



Responsible Disposal of Electronic Assets Policy

Effective Date: 01 December 2020

Purpose

The purpose of this policy is to establish a standard for the responsible management of electronic assets at the end of operational life. This policy noted below does not apply to non-physical assets, such as software licenses.

This policy allows NetScout to ensure the most effective use and management of all electronic assets and responsible recycling of electronic waste.

Policy

In accordance with the NetScout [Environmental Policy](#), NetScout is committed to reducing the environmental impacts of company operations and fully complying with all applicable laws and regulations relating to electronic waste.

Coverage

This policy applies to electronic assets at end of use and operational life, including PC's, laptops, servers, printers, monitors, keyboards, mobile devices, and similar assets. This does not include Engineering Lab equipment but does include all other electronic assets. All Engineering Lab equipment is managed by the Engineering Operations team.

NetScout departmental managers are encouraged to periodically assess the usage of all electronic assets within their department and decommission any assets which are no longer required.

The policy applies whether the assets are capitalized or not capitalized. Capitalized assets have an "asset tag" affixed to them and are tracked by the NetScout IT organization.

Appropriate Disposal

Whenever possible, NetScout will seek to re-use and re-deploy functional electronic assets.

- If assets cannot be redeployed internally, NetScout will consider whether they may be donated to non-profit organizations that meet the guidelines of the [Heart of Giving](#) program.
- If an asset cannot be reused, it may be "scrapped" and sent for recycling. Before recycling appropriately, it is critical to complete all data destruction requirements as set out by the IT Security Team. Items marked for scrap are not available for other use.

Disposal Process

Whenever electronic assets are determined to be no longer required or have reached the end of their operational life, the following process is to be followed:

- Open a new IT Ticket, identifying the assets to be disposed of and the reason(s) for that disposal.

Typical reasons for disposal are:

- Equipment no longer required



- Occupying storage space and not needed/obsolete equipment
- Equipment defective and not economical to repair
- Whenever possible, remove all data from the assets to be disposed of.
- Return the assets to the location as defined and documented in the IT ticket.
- Prior to being disposed of externally, IT shall be responsible for removing those assets from the asset tracking system.

Note: NetScout assets may not be sold, loaned or donated to employees nor the family or friends of employees.

Data Deletion Requirements

IT will ensure the removal of all NetScout data and software from the asset prior to disposal. Data deletion should meet NIST 800-88 standards.

- Technology equipment with non-functioning memory or storage technology will have the memory or storage device removed and it will be physically destroyed. Hard drives may also be removed and rendered unreadable (drilling, crushing or other demolition methods).
- Disposal of Manufacturing assets should ensure all drives are wiped. Asset numbers should be removed from all asset trackers before disposal.

Vendor Requirements

When the scrapping of electronic assets is the only option, NetScout partners with local vendors that meet the following minimum requirements:

- Responsible Recycling (R2) or e-Stewards certified for recycling of electronics
- Provide reporting to identify assets and weight of materials received for recycling

International collection sites

To assist with the disposal process two international sites have been established **Bangalore** for our Asia Pacific employees and **Dublin** for our European employees.

Assistance/Duty to Report

You are responsible for seeking guidance if you are not sure about the Responsible Disposal of Electronic Assets Policy, and to question or challenge the propriety of situations you suspect may not fully comply with this Policy.

To seek guidance or discuss a concern, you may contact your local manager, local Human Resources business partner, your legal support, or the Compliance Office via MB Compliance@netscout.com. Alternatively, if you do not feel comfortable speaking with someone in person, you may seek assistance online via the secure NetScout Ethics Reporting System ("NSERS") or by calling the number assigned to your location on the NSERS site.

The NSERS is a 24-hour, seven-day-a-week dedicated resource maintained by an independent party to maintain confidentiality and ensure anonymity when requested and allowed by law.

Consequences for Non-Compliance

If you do not comply with this Policy, you may face discipline, up to and including termination of employment.



Related Policies and Resources

All internal policies are located in the [Policies](#) section of The Scout portal.

[Environmental Policy](#)

[Procedures for Handling Personal Data](#)



Policy Title:	Responsible Disposal of Electronic Assets Policy
Policy Number:	SEC-012
Policy Version:	4.3
Effective Date:	01 September 2020
Next Review Date:	01 September 2021
Named Owner:	IT Services
Approved By:	Thor Wallace, CIO
Legal Reviewer:	[if applicable]

Version	Date	Author	Comments
2.0	01 September 2020	Thor Wallace	Updated