 certification within the extended time period (for example, if other critical non-compliance issues are pending, or if

the timeplan is insufficient). A factory that has been certified to OHSAS 18001 has good prerequisites for an extended time approval.

### Process Chemical Data Collection (PCDC) Tool and guidelines

The applicant must complete and upload the PCDC Tool to TCO Certified Portal. TCO Development has entered the scope of the data to be entered, therefore it is preferred that applicants download it from tcocertified.com/certification-documents. For the default PCDC Tool, guidelines and films on how to complete the tool, go to: http://www.centerforsustainabilitysolutions.org/pcdctool.

### Completing the Process Chemical Data Collection (PCDC) Tool

- The senior representative at the factory, whose responsibilities cover chemical management, must assist the applicant in the completion of the PCDC Tool.
- The areas that must be completed by the applicant are stated in the Requested Scope tab of the PCDC Tool that can be downloaded from tcocertified.com.
- In cases of proprietary, confidential business information of a CAS# number, the chemical supplier can directly submit this information to TCO Development. This must first be agreed upon by the applicant and TCO Development. If this information is not submitted, then the chemical ingredient must be treated as a restricted substance and the cleaning product must be replaced with an accepted alternative.
- The information must cover all cleaning solvents and their chemical ingredients used in the assembly of certified products.
- Upon request, the process chemical inventory at the factory must also be submitted for independent verification purposes.
- The PCDC Tool must be updated at the request of TCO Development.
- TCO Development has the right to compile confidential information with CAS numbers.
   TCO Development reserves the right to publish such compiled, anonymous information, but no information will be presented in such a way that the company or the products in question can be identified.

To verify compliance with this criterion, the completed PCDC Tool will be reviewed by TCO Development. The factory will be audited by independent assessment bodies.

### Exposure controls and personal protective equipment (PPE)

TCO Certified Accepted Substance List reduces the risk of worker exposure to highly hazardous chemicals. However, safer alternatives do not remove the responsibility of the factory management to provide personal protection equipment as described in section 8 of the chemical safety data sheet (SDS), that covers exposure controls and personal protection. Verification of PPE (availability, training and use) is included in the factory audit requirement of mandate 2.1.

# 3 Environmentally responsible manufacturing

- Large amounts of natural resources and energy are used to manufacture IT products.
- This consumption can lead to soil, water and air pollution, as well as large greenhouse gas emissions.
- To reduce environmental risk, the environmental impact must be measured and environmental and energy management systems need to be in place.

### Major environmental risks in the IT industry

Several environmental hazards occur throughout the IT product life cycle. The manufacturing process is a large risk. Harmful substances that are not handled safely risk ending up in nature. Life cycle assessments confirm that a typical IT product consumes more energy during its manufacture than during its entire usable life, resulting in large greenhouse gas emissions which impacts our climate. Another risk is the extensive use of natural resources in manufacturing, leading to a high energy consumption and the loss of valuable, finite resources

### Our approach: measuring and incentivizing reduced environmental impact

With TCO Certified, the brand owner must have an environmental management system in place, and work systematically with continuous improvement in environmental performance. Gathering information on material reuse and energy efficiency in the assembly phase is important and creates incentives for reducing the product's carbon footprint.

### Criteria in chapter 3 focus on:

- Lowering environmental risk and ensuring continual improvements by requiring that all final assembly factories are certified according to ISO 14001 and have an environmental management system in place.
- Putting the spotlight on energy efficiency in manufacturing through annual reporting.
- Lowering energy use in manufacturing by requiring compliance with ISO 50001.
- Gathering information about post-consumer recycled content and renewable materials to help buyers identify more circular products.
- Offering the brand owner an incentive to determine the product's carbon footprint through Product Carbon Footprint (PCF) analysis.

# 3.1 Environmental management system

### **Background**

A certified environmental management system helps an organization work in a systematic way with environmental performance, and make continuous environmental improvements. To be efficient, an environmental management system must include independent, external reviews

### **Definitions**

Final assembly factory: A Final assembly factory is where the final assembly of the certified product is taking place and is defined as the whole operation covered by a business license, and thereby the employment agreements of the factory workers.

### **Applicability**

All product categories.

The company or companies that manufacture the product.

### References

2.11

### 3.1.1 Mandate

Each final assembly factory manufacturing the certified product must be certified in accordance with ISO 14001.

### Submit the following to an approved verifier:

 A copy of a valid ISO 14001 certificate for every final assembly factory manufacturing certified products.

### Submit the following together with the application to TCO Development:

• A copy of a verification report from a verifier approved by TCO Development.

### 3.1.2 Clarification

The applicant must ensure that a valid ISO 14001 certificate is available on TCO Certified Portal at all times, for every final assembly factory manufacturing certified products.

The certificate(s) or an appendix to the certificate(s) must make it clear what the certification covers.

The applicant may ask for an extended time period of 12 months maximum on behalf of a factory that is not yet certified, by presenting a time plan for achieving the ISO 14001 certification and signing an agreement. TCO Development has the right to deny the applicant an extended period of time if there is a substantial risk that the factory will not be able to achieve ISO 14001 certification within the extended time period.

The certificate must be issued by a certification body that is accredited by an accreditation body covered by the International Accreditation Forum, <u>iaf.nu</u>, Multilateral Arrangement on Environmental Management Systems.

# 3.2 Energy efficiency indicators

### **Background**

While IT products become increasingly energy efficient in the use phase, there are still improvements to be made in the manufacturing phase. Life cycle assessments show that many IT products consume more energy during manufacturing than during the use phase.

### **Applicability**

All product categories.

### 3.2.1 Mandate

Each final assembly factory which manufactures the certified product must report the previous calendar year energy efficiency indicators by the end of August each year. (This applies until the year after a certificate has expired.)

### Submit the following to an approved verifier:

• A completed and signed factory form(s) (chapter 11.2)

### Submit the following together with the application to TCO Development:

- A copy of the verification report(s) from a verifier approved by TCO Development.
- The energy efficiency indicators must be reported in TCO Certified Portal.

# 3.3 Energy management system

### **Background**

A certified energy management system helps an organization work in a systematic way with energy performance, and make continuous improvement at both company and product levels. To be efficient, an energy management system must include independent, external reviews.

### **Definitions**

Final assembly factory: Factory where the final assembly of the certified product takes place.

### **Applicability**

All product categories

### 3.3.1 Mandate

Each final assembly factory manufacturing the certified product must be certified in accordance with ISO 50001

### Submit the following to an approved verifier:

 A copy of a valid ISO 50001 certificate for every final assembly factory manufacturing certified products.

### Submit the following together with the application to TCO Development:

• A copy of a verification report from a verifier approved by TCO Development

### 3.3.2 Clarification

The applicant must ensure that a valid ISO 50001 certificate is available on TCO Certified Portal at all times, for every final assembly factory manufacturing certified products.

The certificate(s) or an appendix to the certificate(s) must make it clear what the certification covers.

Factories that do not yet have a certified energy management system according to ISO 50001, may apply to TCO Development for an extended time period of 24 months to complete certification by annually submitting an extension application on the status of the certification. This application and status template can be obtained from TCO Development. TCO Development has the right to deny the applicant an extended period of time if there is a substantial risk that the factory will not be able to achieve ISO 50001 certification within the extended time period. The certificate must be issued by a certification body that is accredited by an accreditation body covered by the International Accreditation Forum, iaf.nu, Multilateral Arrangement on Energy Management Systems

# 3.4 Post-consumer recycled content

### **Background**

Use of recycled materials lowers the environmental impact. The manufacturing of recycled plastics, if 100% recycled content is achieved, can reduce the energy consumption up to 60 percent, compared to virgin plastics. Less raw materials are required to produce recycled plastics, which can lead to a reduced carbon footprint. Every metric ton of recycled plastic produced can result in up to 1-3 metric tons of carbon dioxide savings, compared to virgin plastics.

The long-term goal is that all materials in certified products are circulated and renewable where technically possible.

### **Definition**

PCR – Post-consumer recycled: Post-consumer recycled materials are derived from used consumer products, often packaging, bottles, durable goods including IT products. (I.e. aluminum cans, PET bottles). This does not include PCM material.

PCM - "Pre-consumer Material": Material or by-products generated during the manufacturing of a product but before the product reaches the end-use consumer.

### **Applicability**

All product categories.

### 3.4.1 Mandate

The following information for the typical product configuration (mandate 1.2.1 - product specification) of the certified product (including any external power supply) must be reported:

- Percentage of post-consumer recycled plastics by weight versus the total weight of all plastics.
- Percentage of identified post-consumer recycled materials (plastic and non-plastic) by weight versus the product weight

### Submit the following to an approved verifier:

- A completed and signed product form (chapter 11.3).
- Documentation on PCR content of all parts with a weight above 0.5g

### Submit the following together with the application to TCO Development:

A copy of the verification report(s) from a verifier approved by TCO Development.

### 3.4.2 Clarification

Only post-consumer recycled content where the weight is confirmed by documented proof from the material vendor as described below may be reported.

Document proof from the material vendor must be provided for each part containing post-consumer recycled material if it is to be included in the PCR percentage. If no proof exists then 0% must be reported. TCO Development has the right to require a full bill of material.

### **Exceptions plastics**

Optical components and display panels, electronic components, cables, connectors, PCBs, insulating mylar sheets, hard sheets for insulation, soft sheets for heat dissipation, elastomer feet, sponge materials, and labels may be excluded. This means that the weight of these items is not included when calculating the total weight of the plastic in the product in this requirement.

### The following information must be submitted to an approved verifier

For each plastic part with a weight above 0.5g, the following must be reported:

- Name of part/Part ID
- Material manufacturer name
- Weight (grams)
- Post-consumer recycled content in weight (grams)

For identified non-plastic post-consumer recycled content:

- Name of part/Part ID
- Material manufacturer name
- Weight (grams)
- Type of material
- Post-consumer recycled content in weight (grams)

A PCR template is available at too certified.com/certification-documents and may be used to provide this information. Similar templates covering the same information is acceptable.

### Clarification of sustainability performance indicator(s)

One or more "sustainability performance indicators" (chapter 1.3) are collected for this criterion. There is no mandatory level for these indicators but they must be verified and reported according to the description below.

### Percentage of post-consumer recycled plastics (Class A-G)

Percentage of post-consumer recycled plastics by weight versus the total weight of all plastic parts. All exceptions listed in the above clarification are applicable.

- Class A: ≥ 85%
- Class B: ≥ 70%
- Class C: ≥ 50%
- Class D: ≥ 30%
- Class E: ≥ 10%
- Class F: > 0%
- Class G: 0%

### Percentage of identified post-consumer recycled materials (Class A-G)

Percentage of identified post-consumer recycled materials (plastic and non-plastic) by weight versus the typical product weight.

- Class A: ≥ 50%
- Class B: ≥ 40%
- Class C: ≥ 30%
- Class D: ≥ 20%
- Class E: ≥ 10%
- Class F: > 0%
- Class G: 0%

# 3.5 Product carbon footprint

### **Background**

Product Carbon Footprint (PCF) is one of the most established ways for determining the climate impact of a product. PCFs cover the whole life cycle of a product, from the raw material extraction to the recycling or disposal phase. Using product carbon footprints enables an overall picture in order to work on reductions and measures in the right places.

The accuracy of PCFs can vary enormously based on the methodology and type of source data used. As it is very time-consuming and costly to make accurate PCFs the majority of PCFs are based on very general source data. This results in large uncertainties making product comparisons useless.

### **Definitions**

**Primary data:** This term refers to data from specific processes within the supply chain of the user of the PCF method. Such data may take the form of activity data, or foreground elementary flows (life cycle inventory). Primary data are site-specific, company-specific (if multiple sites for the same product), or supply chain-specific. Primary data may be obtained through meter readings, purchase records, utility bills, engineering models, direct monitoring, material/product balances, stoichiometry, or other methods for obtaining data from specific processes in the value chain of the user of the PCF method.

**Foreground system processes**: This term refers to those processes in the product life cycle for which direct access to information is available. For example, the producer's site and other processes operated by the producer or its contractors (e.g. goods transport, head-office services, etc.) belong to the foreground processes

### **Applicability**

All product categories.

### 3.5.1 Mandate

A classification of the PCF methodology and availability must be conducted by an approved verifier.

### Submit the following to an approved verifier:

- Necessary documentation for the PCF evaluation
- A completed and signed product form (11.3).

### Submit the following together with the application to TCO Development:

- A copy of the verification report(s) from a verifier approved by TCO Development.
- The classification of the PCF method, and availability must be reported in TCO Certified Portal.

### 3.5.2 Clarification

It is not required to have conducted a PCF for the product. If no PCF data is available at the time of certification, the product will receive the lowest classification of the method, and availability. It is possible to submit data for PCF evaluation at any time in order to update the classification.

The PCF for the product is estimated based on product type data using either ISO 14040, ISO 14044, ISO 14067, ISO 14025, IEC TR 62921, PAS 2050, the WRI GHG Protocol Product Life Cycle Accounting and Reporting Standard, PAIA-tool, INEMI Eco-Impact Estimator or equivalent PCF standard.

For product models which can be configured, the typical product configuration must be used. The typical product configuration is defined as the product configuration which is expected to be manufactured in the largest number.

### **PCF Requirements**

The product carbon footprint result must include the following:

- 1. Inputs used in the assessment (at a minimum, lifetime of the product, amount of electricity consumed in the use phase by the product per year, and significant product model elements/parameters).
- 2. Total life cycle carbon footprint and carbon footprint of the product's life cycle stages (at a minimum, manufacturing, use, transport, and end-of-life).
- **3.** Explanation of uncertainty addressed either through a statistical assessment or through a disclaimer statement.

### The PCF method (Class A-E)

### Class A

- The PCF for the product is based on the product model.
- The PCF consists of primary data in foreground system processes.
- The PCF is critically reviewed by a third party. The review report must at least include:
  - o Number of years experience in the LCA/PCF field
  - o Number of carbon footprints reviewed
  - Number of carbon footprints conducted

### Class B

- The PCF for the product is based on the product model.
- The PCF is critically reviewed by a third party. The review report must at least include:
  - Number of years experience in the LCA/PCF field
  - Number of carbon footprints reviewed
  - Number of carbon footprints conducted

### Class C

• The PCF for the product is based on the product model.

### Class D

- The PCF for the product is based on the product model family.
  - Example

Similar chassis appearance

Same display size

Similar functionality (e.g. headset with microphone)

### Class E

• No data available

### **Verification guideline**

For Class C-E a general evaluation of the methodology together with a statement that this methodology will always be used can be made for each product category instead of providing proof for each certified product.

### Availability (Class A-D)

The availability of PCF increases the transparency of PCF methods used and enables future revisions.

### Class A

- The results of the PCF as defined in the PCR Requirements are publicly available and can be downloaded free of charge.
- A link to the download location is uploaded to TCO Certified Portal

### Class B

- The results of the PCF as defined in the PCR Requirements are available on-demand from the brand owner.
- Instructions on how to retrieve the PCF is provided

### Class C

• The results of the PCF as defined in the PCR Requirements are not publicly available.

### Class D

No PCF available

### Verification guideline

For Class A.

- Confirm that the PCF is available for download free of charge on the brand owners PCF repository or
- 2. A public statement on the brand owners website that at least all TCO Certified products will have the results of the PCF available online during product availability.

# 4 User health and safety

- A poorly designed IT product may cause discomfort and cause injury and health problems for the user.
- Fire hazard, electric shock and explosions are some of the risks associated with substandard products. They may also have a short lifespan which is negative from a sustainability perspective.
- A safe and ergonomically designed IT product supports productivity and can meet the user's needs longer.

### Poor product design is a safety hazard

Product safety and functionality is fundamental to sustainability in the IT sector. Products that are uncomfortable or unsafe to use often have a short lifespan which leads to pollution, e-waste and high resource consumption. They may also cause health and safety problems for the user. Examples of identified safety hazards include product overheating and risk of fire, battery volatility which can lead to burning or explosion, and poor electrical safety design that may increase the risk of fire or electric shock.

### Our approach: verifying product safety, protecting the user

An IT product must be safe to use and should provide the user with the necessary function and comfort for a long time. To be efficient, criteria for user health and safety aspects must be specific, and tailored to each product category.

### Criteria in chapter 4 focus on:

- Requiring that products are safe to use and that the user's risk of injury is minimized.
- Making sure that any cases of burning, explosion and electric shock are prevented.
- Limiting specific risks through criteria adapted for each product category.

# 4.1 Electrical safety

### **Background**

IT products must be safe to use. Electrical safety refers to the electrical design of the product. Electrical insulation and other arrangements must be in place to prevent the user from touching live components. Faulty or inadequate electrical insulation can also result in an electrical flashover that may cause a fire or an explosion.

### **Applicability**

All products with built-in power supplies as well as any external power supply intended to be used together with the product.

### References

4.1.

### 4.1.1 Mandate

The product and external power supply/supplies must be certified according to EN/IEC 62368-1 edition 2 or newer.

### Submit the following to an approved verifier:

• A copy of a valid CB certificate or a national certificate from a CB member (NCB) for the product.

### Submit the following together with the application to TCO Development:

• A copy of the verification report(s) from a verifier approved by TCO Development.

# 5 Product performance

- A low-performing product can reduce user productivity and satisfaction. It may therefore be discarded prematurely.
- High energy consumption can lead to large emissions of greenhouse gases, which contributes to the climate crisis.
- By taking both product performance and environmental factors into account, user productivity can improve and the device can be in use for a longer time.

### Low product performance reduces productivity and is a sustainability risk

Product performance is essential for user satisfaction and productivity. Low-performing products are also problematic from a sustainability perspective — in many cases, these products have a shorter lifespan, which leads to pollution, e-waste and high resource consumption. Discarding products prematurely is often also more costly for the purchasing organization.

### Our approach: balancing product performance with energy efficiency

Product performance, user satisfaction and the development of more circular IT products are interconnected. In order for IT products to be more sustainable, all these factors need to be prioritized. Balancing product performance with energy efficiency is also important to reduce the product's climate impact.

High-performance products can meet the user's needs for a longer period of time. This way, the product's service life can be extended, which is an extremely important factor in reducing resource consumption, reducing greenhouse gas emissions and the amount of e-waste produced. Using the product for a longer time is also often better from an economic perspective, and provides a lower total cost of ownership for the purchasing organization.

### Criteria in chapter 5 focus on:

• Requiring that product performance is balanced with energy efficiency through specific criteria for each product category.

# 5.1 Energy efficiency

### **Background**

The IT industry and people's IT usage are large sources of greenhouse gas emissions, which remain the leading factor in climate change. As the volume of IT equipment in use grows, greenhouse gas emissions are also increasing. Reducing the problem requires a number of measures, of which energy-efficient products are one part.

This criterion focuses on energy efficiency in the use phase and helps purchasing organizations independently verify that the IT product they source meets the energy efficiency requirements of ENERGY STAR.

### **Applicability**

Imaging equipment.

### References

5.1.

### 5.1.1 Mandate

The energy efficiency and power supply requirements in version 3.0 of ENERGY STAR® program for imaging equipment must be fulfilled.

### Submit the following to an approved verifier:

• A copy of the test report(s) from a laboratory accredited according to ISO 17025.

### Submit the following together with the application to TCO Development:

A copy of the test report(s), and a copy of the verification report(s) from a verifier approved by TCO Development.

### 5.1.2 Clarification

The product must be tested according to version 3.0 or a more recent version of the ENERGY STAR®program for printers. Testing can be carried out at any test facility accredited according to ISO 17025, but the test report must be verified by a verification organization approved by TCO Development

The tests only need to cover the energy consumption requirements and the external power supply requirements of that program. The product does not need to be ENERGY STAR certified to be approved for TCO Certified.

### **Exceptions and special requirements**

TCO Development also accepts all exceptions and special requirements, test methods, etc. that are accepted by ENERGY STAR.

Products that are covered by other ENERGY STAR product specifications must be tested in accordance with that specification.

# 5.2 N-up printing capability

### **Background**

This technology enables the ability to print multiple pages onto a single sheet of paper. The N-up printing method can therefore save a considerable amount of paper and ink/toner which helps to lower the total environmental impact of the imaging equipment during its lifetime.

### **Applicability**

Imaging equipment

### 5.2.1 Mandate

The product must offer as a standard feature the capability to print two or more pages of a document on one sheet of paper when the product is managed by original software provided by the manufacturer (the printer driver).

### Submit the following to an approved verifier:

• A completed and signed product form (chapter 11.3)

### Submit the following together with the application to TCO Development:

A copy of the verification report(s) from a verifier approved by TCO Development.

# 5.3 Automatic duplex

### **Background**

The use of paper is one of the most important hotspots throughout the life cycle of imaging equipment products. By printing on both sides of a paper compared to printing on one the total environmental footprint can greatly be reduced. As a result, this can help reduce deforestation and also help to conserve water as producing paper is a water intensive process.

### **Applicability**

Imaging equipment

### 5.3.1 Mandate

The default printer drivers of the product must be set to automatic duplexing when printing.

### Submit the following to an approved verifier:

• A completed and signed product form (chapter 11.3).

### Submit the following together with the application to TCO Development:

A copy of the verification report(s) from a verifier approved by TCO Development.

### 5.3.2 Clarification

If the product is registered in the ENERGY STAR database this can be used as evidence to show compliance with this criterion.

# 5.4 Capability to use recycled paper

### **Background**

Recycled paper can have substantially lower environmental impacts than virgin paper, so the confirmed ability of the equipment to use recycled paper can bring significant reduction of impacts. For instance, energy consumption can be reduced by 27%, wastewater by 33%, air particulate emission by 28% and solid waste by 54%.

### **Applicability**

Imaging equipment

### References

5.2, 5.3, 5.4

### 5.4.1 Mandate

The product must be capable of processing recycled paper that meets the quality requirements of EN 12281:Printing and business paper for dry toner imaging processes or equivalent.

### Submit the following to an approved verifier:

• A completed and signed product form (chapter 11.3).

### Submit the following together with the application to TCO Development:

A copy of the verification report(s) from a verifier approved by TCO Development.

### 5.4.2 Clarification

Scanners are excluded from the scope of this criterion.

# 6 Product lifetime extension

- In our current, linear way of producing and consuming products we take virgin natural resources and make products from them which we then discard once we're done using them often after a relatively short time.
- Linearity leads to the loss of valuable and scarce natural resources, pollution and extensive energy use that contributes to the climate crisis.
- Moving toward sustainable solutions means creating a system that is more regenerative, where products and materials are kept in their intended use longer.

### Linearity undermines ecosystems and the economy

Today, the common approach to the IT product life cycle is linear. Virgin materials are extracted to make new products which are used and then discarded, often after a relatively short time. In a majority of cases, materials are not recycled, and turn to waste. This linear "take, make, use, dispose" model is not sustainable and largely inefficient from a resource perspective. It depletes the earth's natural resources, and creates enormous amounts of hazardous e-waste.

### Our approach: driving the development of products that can live longer

The best way to begin taking a more circular approach to the production and consumption of IT products, is extending their usable life. For the IT industry, this means designing products that are durable, built to last, upgradeable and repairable, making them more attractive for reuse or secondary markets. Once a product has reached the end of its usable life, the materials should be possible to recycle and use again in new products.

### Criteria in chapter 6 focus on:

- Extending product life by requiring that products are durable, repairable and that spare parts and repair manuals are available.
- Making sure batteries in mobile products live longer, are replaceable and easily can be charged in a way that protects the battery from premature degradation.
- Enabling reuse of cables and reducing e-waste through requirements of standardized connectors.
- Incentivizing the IT industry to produce longer-lasting products by requiring that a product warranty must be in place on all markets where the product is sold.
- Preventing data leakage and promoting safe reselling of products through secure data removal solutions.

# 6.1 Product warranty

### **Background**

By extending product lifetime, natural resources are used more efficiently and the pollution to air, water and soil is reduced. A precondition for an extended product lifetime is that the product is of high quality. A product warranty provides the brand owner with an economic incentive to design a durable product that lasts longer.

### **Definitions**

Brand owner: The company or organization owning or controlling the brand name. Brand name: The name or sign, including but not limited to a trademark or company name, used to identify, amongst users and customers, the manufacturer or seller of a product. Product warranty: Is an agreement where the brand owner offers to repair or replace broken products at no charge.

### **Applicability**

All product categories.

### 6.1.1 Mandate

The brand owner must:

Provide a product warranty for at least one year,

AND

• Provide information about the minimum product warranty period for the product

covering all markets where the product is sold.

### Submit the following to an approved verifier:

• A completed and signed brand owner product form (chapter 11.4).

### Submit the following together with the application to TCO Development:

• A copy of the verification report(s) from a verifier approved by TCO Development.

### 6.1.2 Clarification

### Clarification of sustainability performance indicator(s)

One or more "sustainability performance indicators" (chapter 1.3) are collected for this criterion. There is no mandatory level for these indicators but they must be verified and reported according to the description below.

### Warranty period (Class A-G)

The minimum number of years the whole product is covered by warranty

- Class A Product warranty for at least 7 years, covering all markets where the product is sold
- **Class B** Product warranty for at least 6 years, covering all markets where the product is sold
- Class C Product warranty for at least 5 years, covering all markets where the product is sold
- **Class D** Product warranty for at least 4 years, covering all markets where the product is sold
- Class E Product warranty for at least 3 years, covering all markets where the product is sold
- **Class F -** Product warranty for at least 2 years, covering all markets where the product is sold
- **Class G** Product warranty for at least 1 years, covering all markets where the product is sold

Verification: Documentation proving the product warranty period, covering all markets where the product is sold. If product components have different warranty periods, the worst case scenario (least number of years) must be reported.

# The following SPI(s) is not required for compliance with TCO Certified. If no information is provided the product will receive the lowest classification by default.

### Extended warranty availability (Class A-G)

The maximum number of years the product warranty can be extended to covering the whole product.

- **Class A** Extended warranty for the product is available for 7 years or more on all markets where the product is sold
- **Class B** Extended warranty for the product is available for at least 6 years on all markets where the product is sold
- Class C Extended warranty for the product is available for at least 5 years on all markets where the product is sold
- **Class D** Extended warranty for the product is available for at least 4 years on all markets where the product is sold
- **Class E** Extended warranty for the product is available for at least 3 years on all markets where the product is sold
- **Class F** Extended warranty for the product is available up to 2 years on all markets where the product is sold
- Class G No information provided

Verification: Documentation proving the maximum availability of an extended warranty for the product for all markets where the product is sold. If product components have different warranty periods, the worst case scenario (least number of years) must be reported. Extended warranty is defined as the warranty time that exceeds the base warranty period.

### Public repair policy (A-C)

### • Class A

- o Product repair is favored before product replacement.
- o A repair policy is publicly available.

### Class B

o No policy on product repair vs. replacement

### • Class C

o No information provided

Verification: A link to a Public policy proving the type of repair policy.

# 6.2 Replaceable components

### **Background**

Extending the lifetime of IT products is the most effective way to reduce their environmental impact. Components that often break or become outdated may limit the total lifespan of the product and must be replaceable. By making these critical replaceable components available, IT-products can live longer.

### **Definitions**

CPU: Central processing unit.

RAM: Random access memory.

Brand owner: The company or organization owning or controlling the brand name.

Brand name: The name or sign, including but not limited to a trademark or company name, used to identify, amongst users and customers, the manufacturer or seller of a product. Storage: any computing hardware that is used for storing, porting and extracting data files and objects, including temporarily and permanently storage of information. E.g. (SSD, HDD, RAM). System board: Also referred to as the motherboard.

External/Internal PSU: The power supply unit used to convert AC to low voltage DC power for the internal components of the product.

Critical replaceable components: Components that are crucial for the functionality of the product. A list of the critical replaceable components as defined by TCO Certified is specified below

Container: means an end-user replaceable product that holds toner or ink and that fits onto or into or is emptied into an imaging equipment product. Containers do not contain integrated components or moving parts integral to the imaging product's function. Containers may also be called bottles or tanks.

Cartridge: (Ink/toner) means an end-user replaceable product, which fits into or onto an imaging equipment product, with a printing-related functionality that includes integrated components or moving parts integral to the imaging equipment's function beyond holding the ink or toner material. Cartridges may also be called modules.

Firmware: a specific class of computer software that provides the low-level control for a device's specific hardware

### **Applicability**

Imaging equipment.

### References

6.1, 6.2.

### 6.2.1 Mandate

- The brand owner must provide a service manual describing how to replace at least all
  critical replaceable components listed under "Replaceable by user". The service
  manual must be available for anyone to read, free of charge in case the critical
  replaceable components are available for anyone to purchase or to the service
  network.
- 2. The brand owner must guarantee that, during the validity of the certificate, all critical replaceable components for the product type; that are listed in the clarifications of this criterion;
  - are available for anyone to purchase
  - o may be replaced by a service network for repair and maintenance of the certified product on all markets where it is sold.

### Submit the following to an approved verifier:

• A completed and signed brand owner form (chapter 11.4).

### Submit the following together with the application to TCO Development:

• A copy of the verification report(s) from a verifier approved by TCO Development.

### 6.2.2 Clarifications

### Replaceable parts management

- The brand owner must provide a service manual including step-by-step instructions and component descriptions for the disassembly and assembly.
  - External PSU, charger, and AC Adapters are exempted from the disassembly instructions.
  - o If instructions on how to replace all critical replaceable components (listed as "Replaceable by user") are included in the user manual, no additional service manual is needed to comply with the mandate 6.2.1.
- A critical, replaceable component must be possible to replace with an equivalent component. However, the replacement component does not have to be identical to the original component.
- Instructions on how to replace the critical components (listed as "Replaceable by user") must be available online during the validity of the certificate.
- Step-by-step instructions on how to replace soldered components does not need to be listed in the service manual (mandate 6.2.1)

### Critical replaceable components:

The critical replaceable components listed below must only be made available if they are included in the certified product.

Replaceable by user:	Replaceable by manufacturer
External PSU	Print heads
Cartridge container unit	Laser unit
Toner collection unit	Fuser units
	Drum units
	Internal PSU
	Transfer Roller
	Pickup Rollers
	System board/ motherboard
	Ink collection unit

The critical replaceable components listed in the clarification need only be made available if they are part of the certified product.

### Clarification of sustainability performance indicator (SPI)(s)

One or more "sustainability performance indicators" (chapter 1.3) are collected for this criterion. There is no mandatory level for these indicators but they must be verified and reported according to the description below.

### Replaceability and repairability of the product

For each critical component in the component table above, the following evaluation must be completed to calculate the repairability and reusability of the product. The evaluation is based on the standard EN 45554:2020 - General methods for the assessment of the ability to repair, reuse and upgrade energy-related products.

- 1. Fasteners and connectors (Class A-D)
- 2. Necessary tools for repair/upgrade, (Class A-D)
- 3. Availability of spare parts
  - a. Availability by target group (Class A-E)
  - **b.** Duration of availability (Class A-D)
- 4. Comprehensiveness of available information (Class A-C)

### 1. Fasteners and connectors (Class A-D)

The reusability of fasteners and connectors is interlinked with the repairability and reusability of products and components. Knowledge of type of fasteners can assist with the assessment of tools and skills necessary for repair reuse or upgrade.

### **Evaluation procedure**

The assessment of the fasteners and connectors must be done from the start until the component is removed. This means that if any other part needs to be removed before it is possible to remove the critical component, then those steps must also be taken into consideration for the final score.

### • Class A: Reusable

 An original fastening system that can be completely reused, or any elements of the fastening system that cannot be reused are supplied with the new part for the repair, reuse or upgrade process.

### Class B: Removable

 An original fastening system that is not reusable, but can be removed without causing damage or leaving residue which hinders reassembly (in case of repair or upgrade) or reuse of the removed part (in case of reuse) for the repair, reuse or upgrade process.

### Class C: Neither removable nor reusable

• An original fastening system that is not removable and not reusable, as defined above, for the repair, reuse or upgrade process.

### Class D: No evaluation performed

### **Example for a battery in a notebook:**

Example 1

Step 1 - Remove eight screws to open the chassis - Class A

Step 2 - Remove four screws and loosen the connector to the motherboard - Class A

Step 3 - The battery can now be replaced without additional steps - Class A

Total score for battery component: Class A

### Example 2

Step 1 - Remove eight screws to open the chassis - Class A

Step 2 - Remove four screws and loosen the connector to the motherboard - Class A

Step 3 - The battery is glued with non-reusable adhesive - Class B

Total score for battery component: Class B

### **Example for a power board in a display:**

Example 1

Step 1 - Remove eight screws to open the chassis - Class A

Step 2 - Remove four screws and loosen the connector to the motherboard - Class A

Step 3 - Remove four screws and loosen the connector to the power board. Class A

Total score for power board component: Class A

### Example 2

Step 1 - Remove eight screws to open the chassis - Class A

Step 2 - Remove four screws and loosen the connector to the motherboard - Class A

Step 3 - The connector to the power board is taped and fastened with screws - Class B Total score for power board component: Class B

If a component is soldered to another component, it automatically receives Class C.

### 2. Necessary tools for repair/upgrade (Class A-E)

The availability of tools necessary for repair, service or upgrade, are interlinked with the product lifetime. Without easy access to tools needed for repair, upgrade or service the likelihood of these decrease. Therefore, it is important to make use of tools that are readily available instead of using proprietary tools.

### • Class A: Basic tools, no tools, provided tools

- Replacing critical components can be carried out without the use of any tools, or with a tool or set of tools that is supplied with the product or spare part, or with basic tools as listed in Table A.
- All tools required must be listed in the service manual.

Tool type	Reference
Screwdriver for slotted heads, cross recess or for hexalobular recess heads	ISO, 2380, ISO, 8764, ISO 10664
Hexagon socket key	ISO 2936
Combination Wrench	ISO 7738
Combination pliers	ISO 5746
Half round nose pliers	ISO 5745
Diagonal cutters	ISO 5749
Multigrip pliers (multiple slip joint pliers)	ISO 8976
Locking pliers	
Combination pliers for wire stripping and terminal crimping	
Prying lever	
Tweezers	
Hammer, steel head	ISO 15601
Utility knife cutter with snap off blades	
Multimeter	
Voltage tester	

Soldering iron	
Magnifying glass	

Table A - Basic tools

### Class B: Other commercially available tools.

- Replacing critical components can be carried out with non-proprietary tools that are not Class A.
- All tools required must be listed in the service manual.

Verification: The brand owner must include a link to a shop where the tools can be bought in the service manual.

### • Class C: Can be carried out with proprietary tools.

The tools required to replace critical components can be carried out with use of proprietary tools. These are tools that are not available for purchase by the general public or for which any applicable patents are not available to license under fair, reasonable, and non-discriminatory terms.

Verification: The brand owner must state in the service manual that the tools needed are proprietary.

### • Class D: Not enough information, or not feasible with any existing tools.

 The tools listed in the service manual are not Class A, and no extra information is made available on where usable tools can be purchased, or if they are proprietary.

or

• The tools required to replace the critical components are not listed in the service manual.

### • Class E: No evaluation performed

### 3. Availability of spare parts

The availability of spare parts is a prerequisite for a successful repair. Spare parts availability refers to both the availability to various target groups and the availability over a specific period of time. These two perspectives are assessed in sequence.

### 3.a. Availability by target group (Class A-E)

- Class A: Publicly available
- Class B: Available to independent repair service providers
- Class C: Available to brand owner- authorized repair service providers
- Class D: Available to the brand owner only
- Class E: No spare parts available or no information on availability

Verification: The brand owner must pledge the availability of spare parts in the service manual.

### 3.b. Duration of availability (Class A-D)

- Class A: Long-term availability (6 or more years)
- Class B: Mid-term availability (4 or more years)
- Class C: Short-term availability (2 or more years)
- Class D: No information on duration of availability

Verification: The brand owner must pledge the minimum duration of availability for spare parts in the service manual.

#### 4. Comprehensiveness of available information (Class A-C)

The comprehensiveness of service information facilitates the possibility for repairs, maintenance and upgrades, which enables the extension of product lifetime.

#### • Class A: Comprehensive information available

A repair, reuse or upgrade process, for which the following information is available for anyone to read, free of charge:

- Step-by-step disassembly instructions with identification of tools needed.
- o Information on where to attain all tools needed for repair/upgrade.
- An overview of repair or upgrade services offered by the manufacturer.
- o Troubleshooting charts.
- Circuit board schematics.(only main board)
- Functional specification of parts (e.g. resistance value of resistors).
- o Recommended torque for fasteners.
- o Diagnostic and error resetting codes.

or

 Appropriate formats for reporting comprehensive information can include IEEE1874 (IEEE Standard for Documentation Schema for Repair and Assembly of Electronic Devices).

#### • Class B: Basic information available

A repair, reuse or upgrade process, for which the following information is available for anyone to read, free of charge:

- Step-by-step disassembly instructions with identification of tools needed.
- o Information on where to attain all tools needed for repair/upgrade.
- An overview of repair or upgrade services offered by the manufacturer.
- Troubleshooting charts.

#### • Class C: Limited information available

A repair, reuse or upgrade process, for which the following information is available for anyone to read, free of charge:

• Step-by-step disassembly instructions with identification of tools needed.

Verification: Unless the brand owner provides documentation showing compliance with Class A or B, the product will be categorized as Class C.

#### Capability to use remanufactured cartridges and containers (Class A-C)

To extend the usable life and lower the total environmental footprint of imaging equipment products it is of importance that the product is able to use remanufactured cartridges and containers. This SPI gives manufacturers incentive to design their products and consumables in a way that helps promote reuse and new more circular business models.

#### • Class A - Capability to use remanufactured cartridges and containers

The product is not designed to prevent remanufactured toner and/or ink cartridges and containers. Constructive, software-based, or other measures that prevent the use of remanufactured cartridges and containers is not present or applied (i.e firmware updates preventing the use of reused/remanufactured consumables, unique id chips preventing reuse/remanufacturing of cartridges or containers).

Verification: Publicly available documentation proving that remanufactured cartridges and containers can be used in the product, or a statement in the user manual covering the above-mentioned text in Class A.

Class B - No capability to use remanufactured cartridges and containers

Verification: Statement from the brand owner that they do not fulfill Class A.

• Class C - No information provided

# Functionality allowing firmware updates to be rolled back to previously installed versions. (Class A-C)

Firmware can be updated remotely via firmware updates, which are sent out by the brand owner. These firmware updates affect how the product works and the way it accomplishes its tasks. Firmware updates can fix minor problems and even improve the way your product functions, such as printing speed. But running a firmware update on your product can lead to complications if not researched thoroughly. Some firmware updates have resulted in restricting the usage of remanufactured and compatible ink cartridges. This SPI sets out to prevent this limitation of functionality to increase the reuse and refurbishment of cartridges and containers.

#### • Class A - Functionality allowing firmware updates to be rolled back

The product includes functionality allowing firmware updates to be rolled back to previously installed versions. In case of firmware updates, the previous version must be made available for anyone to download free of charge.

Verification: Instructions detailing how firmware updates can be rolled back must be provided in the service manual or user manual. The manual must also include information about where previous versions of firmware can be downloaded free of charge.

#### • Class B - No functionality allowing firmware updates to be rolled back

Verification: Statement from the brand owner that they do not fulfill Class A.

#### • Class C - No information provided

# 6.3 Prolonged lifetime of consumables

#### **Background**

To extend the usable life of IT products and produce less e-waste, products must be prepared for reuse/remanufacturing. One barrier for imaging equipment is that the cartridges or containers are sometimes purposefully designed to limit the ability to reuse/remanufacture them. To promote the reuse through maintenance, refurbishment, and recycling, the end-users, technicians and remanufacturers must not be limited by practices that would prevent reuse/remanufacturing of toner and ink cartridges.

#### **Definitions**

Container: means an end-user replaceable product that holds toner or ink and that fits onto or into or is emptied into an imaging equipment product. Containers do not contain integrated components or moving parts integral to the imaging product's function. Containers may also be called bottles or tanks.

Cartridge: (Ink/toner) means an end-user replaceable product, which fits into or onto an imaging equipment product, with a printing- related functionality that includes integrated components or moving parts integral to the imaging equipment's function beyond holding the ink or toner material. Cartridges may also be called modules.

#### **Applicability**

Imaging equipment

#### 6.3.1 Mandate

Cartridges or containers shipped with the product must not be purposefully designed to limit the ability to reuse/remanufacture.

Examples of features which are deemed to limit the ability to remanufacture, or promote non-reuse, include, but are not limited to:

• Statements on the cartridge or container, or packaging, which declare, or imply, that the product is not designed to be remanufactured

#### Submit the following to an approved verifier:

• A completed and signed brand owner form (chapter 11.4).

#### Submit the following together with the application to TCO Development:

• A copy of the verification report(s) from a verifier approved by TCO Development.

# 6.4 Consumable quality

#### **Background**

Products shipped with subpar quality consumables can result in excessive waste generation as these are disposed of before their end of life by the user. By requiring higher quality consumables to be shipped with the product we can help increase the lifetime of the consumables and in turn enable more reusability of them. As a consequence this can help lower the total environmental footprint of the product.

#### **Definitions**

Consumables: meaning replaceable products essential to the functioning of the imaging equipment product. They can be replaced or replenished by either the end user or service provider during the normal usage and life span of the imaging equipment product.

#### **Applicability**

Imaging equipment

#### 6.4.1 Mandate

All toner cartridges and/or containers shipped with the product must be tested to and comply with at least one of the following quality standards:

- DIN Technical Report No. 155:2007-09
- DIN 33870-1 for monochrome printouts
- DIN 33870-2 for colour printouts
- DIN 33871-1 series
- DIN 33871-2 series

or

an equivalent quality standard for cartridges and containers.

#### Submit the following to an approved verifier:

• A completed and signed brand owner form (chapter 11.4).

#### Submit the following together with the application to TCO Development:

• A copy of the verification report(s) from a verifier approved by TCO Development.

# 7 Reduction of hazardous substances

- Hazardous substances used in IT products are a risk to human health and the natural environment.
- Legislation is lagging and focuses on banning substances but the substitutions can be just as hazardous, or even worse.
- TCO Certified drives transparency and knowledge-sharing, developing pathways to safer alternatives.

#### Hazardous substances – a risk to human health and the environment

No one knows how many chemicals are in use today. What we do know is that very few of these substances have been studied for their impact on humans and the environment. Two examples of potentially hazardous substances are plasticizers and flame retardants, often used in components, cables and other plastic parts. These substances risk leaking out in the natural environment, both in connection with manufacturing, and when products and their packaging are incinerated, placed in landfill or recycled in an improper way.

Keeping hazardous substances out of products is important also from a circular perspective. Contaminated materials cannot be responsibly recycled and reused in new products, and risk therefore being incinerated or discarded, adding to the enormous e-waste problem.

#### Our approach: guiding the IT industry to safer alternatives

For a long time, TCO Certified has restricted the use of harmful substances with criteria that go beyond RoHS. However, simply banning substances isn't enough. A banned substance may be replaced with another that is equally harmful, or potentially even worse. Therefore, we need better information about substances before they are being used. With TCO Certified, a chemical is considered a high risk until it is proven to be otherwise. GreenScreen® for Safer Chemicals is used to identify a pathway to safer alternatives.

#### Criteria in chapter 7 focus on:

- Reducing or eliminating the use of hazardous substances in IT products and their packaging, beyond RoHS.
- Requiring that all flame retardants and plasticizers are assessed by an independent toxicologist and benchmarked as a safer alternative before being used in certified products. The same principle applies also to process chemicals, covered in chapter 2.
- Increasing transparency and making safer alternatives the mainstream choice by collecting all approved substances on the public and dynamic TCO Certified Accepted Substance List.

# 7.1 Heavy metals

#### **Background**

Electronic devices contain hazardous substances like heavy metals and brominated flame retardants. The effects of cadmium, mercury, lead and hexavalent chromium are well documented as substances hazardous both to human health and the environment. They may cause problems, both in the manufacturing phase where workers or the environment can be exposed, and at the material recovery, where uncontrolled recycling can cause the release of toxins such as dioxins and furans.

This criterion is harmonized with EU RoHS Directive (2011/65/EU), except that in TCO Certified, mercury is not allowed in lamps. As TCO Certified is a global certification, this also affects products sold outside the EU.

#### **Applicability**

Displays, notebooks, tablets, smartphones, desktops, all-in-one PC's, headsets, servers, network equipment, data storage products, imaging equipment.

#### References

7.1, 7.2.

#### 7.1.1 Mandate

The product must not contain cadmium, mercury, lead and hexavalent chromium

Exemptions are according to EU Directive 2011/65/EU (RoHS) and the documents supporting the directive except that mercury in lamps is not permitted.

The maximum concentration values tolerated by weight in homogeneous materials are 0.01% for cadmium, 0.1% for mercury, 0.1% for lead and 0.1% for hexavalent chromium according to EU RoHS Directive (2011/65/EU annex II) and the documents supporting the directive.

The limit value for batteries is 0.0005 % for mercury, 0.002 % for cadmium and 0.004 % lead per listed part, according to EU Directive 2006/66/EC.

#### Submit the following to an approved verifier:

A completed and signed product form (chapter 11.3).

#### Submit the following together with the application to TCO Development:

• A copy of a verification report from a verifier approved by TCO Development.

# 7.2 Halogens

#### **Background**

Halogenated substances are often persistent and can bio-accumulate in living organisms. They are problematic from both a human health and environmental perspective throughout the product life cycle and should be phased out. Workers may be exposed during manufacturing. Substances risk leaking out into the natural environment at end of life. PVC is by far the most common halogen-containing plastic.

#### **Definitions**

Electronic component is considered an individual part or combination of parts that, when together, perform a design function(s).

Product housing protects internal components and safeguards the user against injury from these electrical components. Product safety standards define these safeguards as different types of protective enclosures. These enclosures are added to safeguard against electrical shock, high temperatures, fire and mechanical (moving parts such as the fan), and radiation (such as any internal laser), whilst also protecting internal parts.

Printed circuit board (PCB) or printed wiring board (PWB) laminate is a printed board that provides point-to-point connections.

Power board or power PCB regulates the power leading to the device, converting alternating current to direct current

Polybrominated biphenyls (PBB) and polybrominated diphenyl ethers (PBDE) are restricted in the EU RoHS Directive (2011/65/EU) due to the hazardous properties of these substances. Hexabromocyclododecane (HBCDD) has been identified as a substance of very high concern in accordance with EU REACH criteria due to PBT (persistent, bio accumulative, toxic) properties.

#### **Applicability**

All product categories.

#### References

7.2, 7.3.

#### 7.2.1 Mandate

- 1. Product housing parts above 0.5 grams and the power PCB laminate of the internal/external power supply unit must not contain intentionally added (additive or reactive) flame retardants or plasticizers with halogenated substances. Exempted are all other parts, such as electronic components, other PCB laminates and all kinds of cable insulation.
- 2. The product must not contain PBB, PBDE and HBCDD. No parts of the product are exempted.
- 3. The largest PCB by area in the power supply unit (internal/external) must be tested for bromine and chlorine, (see clarification below).

Maximum concentration values tolerated for a restricted substance (including decaBDE) is 0.1% by weight of the material in homogeneous materials.

Fluoroorganic additives, used to modify the dripping behavior of plastics in fire conditions or to improve the processing behavior, are exempted provided that they do not exceed 0.5% by weight of the material in homogeneous materials.

#### Submit the following to an approved verifier:

- A completed and signed product form (chapter 11.3).
- A copy of the test report(s) from any laboratory accredited according to ISO 17025

#### Submit the following together with the application to TCO Development:

• A copy of the test report(s) from any laboratory accredited according to ISO 17025 and a copy of the verification report(s) from a verifier approved by TCO Development.

#### 7.2.2 Clarification

Point 1 of the mandate applies to product housing parts above 0.5 grams. This includes the product stand and the housing of the external power supply. The internal or external power supply socket or inlet is not included in the definition of product housing.

The power board laminate of the internal or external power supply is the only PCB that is mandated due to the high risk for their being added flame retardants to this part. All other PCBs inside the product are exempted. Restricted substances must be replaced with substances on the public TCO Certified Accepted Substance List. See mandate 7.3. non-halogenated substances for the requirements on safer substitution.

Point 2 of the mandate applies to the whole of the product, including components, parts and raw materials in all assemblies and sub-assemblies, such as batteries, paint, surface treatment, plastics, electronic components and printed wiring boards.

Point 3 of the mandate applies to the testing for bromine and chlorine where the following is required:

The largest PCB by area in the power supply unit must be tested for bromine and chlorine. The PCB must be tested in its final state with PCB laminates included but does not need to be tested with electrical components attached. Testing must be conducted through either IEC IEC 62321-3-1:2013, 62321-3-2:2020 or EN14582 by an ISO 17025 accredited laboratory. If the same PCB is used in multiple products, a test report may be used for multiple products if traceability between the tested sample and the product is verified.

- If indications of bromine or chlorine >0.1% are discovered, the applicant must proceed with additional testing in order to prove compliance with this criterion.
- If the concentration of detected substance is <0.1%, then no additional testing is needed.

# 7.3 Non-halogenated substances

#### **Background**

Hazardous non-halogenated substances are problematic in the manufacturing and material recovery phases where workers and the environment can be exposed, leading to both human health and environmental risks. The purpose of this criterion is to increase the knowledge of which non-halogenated substances are used in certified products, how hazardous they are to human health and the environment, and to drive a shift toward less hazardous alternatives. This mandate uses the hazard assessment and decision logic framework GreenScreen® for Safer Chemicals, developed by the non-profit organization Clean Production Action (CPA). GreenScreen criteria are in line with international standards and regulations that assess the human health and environmental risks of chemicals. These include the Regulation on the classification, labelling and packaging of substances and mixtures (CLP), Globally Harmonized System of Classification and Labelling of Chemicals (GHS), OECD testing protocols, European REACH Regulation that includes RoHs, POPs, SVHCs and the U.S. EPA's Design for Environment (DfE) Alternatives Assessment.

#### **Definitions**

GreenScreen Profilers: Toxicology firms licensed by CPA to provide GreenScreen assessment services for a fee to clients.

TCO Certified Accepted Substance List: Public list of independently assessed safer available alternatives considering toxicity and functionality. Go to tcocertified.com.

Clean Production Action (CPA). Developers of GreenScreen® for Safer Chemicals.

Electronic component is considered an individual part or combination of parts that, when together, perform a design function(s) and are typically directly attached to a printed circuit board. Internal and external power supplies are not included in the definition.

Product housing protects internal components and safeguards the user against injury from these electrical components. Product safety standards define these safeguards as different types of protective enclosures. These enclosures are added to safeguard against electrical shock, high temperatures, fire and mechanical (moving parts such as the fan), and radiation (such as any internal laser), whilst also protecting internal parts.

#### **Applicability**

All product categories.

#### References

7.4, 7.5, 7.6.

#### 7.3.1 Mandate

- Product housing parts above 0.5 grams and the power PCB laminate of the
  internal/external power supply unit must only contain intentionally added (additive or
  reactive) non-halogenated flame retardants that have been assigned a GreenScreen
  benchmark score of 2, 3 or 4 by a licensed GreenScreen Profiler and appear on the
  public TCO Certified Accepted Substance List. (A benchmark U may only be accepted
  when the "worst case scenario" for data gaps is considered to be a benchmark 2 or
  above.)
- All substances of a mixture must be accounted for. Non-accepted substances must not exceed concentration levels of 0.1% by weight of the flame retardant.
- Exempted are all other parts, such as electronic components and all kinds of cable insulation.

#### Submit the following to an approved verifier:

A completed and signed product form (chapter 11.3).

#### Submit the following together with the application to TCO Development:

- A copy of a verification report from a verifier approved by TCO Development.
- A document copy or access to a database copy of the certified assessment report conducted and issued by a licensed GreenScreen Profiler.

#### 7.3.2 Clarification

The mandate applies to product housing parts above 0.5 grams. This includes the product stand and the housing of the external power supply. The internal or external power supply socket or inlet is not included in the definition of product housing.

The power board laminate of the internal or external power supply is the only PCB that is mandated due to the high risk for their being added flame retardants to this part. All other PCBs inside the product are exempted.

#### **TCO Certified Accepted Substance List**

Non-halogenated flame retardants can be used in certified products once they receive an accepted benchmark and appear on the public TCO Certified Accepted Substance List. The list is dynamic, which allows new substances that have undergone a valid assessment to be added. Accepted substances may be reassessed in light of new scientific findings. If an accepted substance is reassessed and given a benchmark score lower than 2, TCO Development reserves the right to remove the substance from TCO Certified Accepted Substance List. Before a substance is removed from the list a sunset date (at least one year) is set and shown on the list. This is to give chemical and product manufacturers time to submit additional information to improve the benchmark score or to transfer to an alternative on the list. Product models that use a removed chemical but were certified before the sunset date are permitted to keep their TCO Certified certificate. Models certified after the sunset date may only contain flame retardants or plasticisers that are listed on TCO Certified Accepted Substance List.

Any spot checks by TCO Development will require manufacturers to disclose substance details being used in randomly chosen products. To verify that the obligations according to this mandate are fulfilled CASNR disclosure and laboratory assessments of selected parts will be conducted to assess the completeness, quality and validity of a benchmark score.

TCO Development and Clean Production Action (CPA) must have access to a copy of the GreenScreen assessment report before the substance can be added to TCO Certified Accepted Substance List, available at tcocertified.com.

#### Conformity procedure

- The applicant must contact relevant suppliers and ask them to confirm that the flame retardants and plasticizers they use only include substances listed on TCO Certified Accepted Substance List.
- If all flame retardants and plasticizers only include substances on TCO Certified Accepted Substance List, complete the product form 11.3 and submit it to an approved verifier. When the verifier considers all documentation to be compliant, they will issue an environmental verification to the applicant.
- If any flame retardant or plasticizer is used that contains a substance that is above the threshold level but doesn't appear on TCO Certified Accepted Substance List, then it must be added before approval can be given by a verifier. An extended time period to comply can be applied for here (see "Applying for an extended period..." below).

#### Adding a substance to the TCO Certified Accepted Substance List:

- 1. Contact TCO Development directly to see if we have any additional information on the substance. Reasons for the substance's absence can be that the substance has received benchmark 1, that no assessment has been conducted or that it has a benchmark score U (unspecified), due to a high number of data gaps.
- 2. If TCO Development requires the substance to be benchmarked, we recommend that you contact your suppliers and inform them that the substance will need an assessment by a licensed GreenScreen Profiler. The list of licensed profilers can be found on the Clean Production Action website at greenscreenchemicals.org.
- 3. A draft report per substance (not per product) is assembled by the licensed profiler from the available information (literature search, structural similarity comparison, expert judgment).
- **4.** It is the licensed profiler that sets the benchmark score per relevant substance, which is valid for at least five years.
- **5**. Benchmark reports must be submitted to TCO Development for final approval before a substance is added to TCO Certified Accepted Substance List. A copy must also be made available to CPA.
- **6.** When the final approval is complete, TCO Development will add the substance to the TCO Certified Accepted Substance List, showing the substance's name, CASRN, type, benchmark score, date of the assessment and profiler.
- 7. Once a substance is added to the list and the environmental verifier identifies them, then they will issue the environmental verification to the applicant (see above point 1:

"If all flame retardants and plasticizers only include substances on TCO Certified Accepted Substance List the procedure is as follows").

# Applying for an extended period of time to substitute or add a substance to TCO Certified Accepted Substance List

Applicants signing the mandate have the option to seek an extended period of time in order to complete assessments or substitute restricted substances. Upon request for an extension, the applicant is required to complete a risk assessment questionnaire and submit it to TCO Development. The risk assessment requires the applicant to clarify why an extension is necessary, provide information on the chemical and its substitute in question, and include a timeline for the assessment and/or substitution to be completed. If an extension application is not granted, the applicant is required to ensure that all used flame retardants or plasticizers only include substances that are on TCO Certified Accepted Substance List before an environmental verification can be issued for the product model by an environmental verifier. If the agreed extension due date is exceeded without conformity, then the environmental verifier must contact TCO Development and a course of action will be decided after discussing the issue with the applicant.

## 7.4 Plasticizers

#### **Background**

Plasticizers are increasingly associated with negative environmental and human health impacts. RoHs is a restricted substances list that, beginning in 2019, restricts the use of four phthalates. TCO Development is committed to take a much broader approach by identifying and restricting not only these four, but all substances of high concern used in IT products. Our criteria are therefore designed to make sure that replacement substances are independently assessed as safer alternatives, and that transparency increases. The full list of safer alternatives is available on toocertified.com.

This mandate uses the hazard assessment and decision logic framework called GreenScreen® for Safer Chemicals, developed by the non-profit organization Clean Production Action (CPA).

GreenScreen criteria are in line with international standards and regulations that assess chemicals on their human health and environmental hazards. These include the Regulation on the classification, labelling and packaging of substances and mixtures (CLP), Globally Harmonized System of Classification and Labelling of Chemicals (GHS), OECD testing protocols, European REACH Regulation that includes RoHs, POPs, SVHCs and the U.S. EPA's Design for Environment (DfE) Alternatives Assessment .

#### **Definitions**

Plasticizer: An additive to a polymer (plastic), to increase its flexibility, transparency, durability, or longevity.

Phthalates: The most common type of plasticizer in PVC cables.

Licensed profilers: Toxicology firms licensed by CPA to provide GreenScreen assessment services for a fee to clients.

TCO Certified Accepted Substance List: Public list of independently assessed safer available alternatives considering toxicity and functionality. Available at tcocertified.com.

Clean Production Action (CPA). Developers of GreenScreen® for Safer Chemicals, Product housing is considered the external enclosure or casing that protects the internal parts of the product. This includes the product stand.

Electronic component is considered an individual part or combination of parts that, when together, perform a design function(s) and are typically directly attached to a printed circuit board. Internal and external power supplies are not included in the definition.

#### **Applicability**

All product categories.

#### References

7.4, 7.5, 7.6.

#### 7.4.1 Mandate

- Plasticizers used in product housing and cable and wire insulations must have been assigned a GreenScreen benchmark score of 2, 3 or 4 by a licensed GreenScreen profiler and appear on the public TCO Certified Accepted Substance List. A benchmark U is only accepted when the "worst case scenario" for data gaps is considered to be a benchmark 2 or above.
  - Exempted are connectors and wires inside electronic components.
- The product must not contain Bis (2-ethylhexyl) phthalate (DEHP), Butyl benzyl phthalate (BBP), Dibutyl phthalate (DBP), and Diisobutyl phthalate (DIBP). No parts of the product are exempted.
- All substances of a plasticizer mixture must be accounted for. Non-accepted ingredients must not exceed concentration levels of 0.1% by weight of the plasticizer.

#### Submit the following to an approved verifier:

• A completed and signed product form (chapter 11.3).

#### Submit the following together with the application to TCO Development:

- A copy of a verification report from a verifier approved by TCO Development.
- A document copy or access to a database copy of the complete assessment report conducted and issued by an approved GreenScreen licensed profiler.

#### 7.4.2 Clarification

The mandate applies to the product housing, cable and wire insulations with no weight threshold. This includes internal and external power supply housing and their cables and wires. Wires that are exempted are those enclosed inside electronic components such as a HDD, SSD and ODD.

TCO Development and Clean Production Action (CPA) must have access to a copy of the GreenScreen assessment report before the substance can be added to TCO Certified Accepted Substance List. Once this is done, the substance will be added to the list, available at tcocertified.com.

For more clarifications on TCO Certified Accepted Substance List, conformity procedure, rules for adding a substance and applying for an extended period of time for substances not on the list, refer to clarifications under the mandate non-halogenated substances 7.3 clarifications.

# 7.5 Hazardous substances in product packaging

#### **Background**

The use of hazardous substances in packaging materials is problematic and should be minimized. It poses a risk to human health and the environment, not least because packaging materials have a short lifespan and generate large volumes of waste. Several hazardous substances are regulated in many countries, and the use of them should be phased out.

#### **Applicability**

All product categories.

#### References

7.7.

#### 7.5.1 Mandate

The packaging material must not contain lead (Pb), cadmium (Cd), mercury (Hg) or hexavalent chromium (Cr6). Plastic packaging material must not contain organically bound halogens.

#### Submit the following to an approved verifier:

• A completed and signed product form (chapter 11.3).

#### Submit the following together with the application to TCO Development:

• A copy of a verification report from a verifier approved by TCO Development.

#### 7.5.2 Clarification

Limit values are according to Directive 94/62/EC on packaging and packaging waste.

# **8 Material Recovery**

- More than 50 million metric tons of e-waste is generated every year and only a small amount is handled in a safe way.
- This leads to pollution, human health hazards and the loss of valuable finite resources.
- For a more sustainable life cycle, products and materials must be recovered and reused to a much larger extent.

#### Material waste - a multi-faceted sustainability issue

Today's unsustainable handling of e-waste leads to pollution, health hazards and the loss of valuable natural resources, such as copper, gold and rare earth metals. According to the United Nations University, electronic waste is the fastest growing waste stream in the world, with more than 50 million metric tons generated every year. It is estimated that only 20 percent of the waste is handled in a proper way. The rest is unaccounted for and risk being incinerated, placed on scrap heaps, or illegally exported to developing countries, often to destinations lacking effective legislation that regulates how e-waste should be managed. In these countries, products are manually disassembled, burned in the open air or dissolved in acid by local laborers including children, without adequate protective equipment — leading to severe health problems.

The packaging is also a sustainability issue. Packaging material has a short lifetime and generates large volumes of waste. Using several types of materials that are difficult to separate makes recycling a challenge.

#### Our approach: prevent e-waste and recover materials safely

The most important way of reducing e-waste is to use products longer. Read more about this in chapter 6. Once products have reached the end of their usable life, they must be collected for remanufacturing, refurbishing or recycling. Product packaging must be designed in a way that enables reuse and recycling.

#### Criteria in chapter 8 focus on:

- Saving natural resources and limiting hazardous waste by requiring that all packaging materials must be easily separable if not reusable.
- Gathering information on which take-back schemes and recycling facilities are used today, to prepare for future criteria on material recovery.

# 8.1 Product packaging

#### **Background**

Packaging is a well-known environmental problem that is regulated in many countries worldwide. Packaging material has a short lifetime and generates large volumes of waste.

#### **Applicability**

All product categories.

#### 8.1.1 Mandate

- Non-reusable packaging components of the certified product weighing more than 25 grams must be possible to separate into single material types without the use of tools in order for the material to be recycled.
- Exempted is reusable packaging.

#### Submit the following to an approved verifier:

A completed and signed product form (chapter 11.3)

# The following information must be submitted with the application to TCO Development:

A copy of the verification report(s) from a verifier approved by TCO Development.

#### 8.1.2 Clarification

A reusable package or container is designed for repeated reuse without impairment of its protective function. A take back system of the packaging must also be available for all end users in order for packaging to be defined as reusable.

# 8.2 E-waste management

#### **Background**

Enormous amounts of e-waste is generated every year. It is one of the world's fastest growing waste streams, and much of it is exported to developing countries, burdening local communities with this global problem. Unsafe handling of e-waste causes pollution, human health hazards and the loss of valuable, finite resources. The Basel Convention governs the export of many types of electronic waste, however, it is not properly implemented in all countries. To help reduce the e-waste problem, manufacturers need to provide mechanisms to take back their products. This is consistent with the principle of individual producer responsibility, where each manufacturer is financially responsible for managing its own branded products at end-of-use. The purpose of this criterion is to influence the expansion of better electronic waste management practices to more countries.

#### **Applicability**

All product categories.

#### 8.2.1 Mandate

By the end of August each year, the brand owner must report the following for the previous calendar year on a global scale for each certified product. (This applies until one year after the certificate expires):

- 1. The number of certified products that were manufactured
- 2. All countries the certified products were sold in
- 3. The name of the take-back system or extended producer responsibility schemes (EPRs) used for each country
- **4.** The name and address of the reuse and recycling facilities processing the collected products together with the standards met by the facilities (i.e. R2, e-Stewards, EN50625, or equivalent).

#### Submit the following to an approved verifier:

A completed and signed brand owner product form (chapter 11.4).

#### Submit the following together with the application to TCO Development:

- A copy of the verification report(s) from a verifier approved by TCO Development.
- The e-waste management template must be uploaded annually in TCO Certified Portal

#### 8.2.2 Clarification

Instead of reporting manufacturing volumes for each certified product, reporting may be done by combining all certified products within each product category.

Reuse and recycling facilities that are used by government-approved EPRs are excluded from point 4 in the mandate.

The e-waste management template can be found at https://tcocertified.com/certification-documents/

#### Clarification of sustainability performance indicator(s)

One or more "sustainability performance indicators" (chapter 1.3) are collected for this criterion. There is no mandatory level for these indicators but they must be verified and reported according to the description below.

The following SPI(s) is not required for compliance with TCO Certified. If no information is provided the product will receive the lowest classification by default.

# Membership in multi-stakeholder initiatives working towards solving the problems connected to e-waste (Class A-C)

- **Class A:** Membership in a multi-stakeholder initiative working towards solving the problems connected to e-waste (i.e StEP, PREVENT Waste Alliance, PACE)
- Class B: No membership
- Class C: No information provided

Verification: The brand owner must provide documentation showing an active membership in a multi-stakeholder initiative working towards solving the problems connected to e-waste.

#### Use of internationally accredited reuse and recycling facilities (Class A-D)

Brand Owners use EPRs and/or reuse/recycling facilities that are certified to internationally accredited standards (R2, e-Stewards, EN50625 or equivalent).

- **Class A:** For all markets where certified products are sold, only internationally accredited EPRs and reuse/recycling facilities are used by the brand owner.
- **Class B:** For all markets where certified products are sold, internationally accredited reuse/recycling facilities (EPRs excluded) are used.
- **Class C:** Not all markets where certified products are sold are covered by accredited EPRs or reuse/recycling facilities.
- **Class D:** No markets where certified products are sold are covered by accredited EPRs or reuse/recycling facilities.

Verification: The data must be provided during the reporting at the end of August.

- For EPR systems:
  - a link to their public policy must be provided which must include their requirement on internationally accredited standards (R2, e-Stewards, EN50625 or equivalent).

- For reuse and recycling facilities:
  - o a valid certificate for R2, e-Stewards, EN50625, or equivalent must be provided.

#### Ratio of compensated versus manufactured products (Class A-G)

For product category applicability, see the corresponding TCO Certified Edge, E-waste compensation criteria document.

For this SPI, products have the possibility to be compliant with the model of TCO Certified Edge - E-waste compensation without achieving the full 100% compensation threshold. The compensation must still follow the rules in TCO Certified Edge - E-waste compensation.

- Class A: Fully compliant with TCO Certified Edge, E-waste compensated. (100%)
- Class B: 75% or above
- Class C: 50% or above
- Class D: 25% or above
- Class E: 10% or above
- Class F: 1-10%
- **Class G:** 0% or no information provided.

Verification: The brand owner must provide a verification of conformity report from an approved verification organization which follows the TCO Certified Edge, E-waste compensated rules.

# 8.3 Material coding of plastics

#### **Background**

The best way of reducing IT products' environmental impact is to extend product life through reuse. Once this no longer is possible, the materials must be recycled. By coding the plastic parts, recycling is made easier and the materials can be used in new products.

#### **Definitions**

Plastic parts are parts made mainly of plastics, e.g. the product housing. Parts containing other materials in any significant amounts, e.g. cables with metal conductors, are not included in the definition.

Printed wiring board laminate is a printed board that provides point-to-point connections but not printed components in a predetermined configuration on a common base.

#### **Applicability**

Displays, desktops, all-in-one PCs, projectors, servers, network equipment, data storage products, Imaging equipment.

#### References

8.1-8.3.

#### 8.3.1 Mandate

• Parts made with a majority of plastics weighing more than 25 grams must be material coded in accordance with ISO 11469 and ISO 1043-1, -2, -3, -4.

#### Submit the following to an approved verifier:

A completed and signed product form (chapter 11.3)

# The following information must be submitted with the application to TCO Development:

• A copy of a verification report from a verifier approved by TCO Development.

#### 8.3.2 Clarification

Printed wiring board laminates, wires and cables, connectors, electronic components, optical components, acoustic components, ESD and EMI components are exempted from the mandate

If the amount of flame retardant exceeds 1 % by weight, the coding must be complemented in accordance with ISO 1043-4.

The requirements also apply to plastics in the LCD panel, however, labeling of the light guide may instead consist of the application of a label in close proximity, for example PLASTIC LIGHT GUIDE: plastic type(s) < or > PLASTIC LIGHT GUIDE: plastic type(s) <.

Labeling of plate diffuser (not thin plastic film diffuser) must follow the same rules as for the light guide. The requirement does not cover other thin plastic films in the panel due to difficulties in labeling these.

# 9 Test conditions for imaging equipment

# 9.1 General test conditions

#### 9.1.1 Definition of a test object

The product that are subject to tests within this product category are defined in the chapter "About this document".

#### 9.1.2 Required information about the product

#### The applicant must specify:

• Name(s), type designation(s) and manufacturer of the product.

#### 9.1.3 Test conditions

- The product must be delivered to the test facility in test-ready condition and include any required accessories. All necessary information about how to operate and adjust the product must be provided.
- The performance of the tested product must in all aspects be equal to the product that is delivered to the end-user.
- Only equipment that is necessary for the functionality of the product should be connected to external ports such as USB-ports, unless otherwise stated by the manufacturer.
- The product must be tested under nominal conditions of input voltage, current, etc. If sold on different markets, one setup must be chosen by the manufacturer which must represent the conditions of the country there the product must be sold the most.

# 9.1.4 Instruments used for testing

All instruments used for testing must be calibrated and there must be a valid calibration report. Calibration must be done before the tests are carried out. Calibrations must be traceable to national standards.

## 9.1.5 Test report

The test results are valid only for the presentation form(s) and configuration(s) that are included in the test. However, configurations may be accepted by the test facility based on tests of a "worst case" configuration. In this case, it must be clearly specified in the test report which of the configurations that have been tested.

#### The test report must include the following information:

- Any changes to the test methods.
- The manufacturer, brand name, model type and serial number (if available).

- The supply voltage and frequency used during the test and whether it is a CLASS I or CLASS III type. If CLASS III the AC external power supply brand name and model number must also be stated.
- The degree of uncertainty for each given measurement result.
- Photographs of the product showing: front, rear and, if applicable, the external power.

#### 9.1.6 Overall uncertainty

The overall uncertainty of the test facility must be calculated for each measurement procedure in this document and presented in the test report. The uncertainty must be within the required levels for each criterion. All measurement uncertainties claimed for used instruments must be referred to traceable calibration reports.

#### About combining overall uncertainty values during test measurements:

- Criteria are fulfilled without adding or subtracting the overall measurement uncertainty.
- Report the value shown on the instrument without adding or subtracting the overall measurement uncertainty.
- The overall measurement uncertainty of the test facility must be printed in the test report together with the reported value.
- If a test facility has an overall measurement uncertainty higher than the one allowed by TCO Development for a certain criterion, then the test report for that criterion is not valid for certification and the test result will not be accepted by TCO Development.

# 10 References

International standard organizations referred to and their websites..

- ASTM, American Society for Testing and Materials, <a href="http://www.astm.org/">http://www.astm.org/</a>
- CIE, Commission Internationale de l'Eclairage, International Commission on Illumination, www.cie.co.at/cie/
- DIN, Deutsches Institut für Normung e. V., <u>www2.din.de</u>
- EBU, European Broadcasting Union, <a href="http://www.ebu.ch/tech\_info.html">http://www.ebu.ch/tech\_info.html</a>
- IEC, International Electrotechnical Commission, www.iec.ch
- ISO, International Organization for Standardization, <a href="http://www.iso.org/">http://www.iso.org/</a>
- ITU, International Telcommunication Union <a href="https://www.itu.int/home/index.html">www.itu.int/home/index.html</a>
- SMTPE, Society of Motion Picture Television Engineers, www.smtpe.org
- VESA, Video Electronics Standards Association, <u>www.vesa.org</u>
- 1.1 EN 60950-1 (IEC 60950-1). Safety of information technology equipment including business equipment.
- 2.1 Responsible Business Alliance (RBA), http://www.responsiblebusiness.org/
- 2.2 SA8000, http://www.sa-intl.org
- 2.3 Amfori BSCI, http://www.amfori.org/
- 2.4 https://iccwbo.org/global-issues-trends/responsible-business/combatting-corruption/
- 2.5 http://www.oecd.org/corporate/mne/mining.htm
- 2.6 EPRM: https://europeanpartnership-responsibleminerals.eu/
- 2.7 RCI http://en.cccmc.org.cn/news/58372.htm
- 2.8 RMI http://www.responsiblemineralsinitiative.org/
- 2.9 & 3.1 EMAS EU regulation no 761/2001 concerning the voluntary participation of industrial companies in the Union's environmental control and review structure.
- 2.10 ISO 14001 Environmental management systems Specification with guidance for use
- 2.11 https://www.bsigroup.com/en-GB/standards/
- 2.12 https://www.iso.org/iso-45001-occupational-health-and-safety.html
- 2.13 http://www.centerforsustainabilitysolutions.org/clean-electronics/
- 3.1 EMAS EU regulation no 761/2001 concerning the voluntary participation of industrial companies in the Union's environmental control and review structure.
- 3.2 ISO 14001 Environmental management systems Specification with guidance for use
- 4.1 EN 60950 (IEC 60950). Safety of information technology equipment including business equipment.
- 5.1 ENERGY STAR® Program Requirements for Computers
- 5.2 https://www.nap.edu/read/5734/chapter/9#61

- 5.3 <a href="https://www.planetexperts.com/recycled-beats-virgin-paper-environmental-impact-new-study-shows">https://www.planetexperts.com/recycled-beats-virgin-paper-environmental-impact-new-study-shows</a>
- 5.4 Pratima Bajpai, 15 Environmental Aspects of Recycling, in: Recycling and Deinking of Recovered Paper, 2014, Pages 271-282; available online at:
- https://www.sciencedirect.com/topics/earth-andplanetary-sciences/recycled-paper
- 6.1 Tecchio,P., Ardente, F., Marwede, M., Christian, C., Dimitrova, G. and Mathieux, F., Analysis of material efficiency aspects of personal computers product group, EUR 28394 EN, Publications Office of the European Union, Luxembourg, 2018, ISBN 978-92-79-64943-1, doi:10.2788/89220, J
- 6.2 Ben Bridgens, Kersty Hobson, Debra Lilley, Jacquetta Lee, Janet L. Scott, Garrath T. Wilson, Closing the Loop on E-waste: A Multidisciplinary Perspective, Journal of Industrial Ecology, 2017
- 7.1 EU Directive 2006/66/EC on batteries and accumulators containing certain dangerous substances
- 7.2 EU Directive 2011/65/ECon the restriction of the use of certain hazardous substances in electrical and electronic equipment
- 7.3 Regulation concerning Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), EC 1907/2006
- 7.4 GovTrack.us. "H.R. 4040--110th Congress (2007): Consumer Product Safety Improvement Act of 2008, GovTrack.us (database of federal legislation). Retrieved 14 August 2009. -> https://echa.europa.eu/sv/home NEW
- 7.5 ECHA Website Proposal for identification of Substances of Very High Concern -> http://eur-lex.europa.eu/homepage.html NEW
- 7.6 https://www.greenscreenchemicals.org/
- 7.7 Directive 94/62/EC on packaging and packaging waste.
- 8.1 EU Directive 67/548/EEC on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances
- 8.2 ISO 11469:2000 Plastics Generic identification and marking of plastics products
- 8.3 ISO 1043-1, -2, -3, -4 Plastics Symbols and abbreviated terms
- 8.4 EU Directive 2002/96/EC on waste electrical and electronic equipment (WEEE)

# 11 Forms and signatures for application

All forms must be completed, signed and sent to a verifier approved by TCO Development.

The forms in this chapter are for reporting conformity with the mandates in TCO Certified, generation 9, for imaging equipment and for providing information about the brand owner management systems, the product and its manufacture.

# 11.1 Brand owner form

The information in this form refers to the brand owner. The form may cover several of the brand owner's products. The form must be submitted once a year.

# 11.1.1 Supply chain responsibility (mandate 2.1.1)

The most recent version of the brand owner's public code of conduct is attached (yes/no)	
Information on the routines of how management and workers have been informed about the brand owner's code of conduct is attached (yes/no)	
Supply chain responsibility mandate is fulfilled (yes/no)	

# 11.1.2 Supply chain transparency (mandate 2.2.1)

Name, title, telephone number and email address of the SMR on the TCO Certified portal	
(yes/no)	
The report from the SMR interview including the verified self-assessment questionnaire	
(SAQ) is attached (yes/no)	
A date, with a period of less than 12 months, of the planned SMR interview with the name	
of the approved verifier on the TCO Certified portal (yes/no)	
Supply chain transparency mandate is fulfilled (yes/no)	

## 11.1.3 Anti-bribery management system (mandate 2.3.1)

An ISO 37001 certificate(s) is attached, or a booked date for the self-assessment	
questionnaire (SAQ) and follow-up interview. (yes/no)	
Anti corruption management mandate is fulfilled (yes/no)	

# 11.1.4 Responsibly sourced minerals (mandate 2.4.1)

The most recent version of the public policy and a description of how it is communicated	
to the supply chain is attached (yes/no)	
A description of the brand owner's structured work on identifying risk areas in their supply	
chain is attached (yes/no)	
The responsibly sourced minerals template is completed and submitted to TCO Certified	
Portal before the brand owner annual due date stated on the portal. (yes/no)	
Responsibly sourced minerals mandate is fulfilled (yes/no)	

The brand owner guarantees that the provided information in chapter 11.1 is correct, and accepts to be bound by the listed mandates as they are fully stated in TCO Certified, generation 9, for imaging equipment.		
Product brand name	Model name(s) or "All certified products"	
Signature	Name and title in block capitals	
Date	Brand owner company	

# 11.2 Factory form

The information in this form refers to the factory where products included in the application are manufactured. The form may cover several of the brand owner's products. A separate copy of the form must be used for each factory.

The supply chain identification template is completed and submitted before the	
due date stated on TCO Certified Portal (yes/no)	

### 11.2.2 Process chemicals management (mandate 2.5.1)

A copy of the ISO 45001 certificate is submitted before the due date stated on	
TCO Certified Portal (yes/no)	
The Process Chemical Data Collection (PCDC) Tool is completed and submitted I	
before the due date stated on TCO Certified Portal. (yes/no)	
The PCDC Tool,can be downloaded at tcocertified.com	
Process chemicals management mandate is fulfilled (yes/no)	

## 11.2.3 Environmental management system (mandate 3.1.1)

A copy of the ISO 14001 certificate is submitted before the due date stated on	
TCO Certified Portal (yes/no)	

# 11.2.4 Energy efficiency indicators (mandate 3.2.1)

Total energy consumption for the factory. (KWh/Year)	
Percentage of renewable energy consumed by the factory (%)	
Energy improvements compared to previous year (%)	

# 11.2.5 Energy management system (mandate 3.3.1)

A copy of the ISO 50001 certificate is submitted before the due date stated on	
TCO Certified Portal (yes/no)	

The applicant guarantees that the provided information in chapter 11.2 is correct, and accepts to be bound by the listed mandates as they are fully stated in TCO Certified, generation 9, for imaging equipment.		
Factory name	Factory address	
Applicant	Name and title in block capitals	
Signature	Date	

# 11.3 Product form

The information in this form refers to the product that is included in the application. A separate copy of the form must be used for each product model.

# 11.3.1 Information to end users (mandate 1.1.1)

Mandate fulfilled through (A.1, A.2 or A.3):	
A. The information document for end users must be written in English or in the local language of the country where the product is to be sold. It must accompany the product in at least one of the following ways:	
1. As a separate printed or digital document.	
2. Included in a printed or digital user manual.	
3. As a separate digital document that is hosted on the brand owner's website. A direct link to the document must be included in the printed or digital user manual mentioned above.	
Information to end users mandate is fulfilled (yes/no)	

### 11.3.2 Product specification (mandate 1.2.1)

Product manufacturer	
Product brand name	
Product brand owner	
Product type/model name	
Total weight of the typical product configuration	
and power supply (kg)	
A copy of the marking label is attached (yes/no)	
Product specification mandate is fulfilled (yes/no)	

# 11.3.3 Sustainability performance indicators (mandate 1.3.1)

Sustainability performance mandate is fulfilled (yes/no)	

# 11.3.4 Non-mandatory sustainability performance indicators (mandate 1.3.1)

(SPIs marked with Z in criterion 1.3)

To achieve a higher classification on the following SPIs, additional information and evaluation is required. The submissions and additional evaluations are <u>optional</u>. By submitting and performing an evaluation, the product will always receive a higher classification than if no evaluation is conducted.

3.5 Documentation on PCF methodology is submitted (yes/no)	
3.5 Documentation regarding PCF availability is submitted (yes/no)	

6.1 Documentation on extended warranty availability is attached (yes/no)	
6.1 Documentation on public repair policy is attached (yes/no)	
6.2 Should the SPI "Classification of fasteners and connectors" be evaluated? (yes/no)	
6.2 Should the SPI "Necessary tools for repair/upgrade)" be evaluated? (yes/no)	
6.2 Should the SPI "Classification of availability of spare parts by target group" be evaluated? (yes/no)	
6.2 Should the SPI "Classification of availability of spare parts by duration of availability" be evaluated? (yes/no)	
6.2 Should the SPI "Classification of availability of comprehensive information" be evaluated? (yes/no)	
6.2 Should the SPI "Capability to use remanufactured cartridges and containers" be evaluated? (yes/no)	
6.2 Should the SPI "Functionality allowing firmware updates to be rolled back to previously installed versions" be evaluated? (yes/no)	
8.2 Documentation showing the brand owner involvement in multi-stakeholder initiatives working towards solving the problems connected to e-waste is submitted (yes/no)	
8.2 Documentation on ratio of compensated versus manufactured products is submitted (yes/no)	
11.3.5 Post-consumer recycled content (mandate 3.4)	
TCO Certified PCR template may be used for submission for this criterion	
Documentation on weight of post consumer recycled plastic parts is attached (yes/no)	
Documentation on weight of all plastic parts is attached (yes/no)	
Documentation on weight of post consumer recycled non-plastic parts is attached (yes/no)	
Post-consumer recycled content mandate is fulfilled (yes/no)	
11.3.6 Electrical safety (mandate 4.1.1)	
A copy of a valid CB certificate or a national certificate from a CB member (NCB) for the product is attached (yes/no)	
11.3.7 Energy efficiency (mandate 5.1.1)	

A copy of the test report(s) from a laboratory accredited according to ISO 17025

is attached (yes no)

Energy efficiency mandate is fulfilled (yes/no)

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7.1.1 Heavy metals mandate is fulfilled (yes/no)	
7.2.1 Halogens mandate is fulfilled (yes/no)	
7.2.3 A copy of the test report(s) from a laboratory accredited according to ISO 17025 is attached (yes/no)	
7.3.1 Non- halogenated substances mandate is fulfilled (yes/no)	
7.4 1 Plasticizers mandate is fulfilled (yes/no)	
7.5.1 Hazardous substances in product packaging mandate is fulfilled (yes/no)	

# 11.3.9 Material recovery

8.1.1 Material coding of plastics mandate is fulfilled (yes/no)	
8.2.1 Product packaging mandate is fulfilled (yes/no)	

The applicant guarantees that the provided information in chapter 11.3 is correct, and accepts to be bound by the listed mandates as they are fully stated in TCO Certified, generation 9, for imaging equipment.		
Product brand name	Model name(s)	
Signature	Name and title in block capitals	
Date	Applicant	

# 11.4 Brand owner product form

The information in this form refers to the product that is included in the application.

The form may be signed once and cover all products, but a copy of the form must be attached to each application.

Information about the minimum product warranty period for the product is attached (yes/no)	
Product warranty - brand owner mandate is fulfilled (yes/no)	

## 11.4.2 Replaceable components (mandate 6.2.1)

A link to the service manual on the brand owner website or a pdf of the material that will be published there during the validity of the certificate is attached (yes/no)	
Replaceable components mandate is fulfilled (yes/no)	

# 11.4.3 E-waste management (mandate 8.2.1)

E-waste management mandate is fulfilled (yes/no)	
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# 11.4.4 Factory identification (mandate 2.1.1)

The final assembly factory/factories that manufacture the certified product are	
reported at the time of application (yes/no)	
The most recent independent audit and a CAP for each non-conformity was/is	
provided for the factory (yes/no)	

The brand owner guarantees that the provided information in chapter 11.4 is correct, and accepts to be bound by the listed mandates as they are fully stated in TCO Certified, generation 9, for imaging equipment.		
Product brand name	Model name(s) or "All products"	
Signature	Name and title in block capitals	
Date	Company	

# 11.5 Certification documents

The process chemical data template, self-assessment questionnaire and other relevant documents are available on toocertified.com/certification-documents.

All changes or clarifications made to this document are announced in the Technical updates and changes newsletter. All changes communicated through the newsletter can be found on <a href="https://tcocertified.com/technical-updates-and-changes/">https://tcocertified.com/technical-updates-and-changes/</a>



