

Colorado Document Security

Information Destruction

Operational Policy & Procedures Manual

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1 EMPLOYEE AND SUBCONTRACTOR SCREENING

1.1 NON-ACCESS AND ACCESS EMPLOYEE PAPERWORK

Management will maintain on file the following documentation for all employees, whether their position grants them physical access (“Access Employee”) to confidential material or not (“Non-Access Employee”):

- I-9 or similar documentation verifying an employee’s legal right to work in a particular country.
- Confidentiality Agreement attesting to the employee’s understanding that they will be exposed to confidential material and that they agree to maintain and protect the confidentiality of all information taken into custody by the company.
- Copy of current driver’s license (drivers only)

1.2 Access Employee Criminal Background Checks

Prior to being granted access to confidential material, all Access Employees will have an initial criminal background investigation completed by a third party to verify that the employee has not been convicted of a theft-related felony in the last 7 years. The criminal background investigation is to include the following:

- Social Security Trace (or Social Security Header Search): A report of all names and addresses associated with a social security number
- Federal records search for all Federal Districts in all states on the Social Security Header Search reported within the last 7 years
- Statewide records search for all states on Social Security Header Search reported within the last 7 years
- County records search for all counties on Social Security Header Search reported within the last 7 years

In addition to initial screening, all Access Employees are subject to ongoing criminal background investigations checks. Any employee convicted of a theft-related felony during their employment with the company will be removed from a position where they have access to confidential material.

1.3 Access Employee Drug Screening

Prior to being granted access to confidential material, all Access Employees must have an initial drug screening. In addition to this initial screening, 50% of all Access Employees are subject to random drug screenings on an annual basis.

1.4 Access Employee Prior Employment Verification

Prior to being granted access to confidential material, all Access Employees will have the previous 7 years of employment history verified by management.

1.5 Subcontractor Screening

NAID Certification requires that the Company maintain secure control over all material from the moment the custody of the material is transferred from the customer, throughout all stages of the process, i.e. transportation, staging and destruction, until the material is destroyed and responsibly disposed. It may become necessary from time to time to subcontract all or a portion of this process to other organizations, of which the Company has no immediate or direct control. In order to ensure that our customers continue to receive a secure certified service when fiduciary responsibility is transferred to a subcontractor, management will adhere to the following procedures for all situations in which a subcontractor is used:

- Customer notification:
 - Notify customers in writing of the use of a subcontractor. This notification must identify the parties destined to accept custody, the exact location of destruction and the method of destruction.
 - This written notification will be included in all bids or proposals, whenever applicable, if this information is known at the time of the bid or proposal, as well as prior to or at the time the service is rendered.
 - If the subcontractor performing destruction services is not NAID Certified, this will also be included in the customer notification.
- Obtain the following written acknowledgments from the subcontractor(s):
 - All individuals of the subcontractor companies or agents in the chain of custody, including third party transporters, understand that the media they come into contact with may be confidential and the subcontractor accepts fiduciary responsibility of the material.
 - All employees and individuals in the subsequent chain of custody submit to the same background screening required for NAID Certification.
 - All agents subsequently accepting custody of media must meet the current NAID Certification specifications for all applicable criteria.

2 DRIVER PROCEDURES

2.1 Access to Vehicles

The company wants to ensure that the utmost security precautions are taken by all employees. The company's access rules and regulations are as follows for those employees whose job duties involve driving:

- Only Management and designated employee Drivers will be allowed to have keys to vehicles.
- Two sets of keys will be issued to each driver.
- Employees are not allowed to utilize the company's vehicles for personal use without prior authorization from Management.
- Drivers are to follow the management-designated routes in providing services.

2.2 Security and Safety Measures for Vehicle Usage

In addition to the access limitations, the company utilizes the following security and safety measures for all drivers:

- Driver's Manual will be kept in every vehicle for reference purposes.
- Each driver has been provided with a readily accessible two-way communication device. The device should be kept on at all times unless it is prohibited while inside a customer's facility.
- All doors to the vehicles must be locked at all times, whether it contains confidential materials or not.
- All drivers should exercise extreme caution in all phases of vehicle operation. At no time should any employee put themselves or others at risk for accessing a loading area or loading materials.
- The use of cameras in or around vehicles where confidential materials are located is prohibited without prior authorization from Management.
- Employees are forbidden from possessing firearms while using the company's vehicles. Any employee found violating this policy may be dismissed.

2.3 No Unauthorized Access to Truck

Under no circumstances are there to be any unauthorized persons permitted to have access to the cab, body, box, payload or tail-lift of the truck. Similarly, no unauthorized person shall be transported as a passenger in the truck at any time. Only Management can authorize access to the truck or permission to provide transportation to any Non Access employee or visitor.

2.4 Driver Demeanor

The company's effort to provide professional and prompt service requires that all company employees, particularly drivers, be polite and conduct themselves without excessive interaction with the client's personnel. The goal is to provide superior service with a minimum of distraction to their production.

2.5 Vehicle Preparation

Prior to driving to a client's location, all drivers must ensure that they are properly prepared for travel. Drivers must do the following prior to departure:

- Drivers must be certain that all vehicle paperwork required by the state is in the vehicle and up-to-date. This also includes any driver's license required.
- Drivers must make sure the truck is loaded with any security containers, carts, or pallets that are required to execute the assigned work orders.
- The driver is responsible to make sure there is a sufficient supply of the company's business cards in the truck.
- Drivers must make certain that the truck has adequate fuel to complete the route. There is no excuse for running out of fuel. Such incidents will be noted and considered in employee evaluations.
- If a vehicle is in need of repair, the driver should complete a Maintenance Request form and notify Management.

2.6 Driver Authority

Unless it is stipulated otherwise, while completing assignments the driver is the company's sanctioned authority and is responsible for instructing any other assistants in order to execute their assignments and duties safely, securely and as efficiently as possible. The driver is the lead representative and in charge of all client communications and interactions, unless a higher company authority is present.

In the event that a destruction facility is unattended when a driver arrives or departs, the driver will be responsible for its security. The driver should relock any doors and set the alarm before they leave the building unattended. If no security procedures have been established with the client prior to arrival, the driver must either contact the client or the company's management to determine how to handle the situation.

2.7 In Route

The success of the company's business is dependent upon the knowledge and reliability of its drivers while completing an assignment. Drivers should familiarize themselves with all aspects of the company's business and the expectations of their drivers. Specifically, drivers should ensure that the following are adhered to while traveling to or from an assignment:

- Follow scheduled and designated routes to, from and between clients.
- It is driver's responsibility to inform Management of all developments that affect the timeliness and efficiency of executing the route. Drivers are required to notify Management in advance of any period of time that they will be unable to be reached via the company-issued two-way communications device.
- The driver must always make sure that any confidential materials on the vehicle are secure at all times.
- In the event of a breakdown, the driver should immediately contact Management of the company and inform them of the situation. The driver or a representative of the company should then contact any client(s) that will be affected by the delay. Arrangements to service the vehicle should then be made. The driver should stay with the truck until help arrives. The driver should never leave a disabled truck unattended for any reason other than their safety or the safety of others. The driver should keep Management informed of the estimated time required for repairs.
- In the event of a collision or other accident, the driver should contact any emergency authority required first. If able, the driver should then notify Management or a representative of the company of the situation and if the vehicle will be operational. The driver or a representative of the company should then contact any client(s) that will be affected by the delay. The driver should also make sure the materials in the truck are secure. If they are not secure, the driver and any assistants should do their best to secure them. Management may need to dispatch help if required to secure the materials. Except for the police, the driver and any assistants should not engage in a dialogue with anyone regarding the accident, unless otherwise directed by Management.
- If a driver arrives at a loading area that is occupied, the driver should assess how long the delay will be. If it will be a long delay (more than 15 minutes) or if the length of the delay is indeterminable, the driver should locate an alternate loading area. If no alternative is available, the driver should notify the client to make alternative arrangements.

2.8 While at Client's Facility

Upon arrival at the client's facility, all drivers and any assistants of the company should remember to be professional and courteous at all times. The following guidelines should also be used:

- There may be instances where a client makes a request outside of the scope of the assignment that will need to be dealt with immediately. If the request is reasonable and does not seriously delay the route, then the driver should comply with the request and notify Management of the company later. (Management will inform the client of the problem with such requests later or assess a charge for the extra service.) If a client makes a request that is unreasonable, delays the route, compromises security, or is otherwise inappropriate, the driver should notify Management of the company immediately. Once apprised, Management will advise the driver regarding how to proceed.
- While at the client's facility, if a vehicle is required to be left unattended, the cab and box must be locked, whether it contains confidential materials or not. No materials in the company's custody should be left unattended ever.
- Collection containers with confidential media must never be left unattended, even if they are locked, unless they are secured in a locked company vehicle.
- If destruction of confidential material is not performed at the client's facility, then the driver should secure all containers before moving them. No person, not even an employee of the client, is allowed to examine or retrieve materials taken into the company's possession. If a situation requires that a client look through the materials or retrieve something from them, then the driver should contact Management first to get approval.
- If a customer expresses a complaint about a driver or the company, the driver should offer to convey their dissatisfaction or give them the company's business card.

2.9 Collecting, Receiving and Destroying Confidential Materials for On-site, Mobile Destruction

The company adheres to the following general policies in the collection, receipt and destruction of materials for on-site, mobile destruction:

- All materials taken into the company's custody are to be destroyed at the customer's site before proceeding to the next client, unless otherwise prearranged.
- All materials to be destroyed are always attended by an Access employee while in the custody of the company before they are destroyed. Collection containers with confidential media must never be left unattended, even if they are locked. If a vehicle is left running and unattended while collecting media at the client site, the driver should use duplicate keys to lock the vehicle cab and box.
- At time of media pick-up, customer must be provided with a receipt or certificate of destruction that indicates the type of service provided, a description of the material destroyed, and the quantity.

The driver should use the following steps in receiving/collecting and transporting confidential materials for destruction:

- At time of media pick-up, customer must be provided with a receipt indicating type and quantity of media (paper, micro media, computer hard drives, non-paper media – CDs, DVDs, tapes, etc.) being collected and that mobile destruction services are being provided for the media/materials collected and whether or not such services are NAID Certified. Management will instruct driver as to proper recording of this information on the receipt.
- The driver should complete the Certificate of Destruction, have it signed by the client's representative, and leave the receipt with the client. The driver must return the work order to Management.

The company's destruction process procedures are as follows:

- Paper materials should be destroyed by Cross Cut or Pierce & Tear shredding and the specifications for particle sizes should be no larger than 3/4 inch Width (max) & 2.5 inches Length (max.)
- Microfiche or Microfilm can be destroyed by equipment/process which produces a particle size of 1/8 inch maximum dimension or less. Destroyed materials should be properly discarded.
- Non-Paper Media (CD's, DVD's, tapes, flash electronic storage devices, x-rays) will be destroyed using the standard method of Pierce & Tear shredding. If it becomes necessary to deviate from this standard method of destruction for any reason, management will notify the customer in writing of the actual method of destruction.
- Management will decide the appropriate method to use to destroy atypical media or non-media materials that require destruction.
- On a monthly basis, Management will inspect the destroyed materials prior to disposal, to ensure that the destroyed material is within the original equipment manufacturer specifications and within certification specifications.
- Paperwork verifying destruction should be returned and signed by an authorized agent of the client, preferably the person that witnessed the destruction process.
- Prior to leaving a client's facility, the driver should ensure that no confidential materials or trash are left on the ground where the loading or destruction took place.
- When leaving equipment at a client's facility, the driver should make sure it is in reasonable condition considering the environment in which it is located. Containers that are to be left in an office area require a much better appearance than those to be left in a warehouse. The driver should never leave equipment that does not function properly.

2.10 Reporting Damage to a Client's Facility

The company takes pride in providing quick and honest employees. In the event that any accidental damages occur during an assignment, the driver must notify the client immediately about any damages to their property. The client should be assured that the company takes responsibility for actions that caused the damages and will pay for any damages resulting from those actions. The driver or assistant should notify Management at the company of such an occurrence as soon as possible. Management will be responsible for inspecting the damage and reconciling the issue with the client.

2.11 Ending the Destruction Assignment

Upon completion of an assignment, the driver and any assistants will unload all materials at the designated secure location. Each client's material should be individually staged and weighed. The driver will inspect and accept the materials, as they are unloaded from the truck. The driver will turn the Receiving Ticket over to Management upon verification that all materials have been removed from the vehicle.

Management is responsible for materials once they are unloaded at the designated secure location. Management will weigh bales and record the weight on appropriate documents before they are shipped to a disposal agent. The driver and any assistants will return their ID Badge to Management or the designated location in the office upon completion of the shift.

3 QUALITY CONTROL

3.1 Frequency of QC

On a monthly basis, Management will inspect the destroyed materials prior to disposal, to ensure that the destroyed material is within the original equipment manufacturer specifications and within certification specifications.

3.2 Method of QC

Collect a random sample of shredded material from each mobile unit.

- Within the sample collected: measure several individual particles, width and length.
- Compare to Manufactures and Certification requirements.
- If measurements are out of speck contact Management first then the Manufacturer of the shredder.

While shredder is in operation observe all functions and controls and verify all operations are performing to standard.

- Record all results on the QC log page of the Employee Manual.
- Follow all corrective actions provided by Management and the Manufacturer.

3.3 Corrective Actions

Management will be responsible for directing any Corrective Actions to be executed in the event of a failed quality control check. These actions may include the following:

- Particle size is too large and/or the equipment is underperforming.
 - Management will arrange for maintenance of the blades and/or other components, as recommended by the equipment OEM.

4 NOTIFICATIONS

4.1 Management Data Breach Notification to Customer

Management will report, following discovery and without unreasonable delay, to the customer any release of, or unauthorized access to the customer's confidential material that poses a threat to the security or confidentiality of that information. Any such report shall include the identification (if known) of each individual whose confidential information has been, or is reasonably believed to have been, accessed, acquired, or disclosed during such breach.

4.2 Employee Data Breach Notification to Management

All destruction personnel and drivers will report, following discovery and without unreasonable delay, to management any release of, or unauthorized access to the customer's confidential material that poses a threat to the security or confidentiality of that information. Any such report shall include the identification (if known) of each individual suspected of causing the breach, as well as each individual whose confidential information has been, or is reasonably believed to have been, accessed, acquired, or disclosed during such breach.

Any such report shall be kept confidential and management will not retaliate against any employee who has reported, in good faith, a potential or actual data breach.

4.3 Notification of Subcontracted or Non-NAID Certified Services

The customer must be notified in writing by management whenever all or a portion of the destruction process is being subcontracted to another service provider, or when a destruction service is not NAID Certified, but such services could be NAID Certified. This includes advance notification to potential customers at the bid or proposal stage; as well as notification at the time of the service, either on a materials receipt, certificate of destruction, customer agreement/contract or other written notice (including email).

In instances where a subcontractor will be used, the advance notification must also identify the parties destined to accept custody, the exact location of destruction and the method of destruction, if this information is known at the time of the bid or proposal. This information must always be provided prior to or at the time the service is rendered. The notification must also indicate if a subcontractor performing destruction services is not NAID Certified.

5 NAID UNANNOUNCED AUDIT POLICIES

As part of our NAID Certification, we are subject to unannounced audits conducted by a NAID auditor, which may occur at any time, either in the field or at the destruction facility or company offices. The auditor has the authority to challenge our security and to review any item that would be reviewed during a scheduled audit to ensure that our practices are consistent with NAID Certification standards. The auditor

may also follow company vehicles to witness collection and destruction activities at a customer's location prior to announcing his/her presence.

The NAID Certification Review Board (CRB) tracks verified reports of NAID Certification non-compliance and may issue fines and/or sanctions or recommend removal of our Certification to the NAID Complaint Resolution Council (CRC) and Board of Directors for any violations.

5.1 Unannounced Audits at the Office or Destruction Facility

The following procedures must be followed in the event that a NAID Auditor arrives at the office or destruction facility to conduct an unannounced audit:

- Ask to see the Auditor's identification. All NAID Auditors have a photo ID Badge issued by NAID.
- Verify that the Auditor has an Auditor Assignment and Confidentiality agreement, which has been signed and dated by a NAID official.
- Call the NAID office or notify company management if there is any reason to doubt the legitimacy of the audit.
- Contact (First Company representative) Scott Fasken 970-210-7321 to accompany the auditor during the audit. If Scott Fasken is not available, contact (Second Company representative) Gail White 970-234-2384.
- Scott Fasken or Gail White will escort the Auditor throughout the audit process and will allow access to all requested areas and documentation, if such request is not a hardship and does not unreasonably disrupt daily operations.
- Only if Scott Fasken and Gail White are both unavailable, any employee may assist and accompany the Auditor during the audit, provided that they have been cleared for access to confidential customer material.
- At the end of the unannounced audit the auditor may ask you to sign a report. This report should be signed if asked. Your signature acknowledges that the audit took place; it does NOT indicate your agreement with the report.

5.2 Unannounced Audits in the Field or at the Customer's Site

The following procedures must be followed in the event that a NAID Auditor arrives at a location where a driver or driver's assistant is picking up customer material for onsite destruction or transportation back to the destruction facility:

- Ask to see the Auditor's identification. All NAID Auditors have a photo ID Badge issued by NAID.
- Verify that the Auditor has an Auditor Assignment and Confidentiality agreement, which has been signed and dated by a NAID official.
- Call the NAID office or notify company management if there is any reason to doubt the legitimacy of the audit.
- Contact Scott Fasken 970-210-7321 to report the audit. If Scott Fasken is not available, contact Gail White 970-234-2384.
- At the end of the unannounced audit the auditor may ask you to sign a report. This report should be signed if asked. Your signature acknowledges that the audit took place; it does NOT indicate your agreement with the report.