



EPEAT OPERATIONAL POLICIES

These EPEAT Operational Policies were approved by the EPEAT Board of Advisors on June 20, 2006 and adopted by the EPEAT Board of Directors on July 5, 2006.

EPEAT, Inc. is a 501(c)(4) corporation formed by the Green Electronics Council (GEC) to operate the EPEAT program. The GEC is a program of the International Sustainable Development Foundation, an independent 501(c)(3) charitable organization.

This document defines the fundamental policies that will guide the Operations Procedures of the EPEAT program. In addition it lays out the roles and responsibilities of two bodies that oversee the EPEAT program and EPEAT, Inc. – Board of Directors and the EPEAT Board of Advisors.

The design and operational principles of EPEAT are the result of a two-year multi-stakeholder process. That process resulted in the adoption of the IEEE Standard 1680-2006 and the selection of the Green Electronics Council as the “host organization”. The EPEAT organization was created to implement sections 1.5, 1.6 and 1.7 of the IEEE 1680-2000 standard. In order to ensure these sections are implemented effectively and transparently, these EPEAT Operational Policies have been derived initially from two sources:

1. The decisions of the multi-stakeholder Development and Implementation Teams which are represented in the documents and records of that process obtainable at <http://www.zerowaste.org>.
2. The IEEE Standard 1680-2006 which can be purchased from the IEEE standards store at <http://standards.ieee.org/>.

These Operational Policies have been adopted, and may be amended, by the EPEAT, Inc. Board of Directors.

1. EPEAT Governance

The credibility and success of EPEAT springs from the support of a balanced group of stakeholders who are dedicated to the success of EPEAT, and which is embodied in the EPEAT Board of Advisors. As a corporation, EPEAT, Inc. must have a Board of Directors who carry fiduciary responsibilities for the corporation. However, some members of the EPEAT Board of Advisors are not able to take on fiduciary responsibilities and the attendant liabilities. Therefore, the EPEAT, Inc. Board of Directors and the EPEAT Board of Advisors cannot be the same body.

Though the EPEAT, Inc. Board of Directors will by necessity hold ultimate fiduciary responsibility for EPEAT, Inc., they will delegate much of the operational authority to the oversight of the EPEAT Board of Advisors. In fact, they will delegate nearly as much operational authority to the EPEAT Board of Advisors as can be done while still protecting the EPEAT Board of Advisors from liability that comes with fiduciary responsibility.

The EPEAT, Inc. Board of Directors will adopt the EPEAT, Inc. by-laws and these EPEAT Operational Policies, and they are legally responsible for ensuring that the EPEAT, Inc. Director operates the program in accordance with these corporate by-laws and policies.

The EPEAT Board of Advisors reviews and approves the EPEAT Operational Policies and periodically recommends them to the EPEAT, Inc. Board of Directors. The EPEAT program is governed directly by these EPEAT Operational Policies. In order to maintain transparency, the documents will be maintained on a publicly available website.

Once this document is approved and recommended by the EPEAT Board of Advisors and adopted by the EPEAT, Inc. Board of Directors, the EPEAT Director will develop Operations Procedures implementing the Policies, as needed. The Operations Procedures will follow and implement the policies contained in this document and shall be periodically reviewed by the EPEAT Board of Advisors.

2. EPEAT, Inc. Board of Directors

The EPEAT, Inc. Board of Directors will provide fiduciary oversight and management of the EPEAT program.

2.1. Powers and Responsibilities of the EPEAT, Inc. Board of Directors

The EPEAT, Inc. Board of Directors shall be the decision making-body on the following matters:

1. Constitution and decision-making rules of the EPEAT, Inc. Board of Directors
2. Approval of any change to the EPEAT By-Laws

In addition the EPEAT, Inc. Board of Directors shall be the decision making-body on the following matters regarding which it shall seek the advice and recommendations from the EPEAT Board of Advisors:

1. Membership of the EPEAT Board of Advisors
2. Adoption or amendment of the EPEAT Operational Policies
3. Approval of the annual EPEAT workplan and budget and any major off-cycle adjustments to them
4. Approval of major EPEAT legal agreements and financial obligations. They may formally delegate approval of standard agreements to the EPEAT Director.

2.2. Board of Directors Membership

Initially the EPEAT, Inc. Board of Directors shall be constituted by, and consist of, the Board of Directors of the International Sustainable Development Foundation (ISDF). Members may be added or removed by the ISDF Board of Directors.

3. EPEAT Board of Advisors

The EPEAT program shall be directly and continuously overseen by a Board of Advisors that is balanced and representative of the key stakeholder groups that are concerned with procurement and the environmental impacts of electronics.

Members of the Board of Advisors shall be expected to bring the perspectives and experience of the organizations that they “represent”. However, members shall be

expected to work cooperatively with the other stakeholders, not simply in the interests of their organization, but in the best interests of the EPEAT program.

3.1. Powers and Responsibilities of the EPEAT Board of Advisors

The EPEAT Board of Advisors will be a decision-making body on the following operational matters:

1. Approval and recommendation to the EPEAT, Inc. Board of Directors of the Annual workplan and budget
2. Review and approval of the qualifications of Product Verification Committee (PVC) members and Qualified Verifiers
3. Development, maintenance, approval and recommendation to the Board of Directors of this Operational Policies document.
4. Approval and recommendation to the Board of Directors of the Manufacturer's Agreement and fee structure
5. Approval and recommendation to the Board of Directors of rules relating to the composition and membership structure of the EPEAT Board of Advisors
6. Approval and recommendation to the Board of Directors for the appointment or removal of individual members of the Board of Advisors
7. Approval and recommendation to the Board of Directors of major programmatic changes, for example:
 - a. The role that EPEAT personnel will play in initiating or participating in the development of a Standard for additional products than those included in IEEE 1680-2006
 - b. The role that EPEAT personnel will play in initiating or participating in a standard revision or update process for IEEE 1680-2006.
 - c. The making of any changes to program that don't directly reflect IEEE 1680-2006

The Board of Advisors will provide ongoing advice to the EPEAT Director on any matter upon which they are requested by the EPEAT Director or that they chose, including the following:

1. Review of the Operations Procedures to be developed and maintained by EPEAT, Inc.
2. Operational day to day issues within the framework of the budget and workplan.
3. Interpretations of the intent and meaning of IEEE 1680-2006 that are developed and applied by EPEAT, Inc. in the course of conducting product verifications and other activities.

3.2. Meetings and Quorum

Regular meetings of the Board of Advisors will occur at least once per calendar quarter, and may also be scheduled at any time by the EPEAT Executive Director on at least ten days advance notice provided to members. Any member of the Board of Advisors may request a meeting to the EPEAT Director. Meetings may be attended in person or by telephone.

Board of Advisors meeting shall be open to anyone who wishes to attend, though observers' opportunity to speak may be limited by the meeting facilitator. The Board

may choose at certain times to be in executive session, at which time observers and non-voting members will be asked not to attend.

A quorum of the Board shall consist of greater than 75 percent of the serving members in attendance at a meeting. A Board meeting shall be official if convened by the EPEAT Director and a quorum is present. Once a quorum is obtained in a meeting, it is maintained until the meeting is adjourned.

3.3. Notice of Meetings

Notice of Board meetings, and the documents that will be considered in the meetings, with the exception of documents containing confidential information, will be posted on the web. E-mail notifications of meetings will be provided to any individual who signs up to be on an e-mail notification list.

3.4. Board of Advisors Decision-Making Process

The Board of Advisors will make decisions based on consensus of the body. Agreement is defined as having at least a consensus of 75 percent of the members present in any official meeting who “can live with the decision”. This means that though they may not totally agree with the decision, they are willing to move forward with it.

The Board of Advisors may vote verbally in in-person or telecon meetings, or by email. In case of an email vote the EPEAT Executive Director will formulate the matter being voted upon and will distribute the question to the Board members via email. All votes on the issue in question must be made via email by each member voting and copying the entire BofA on their vote.

Vote by proxy is permitted only if explicit written delegation is given to the EPEAT Director and other members of the Board of Advisors at least one day in advance of a meeting. Proxy votes shall be of two types:

1. When an individual is unable to attend and delegates another individual, who is not a member of the Board, to attend in his/her stead and carry full deliberative and voting rights. That substitute shall count toward a quorum.
2. When an individual is unable to attend and assigns a proxy vote on a specific question that has been described and announced for consideration in advance. That proxy may be another member. But generally such a proxy who is another member shall not be delegated the right to vote on any matters that are raised. In other words, all members are equal and one member should not hold more than one vote on matters being deliberated in a meeting.

The quorum and consensus rules shall apply to substantive actions of the Board, and shall not restrict a smaller group from making progress on routine and necessary business, which shall be so determined by the meeting facilitator. For example a meeting of members less than a quorum could decide to form a subgroup to work on a matter. Any member may elevate an item defined as non-substantive by the facilitator to substantive, including through review and challenge of meeting minutes, in which case the matter shall be referred to a vote of the membership in an official meeting.

3.5. Records of Meetings

The EPEAT Executive Director is responsible for ensuring that notes are taken of Board of Advisors meetings. The notes will record decisions made and will be distributed to members via email and, optionally, posted to the website.

3.6. Board of Advisors Membership

The following principles shall apply to membership of the Board of Advisors. It is understood that if a member leaves the Board of Advisors the stakeholder balance may be upset for a short interval. EPEAT staff, and the Board of Advisors shall cooperate to bring the Board of Advisors back into balance within 60 days.

The Board of Advisors shall be considered a fully functioning Board of Advisors if it consists of at least 8 serving members.

3.6.1. Number of Members

The Board of Advisors will consist of between 12 and 15 members.

3.6.2. Balanced Representation of Stakeholders

The membership of the Board of Advisors shall be a balanced representation preferably including the following stakeholder categories, and possibly others:

1. Institutional purchasing organizations using EPEAT in purchasing
2. Electronics manufacturers participating in EPEAT
3. Resellers of electronic products to institutions
4. Governmental agencies, ideally including both state and federal representatives
5. Environmental advocacy organizations
6. Electronics recycling companies
7. Academics with expertise in both electronics and the environment

Definition: “*Balanced*” shall mean the following:

- Over time other stakeholder groups may be desired to participate on the Board of Advisors, while current stakeholders may choose to “opt out”. The Board of Advisors shall consist of at least four or a maximum of eight stakeholder categories, each category having at least one member.
- Replacements will be made within 60 days.
- No one stakeholder category shall have more than 3 members, nor more than 25 percent of membership, whichever is less.
- Within each stakeholder category it shall be desirable to include individuals from different types of organizations, e.g. they could differ by size, by area of expertise, etc.

Definition: “*Stakeholder group*” or “*Stakeholder category*” is any number of organizations or individuals who may be impacted by, whose activities may be impacted by, or who may have a direct interest in the IEEE 1680-2006 Standard.

3.6.3. Member Responsibilities

Members of the Board of Advisors shall have a responsibility to the other members to serve in good standing by attending at least 2/3 of the meetings, either in person or by phone, within a six month period, either personally, by proxy, or by sending a knowledgeable representative.

3.6.4. Appointment of Members

The EPEAT, Inc. Board of Directors shall approve Board of Advisors members. The initial membership shall be invited to participate by the EPEAT, Inc. staff. Once it is initially convened, the Board of Advisors shall recommend additions and removals of Board of Advisors members to the EPEAT, Inc. Board of Directors.

Any member of the Board of Advisors may withdraw from the Board of Advisors at any time before expiration of their term upon 30 days written notice to EPEAT, Inc. and the Board of Advisors.

The Board of Advisors may periodically, at its option, review its membership and shall assure that its members are serving in good standing. The Board of Advisors may direct the EPEAT, Inc. staff to nominate new members. All such changes shall maintain the stakeholder balance of the Board.

If a member resigns in the middle of that member's term, the company or organization which that member represents shall have the first option to nominate to the Board of Advisors a qualified individual as a replacement. The expectation is that the Board of Advisors would accept that nominee, though shall not be bound to do so.

3.6.5. Member Terms

Members shall serve staggered three-year terms. The initial terms – evenly distributed as 1, 2 and 3 year terms – were assigned randomly, except that no two representatives of a stakeholder group shall have their term expire in the same year.

In order to keep new perspectives coming to the Board of Advisors, term limits shall be enforced. However, a member may serve more than one term if a suitable replacement cannot be identified who is from the same stakeholder category and who is qualified and willing to serve, after a reasonable search by the EPEAT Director within 60 days. If a member has cycled off the Board, that individual may again serve on the Board after one year.

3.6.6. Compensation

Members of the Board of Advisors shall serve without compensation.

3.7. Liabilities for Members of the Board of Advisors

The Board of Advisors shall not hold fiduciary responsibility for EPEAT, and the members shall not therefore be liable for any actions of EPEAT, Inc.

The Agreement with Subscribers shall provide that no member of the Board of Advisors will be liable to EPEAT, Inc. GEC, or to any Subscriber for any acts or omissions of such Board member in their performance of their duties.

4. Workplan and Budget

The EPEAT Director shall annually, or more periodically as requested by the Board of Advisors, prepare a budget and workplan, together with a financial summary of resources

proposed to be expended for such activities, and submit such to the Board of Advisors for their approval and recommendation to the EPEAT, Inc. Board of Directors.

EPEAT, Inc. will expend is approved budget only for the specific purposes and activities set out within the limits of the annual budget and workplan.

Once approved, the annual budget will be available upon request to any of the Subscribers.

5. Subscriber and License Agreement between EPEAT, Inc. and Manufacturers

The Agreement shall be a subscriber and licensing agreement between EPEAT, Inc. and an individual manufacturer for the purpose of allowing the manufacturer to register products to the IEEE 1680 standard in EPEAT, and to commit the manufacturer to the terms of the IEEE 1680 standard and other conditions as defined by EPEAT, Inc.

The form of the Agreement may be changed from time-to-time under the direction and approval of the EPEAT Board of Advisors. EPEAT, Inc, will not have the discretion to negotiate specific and unique terms with individual manufacturers

The Agreement will obligate EPEAT, Inc. to do those things that are required in IEEE 1680-2006 and those that are reasonable with respect to EPEAT, Inc.'s relationship with manufacturers in the operation of the EPEAT program. It will be consistent with EPEAT Operational Policies.

6. Verification of Manufacturer Product Declarations

To fulfill its obligations under IEEE Standard 1680, EPEAT, Inc. will establish and operate a verification program that maintains high credibility in the EPEAT system, according to the provisions of sections 1.6 and 1.7 of the IEEE Standard. The program will verify conformance with the Standard of products, including product and company information, as they have been declared to the environmental criteria of section 4 of the IEEE Standard. All products and all units of said products, as so defined in the Standard, are subject to verification.

6.1. Definition of a key term for this section

“Independent”, when used in describing the qualifications of members of the Product Verification Committee and Qualified Verifiers, shall mean that neither they, nor their employer, nor their client shall be a manufacturer or seller of any EPEAT registered products, or products that directly compete in the marketplace with EPEAT registered products. This shall not exclude the special case where a Qualified Verifier enters under contract with a manufacturer to perform investigations relating to a product verification, but it would provide that a Qualified Verifier could not have a longer term employment or contractual relationship with a manufacturer. Nor shall this exclude an individual or an organization that, by their accreditation or certification, assures independence of their judgments and services, such as an accredited testing laboratory. Any indirect financial affiliation with a manufacturer shall be stated by the individual and may be examined by the Board of Advisors to determine whether it constitutes a breach of independence.

6.2. Data used for verification

EPEAT, Inc. may use any and all information available to it regarding a product for verification purposes. Specifically this may include:

1. Information provided by the manufacturer at the time of product declaration
2. Information that is provided by the manufacturer for verification purposes
3. Other public information or confidential information obtained under non-disclosure agreement regarding the product or company that EPEAT obtains for verification purposes.

6.3. Product Verification Committee (PVC)

EPEAT, Inc. will establish and maintain a Product Verification Committee as specified in section 1.6 of IEEE Standard 1680.

6.3.1. Responsibilities of the PVC

The PVC is responsible for making final decisions regarding the verification of the conformance of products to the criteria in section 4 of IEEE 1680, and for ensuring that the verification methods and the selection of products and criteria for verification are adequate to provide a high degree of credibility that products conform to the Standard as declared.

6.3.2. PVC Membership

The PVC shall be comprised of between 3 and 5 experts who are knowledgeable about the technical assessment and environmental characteristics of electronic products and, specifically, the criteria set forth in IEEE 1680. PVC members shall be independent of financial benefit that would derive from the registration or de-registration of products on the Registry. At least 2 of the members will also have expertise and experience in standards' conformance assessment.

Qualifications of PVC members shall be drafted by the EPEAT staff and approved by the Board of Advisors. Members of the PVC shall be appointed by the EPEAT Executive Director.

EPEAT will make available to the public on a website the identity of the members of the Product Verification Committee.

6.3.3. PVC Member Compensation

Compensation paid to members of the Product Verification Committee for their services will be independent of whether the products reviewed by the Committee are verified to be in conformance with, or are determined not to be in conformance with, the Standard. This shall in no way limit the ability of EPEAT, Inc. or the Board of Advisors to assess the quality and independence of the work of the Product Verification Committee and to make adjustments to the membership accordingly.

6.4. Qualified Verifiers and Verifier Qualification Program.

EPEAT, Inc. will establish and maintain a Verifier Qualification Program, as described in IEEE 1680, section 1.7, and will qualify an adequate number of Qualified Verifiers to perform all necessary EPEAT verifications in a timely fashion,

as well as some who will be available to provide independent confirmation of verification decisions if requested.

6.4.1. Qualifications of Qualified Verifiers

EPEAT shall establish and the Board of Advisors shall approve the qualifications for Qualified Verifiers. Qualified Verifiers shall be independent of financial benefit that would derive from the registration or de-registration of products on the Registry. No individual or organization serving on the Product Verification Committee may be listed at the same time as a Qualified Verifier.

EPEAT will make available on the web site the qualifications to be a Qualified Verifier and a list of Qualified Verifiers.

6.4.2. Qualified Verifier Compensation

The compensation paid to any Qualified Verifier for their work or services hereunder by EPEAT, Inc. will be independent of whether the products reviewed by the Qualified Verifier are verified to be in conformance with, or are determined not to be in conformance with, the Standard. This shall in no way limit the ability of EPEAT, Inc. to assess the quality and independence of the work of Qualified Verifiers and to make adjustments to assignments.

6.5. Verification Process

Based on the need to maintain credibility of EPEAT product registrations, and considering the number and types of products in the registry, the EPEAT Director from time to time, in consultation with the Product Verification Committee, will develop a Verification Plan that will guide a set or “round” of product verifications. The Plan will describe:

- The number, type, and identity of the products to be verified
- The specific products and criteria to be verified
- Recommended method(s) of investigation
- A schedule of actions including a start date, the decisions that must be made for completion of the verification process, and PVC meetings.

The Plan will be approved by the Product Verification Committee. Upon adoption by the PVC the Verification Plan will be made available to the Board of Advisors, and will be provided to any party on request.

The Verification Plan will address the products and the product information as recorded on the Registry at the time of the Plan start date. The manufacturer (subscriber) can change or remove the product from the registry at any time, but any changes to product registrations made subsequent to the Plan start date will not be considered in product verifications until Final Decisions are rendered by the Product Verification Committee.

It will be essential for verifications process to be expeditious and the timing of decisions and actions to be predictable. Specific steps, decisions and actions in the verification process will be described in EPEAT Operations Procedures. Time periods for verification processes will be initially prescribed in Operations

Procedures. Once experience has been gained, the time periods will be amended into these Operational Policies. Such time periods should balance the time needed for a thorough and due process with the need of purchasers to have high confidence in the accuracy and currency of information on the Registry.

Upon approval of the Verification Plan the EPEAT Director will assign a Qualified Verifier (QV) to each planned verification.

6.5.1. Notice of Verification

Upon approval of the Verification Plan the EPEAT Director will provide notification to manufacturers (subscribers) whose products are being verified regarding the products and the criteria that will be verified, and the assigned QV for each.

Upon such notice the manufacturer (subscriber) will have 30 days to provide to the assigned QV the information identified in IEEE 1680 as Verification Requirements related to the subject criteria for such products. Manufacturer (subscriber) is obligated to provide only the information in Verification Requirements of the Standard, but the EPEAT Director and QVs can use any information they choose related to the product and/or criteria being verified.

6.5.2. Verification Process

QVs will work with the manufacturers (subscribers) to obtain any additional data that are needed, and that manufacturers (subscribers) are willing provide, to assess conformance with the Standard. QVs will submit verification reports that include recommendations of conformance or nonconformance, and that include all supporting data, to the EPEAT Director and the manufacturer (subscriber). The EPEAT Director will provide such reports to the PVC along with its recommendations.

The EPEAT Director will keep manufacturers (subscribers) informed about the status and progress of verifications of their products. Manufacturers (subscribers) will have opportunities to provide information to the PVC during a verification process by providing such information to the EPEAT Director, which will be obligated to provide it to the PVC.

6.5.3. Findings of Conformance and Nonconformance

The PVC will review the information provided and issue either a finding of conformance or a finding of nonconformance. For products for which the finding is conformance with the standard, this shall be considered the PVC's Final Decision.

For findings of nonconformance the PVC shall direct the EPEAT Director to issue and deliver to the manufacturer (subscriber) a Nonconformance Finding.

6.5.4. Opportunity for Corrective Action

Manufacturer (Subscriber) shall have an opportunity to undertake corrective action. The EPEAT Director shall cooperate with the manufacturer (subscriber) in understanding what is required to achieve conformance with the Standard. The

manufacturer (subscriber) shall provide corrective action report to the EPEAT Director within a specified period of time.

Corrective action may include any of the following:

- Manufacturer (Subscriber) provides further evidence in support of conformance
- Manufacturer (Subscriber) alters the product registration, or de-registers a product, to correct the nonconformance
- Manufacturer (Subscriber) alters the product and demonstrates that it is now in conformance. In this case, additional time may be necessary. Manufacturer (Subscriber) will be directed to archive the product until it is brought into conformance.

The EPEAT Director shall report back, with recommendations, to the PVC regarding the results of the corrective action.

6.5.5. PVC Review and Outcome of Corrective Action

PVC shall meet to consider the recommendations regarding corrective actions.

1. If further evidence was provided that, in the view of the PVC, demonstrates conformance of the product, then the PVC will issue a Final Decision of conformance, the manufacturer (subscriber) will be notified, and the nonconformance finding will be stricken from the record.
2. If either the product or the registration of the product has been altered and the PVC determines that the product is now in conformance, then the PVC will issue a Final Decision of conformance and notify the manufacturer (subscriber). The initial nonconformance finding will be retained in the record.
3. If no corrective action was taken by the manufacturer (subscriber), or if the PVC finds that the manufacturer's (subscriber's) actions do not change the nonconformance finding, PVC will issue a Nonconformance Decision.

The EPEAT Director will notify the manufacturer (subscriber) of the decision by the PVC. In the case of a Nonconformance Decision the EPEAT Director will direct the manufacturer (subscriber) to undeclare the criterion or criteria that are out of conformance. If the manufacturer (subscriber) fails to complete the undeclaration within 7 business days of notification by EPEAT Director, the EPEAT Director will deregister the product

6.5.6. Manufacturer (Subscriber) Opportunity for Appeal

If it so chooses, the manufacturer (subscriber) may submit appeal documentation to the EPEAT Director which will refer the matter and documentation to the PVC. The manufacturer (subscriber) may request an opportunity for itself or a QV to present directly to the PVC on its behalf. The PVC may chose to hear the direct presentation, and will issue a Final Decision on the appeal.

1. If the PVC finds that the product is in conformance, then the product will be re-registered.

- a. If the Final Decision of the PVC is that all available information does support the product's conformance with the Standard, then the record will show conformance and no record on a finding of nonconformance will be published.
 - b. If the final decision of the PVC is that the manufacturer (subscriber) has taken action after the Verification Plan start date to change the product or the product registration to bring it into conformance, then the record will show the final decision of the PVC as well as the initial finding of product nonconformance and the subsequent actions taken by the manufacturer (subscriber).
2. If the PVC finds that the product is in non-conformance, the PVC will issue a Final Nonconformance Decision.

6.5.7. Manufacturer (Subscriber) Disqualification

In the event of repeated Final Nonconformance Decisions, the Product Verification Committee may recommend disqualification of the manufacturer (subscriber), as provided in IEEE 1680, section 1.6.

6.6. Issuance of Verification Results

After final decisions are rendered on all verifications in a Verification Plan, or at any time that the PVC chooses before all verifications are complete, the PVC shall instruct the EPEAT Executive Director to draft and, upon their review and approval, issue the following:

1. A Verification Outcomes Report will be posted on the website that summarizes the statistics, not specific product results, of the verifications that were conducted, conformance and nonconformance findings and outcomes.
2. Purchasers and other parties who specifically request will be notified of the specific verification decisions and actions. Verification results, clearly noting de-registrations, will be provided on the website.

7. Annual Report

To maintain confidence in the EPEAT program and Registry, and to ensure transparency, the EPEAT Executive Director will annually prepare and present to the Board of Advisors:

- An Annual Report on the activities undertaken and outcomes achieved, including an estimate of the environmental outcomes, together with a financial summary of resources expended for such activities
- An audited Financial Report prepared by a certified public accountant of resources collected and expended during the previous year. The auditors' report will also address whether the Fees were expended for purposes approved by the Board of Advisors.

Annually EPEAT shall make publicly available a report on progress and outcomes upon direction of the Board of Advisors.

8. Operations Procedures

The EPEAT Director will develop and maintain Operations Procedures that delineate the operations of the EPEAT program, as needed. The Operations Procedures will implement and follow the policies set forth in this document and will be publicly available on a website.