

	Ace Computers EPEAT 7.1.1 Manufacturer commitment and performance audits for labor and occupational health and safety Audit Methodology & Results Report Publication Date: July 17, 2026 Auditor: Daniel Baugh
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FORWARD

Ace Computers has completed the following “Manufacturer Labor Rights and OHS Audit” in compliance with EPEAT Criteria for “7.1.1 Required - Manufacturer commitment and performance audits for labor and occupational health and safety”.

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SECTION 1: Risk Assessment Background

Ace Computers participates in the online Registry of products covered under the EPEAT ecolabel. The EPEAT ecolabel is the leading global Type-1 ecolabel for these technology products. The Global Electronics Council (GEC) manages the EPEAT ecolabel, including the Conformity Assurance Bodies that provide 3rd party verification of the products listed in this Registry. Products must meet certain required and optional EPEAT criteria to be considered "EPEAT-registered" and be listed on this site. The specific EPEAT tier achieved by a product aligns with the number of optional criteria the product meets.

1.1: Purpose of Risk Assessment

Ace Computers is applying for the required criteria "7.1.1 Manufacturer commitment and performance audits for labor and occupational health and safety". Under these criteria there are requirements and guidance that must be followed and met for determining manufacturer scope and compliance in the categories of labor rights and Occupational Health and Safety (OHS).

1.2: Defining Risk and Risk Assessment

Risk is defined and must be assessed in the labor rights and OHS category. EPEAT sets out guidance for which Ace Computers has determined their risk parameters and completed the assessment. Essential requirements include the GEC's publishing of "Responsible Supply Chains Criteria" 2025 Annex B (Normative): Labor Rights and Occupational Health and Safety Requirements and Annex C (Normative): Factors to determine prioritized manufacturer and/or supplier facilities.

To meet EPEAT criteria 7.1.1., Ace must assess its manufacturing facility to be In-scope or Out-of-scope. Out-of-scope facilities are those facilities that are reasonably above the threshold of risk for labor rights and OHS violations, and as such require no further action or corrective action. In-scope facilities include the manufacturer or directly contracted suppliers that fall below the thresholds of acceptable risk and require verification of certifications that prove the facility has acquired management systems that reduce potential risks that were identified during the auditing process.

Before EPEAT's Conformity Assurance Body can verify that Ace Computers has demonstrated conformance with the criteria, Ace must prove that the guidelines for each of the categories have been met. To meet guidelines, Ace Computers first established a scoping tool to achieve scoping parameters. Then they demonstrated the scope of identified facilities by gathering data. Once this process was finalized, Ace Computers completed risk analysis of the data to determine if a facility was In-scope or Out-of-scope. This process determined whether the data could be turned over to the Conformity Assurance Body, or if additional conformance data was needed. Finally, after discussions with the Conformity Assurance Body, and upon their determination that Ace Computers has met all necessary verification requirements, Ace can be awarded EPEAT Conformance, and the criteria can be added to Ace Computers' EPEAT Registry. Below is a summary of the definitions, requirements, and verifications to be set in demonstrating conformity with EPEAT. In post-conformance years, Ace must complete annual reporting updates, for continuous monitoring purposes. However, the conformity process has been met, and Ace does not need to submit for conformity again.

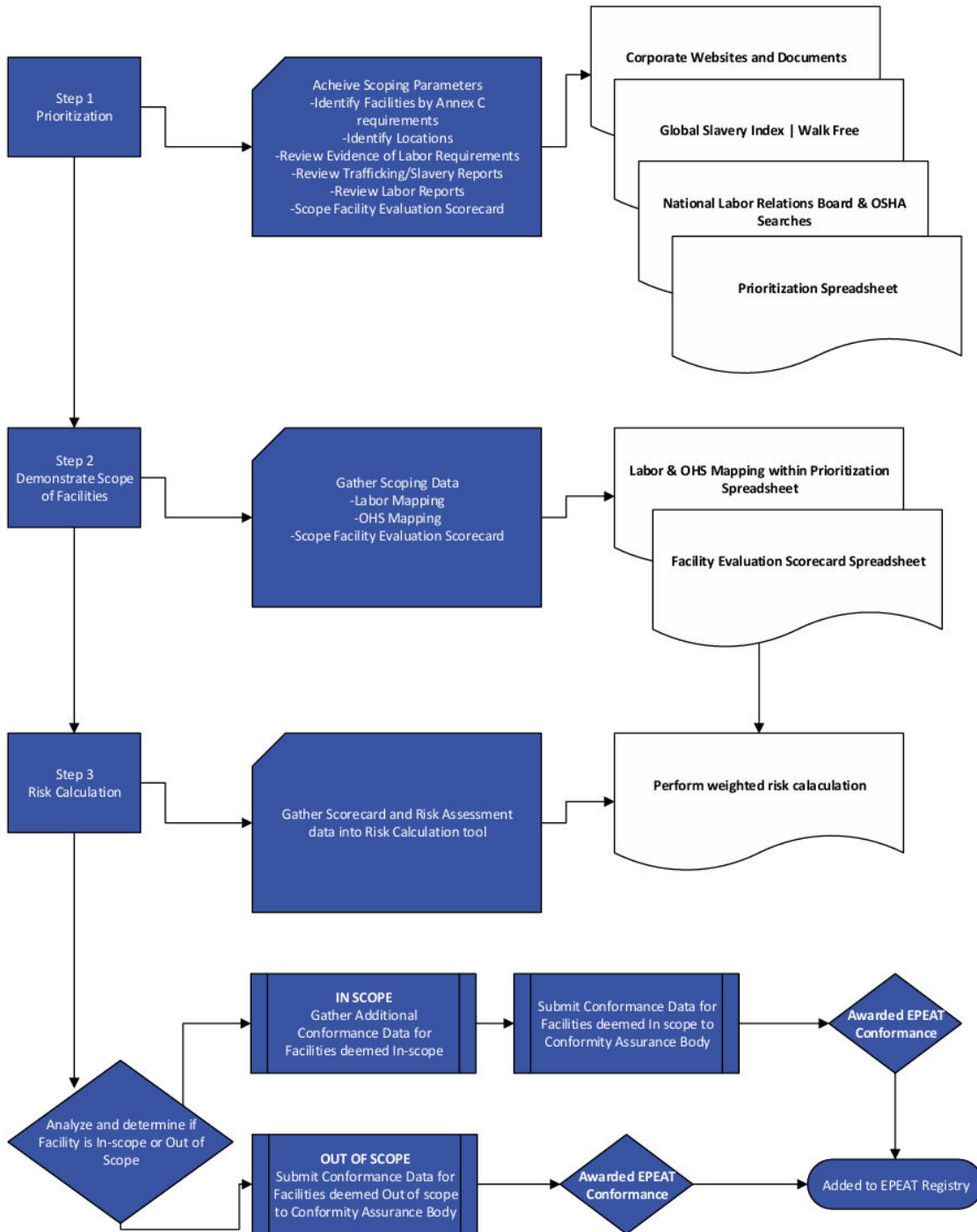
DEFINITIONS

manufacturer: A brand owner that registers products to the EPEAT Ecolabel and is responsible for ensuring ongoing conformance of products to criteria; also referred to as "Participating Manufacturer" in EPEAT policy documents.

product: A marketing model and chassis type associated with a unique product registration, including accessories and peripherals, integral to the operation of the product and contained by default in the point of sale (POS) packaging associated with the unique product registration, excluding consumables in imaging equipment.

SECTION 2: Methodology

2.1: Audit Diagram



2.2: Manufacturer Identification

Ace Computer's facility located on 340 Howard Ave, Des Plaines, IL 60018, USA is the sole manufacturer and assembler of 100% of registered products. Therefore, the selection for Annex B Labor and OHS investigation applies to the Illinois facility for all registered product categories.

2.3: Risk Identification

Our EPEAT Conformity Assurance Body issued guidance to devise a tool to determine if the manufacturer facility was in-scope or out-of-scope. To qualify as out-of-scope, the frequency and likelihood of a violation by a facility of its legal obligations had to be within an acceptable risk level. See definition of Acceptable Risk. If a facility has anything lower than acceptable risk, they are in-scope and must meet additional "requirements for facilities in scope."

2.4: Risk Analysis

To perform a rigorous analysis of EPEAT Social Responsibility of Manufacturers Criteria 7.1.1, Ace Computers deployed the following 1. Risk Assessment to understand how the manufacturer scores on a range of risk categories related to key labor rights and OHS compliance, and a Risk Calculation tool to synthesize the investigation with an index and weighted multiplier based on the percentage of registered products manufactured/assembled in the sole facility.

First, the Risk Assessment is a table based on risk categories of Geographic-specific, Labor and OHS, Enterprise Conduct, and Materiality. Risk Assessment categories were selected based on the requirements identified in EPEAT Annex C. The Risk Assessment serves to organize data at later informs key risk designations.

Second, the Labor Rights and OHS mapping provides data from the manufacturer audit whose requirements meet Annex B. Evidence is collected under each category for the supplier. Mapping displays evidence that correlates with each of Annex B's requirements. With these additional parameters, a threshold is established as "pass" or "fail" for labor rights and OHS performance. The mapping informs labor rights and OHS risk categories found in the Risk Assessment and factored into the Risk Calculation.

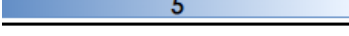
Third, all research informs the Risk Calculation tool. Scores are assigned based on the data collected in the Risk Assessment table and Labor Rights and OHS. Each risk category is given a result based on its "evidence of compliance" as listed from 1-5. This is called Risk Score. This score, out of 15, is multiplied against the Materiality Score (1-5) for the supplier. Materiality is determined on the basis of significance (see Section 2.5 for Score Keys). Significance is defined in this criterion as percentage of registered products manufactured/assembled in the facility. The higher the score, the higher the risk for a facility. The threshold for risk yielding an in-scope designation is a Scope Score of 45/75. In or out of scope determination is based on the Scope Score. Lower than a Scope Score of 45 is considered not Prioritized and higher is Prioritized (see Section 2.5 for details on Scope Score).

2.5 Risk Assessment Methodology

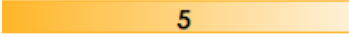
Risk Calculation

Methodology			
Risk Calculation per supplier			
$\text{Risk} \times \text{Materiality} = \text{Scope}$			
Risk Calculation per supplier - expanded			
$(\text{Risk Category Score a} + \text{Risk Category Score b} + \text{Risk Category Score c}) \times (\text{Scope Multiplier Score}) = \text{Supplier Scope Score}$			
See Score Key and Score Key Footnotes (below) for further methodology			

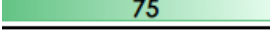
Risk Calculation Score Keys

RISK SCORE KEY*	
 1	Very Low: Complete evidence of compliance
 2	Low: Strong evidence of compliance
 3	Standard: Sufficient evidence of compliance
 4	High: Missing evidence of compliance
 5	Very High: Evidence against compliance

*Risk score is defined by three main categories in Annex C (1-3). Evidence supporting scores is provided in "Risk Assessment" Sheet.

MATERIALITY SCORE KEY**	
 1	Very Low Materiality
 2	Low Materiality
 3	Standard Materiality
 4	High Materiality
 5	Very High Materiality

**Materiality is defined by Annex C (4, a-e). Materiality indicates significance of a manufacturer-supplier relationship. Annex C part 4c defines annual percentage spend as a significant variable. Annual percentage spend is weighted in this assessment for its impact on materiality.

SCOPE SCORE KEY***	
 15	Very Low Risk Relationship: Out of Scope Supplier, Unprioritized
 30	Low Risk Relationship: Out of Scope Supplier, Unprioritized
 45	Medium Risk Relationship: In Scope Supplier, Prioritized
 60	High Risk Relationship: In Scope Supplier, Prioritized
 75	Very High Risk Relationship: In Scope Supplier, Prioritized

***Scope score is a function of the materiality score and the risk score (both as defined to the left). Suppliers must be in scope to be prioritized. Score starts at 1 and may increase up to 75.

SECTION 3: Results

3.1: Manufacturer Labor Rights and OHS Audit Results

Risk Assessment

Risk Assessment (Annex C)	Risk Categories						
	Geographic-specific						Materiality
Name	Geographic Location Based on Corporate Headquarters	Trafficking Tier by Nation; Section 1.a.i	OSHA Complaints; Section 2.b.i-ii	Public Allegations; Section 2.c	Evidence of Labor and OHS Requirements; Section 3.b	Prior Audit Performance (FY 2024); Section 3.c	Percentage of EPEAT Products Produced
Ace Computers - Manufacturer	340 Howard Ave Des Plaines, IL 60018 USA	Tier 1 (Strongest enforcement)	None	None	Supplier Code of Conduct (RBA Guided)	Pass	100.00%

Risk Calculation Results

Risk Calculation	Risk Categories (1-5)			Risk Score (/15)	Materiality Score (/5)	Scope Score (/75)
Manufacturer	Geographic-specific Risk	Labor and OHS Risk	Enterprise Conduct	15	5	75
Ace Computers	1	1	1	3	5	15

Final Risk Score Key

SCOPE SCORE KEY***	
15	Very Low Risk Relationship: Out of Scope Supplier, Unprioritized
30	Low Risk Relationship: Out of Scope Supplier, Unprioritized
45	Medium Risk Relationship: In Scope Supplier, Prioritized
60	High Risk Relationship: In Scope Supplier, Prioritized
75	Very High Risk Relationship: In Scope Supplier, Prioritized

***Scope score is a function of the materiality score and the risk score (both as defined to the left). Suppliers must be in scope to be prioritized. Score starts at 1 and may increase up to 75.

3.2: Mapping

Manufacturer		Labor Rights and OHS Management Systems Manufacturer Requirement and Supplier Conduct				
Name	Annex B Section and Page Mapping	1	2		3	4
		ILO Fundamental Principles and Rights at Work	Occupational Health and Safety	ISO 45001 major categories	Minimum Wage, Working Hours, Overtime and Employment Contracts	Prohibition of Trafficking in Persons
ACE	340 Howard Ave Des Plaines, IL 60018 USA	• A Safe and Healthy Work Environment (C155 and C187) - Pages 4 and 5 • Child labor and the worst forms of child labor (C138 and C182) - Section A2 • Discrimination (employment and occupation) (C111) - Section A6 • Equal Remuneration Convention (C100) - Section A6 • Forced labor (C029 and C105) - Section A1 • Freedom of association and collective bargaining (C087 and C098) - Section A7	• Occupational Safety and Health Convention, 1981 (C155) and Recommendation, 1981 (R164) - Pages 4 and 5 • Promotional Framework for Occupational Safety and Health Convention, 2006 (C187) - Pages 4 and 5	Section B	• minimum wages (ILO C131) - Section A4 • standard working hours (60-hour maximum workweek or local laws, whichever is less) - Section A3 • overtime compensation - Section A4 • employment contractual relationships - Section A1	Section A1

Please see *Ace Code of Conduct* and *EPEAT Responsible Supply Chains Criteria* for more information (links provided below).

3.3: General Audit Results, Risk Determination, and Stakeholder Engagement

Ace Computers' sole manufacturing and assembly facility in Des Plaines, IL exceeded the necessary labor rights and OHS requirements as exhibited in EPEAT Responsible Supply Chains Criteria Annex B. With the investigative data and analysis from these parameters, in addition to the risk factors outlined in Annex C, Ace Computers facility in Des Plaines, IL fell below the risk threshold to be identified as “Prioritized” and is therefore out-of-scope.

Engagement between stakeholders at Ace with EPEAT Responsible Supply Chains Criteria is constantly in development. The above multi-phase audit process on Ace manufacturer and suppliers is an annual process. Therefore, yearly stakeholder engagement is necessary for the investigation, data collection, and risk assessment requirements between Ace and its internal and external stakeholders.

Ace endeavors to be ahead of all requirements in labor rights and OHS at their owned facility.

ANNEXES

I: List of Related Documents

[ACE150 Supplier Code of Conduct 10/23/23](#)

II: Sources of Information

EPEAT Responsible Supply Chains Criteria:

https://globalelectronicscouncil.org/wp-content/uploads/EPEAT_RSC_2025.pdf

Ace Computers Official Website:

[IT Services Company Solutions | Ace Computers](#)

III: Whom to contact

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