



# LEAD BATTERY 360°

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## Grievance Mechanism

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## I. Objectives

Established in 2019, Lead Battery 360° is a global coalition of lead and lead battery industry organizations—including the International Lead Association, Battery Council International, the Association of European Automotive and Industrial Battery Manufacturers, and the Association of Battery Recyclers. The purpose of Lead Battery 360° is to support the improvement of practices in lead battery recycling in low- and middle-income countries and to set a benchmark for sites in more established markets that were already operating in a regulated environment, through its framework.

The Lead Battery 360° Grievance Mechanism aims to ensure that complaints raised with Lead Battery 360° are dealt with in a timely, transparent, consistent and effective manner. This document defines the scope of the Lead Battery 360° grievances, and possible outcomes from it.

The Lead Battery 360° Grievance Mechanism does not replace or restrict access to judicial or other non-judicial remedies. Grievances that suggest or imply criminal liability should be handled through formal police or government procedures, not through the Lead Battery 360° Grievance Mechanism.

## II. Guiding Principles of the Lead Battery 360° Grievance Mechanism

### Anonymity

To uphold confidentiality and promote transparency, the Lead Battery 360° Grievance Mechanism allows for anonymous submissions, giving individuals the option to raise concerns without disclosing their identity. In case Complainants chose not to share their identity with Lead Battery 360°, enough detail and supporting evidence should be provided to assess the issue as Lead Battery 360° will have no means to clarify it further.

The right to anonymity does not apply in cases where Lead Battery 360° believes that there is a regulatory/legal obligation to disclose the issue.

### Confidentiality

Lead Battery 360° will strive to investigate grievances with due regard to confidentiality regardless of whether complainants have chosen to disclose their identity or not. It is also important to note that Lead Battery 360°'s ability to address a complaint could be affected by the decision of keeping the Complainant's identity confidential.

Lead Battery 360° will make available the number and types of grievances received in its annual public report, ensuring confidentiality is maintained to prevent the identification of the parties involved.

### Retaliation

Lead Battery 360° is committed to ensure that its Programme seeks to prevent any risk retaliation, discrimination, threat or any other actions that could result in negative consequences for a Complainant who lodges a grievance.

### III. Scope

The Lead Battery 360° Grievance Mechanism outlines how Lead Battery 360° addresses potential negative impacts that arise with or within the Lead Battery 360° Programme.

#### Grievances within the scope of the Lead Battery 360° Grievance Mechanism

Acceptable grievances might include:

- Grievances against the Lead Battery 360° Secretariat and Governance:
  - A Lead Battery 360° decision about the eligibility to participate in the Lead Battery 360° Programme.
  - A Lead Battery 360° decision about the outcome of an assessment (certification decision).
  - The implementation of the Lead Battery 360° Programme policies and procedures for which its management and board of directors have direct governance responsibility.
- Grievances against Lead Battery 360° Supporters, Participants and Certified Participant:
  - A site's implementation of Lead Battery 360° policies and procedures, including those related to claims / use of the logo.
- Grievances against Lead Battery 360° approved assessors:
  - Expression of dissatisfaction against a Lead Battery 360° approved assessor.

Wherever possible and appropriate, grievances should be handled between the parties involved who have control over the issue. The Complainant should lodge a complaint directly with the Respondent and provide the Respondent with an opportunity to solve the grievance.

#### Grievances outside the scope of the Lead Battery 360° Grievance Mechanism

The following grievances will be considered outside of the Lead Battery 360° Grievance Mechanism's scope:

- Legal disputes are outside the scope of Lead Battery 360°.
- Grievances that seem trivial or vexatious.
- Grievances related to personal grievances or private disputes that are not related to the Lead Battery 360° Programme.
- Grievances that are not based on objective evidence.
- Grievances related to events that occurred more than 5 years prior to lodging it.

### IV. Submitting a Grievance

Complainants may contact Lead Battery 360° to raise a grievance using the form available on the website.

Lead Battery 360° will evaluate the grievance and decide on whether it should be investigated or dismissed, based on the following:

- The grievance is in scope of the Lead Battery 360° Grievance Mechanism.
- The grievance includes relevant evidence to support the complaint.
- The grievance is submitted in English.

The Lead Battery 360° will aim to acknowledge receipt of the grievance within ten calendar days and review the grievance for admissibility within ten calendar days from when it acknowledged receipt.

If a grievance lacks enough information and/or evidence to be investigated, Lead Battery 360° will contact the Complainant to assess whether the claim can be substantiated. If no further information and/or evidence is provided within thirty calendar days, the grievance will be dismissed, and the Complainant notified about it.

Complainants will be informed about the reasons for grievances that are rejected and will be provided with an opportunity to appeal.

## V. Investigating a Grievance

For grievances or appeals that are accepted, Lead Battery 360° will seek resolution through the following:

- Discussion between the Complainant and the Respondent aiming to resolve the grievance via direct dialogue.
- When direct dialogue does not lead to a resolution, Lead Battery 360° will appoint an independent person (Investigator), free of bias and conflict of interest, to conduct the review of the grievance or appeal. The Investigator will engage with the parties to carry out a review of the facts. In case the Investigator requires additional evidence, the required party will have thirty calendar days to provide it. Based on the analysis, the Investigator will then provide a written report with the findings, including a proposed plan for remediation if required.
- The report will be made available to all involved parties for their review. Any comments should be submitted within ten calendar days from the receipt of the report.
- The final report will include comments made by all involved parties and be presented to an ad-hoc Panel for a final decision, which will be provided within thirty calendar days from the receipt of the final report.

## VI. Issue Decision

LeadBattery360° will review the final report and decide on whether the grievance:

- Requires an action plan for remediation.
- Should be dismissed.
- Require the Respondent to remove any Lead Battery 360° associated claims.
- Suspend or terminate the Lead Battery 360° Participant or approved assessor from the Lead Battery 360° Programme.

Where the Secretariat agrees on the decision to implement an action plan for remediation, a timeline with agreed milestones will be established and completion of the actions will be supervised by the Investigator. A final report will be provided to the Secretariat and all parties involved, and the grievance will be considered resolved. A summary of the number and types of grievances received over the past year will be made available in the LeadBattery360° annual public reporting, ensuring confidentiality is maintained to prevent the identification of the parties involved.

## VII. Disclaimer

The processes described in this document are not meant to replace, contravene or modify any applicable international, national, state or local laws, regulations, ordinances, statutes or other requirements.

## VIII. Costs Related to the Grievance Process

Lead Battery 360° strives to minimize the costs of the grievance process for all parties involved, but depending on the type of grievance, costs may arise. These costs may be associated with, but not limited to, a third-party investigation, translation, travel and accommodation.

When a formal investigation is necessary, Complainants will need to agree on sharing the costs. Lead Battery 360° will generally waive the costs related to the Grievance Mechanism in the case of individual whistleblowers, unless the grievance raised is found to be disingenuous.

## IX. Timeframe

The timelines outlined in this document are goals and Lead Battery 360° will make all efforts to achieve it. However, it is recognized that there may be exceptional circumstances that could prevent them from being met. In such cases, Lead Battery 360° shall inform all parties involved about the delays and new timelines.

## X. Lead Battery 360° Logo and Claims

The Lead Battery 360° may require the suspension of the use of its logo or claims associated with the Programme, or any other public reference to Lead Battery 360°, while investigations and resolutions are ongoing. For more information about claims, refer to the Lead Battery 360° Claims Guide.

## XI. Glossary

**Approved Assessor:** a Lead Battery 360° qualified professional that makes assessment decisions related to the Lead Battery 360° Programme.

**Certified Participant:** A company that has been independently assessed and has met the critical Performance Expectations. They are granted the right to use the Lead Battery 360° Certified Participant claim.

**Complainant:** the party submitting a grievance.

**Investigator:** an individual or firm appointed by Lead Battery 360° to carry out an investigation on the facts of the grievance.

**Participant:** A company that has joined the Lead Battery 360° Programme, signed the Letter of Commitment, and is undergoing the assessment process or a Performance Improvement Plan but has not yet obtained certification.

**Parties:** entities participating in the grievance mechanism, including the Complainant, the Respondent, and Lead Battery 360°.

Supporter: A company that supports the objectives of the Lead Battery 360° Programme but is not eligible for third-party assessment.

Complaint/Grievance: a complaint, dispute, challenge, conflict, issue, dissatisfaction related to Lead Battery 360°.

Respondent: the party who is the subject of the grievance.

## XII. References

- Solar Stewardship Initiative – Complaints and Appeals, version 1.0. November 2023.
- The Copper Mark Grievance Mechanism, v.3. March 2024.
- ResponsibleSteel Issues Resolution System, version 3.0. November 2023.
- ASI Complaints Mechanism, version 4. February 2024.