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REPORT OF FINDINGS · ILLUSTRATIVE SAMPLE

Northwind Cloud Cycle July 2026

One closed disposal cycle checked against the disposal terms that applied to it, unit by unit, from the files Northwind Cloud already held.

Report reference	OD-2026-0731-NWC
Cycle	July 2026 · 3 sites · 2 ITADs
Terms checked against	Northwind Cloud ITAD Agreement, Schedule 3 and clause 9
Files received	214 files: listing file, award record, collection records, ITAD reports and certificates
Issued	2 October 2026

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OD-2026-0731-NWC
Northwind Cloud · Cycle July 2026

1 · SUMMARY

71.4% of listed units are evidenced to a final outcome.

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3,437 of 4,812 listed units evidenced to a final outcome
Evidenced rate counts units, not weight

LISTED	AWARDED	COLLECTED	EVIDENCED	NOT YET
4,812	4,812	4,655	3,437	1,218

What we found

- **Two rules passed.** Every drive resold was erased first, with an erasure log matched by serial. Every destruction certificate shows destruction in the country of collection.
- **Two rules failed.** Four of nine destruction certificates list weight, not serials, so 503 destroyed drives can't be tied to a certificate. No screening record was received for any of the seven buyers.
- **One rule could not run.** The ITAD reports 16 GPUs resold. No approval records were received, so the rule couldn't be checked.
- **1,218 collected units** have no evidence of a final outcome yet, and 157 listed units were never collected.

Results by rule

RULE	CLAUSE	RESULT	EVIDENCE GRADE
Drives erased before resale	Sch. 3, cl. 4.1	Passed	4 · Machine-checkable
Drives destroyed in country	Sch. 3, cl. 4.2	Passed	3 · Independent record
Certificates list serials	Sch. 3, cl. 4.5	Failed	2 · Signed document
Buyers screened before sale	cl. 9.4	Failed	1 · Someone's word
GPU resale only with approval	cl. 9.1	Did not run	No evidence

> A missing document is a finding in its own right. It is never shown as a pass. Findings describe gaps in the evidence, not judgements on how anyone processes equipment.

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2 · FINDINGS BY RULE

What was checked, against which rule, and what was found.

F1 · Drives erased before resale Passed

Rule (Sch. 3, cl. 4.1): data-bearing drives may be resold only after certified erasure. **Found:** 412 drives resold; 412 erasure logs received, each matched to its drive by serial. **Evidence:** erasure software logs (grade 4). **Open:** nothing.

F2 · Drives destroyed in country Passed

Rule (Sch. 3, cl. 4.2): drives not erased are destroyed in the country of collection. **Found:** 1,177 drives destroyed under nine certificates; every certificate names a facility in the collection country, confirmed against the facility's public certification record (grade 3). **Open:** nothing. Which units each certificate covers is checked under F3.

F3 · Certificates list serials Failed

Rule (Sch. 3, cl. 4.5): each destruction certificate lists the serial of every drive it covers. **Found:** five certificates list serials (674 drives, all matched to the collection record). Four certificates, covering Amsterdam and Frankfurt, give weight only; 503 destroyed drives can't be tied to a certificate. **Evidence:** signed ITAD certificates (grade 2). **What would close it:** a serial list for each of the four certificates.

F4 · Buyers screened before sale Failed

Rule (cl. 9.4): every buyer is screened against sanctions and denied-party lists before sale, and the record kept. **Found:** seven buyers named in the ITAD's sales records. No screening records received; the ITAD's monthly report states that screening was done (grade 1). Our own checks found six of the seven on a company register; one couldn't be found. None matched the lists we searched. **What would close it:** the ITAD's screening record for each buyer, and a registration document for buyer 5.

F5 · GPU resale only with approval Did not run

Rule (cl. 9.1): no GPU is resold without Northwind Cloud's written approval. **Found:** the ITAD reports 16 GPUs resold. No approval records were in the files received, so the check couldn't run. **What would close it:** the approval record for each of the 16 GPUs, or confirmation that none was given.

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3 · OPEN ITEMS

Where the 1,218 units without evidence sit.

SITE	ITAD	LISTED	COLLECTED	EVIDENCED	NOT YET	RATE
Dublin	ITAD A	1,920	1,920	1,604	316	83.5%
Amsterdam	ITAD A	1,604	1,532	1,061	471	66.1%
Frankfurt	ITAD B	1,288	1,203	772	431	59.9%
Total		**4,812**	**4,655**	**3,437**	**1,218**	**71.4%**

Rate = evidenced ÷ listed. 157 listed units were not collected (Amsterdam 72, Frankfurt 85); no collection record explains why.

By category

CATEGORY	COLLECTED	EVIDENCED	NOT YET
Servers	820	700	120
GPU boards	96	80	16
Memory	1,840	1,316	524
Networking	310	255	55
Drives (data-bearing)	1,589	1,086	503
Total	**4,655**	**3,437**	**1,218**

The 16 GPU boards not yet evidenced are the 16 reported resold without an approval record (F5). The 503 drives not yet evidenced are the destroyed drives on weight-only certificates (F3).

Questions we couldn't answer from the files

- Why were 157 listed units at Amsterdam and Frankfurt not collected, and where are they now?
- Were the 16 GPUs approved for resale outside the files we received?
- Does ITAD A keep screening records for the seven buyers, and who signed them?
- What is buyer 5's registered legal name and country?

4 · WHAT WOULD MAKE EVERY RULE CHECKABLE

Four small additions. None changes how you sell.

ADDITION	CLOSES	WHO PROVIDES IT
Serials on the reports your ITADs already send	F3, part of the 1,218 open units	ITAD, in its existing report
Serials on top-up collections	The 157 uncollected units	ITAD, at collection
One code per part	Category matching across sites	Northwind Cloud listing file
Certificates checked against their collection dates	Certificates issued before collection	Platform, from files already received

With the four additions in place, the same cycle would have read **95.6% evidenced** (4,602 of 4,812), with F3, F4 and F5 able to pass or fail on evidence rather than on its absence.

5 · HOW TO READ THE EVIDENCE GRADES

1 · Someone's word
An email or report saying it was done.

2 · Signed document
A certificate or statement signed by the ITAD.

3 · Independent record
Confirmed against a source the ITAD doesn't control.

4 · Machine-checkable
System data matched automatically by serial.

6 · METHOD

Checked against the terms that applied to this cycle. Unit by unit where serials exist, category by category where they don't, and the report always says which. Every file was fingerprinted on arrival and never altered. Every finding links to the documents behind it in the evidence pack, so your own auditor can review the same record and reach their own opinion. This is a report of findings, not an audit opinion, and not legal advice.

7 · SIGN-OFF

Reviewed by

Approved by