Camara Education E-Waste Policy

Updated January 2026

Overview

Camara Education strives to become an innovative leader in e-waste management by creating a closed loop system for all e-waste generated through our worldwide initiatives. As a social enterprise, we take this commitment very seriously and aim to continually improve on our practices within the areas of e-waste disposal and asset tracking.

Camara Education works with a network of licensed ITAD partners in Ireland, the UK, and Globally to provide a secure system whereby any equipment supplied by our donors can be fully processed in the most secure and efficient way. Each of our certified ITAD partners who are collecting equipment from our donors have signed contracts of commitment to ensure that any electronic equipment and related parts handled by Camara or the partner is properly managed at all stages in the equipment life cycle and meets the highest standards for wiping, refurbishment and disposal.

We have also formalised partnerships with companies who are fully certified by the local Environmental Management Agencies within each of the countries where we operate Camara Education hubs. These partners process the e-waste collected from Camara supported schools and meet all regulations in relation to e-waste disposal.

Purpose

A policy will outline the processes and procedures for all Camara entities to follow when dealing with e-waste handling, storage and disposal within their hubs.

Scope

This policy applies to all Camara Education staff and participating parties of Camara activities. This policy is intended to cover all used electronic equipment which has been provided to Camara by our donors and also to all equipment which is provided by Camara to any school or institution in any of our operating countries.

Security

Camara ensures that all donated IT equipment is wiped in accordance with the latest international standards, specifically ISO/IEC 21964-1:2018 for data destruction. A certificate of data destruction or wiping for hard drives is issued to the donating party upon request.

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The E-Waste Policy Standards:

1. **Maximise Reuse Opportunities**

   1.1. Camara will pursue all available electronic equipment reuse opportunities in an effort to reduce its global footprint.

   1.2. With the assistance of our ITAD partners, Camara is committed to ensuring the following services are completed to the highest standards across our network: Refurbishing, Repair, Reuse, and Recycling of all electronic equipment.

2. **Test Equipment Functionality for Dispatch and Re-use**

   2.1. Data on equipment for reuse shall be responsibly and appropriately handled by our ITAD partners employing tools and processes that meet or exceed Camara's procedural standards.

   2.2. All Equipment shall be fully tested and functional before being distributed to African hubs as a Refurbished product from our ITAD partners. Under no circumstances should any non-functional or faulty equipment be shipped to a Camara Education hub if it does not pass all refurbishment tests and minimum specification requirements.

   2.3. On arrival into Country, all equipment will be checked and tested by our local staff prior to dispatch to any school or educational institution. Any equipment that fails testing and inspection or does not meet Camara standards should be sent to our local ITAD partner for disposition.

3. **Asset Tracking**

   3.1. All assets shipped to African hubs should be tracked by their serial number or a unique asset tracking (Afritrack) number which should be documented on the paperwork which is provided prior to shipment.

   3.2 Afritrak numbers should be printed on a label with a barcode and attached to each Camara computer and monitor prior to dispatch to schools for proper monitoring and future tracking. Afritrack Numbers should be cross-referenced with all known attributes of the asset such as make, model, serial number and hardware specification which should be recorded on Camara's internal systems.

This number is used to track the location and status of all assets during their lifetime.

3.3 Hubs not using the Afritrack system should ensure the serial number on the device is used to track and record device location. All other device attributes such as make, model and hardware spec should be recorded on Camara's internal systems appropriately.

3.4. On arrival at the hub, each asset should be individually verified against shipping documentation and registered onto Camara's data management systems. Any discrepancies or issues between packing list and equipment received should be reported to Camara Education Senior Management and the supplier as soon as possible. Items which are non functional, have missing items or are broken should also be detailed on this report accompanied by photographs. As part of each Hub's procedures for registering the arrival of equipment, each asset is individually verified as received with feedback reports submitted to CEL senior management and the supplier for quality control.

3.5 Camara's internal management systems should be updated by the technical manager with all necessary information regarding school name, location, contact details prior to being dispatched to a school. Documentation acknowledging receival of the specified equipment should be signed by an appointed person within the receiving school and uploaded to Camara's management system

3.6 Educational hubs will make every effort to ensure a closed loop is established for all equipment dispatched through communication with receiving schools and various government Ministries, particularly the Ministry of Education. When equipment reaches end of life, it should be detailed on data management systems as e-waste and all details about the issue and date of removal from schools should be appropriately recorded on Camara's Management System

3.7 All equipment sent an approved and licensed e-waste handler for processing once it reaches end of life should be evidenced through a formal report supplied by the iTAD provider on receival of the device.

4. E-Waste Planning and Management

4.1 Each hub has a plan that is contextually relevant and realistic to their environment for collection and disposal of e-waste. The following methods are generally used by hubs to ensure equipment is returned when obsolete: :
4.1.1 Contractually obligate schools to return equipment at the end of life
4.1.2 Schools are offered a discount on purchases of replacement equipment for returning obsolete equipment.
4.1.3 Encourage schools and donors to cover the cost of an extended maintenance contract to ensure equipment remains functional for as long as possible before reaching end of life
4.1.4. E-waste collection requirements are detailed within MOU agreements made with the Ministry of Education prior to projects commencing so that this is agreed outside of the school.
4.1.5 Educational and information engagements with school leaders and stakeholders regarding the importance of ensuring e-waste is appropriately disposed off for environmental and safety reasons as part of ongoing support to schools.

5. Maintenance

5.1. Camara hubs ensure that necessary equipment is available for use by technicians to ensure that the lifespan of Camara computers is maximised. Camara also ensures that all local technicians and volunteers are fully trained to ensure the skills exist at a local level to troubleshoot, repair, or decommission Camara computers.

6. Obsolete equipment

6.1. When every effort to repair and upgrade Camara equipment has been expended and is found to be non-functional, the equipment should be registered as obsolete in the ERP system.

6.2 Equipment collected by Camara for e-waste should either be transported to a Camara recycling partner or stored in a secure area designated as appropriate for e-waste storage and aggregation prior to being sent to the ITAD partner in a bulk consignment.

6.3 All e-waste equipment returned to Camara staff or to Camara hubs by schools is considered Camara property until it is appropriately handed over to

our certified partner. Under no circumstances should any e-waste equipment be taken from schools or removed from Camara's designated storage by staff members for their own intended purpose or for any personal gain via other ITAD providers. Breach of this by staff will be taken very seriously and could result in disciplinary or legal action.

7. Partnerships

7.1. Camara hubs have mutually beneficial partnerships with certified ITAD providers who are registered and approved by local government authorities who deal with our end of life equipment in the interest of developing closed loop systems of e-waste management.

7.2. Camara is committed to becoming a net contributor to the proper disposal of e-waste by working to ensure that any equipment we receive through our networks or bring into our African hubs is appropriately disposed off.

7.3. Camara will work with national and local governments, where appropriate, to encourage and support the implementation of e-waste policies that will ensure proper collection and disposal of e-waste.

7.4. Camara will continue to develop and strengthen partnerships with fully registered and certified ITAD corporations whose practices in the area of e-waste align with Camara's own ethos and meet the highest international standards. Through these partnerships Camara is poised to be at the forefront of all e-waste initiatives in our operating countries.

7.5. Camara Education will only partner with approved e-waste recycling organisations that align with our own environmental policy and ethos and are certified for their adherence to international regulations and standards. All Camara's ITAD partner organisations used for donor collections will use environmental processes that maximise reuse and reclamation where possible.

7.6. All ITAD partners must maintain transparency and traceability at all phases of their processes as well as adherence to industry standards for data security and destruction. The partners are legally compliant and certified by international standards such as WEEE, Basel, Bamako as well as any country specific requirements. All
ITAD partners should be able to provide annual audit reports of their processes

and facility and be fully certified and compliant at all times.

Obligation

All Camara employees regardless are required to comply with the specifications of this policy. Employees who violate this Policy will be subject to disciplinary action. Camara Partners who violate this Policy may be subject to contract termination.

Reporting

All Camara Education staff members have an obligation to immediately report any known or suspected violations of this Policy. To highlight concerns of potential violations of this Policy, contact your Country Lead, Camara Education's Technical Director or the Director of African Operations.

Definitions

1	E-Waste	Electronic equipment that has reached the end of its useful life in its original form or is incapable of performing its original intended function(s) and cannot be Updated, Reused, or Refurbished.
3	Participating Parties	Staff, partners, volunteers
4	Camara Equipment	All computers, laptops, monitors and all other substantial electronic hardware (projectors, whiteboards, switches) which have been provided to Camara Education by donors or shipped to African hubs for dispatch to schools
5	Disposition	Includes all activities associated with handling end-of-use and end-of-life electronics.
6	Refurbishment	Electronic equipment that has undergone a process that includes, but is not limited to, disassembly or physical modifications to the equipment, part removal and upgrades in order to render the whole unit available for reuse.
7	Repair	The process of fixing a specified fault or series of

		faults to render the product or component available for Reuse.
8	Reuse	A process of using again an electrical or electronic device directly following a functionality test or possibly after Refurbishment or Repair. Other relevant processes to enable Reuse may include data Sanitization and software installation.
9	Recycling	A process where electrical and electronic devices not suitable for Refurbishment, Remanufacturing, Repair and/or Reuse should be processed for material recovery of scarce resources and reusable raw materials and appropriate treatment of environmentally sensitive materials.
10	Functional	Equipment that functions in the way originally intended by the manufacturer following a testing or Refurbishment process where essential functions are tested.
11	End-of-Use/Life Electronics	Electronic Equipment that has reached the end of its useful life in its original form or to perform its original intended function(s). (This material may be Reused, Refurbished, Remanufactured or Recycled as appropriate.)
12	Sanitised/Sanitisation	A process to render access to Data on the media infeasible. Purging, Wiping and destruction are actions that can be taken to sanitise media.