LEAD BATTERY 360°

Code Guidance

V1, January 2026

Created on:	Last revised on:	Organization:
8 January 2024		LeadBattery360º
Title:		Type:
LeadBattery360º Code Guidance		Public

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PRINCIPLE 1: Support responsible battery manufacturing and recycling by placing environmental health and safety excellence at the heart of our operations.

1.A. Occupational Health and Safety (OH&S)

Note: Lead exposure and emissions are covered under Principle 2

Performance Expectations and Performance Determination

Performance Expectation

(a) OH&S Legal Compliance. Ensure compliance with laws, regulations and international conventions on OH&S in the country of operation.

How can the company meet this expectation?

Sites are expected to establish, implement, and maintain a process(es) to:

- determine and have access to up-to-date applicable OH&S legal requirements;
- take these legal requirements into account when establishing, implementing, maintaining and continuously improving their OH&S management system;
- regularly evaluate the extent to which legal requirements are fulfilled;
- take corrective action, if necessary; and
- maintain knowledge and understanding of the company's compliance status.

Legal requirements can include, but are not limited to:

- legislation (national, regional or international), including statutes and regulations;
- decrees and directives;
- orders issued by regulators;
- permits, licences or other forms of authorization;
- judgments of courts or administrative tribunals;
- treaties, conventions, protocols;
- collective agreements, when legally binding.

In addition to legal requirements, companies should consider other applicable requirements that the company has to or chooses to comply with, for example:

- the company's policies, standards, rules, and/or codes;
- contractual conditions;
- employment agreements;
- agreements with interested parties;
- agreements with health authorities;
- public commitments;
- insurance requirements;
- non-regulatory standards, consensus standards and guidelines;
- voluntary principles, codes of practice, technical specifications, charters, including the Lead Battery 360° Code.

Companies are expected to maintain and retain documented information on their legal requirements and compliance evaluation; and to ensure that it is updated regularly to reflect any changes. The frequency and timing of compliance evaluations can vary depending on the importance of the requirement, variations in operating conditions, changes in legal requirements, and the company's past performance.

Companies are expected to assign responsibility and authority for legal compliance to dedicated staff member(s), who should have a clear understanding of their roles in achieving the intended outcomes of the OH&S legal compliance processes, while top management retains ultimate accountability for compliance.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place procedures and processes, including appointed staff members, to monitor and ensure compliance with national requirements and international conventions in relation to OH&S matters.	The Company has started to develop or has in place basic procedures and processes, including appointed staff members, to monitor and ensure compliance with national legal requirements and international conventions in relation to OH&S matters to identify and take action to remedy potential cases of non-compliance on OH&S.	The Company has in place and implements procedures and processes, including appointed staff members, to monitor and ensure compliance with national legal requirements and international conventions on OH&S matters to identify OH&S risks and take action to remedy cases of non-compliance on OH&S. If non-compliances are identified, the Company demonstrates that no wilful or repeated violations were found. The Company demonstrates timely and effective action has been implemented to remedy the non-compliance and to prevent further non-compliances from recurring.

Performance Expectation

(b) Occupational Health and Safety (OH&S) Policy. Document, communicate, and regularly review an OH&S policy designed for continuous improvement, endorsed by the Board and senior management, and supported through the provision of human and financial resources.

How can the company meet this expectation?

Companies are expected to document an OH&S policy that:

- outlines the company's commitment to provide healthy and safe working conditions, setting the company's intentions and long-term direction for OH&S management and performance;
- is endorsed by senior management, including the Board or equivalent governance body;
- is appropriate to the purpose, size and context of the company and to the specific nature of its OH&S risks and opportunities;
- is consistent with legal and other requirements as per Performance Expectation 1.A.(a);
- includes a commitment to continuous improvement.

Companies are expected to communicate the policy within the organization and to make it publicly available.

Companies are expected to regularly review the policy, as part of management review, to ensure its continuing suitability, adequacy and effectiveness. Policy review should be undertaken at pre-planned intervals. The frequency and timing of policy review can vary depending on variations in operating conditions, changes in legal requirements, and the company's past performance.

Companies are expected to demonstrate leadership and commitment to OH&S, including by ensuring that there are sufficient human and financial resources available to establish, implement, maintain and improve a robust, credible, and reliable OH&S management system consistent with the objectives of the policy.

Those involved in the company's OH&S management system should have a clear understanding of their role, responsibility and authority for achieving the intended outcomes of the OH&S policy, while senior management retains ultimate accountability.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have a documented OH&S Policy in place available to its employees.	The Company has started to develop or has in place a basic OH&S Policy available to its employees. Where a Policy is already in place, it is endorsed by the Board and by senior management; responsibilities and accountabilities for oversight and implementation are broadly understood. The Policy includes a commitment to continuous improvement.	The Company has in place and implements a publicly available OH&S policy. The Policy is endorsed by the Board and by senior management, which demonstrates strong control and oversight. Roles and responsibilities are clearly understood by employees. The Policy is supported through the provision of sufficient human and financial resources. The Policy is regularly reviewed to ensure effectiveness and continuous improvement and findings are fully integrated into planning and decision making.

Performance Expectation

(c) Hazards and Risks Assessment and Management. Maintain procedures and processes to identify work-related hazards and assess OH&S risks and apply a hierarchy of controls to minimize risks for workers and visitors.

How can the company meet this expectation?

Companies are expected to establish, implement, and maintain procedures to systematically identify all work-related hazards that could cause injury or ill health to employees, contractors, or visitors, including but not limited to:

- physical hazards arising from infrastructure, materials, and the physical conditions of the workplace, including hazards encountered during construction, production, assembly, or maintenance activities;
- chemical hazards arising from the storage and handling of chemicals or substances such as lead compounds, solvents and battery acids;
- biological hazards arising from exposure to biological agents, such as bacteria, viruses, parasites, and moulds or fungi;
- psychosocial hazards, such as fatigue, or harassment;
- mechanical hazards arising from the use of machinery, equipment, or tools;
- electrical and energy hazards, such as electric shocks, burns, arc flash, explosions, or fires;
- movement hazards arising from uneven surfaces, environmental conditions, moving equipment, or objects falling from heights;
- struck-by hazards from moving vehicles, falls from vehicles, vehicle collisions, and rollovers;

- ergonomic hazards related to workplace design, repetitive motions, over-exertion, vibration, or other hazards;
- other hazards related to human factors, such as human capabilities, limitations, and the interaction between the activity, the worker and the organization.

Companies should identify work-related hazards on an on-going basis and proactively, beginning at the conceptual design stage of any new workplace, facility, product or organization, and then continuing during operations to reflect current, changing and future activities. To this end, the processes to identify hazards should involve:

- gathering input and feedback from workers, as per Performance Expectation 1.A.(d), including contractors and other personnel;
- conducting regular site inspections to assess working conditions, operational practices, and environmental factors;
- incorporating insights gained from the analysis of potential emergency scenarios;
- reviewing and analysing information from past incidents.

Common hazards can include lead dust exposure, sulphuric acid spills, battery explosions due to hydrogen gas buildup, heat stress in smelting operations, manual handling injuries, and risks from heavy machinery or vehicle use.

Once hazards are identified, companies are expected to assess the likelihood of occurrence and severity of impact of each hazard to determine the level of risk, based on the Company's own criteria or using available standardized methodologies. This OH&S risk assessment should be documented and regularly updated, integrated into planning and used to inform decision-making. Companies should involve trained personnel in the assessment process, which should be applied consistently across all operations, work activities and tasks.

Companies are expected to apply a hierarchy of controls to effectively manage OH&S risks, prioritizing elimination of hazards wherever possible. When elimination is not feasible, companies should minimize risks by following the subsequent control measures in order:

- substitution, by replacing a material, equipment, or process with one that is less hazardous;
- engineering controls, by isolating people from the hazard through physical means or modifications to equipment and their environment, or by implementing
  collective protective measures such as machine guarding and ventilation systems;
- administrative measures, by adopting measures such as changing the way employees work to reduce risk expose; and as a last resort,
- providing workers with personal protective equipment (PPE) that is free of charge and in good condition to protect them against hazards.

Control measures should be appropriate, effective, and tailored to the specific risk profile of the hazard, as defined during the risk assessment. Special attention should be paid to exposure to hazardous substances and materials, specifically lead exposure, as per Performance Expectations of Principle 2.

Companies should regularly review their hazard identification, risk assessment, and control measures to ensure continuous improvement. Reviews should be conducted regularly, but should also be triggered by changes in operations; new equipment or materials; post-maintenance; incidents, accidents or near misses; or regulatory updates. Management and workers should be involved in evaluating the effectiveness of

controls, and findings should be integrated into broader OH&S planning and continuous improvement efforts.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place procedures or processes to identify work-related hazards and assess OH&S risks.	The Company has started to implement procedures and processes to identify work-related hazards and assess OH&S risks. Hazards and OH&S risks are broadly understood by senior management. The Company applies the hierarchy of controls to eliminate hazards and minimize risks for workers and visitors.	The Company has in place and implements procedures and processes to identify work-related hazards and assess OH&S risks. Hazards and OH&S risks are well understood by management and relevant workforce and integrated into planning and decision making. Procedures, processes, and controls measures are effective and regularly reviewed for continual improvement. This includes a review of the mitigation hierarchy for the elimination, substitution, and/or control of hazards associated with the use of chemicals.

Performance Expectation

(d) Workers' engagement on OH&S. Provide workers with a mechanism by which they can raise, discuss, participate, and be consulted on matters that affect their health and safety, including for the resolution of OH&S concerns with management.

How can the company meet this expectation?

Companies are expected to create accessible and transparent channels for workers to raise OH&S concerns, report hazards and incidents, and provide suggestions for improving workplace safety. Engaging workers ensures that those closest to the risks can share practical insights and information that can strengthen the overall safety culture and contribute to decision-making. These mechanisms should include:

- regular scheduled meetings with workers and workers' representatives, where they exist;
- regular consultation forums or surveys;
- setting dedicated OH&S committees.

Companies are expected to consult workers before implementing significant changes that may affect their health and safety, such as process changes, equipment upgrades, or new chemical use. Channels should be clearly communicated to all workers and available in languages and formats appropriate to the local context. Companies should ensure that workers understand that they can raise concerns without fear of retribution. Channels should be available for workers to submit concerns anonymously, as per Performance Expectation 5.B.(k).

Workers should be actively encouraged by the Company to take part in discussions about health and safety policies, procedures, and practices. This includes involving them in risk assessments, safety inspections, and incident investigations. The frequency and timing of this engagement can vary depending on the context of the organization, as well as the company's OH&S performance and legal requirements.

When workers raise OH&S concerns, companies should have a formal process in place to assess, address, and resolve issues promptly. The company should reinforce accountability by establishing clear documentation, response timelines, and feedback loops in order to communicate corrective actions back to workers, as per Performance Expectation 1.A.(f).

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have measures in place to inform workers on OH&S issues.	The Company has started to adopt or has some measures in place to inform workers on OH&S issues; for example, the Company conducts regular workers' briefings, such as toolbox meetings conducted on site.	The Company has in place and implements measures in place to inform workers on OH&S issues. Such measures include mechanisms by which workers can raise, discuss, participate in, and be consulted on with all levels of management on matters that affect their health and safety, including for the resolution of OH&S concerns. Concerns raised by workers are acted upon and integrated into planning and decision making. The mechanism is regularly reviewed for effectiveness and continuous improvement.

Performance Expectation

(e) Access to occupational health services. Provide employees with access to occupational health services with appropriate levels of medical surveillance, counselling and advice on wellbeing.

How can the company meet this expectation?

Companies are expected to provide all employees with competent and accessible occupational health services that are proportional to the nature, scale, and hazards of the work they perform. This includes preventive, clinical, advisory, and rehabilitative services aimed at protecting and promoting the health, safety, and wellbeing of employees, which can be in-house or from external providers and local general practitioners or equivalent.

Occupational health services should include regular medical surveillance when relevant to workplace lead exposure, as per the Performance Expectations of Principle 2. Companies should ensure surveillance programs follow applicable regulations and standards set forth in Principle 2, including baseline and periodic health checks to monitor early signs of work-related illness or exposure for all employees.

Companies are expected to offer employees access to counselling and mental health services to support emotional wellbeing, particularly in high-stress or hazardous environments. These may include stress management programs, access to psychological support, and resources for personal and family health concerns. Additionally, occupational health professionals should actively advise workers and management on preventive health practices, job adaptations, and return-to-work planning following illness or injury.

Companies should fully document and regularly review the effectiveness of their occupational health services to promote a proactive health and safety culture and help prevent long-term health injuries or illnesses, as well as work towards continuous improvement.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place measures to facilitate access to medical advice to employees from a local general practitioner (or equivalent).	The Company has started to adopt or has some measures in place to facilitate access to medical advice to employees from a local general practitioner (or equivalent).	The Company has in place and implements measures to facilitate access to medical advice to employees from a local general practitioner (or equivalent). The Company provides all employees with appropriate medical surveillance, counselling, and advice on wellbeing through regular access to occupational health services, including to an occupational health practitioner. Programmatic health surveillance and counselling is fully documented and regularly reviewed for effectiveness and continuous improvement.

Performance Expectation

(f) Incident follow-up. Have procedures and processes in place to record, investigate, and follow-up on OH&S incidents, by definition and implementation of corrective actions and monitoring the effectiveness of such actions through management review at pre-planned intervals.

How can the company meet this expectation?

Companies are expected to establish documented procedures for promptly recording all OH&S incidents, including but not limited to injuries, illnesses, near-misses, unsafe conditions, and environmental exposures. The recording process should ensure accurate documentation of what happened, when, where, and who was involved, and should comply with applicable regulatory reporting requirements in the region where the Company operates.

All reported incidents should be systematically investigated to determine the causality of the incident using root cause analysis techniques and evaluation. Companies should ensure the investigation process involves relevant personnel, including the affected worker and their supervisors and, where they exist, worker representatives, as appropriate.

Following the investigation, companies are expected to define corrective actions aimed at eliminating or minimizing the underlying causes. These actions should be assigned to responsible parties with clear timelines, and resources should be allocated to ensure they are implemented effectively and without delay.

Companies are expected to monitor the implementation of corrective actions and evaluate their effectiveness over time. This includes checking whether the same or similar incidents recur and verifying that risks have been reduced to a predefined acceptable level, as per Performance Expectation 1.A.(c). These evaluations should be formally and regularly reviewed by management and used to inform continuous improvement of the OH&S management system.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place procedures or processes to record and follow-up on OH&S incidents.	The Company has started to develop procedures and processes or has in place some measures to record and follow-up on OH&S incidents. Where OH&S incidents occur, the Company undertakes corrective actions.	The Company has documented procedures and processes in place to record, investigate, and follow-up on OH&S incidents, including near misses. The Company has documented systems in place to define and implement corrective and preventive actions in a timely manner, to monitor implementation, and to monitor the effectiveness of such actions through management review at pre-planned intervals. Findings are fully integrated into planning and decision making,

		with a view to continuous improvement.

Performance Expectation

(g) Education and training on OH&S. Provide appropriate and periodic training and effective education to employees, require onsite contractors to train their workers on all aspects relevant to their specific tasks and work areas, and provide appropriate briefings to visitors to company facilities.

How can the company meet this expectation?

Companies are expected to ensure that all employees receive appropriate, task-relevant, and timely OH&S training tailored to the specific risks associated with their roles, including but not limited to:

- hazard recognition, to equip employees to identify all types of hazards in their work environment, and how to report them;
- safety protocols and work procedures;
- emergency procedures and response, including types of emergencies, evacuation plans and the use of emergency equipment, as per Performance Expectation 1.A.(h);
- proper use, maintenance, and disposal of PPE;
- task-specific training such as working at heights, working in confined spaces, chemical handling, etc.

Training should be delivered upon hiring, when roles or processes change, following major incidents or near misses (where applicable), and at regular intervals thereafter. Companies should evaluate training effectiveness, by assessing that workers understand and can apply what they have learned, through standardized procedures such as frequent testing and employee engagement, as well as observation, inspections and internal audits. Companies should establish procedures for ensuring that individuals delivering OHS training, whether internal or external, are competent and qualified.

Companies are expected to ensure onsite contractors train their workers on OH&S practices relevant to the tasks they will perform and the specific environments in which they will operate. Companies should establish clear requirements for contractor training programs as part of contractor qualification and oversight processes, including verifying that all workers have completed training and are competent on OH&S prior to site access and task execution.

Companies are expected to provide appropriate briefings to visitors to company facilities before entering operational areas. These briefings should cover essential safety rules, emergency procedures, restricted zones, and any relevant site-specific hazards. Briefings should be documented and delivered in a manner that ensures comprehension, which can include translation into local language or visual aids where necessary.

Companies should maintain comprehensive records of all training activities, including attendee lists, topics covered, and training dates, along with documentation shared during education activities. Training programs should be regularly reviewed and updated to reflect changes in local and international legislation, company procedures, available technology, or risk profiles. Ongoing improvement of training content and delivery methods is essential to build a strong safety culture.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not provide appropriate or periodic training and effective education to employees, nor does it have OH&S training requirements for contractors for their workers, or policies in place to provide	The Company has started to provide or provides basic training for employees, at a minimum, upon hiring, and provides briefings to visitors to company facilities.	The Company provides appropriate and periodic training for employees and requires onsite contractors to train their workers on all aspects relevant to their specific tasks and work areas.

appropriate briefings to visitors to company facilities.	The Company has started to develop or has established basic OH&S training requirements for contractors for their workers. Where relevant, these are addressed on a day-by-day basis in toolbox and other shopfloor meetings.	The Company has processes or procedures in place to verify that training is effective.

Performance Expectation

(h) Emergency Response. Have and regularly test, as appropriate, emergency procedures, response and evacuation plans.

How can the company meet this expectation?

Companies are expected to establish documented emergency response procedures that are tailored to the specific risks associated with their operations, such as:

- chemical spills;
- fires;
- lead or acid exposure;
- electrical incidents; and
- natural disasters.

These procedures should clearly define roles and responsibilities, communication protocols, evacuation routes, assembly points, first aid provision, and guidance on coordination with external emergency services.

Emergency response and evacuation plans should be effectively communicated to all employees, contractors, visitors, and other relevant stakeholders, such as emergency response services, government authorities and the local community, as applicable.

Training on these procedures should be conducted during onboarding and refreshed regularly to ensure all individuals understand how to safely respond in an emergency. Critical information should be posted in accessible locations and provided in appropriate languages and formats.

Companies are expected to test their emergency procedures at pre-defined intervals through practical drills, simulations, or team exercises. These tests should assess the readiness of personnel, the adequacy of response times, and the clarity of procedures, as well as the functionality of alarms and communication systems. Drills should involve day-to-day staff, part-time workers, contractors and emergency coordinators.

After each drill or emergency event, companies should conduct a thorough review to identify gaps or areas of improvement of their emergency procedures. Lessons learned should inform updates to emergency plans and future training, as well as equipment needs and other actions to ensure continuous improvement of emergency preparedness.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place emergency response procedures or evacuation plans in line with national regulations.	The Company has started to develop or has in place emergency response procedures and evacuation plans in line with national regulations.	The Company has in place and implements emergency response procedures and evacuation plans in line with national regulations. The Company demonstrates that emergency procedures, response and evacuation plans are regularly and appropriately tested.

Performance Expectation

(i) OH&S Performance. Evaluate periodically OH&S performance using lagging and/or leading indicators, set goals to improve OH&S performance, and strive to continuously improve performance over time.

How can the company meet this expectation?

Companies are expected to establish a systematic approach to measuring OH&S performance through both leading indicators and lagging indicators based on metrics relevant to the company's operations and risk profile. These performance indicators may include:

- Leading Indicators (Proactive Measures)
  - number of safety training sessions completed
  - number and percentage of workers trained
  - frequency or scores of safety audits or inspections
  - employee participation rates in safety programs
  - percentage of corrective actions closed on time
- Lagging Indicators (Reactive Measures)
  - Total Recordable Incident Rate (TRIR)
  - Lost-Time Injury Frequency Rate (LTIFR)
  - number and percentage of workers' compensation claims filed
  - severity rate of reported incidents

After evaluating OH&S performance, companies are expected to define SMART objectives to improve OH&S performance over time. These goals should align with the organization's OH&S policy, as per Performance Expectation 1.A.(a), and risk management priorities, be tracked through specific KPIs, and be reviewed regularly by senior management within a specific timeframe.

OH&S performance management should be embedded in a broader framework of continuous improvement. Companies should use performance data to identify trends, proactively address weaknesses, and drive corrective or preventive actions. Management review processes should include the evaluation of

OH&S goals and results to ensure the company's approach evolves in response to internal changes, external requirements, and lessons learned.

How will performance be determined?

Does not meet	Partially meets	Meets
The Company does not evaluate its OH&S performance using lagging and/or leading indicators.	The Company has started to identify and measure key performance indicators (KPIs), that may help improve its occupational health & safety performance. However, the company has not established targets, the KPIs are not embedded into business processes and/or are not widely communicated.	The Company has identified key performance indicators (KPIs) that will help it measure and improve its occupational health & safety performance and has established improvement targets. KPIs are embedded into key business processes, are communicated to staff and other relevant stakeholders, and are regularly reviewed for continual improvement.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 1 – 1.A Occupational Health and Safety is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
1.A.(a) OH&S Legal Compliance	√	√	√
1.A.(b) Occupational Health and Safety (OH&S) Policy	√	√	√
1.A.(c) Hazards and Risks Assessment and Management	√	√	√
1.A.(d) Workers' engagement on OH&S	√	√	√
1.A.(e) Access to occupational health services	√	√	√
1.A.(f) Incident follow-up	√	√	√
1.A.(g) Education and training on OH&S	√	√	√
1.A.(h) Emergency Response	√	√	√

1.A.(i) OH&S Performance	√	√	√

Data Collection Method

Conformance with the Performance Expectations of Principle 1 - 1.A Occupational Health and Safety is assessed through:

Performance Expectation	Observation	Document Review	Interviews			
			Board and Management	Employees	Contracted Workers	Other Stakeholders
1.A.(a) OH&S Legal Compliance1 .A.(a)		√	√			
1.A.(b) Occupationa l Health and Safety (OH&S) Policy	√	√	√	√	√	
1.A.(c) Hazards and Risks Assessment and Managemen t	√	√	√	√	√	
1.A.(d) Workers' engagement on OH&S		√	√	√	√	
1.A.(e) Access to occupational health services	√	√	√	√	√	
1.A.(f) Incident follow-up		√	√	√	√	
1.A.(g) Education and training on OH&S		√	√	√	√	
1.A.(h) Emergency Response	√	√	√	√	√	√

1.A.(i) OH&S Performance		√	√			

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during assessment:

- A register with OH&S legal and regulatory requirements that are applicable to the company's operation;
- A procedure for regularly evaluating compliance with applicable OH&S legal and regulatory requirements;
- Evidence of monitoring changes in applicable OH&S legal and regulatory requirements;
- Licences and permits related to OH&S;
- Corporate and/or site / facility level OH&S Policy or other document including a formal commitment to occupational health and safety endorsed by the Board;
- Evidence of communication and training of such Policy to employees and contracted workers;
- OHS management systems manual or procedures for the implementation of the OH&S Policy;
- Corrective action plans implemented to correct identified non-compliances;
- Organisational charts showing OH&S roles, responsibilities and authorities;
- Job descriptions and procedures identifying roles and responsibilities to implement the OHS Policy;
- Records of management review such as meeting notes and internal reports;
- Evidence of review, and update of OH&S policies and procedures;
- Evidence of allocation of budgetary resources to OHS Policy implementation;
- Government inspections and OH&S surveillance and monitoring reports;
- Evidence of compliance with regulatory frameworks, such as, for example, OSHA;
- Internal and external audit reports;
- Third-party verification report or certificate of a formal management system that covers the management of OH&S, such as ISO 45001.
- Policy and procedures describing the company's commitment to eliminate workplace hazards and minimize risks;
- A risk register assessing the significance or severity, probability, and consequences of the full range of potential hazards associated with the company operations;
- Area- and task-specific hazard and risk assessments and methodologies for identifying the hazards and risks and occupational diseases assessments;
- A risk register assessing the significance or severity, probability, and consequences of the full range of potential risks and impacts associated with the site operations;
- A management plan or procedures describing performance targets and actions taken by the company to eliminate workplace hazards and minimize risks, including through the hierarchy of controls;
- OHS performance target measurement reports;
- Safe working instructions;
- A procedure describing how the company conducts effective consultation and participation with workers relating to occupational health and safety matters, including risk identification and management;
- Records of consultation and participation with workers and management relating to OH&S;
- An inventory of PPE and records of inspection and testing of PPE;
- PPE issue record;
- A procedure to ensure that appropriate safeguards to protect workers are installed on all machinery including mobile equipment;

- Health and safety committee meetings, records of action taken and follow-ups;
- Health and safety committee member appointments or health and safety committee member election records;
- Health and safety meeting schedule;
- Records of worker grievances related to OH&S;
- CV/credentials of individuals providing site occupational health services;
- Job descriptions of occupational health professionals employed by the company or contracts with external providers;
- Procedures for worker occupational health surveillance and annual medical examination;
- A health and safety plan describing the activities undertaken by the company to protect and promote workers' safety, health and wellbeing;
- Records of health services provided to workers – with due regard for confidentiality, as appropriate;
- Documents on proposals for preventive and control measures made by the health practitioner;
- Certificate of recognition of professional competency of the company conducting workplace monitoring and worker health surveillance;
- Occupational health surveillance procedures that include frequency of medical surveillance;
- Policy or procedure relating to confidentiality and disclosure of medical records;
- OH&S surveillance records;
- Grievance records related to OH&S surveillance;
- Incident and near miss investigation procedures, reports and records;
- Reports of actions taken by the company to address reported incidents;
- Records of company follow up regarding OH&S incidents with relevant stakeholders;
- Incident root cause analysis reports;
- Reports filed with local, regulatory and competent authorities on incidents;
- Training records;
- Training procedure/policy;
- Training material/manuals;
- Licences and training for mobile equipment operators;
- Education programme plan and implementation records;
- Agreements and communications with contractors including training requirements for contracted workers;
- Toolbox talk for contractors, site visitors and other stakeholders;
- Policy and procedures for emergency response and evacuation;
- Emergency response and evacuation plans and drills;
- Description and frequency of firefighting training and fire and emergency evacuation drills;
- Emergency evacuation drill records;
- Documentation of collaboration with relevant stakeholders on developing emergency response plans and drills;
- Records of training for workers and management on emergency response and evacuation;
- Inventory of in date fire safety devices, including alarms and fire-fighting teams and equipment, and their location;
- Firefighting equipment service, inspection and testing records (internal and external);
- Operating instructions for fire fighting equipment;
- Documentation related to the installation of emergency lighting and their location;
- Plan to detect, prevent, and combat the outbreak and spreading of fires, explosions, and natural disasters;
- Documentation of leading and lagging KPIs and performance monitoring;

- OH&S data collection and aggregation files;
- Evidence of trends analysis and target setting;
- Sustainability or Corporate Social Responsibility reports, in line with the GRI Standards, the Sustainability Accounting Standards Board (SASB) Standards, or other equivalent reports;
- Assurance claim on publicly available website, annual report, or corporate sustainability report relating to OH&S data.

Interviews

During interviews with management, managers can demonstrate or describe:

- A good understanding of the company's OH&S Policy;
- Examples of how the OH&S Policy is implemented;
- How the company has established roles and responsibilities, including expectations for senior, middle level and operational management;
- How the company has allocated resources for the implementation of the OH&S Policy and how it has determined whether such resources are sufficient and effective;
- Understanding the dynamics of the site and how OH&S fit into the operations;
- Whether implementation of the Policy is regularly reviewed and continuously improved;
- A good understanding of the company's policy or procedures to identify hazards and risks to health and safety of all workers associated with the company's operations;
- How workers are trained on the OSH policy and the frequency of the training;
- Examples of the significance or severity, probability, and consequences (level of risk of injury or illness) of potential hazards associated with the company operations, including area- and task-specific risks;
- The company's plan to eliminate hazards and minimize or mitigate risks associated with the company's operations, including through a hierarchy of controls;
- How the company has allocated resources for the implementation of measures to eliminate hazards and minimize or mitigate risks;
- The process for conducting effective consultation and participation with workers relating to occupational health and safety matters, including hazard and risk identification and management;
- How OH&S meeting minutes are recorded;
- How OH&S committee members are appointed or elected;
- How grievances related to OH&S are handled and tracked;
- Understanding of how many times OH&S meetings are held;
- How the company encourages and facilitates engagement of workers in relation to occupational health and safety matters, including hazards and risks assessment and management;
- How workers' concerns are taken investigated, addressed, and feedbacked on, as part of the company's risk management plan;
- How workers are trained and consulted through health and safety trainings and meetings.
- A good understanding of the health services available to workers;
- A good understanding of the company's procedures to survey and examine workers health
- A good understanding of the actions taken by the company to protect and promote workers' safety, health and wellbeing;
- A good understanding of the health services available to workers;
- A good understanding of the company's procedures to survey and examine workers' health;
- A good understanding of the actions taken by the company to protect and promote workers' safety, health and wellbeing;

- A good understanding of the procedures for worker occupational health surveillance and annual medical examination;
- Knowledge of credentials of the company conducting workplace monitoring and worker health surveillance;
- Knowledge of the frequency of medical surveillance;
- A good understanding of the policy or procedure relating to confidentiality and disclosure of medical records; and
- How grievances related to OH&S are handled and monitored
- A good understanding of the company's procedures to record, investigate and follow up on OH&S incidents, including near misses;
- A good understanding of the actions taken by the company to define and implement appropriate corrective actions in response to reported incidents;
- A good understanding of the company's procedures to review the effective implementation of corrective actions;
- Knowledge of incident root cause analysis;
- How to report to local, regulatory and competent authorities on incidents;
- A good understanding of the company's OH&S education and training programme for employees;
- A good understanding of the company's expectations relating to training of contracted workers and measure taken by the company to check contractors' conformance against such expectations;
- Knowledge of frequency of training;
- A good understanding of the company's safety guidelines for visitors;
- A good understanding of the company's policy and procedures for emergency response and evacuation;
- How frequently evacuation drills are conducted and how;
- How stakeholders were consulted in the development of emergency response plans;
- How to keep firefighting equipment, evacuation routes, evacuation exits and emergency assembly point free of obstruction;
- Knowledge of minimum requirement for emergency exits;
- The process for training workers on emergency response and evacuation;
- The process for testing and inspection of fire-fighting equipment; and/or the location of fire alarms, emergency exits, escape routes, and emergency lighting.
- A good understanding of how the company measures progress towards set targets, and strives to improve performance over time.

During interviews with workers (including employees and contractors), they can demonstrate or describe:

- A basic understanding of the company's OHS Policy and whom to ask for more information in case of feedback on safety practices and conditions;
- The type and content of the training they have received on the company's OHS policy
- A basic understanding of the company's policy or procedures to identify hazards and risks to health and safety of all workers associated with the company's operations;
- Examples of hazards or risks associated with their position and how to prevent and minimize or mitigate those hazards or risks
- Measures that the company has taken to eliminate hazards and minimize or mitigate risks;
- Participation in consultations on hazard and risk identification, assessment and management;
- The provision of the correct PPE free of charge;
- The installation of appropriate safeguards on machinery;
- Participation in health and safety training;

- The type and content of the training and education program they have received on health and safety;
- Training and understanding of the chemicals being used, including their danger
- Participation in health and safety meetings.
- A basic understanding of the health services available to them;
- How to seek counselling and advice on wellbeing;
- Types, methods and frequency of medical surveillance;
- Knowledge of how medical information is disclosed and kept confidential;
- How incidences and near misses are handled;
- How to report incidents and near misses;
- How incidents and near misses are included in training;
- Knowledge of the type and content of the training they have received on the company's OHS policy.
- How to report potential OH&S incidents.
- A good understanding of the company's policy and procedures for emergency response and evacuation;
- How frequently evacuation drills are conducted;
- Participation in training on emergency response and evacuation;
- Knowledge of availability of fire-fighting equipment and knowledge of how to use it; and/or the location of fire alarms, emergency exits, escape routes, emergency assembly point and emergency lighting;
- Basic knowledge of OH&S performance targets;
- How OHS worker representatives are appointed or elected;
- Names of OH&S worker representatives;
- Formal process for engaging workers on issues related to OH&S;
- Process of OH&S worker representatives participate in matters relating to OH&S.

Observations

During the site inspection and walk through, the assessor observes:

- The measures taken for the elimination of hazards and the minimization or mitigation of risks;
- Machinery safeguards;
- Ventilation and emission control systems;
- The measures taken for the minimization and control of workers' occupational lead exposure;
- Housekeeping and hygiene practices are in place;
- Appropriate hygiene facilities (e.g. male and female showers and changing rooms) are provided for lead exposed workers;
- Adequate facilities for drinking water and hydration;
- Appropriate facilities for smokers that mitigate risk of chemical exposures;
- Control measures are in place to ensure that common areas (e.g. canteen and break rooms) are kept as free as practical from lead contamination;
- Workers issued with and using the appropriate PPE (workwear/overalls, gloves, respirators, hard hats, safety glasses/visors, thermal protective aprons, hearing protection etc);
- Facilities for cleaning and the maintenance/replacement of PPE;
- Visible hazard signs; warning signs; and PPE signs;
- Posted safe work instructions;
- Posted safety data sheets (SDS);
- Labels and signs to identify hazardous substances;
- Engineering controls on machines;

- Guardrails;
- Posted OH&S representatives;
- Posted evacuation plan;
- Clearly visible emergency evacuation signs and plans;
- The location of fire alarms;
- Accessible fire alarms;
- Emergency alarms have notification lighting, in addition to audible signal, in areas where the noise level is observed to be above ambient;
- The availability of appropriate fire-fighting equipment that has been recently inspected and is in date;
- Fire extinguisher operating instructions;
- Clearly marked and unblocked emergency exits and escape routes;
- Adequate emergency exits and escape routes per each working area;
- Emergency exits doors open with a single release operation;
- Emergency exit doors open in direction of travel;
- Emergency exit signs are luminescent;
- Emergency exit signs are in a language understood by employees
- Accessible emergency assembly point;
- Emergency lighting;
- Cleanliness and cluttering of the site;
- Chemicals are stored correctly.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
    - European Parliament and Council (1989). Framework Directive on Occupational Safety and Health (Directive 89/391/EEC) (link)
    - European Parliament and Council (1998). Chemical Agents Directive (Directive 98/24/EC) (link)
    - European Parliament and Council (2006). REACH Regulation (Regulation (EC) No 1907/2006) (link)

- In the United Kingdom:
    - UK Government (1974). Health and Safety at Work etc. Act 1974 (link)
    - UK Government (1996). Health and Safety (Consultation with Employees) Regulations 1996 (link)
    - UK Government (1999). Management of Health and Safety at Work Regulations 1999 (link)
    - UK Government (2002). Control of Substances Hazardous to Health (COSHH) Regulations 2002 (link)

- In the United States:

- U.S. Department of Labor (1970). Occupational Safety and Health Act (OSH Act) of 1970 (link)
- U.S. Congress (1990). 29 CFR 1910 Subpart Z – Toxic and Hazardous Substances (link)
- U.S. Congress (1990). 29 CFR 1910.132–1910.138 – Personal Protective Equipment (PPE) (link)
- U.S. Congress(1990). 29 CFR 1910.1200 – Hazard Communication Standard (HCS) (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- International Organization for Standardization (2018). ISO 45001: Occupational Health and Safety Management Systems – Requirements with Guidance for Use (link)
- International Organization for Standardization (2021). ISO 45003: Psychological Health and Safety at Work – Guidelines for Managing Psychosocial Risks (link)
- International Organization for Standardization (2024). ISO 45004: Occupational Health and Safety Management – Guidelines for Performance Evaluation (link)
- International Organization for Standardization (2018). ISO 22320: Security and Resilience – Emergency Management – Guidelines for Incident Management (link)
- International Labour Organization (2001). ILO-OSH 2001: Guidelines on Occupational Safety and Health Management Systems (link)
- International Labour Organization (n.d.) Occupational Safety and Health – A Guide for Labour Inspectors and other stakeholders (link)
- United Kingdom Health and Safety Executive (2012). Consulting Employees on Health and Safety (HSE Guidance L146) (link)
- United States Occupational Safety and Health Administration (OSHA) (2019). Using Leading Indicators to Improve Safety and Health Outcomes (link)

1.B. Environment

Note: Lead exposure and emissions are covered under Principle 2

Performance Expectations and Performance Determination

Performance Expectation

(a) Environmental Legal Compliance. Ensure compliance with laws, regulations and international conventions on environment-related matters in the country of operation.

How can the company meet this expectation?

Companies are expected to establish, implement, and maintain a process(es) to:

- determine and have access to up-to-date applicable environmental legal requirements;
- take these legal requirements into account when establishing, implementing, maintaining and continuously improving their environmental management system;
- regularly evaluate the extent to which legal requirements are fulfilled;
- take corrective action, if necessary; and

- maintain knowledge and understanding of the company's compliance status.

Environmental legal requirements can include, but are not limited to:

- national, regional, or international environmental legislation and regulations;
- decrees, directives, or policies issued by authorities;
- permits, licences, or other forms of environmental authorization;
- judgments or orders from courts or administrative bodies;
- international treaties, conventions, and protocols (e.g., Basel Convention, Minamata Convention);
- collective agreements, when legally binding.

In addition to legal requirements, companies should consider other applicable environmental requirements that the company has to or chooses to comply with, for example:

- internal environmental policies, standards, and codes of conduct;
- contractual obligations with suppliers, partners, or clients;
- commitments made to interested parties, communities, or investors;
- environmental conditions in insurance or financing agreements;
- non-regulatory environmental standards, technical guidelines, or industry codes (e.g., Lead Battery 360° Code).

Companies are expected to maintain and retain documented information on their environmental legal requirements and compliance evaluations. This information should be updated regularly to reflect any changes in legal or regulatory frameworks. The frequency and timing of compliance evaluations should be proportionate to the significance of the requirement, the potential environmental impact, operating conditions, and historical compliance performance.

Companies are also expected to assign responsibility and authority for legal compliance to qualified personnel or teams, who understand their roles and responsibilities in meeting environmental compliance obligations. Top management retains overall accountability for compliance.
To support effective compliance, companies should:

- conduct regular internal audits or inspections to assess compliance performance;
- use legal registers, risk registers, or digital compliance tools as early warning systems; promptly investigate and address any identified non-compliances, including root cause analysis and implementation of corrective and preventive actions;
- maintain transparent records of compliance status, audit results, corrective measures, and communication with environmental regulators;
- use this information to drive continual improvement and demonstrate due diligence in environmental management.

<u>How will performance be determined?</u>

Does not meet	Partially meets	Fully meets

The Company does not have in place procedures and processes, including appointed staff members, to monitor and ensure compliance with national requirements and international conventions in relation to environmental matters.	The Company has started to develop or has in place basic procedures and processes, including appointed staff members, to monitor and ensure compliance with national legal requirements and international conventions in relation to environmental matters to identify and take action to remedy potential cases of non-compliance.	The Company has in place and implements procedures and processes, including appointed staff members, to monitor and ensure compliance with national legal requirements and international conventions on environmental matters to identify and take action to remedy potential cases of non-compliance. If non-compliances are identified, the Company demonstrates that no willful or repeated violations were found. In addition, the Company demonstrates timely and effective action has been implemented to remedy the non-compliance and to prevent further non-compliances from recurring.

Performance Expectation

(b) Environmental Policy. Document, communicate and regularly review an environmental policy designed for continuous improvement, endorsed by senior management and supported through the provision of human and financial resources.

How can the company meet this expectation?

Companies are expected to document an environmental policy that:

- outlines the company's commitment to environmental protection and performance, including:
  - complying with applicable legal and other requirements;
  - managing environmental risks and impacts;
  - preventing pollution and promoting efficient use of resources; and
  - continuously improving the company's environmental management system and performance.
- is endorsed by senior management, including the Board or equivalent governance body;
- is appropriate to the purpose, size, and context of the company and to the specific nature of its environmental aspects, impacts, and risks;
- is consistent with legal and other requirements as per Performance Expectation 1.B.(a);
- includes a commitment to continuous improvement in environmental performance.

Companies are expected to communicate the environmental policy within the organization (e.g., through training, postings, or internal communications), and to make it publicly available, such as on the company's website or in sustainability reports.

Companies are expected to regularly review the policy, as part of a management review, to ensure its continuing suitability, adequacy, and effectiveness. Policy reviews should be undertaken at pre-planned intervals—at least annually—or in response to:

- changes in operations and environmental regulations, or stakeholder expectations;
- findings from audits, evaluations, or performance assessments;
- shifts in corporate strategy or material environmental issues;
- significant environmental incidents, environmental violations or fines.

Companies are expected to demonstrate leadership and commitment to environmental performance by ensuring that sufficient human and financial resources are available to establish, implement, maintain, and improve a robust, credible, and reliable environmental management system consistent with the objectives of the policy.

Those involved in implementing the environmental policy should have a clear understanding of their roles, responsibilities, and authority in achieving the intended outcomes of the policy, while senior management retains ultimate accountability.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have an environmental policy in place available to its employees.	The Company has started to develop or has in place a basic environmental policy available to its employees. The policy is endorsed by the Board and senior management; responsibilities and accountabilities for oversight and implementation are broadly understood by employees. The policy includes a commitment to continuous improvement.	The Company has in place and implements a publicly available environmental policy. The policy is endorsed by the Board and senior management, which demonstrates strong control and oversight. Roles and responsibilities are clearly understood by employees. The policy is supported through the provision of sufficient human and financial resources. The Policy is regularly reviewed to ensure effectiveness and continuous improvement, and findings are fully integrated into planning and decision making.

Performance Expectation

I Environmental Risks and Impacts Assessment and Management. Maintain procedures and processes to identify environmental risks and impacts and apply the mitigation hierarchy to minimize and manage material risks and impacts.

How can the company meet this expectation?

Companies are expected to establish and maintain formal procedures and processes to identify, assess, and manage environmental risks and impacts associated with their operations, products, and supply chains. These procedures should be based on structured methodologies and should cover both routine and non-routine activities, including potential emergency scenarios.

Companies are expected to apply the mitigation hierarchy to manage environmental risks and impacts by taking the following sequential steps:

- avoid environmental impacts where feasible, particularly during the early stages of site design and planning or during any changes to the operational footprint of the site;
- minimize impacts that cannot be entirely avoided where cost-effective to do so, through the use of cleaner technologies, improved operational practices, and design modifications;
- restore or rehabilitate affected environments to their original state or to a condition agreed upon with relevant stakeholders, such as regulatory agencies, local communities, or environmental experts—particularly in cases of land disturbance, habitat degradation, or contamination;
- offset or compensate for any residual impacts that remain significant after all avoidance, minimization, and restoration efforts, using appropriate, measurable, and credible methods.

This hierarchy should guide the selection of operational controls and inform decision-making processes related to project design, investment planning, and overall environmental management.

Companies are expected to ensure that material environmental risks and impacts are clearly identified, communicated to senior management, and integrated into strategic planning, capital investment decisions, and day-to-day operations. Employees should receive targeted training and awareness initiatives to understand their roles and responsibilities as part of the risk and impact assessment and management process.

Companies are expected to review and improve their environmental risk assessment and management processes on a regular basis. This includes evaluating the effectiveness of existing control measures, updating risk registers and mitigation plans as operations evolve, and incorporating lessons learned from incidents, audits, stakeholder input, and regulatory or scientific developments. Continuous improvement should be an integral part of the company's environmental management system.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have in place documented procedures or processes to identify environmental-related risks and impacts.	The Company has started to implement procedures and processes to identify environmental risks and impacts. Environmental risks and impacts are broadly understood by senior management. The Company implements the mitigation hierarchy to minimize and manage environmental risks and impacts.	The Company has in place and implements procedures and processes to identify and assess environmental risks and impacts. Environmental risks and impacts are well understood by senior management and relevant employees, and are integrated into planning and decision making. Procedures, processes, and controls measures are effective and regularly reviewed for continual improvement.

Performance Expectation

(d) Air quality. Measure and minimize significant air emissions into the atmosphere (including, at a minimum, lead, arsenic, sulfur dioxide, and particulate matter) from point source and fugitive/diffuse emissions, as necessary to manage negative impacts on air quality.

How can the company meet this expectation?

Companies are expected to regularly monitor significant air emissions from both point sources—such as stacks, vents, or flues that discharge emissions through a confined channel—and fugitive or diffuse sources, which include unintentional releases from leaks, open storage, or general facility operations without a specific discharge point. Monitoring should include, at a minimum, lead, arsenic, sulfur dioxide (SO_2), total particulate matter (PM). Measurements should follow standardized methods and be conducted at appropriate intervals using accredited testing services or calibrated in-house systems to ensure accurate emission profiles.

Companies are expected to fully comply with all applicable local, national, and regional air quality regulations, in accordance with Performance Expectation 1.B (a). This includes adhering to emission limits, meeting reporting obligations, and maintaining required permits. Companies should also document emissions data, permit compliance, and reporting records, and ensure they are readily available for internal and regulatory review.

Companies are expected to integrate air emissions data into decision-making and plant management systems by:

- leveraging emissions data to support environmental risk and impact assessments, in accordance with Performance Expectation 1.B I, guide operational and investment decisions, and evaluate opportunities for process optimization;
- applying monitoring results to identify sources of concern, inform corrective actions, and prioritize emission control measures to minimize and manage air pollution;

- setting SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) targets for the reduction of significant air pollutants, and developing and implementing action plans to achieve these targets. These plans should include abatement technology upgrades, improved maintenance and process control, and reducing pollutant generation at the source;
- reviewing progress at least annually, and updating targets and action plans as needed based on performance results, technological advancements, and regulatory developments.

Companies are expected to assign clear roles and responsibilities to qualified personnel for implementing this performance expectation. Personnel should have the authority and resources needed to ensure effective monitoring, compliance, and continuous improvement. Responsibilities should be formally documented and integrated into the company's environmental management system.

Companies are expected to ensure that stack emissions—which are emissions released through chimneys or exhaust stacks, representing a typical form of point source—do not exceed the Best Available Techniques-Associated Emission Levels (BAT-AELs) defined in the latest EU Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metals Industries:

- Sulfur Dioxide (SO_2): ≤ 350 mg/Nm³;
- total Dust/Particulate Matter: ≤ 5 mg/Nm³;
- Arsenic: ≤ 0.05 mg/Nm³.

In regions where local BAT values are not defined, these EU BAT-AELs should serve as a good practice benchmark. Companies should evaluate and apply applicable BAT measures to reduce air emissions and mitigate potential impacts on local air quality and its consequential effects on the environment and human health.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not meet applicable local regulatory requirements on emissions levels and reporting. The Company does not currently measure lead, arsenic, sulfuric oxide and particulate matter emissions released into the atmosphere.	The Company meets applicable local regulatory requirements on emissions levels and reporting. The Company measures lead, arsenic, sulfuric oxide and particulate matter emissions released into the atmosphere.	The Company meets applicable local regulatory requirements on emissions levels and reporting. The Company measures all significant air emissions from point source and fugitive/diffuse emissions. This information is fully integrated into decision making and site improvement plans. The Company has set reduction targets and taken appropriate actions to minimize emissions and to achieve set targets. Stack emissions for arsenic, sulfur dioxide, total dust/ particulate matter and total volatile organics should be no higher than the BAT Associated Emission Values (BAT-AELs) described in the latest EU

		BAT Reference Document for the Non-Ferrous Metals Industries: ● SO2, ≤350 mg/Nm3 ● Total dust, ≤5 mg/Nm3 ● Arsenic, ≤0.05 mg/Nm3

Performance Expectation

I Water quality. Measure and minimize substances of concern in water discharges to surface waters, groundwater, and seawater, including, at a minimum, lead contaminants, as necessary to manage negative impacts on the receiving waterbody, ecosystem, or human health.

How can the company meet this expectation?

Companies are expected to routinely monitor water discharges for key pollutants, including, at a minimum, lead, arsenic, cadmium, and mercury, using accredited laboratories and standardized methods. Monitoring should cover all relevant discharge points to surface waters, groundwater, and seawater, and be conducted with sufficient frequency and scope to support effective risk management and ensure alignment with applicable regulatory standards and the company's environmental protection goals.

Companies are expected to fully comply with all applicable local, national, and regional regulations governing water discharges, in accordance with Performance Expectation 1B (a) Environmental Legal Compliance. This includes maintaining valid discharge permits and meeting applicable discharge limits. Permits should be regularly reviewed and updated as needed to reflect operational changes. Companies should also maintain accurate compliance records and make them available for regulatory inspections and internal audits.

Companies are expected to integrate water quality data into decision-making processes by:

- incorporating water quality monitoring results into plant management systems to support risk assessments, and to evaluate environmental impacts;
- using monitoring data to inform corrective actions and to prioritize measures to minimize and manage water pollution, consistent with the mitigation hierarchy outlined in Performance Expectation 1.B I;
- establishing clear, time-bound targets to reduce concentrations of substances of concern in effluent discharges, and developing and implementing action plans to achieve these targets. These plans should include process optimization, source substitution, and improvements to wastewater treatment systems;
- reviewing progress at least annually, and updating targets and actions as needed based on performance outcomes, technological advancements, and regulatory developments.

Companies are expected to assign clear roles and responsibilities to qualified personnel for implementing this performance expectation. Personnel should have the authority and resources needed to ensure effective monitoring, compliance, and continuous improvement. Responsibilities should be formally documented and integrated into the company's environmental management system

Companies are expected to ensure that emissions to receiving waters do not exceed the Best Available Techniques-Associated Emission Levels (BAT-AELs) specified in the latest EU BAT Reference Document for the Non-Ferrous Metals Industries—namely:

- Lead < 0.5mg/L;
- Arsenic: <0.1mg/L;
- Cadmium <0.1mg/L;
- Mercury: < 0.05mg/L.

In regions where national BAT standards are not defined, these EU BAT-AELs should be used as a benchmark for good practice. Companies should also evaluate and apply relevant BAT options to continuously reduce discharges and minimize their impact on receiving water bodies.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not meet local regulatory requirements with regards to the discharging of substances of concern. The Company does not currently measure contaminants in its effluent discharges.	The Company meets local regulatory requirements with regards to the discharging of substances of concern. The Company measures contaminants in its effluent discharges.	The Company meets local regulatory requirements with regards to the discharging of substances of concern. The Company measures all substances of concern in its effluent discharges to surface waters, groundwater, and seawaters, as necessary to manage negative impacts on water quality. This information is fully integrated into decision making and site improvement plans. The Company has set reduction targets and taken appropriate actions to minimize impacts and achieve set targets. Performance is regularly reviewed for continual improvement. Emissions to receiving water should be no higher than the BAT Associated Emission Values (BAT-AELs) described in the latest EU BAT Reference Document for the Non-Ferrous Metals Industries: ● Lead < 0.5mg/L ● Arsenic: <0.1mg/L

		● Cadmium <0.1mg/L ● Mercury: < 0.05mg/L

Performance Expectation

(f) Spills and Leakages. Prevent and manage spills and leakages to avoid and remediate adverse impacts on air, water and/or soil.

How can the company meet this expectation?

Companies are expected to systematically identify, assess, and document potential sources of spills and leakages by:

- conducting hazard and operability studies and environmental risk and impact assessments for all storage, transfer, and processing units;
- mapping potential release points using site-specific risk matrices;
- evaluating site vulnerability with respect to air, surface water, groundwater, and soil pathways.

These assessments should be documented and regularly reviewed, especially following changes in operations, materials, or infrastructure.

Companies are expected to apply controls in line with the hierarchy of controls (Performance Expectation 1.B I, including both engineering and administrative measures, to prevent spills and leakages, including:

- secondary containment systems for all hazardous substances;
- spill-proof loading/unloading areas with hardstanding, slope control, and sump drainage;
- regular integrity testing and preventative maintenance of tanks, pipes, valves, and storage systems;
- automation and level controls to avoid tank overflows.

Controls should be designed in line with relevant industry standards and maintained through scheduled inspections and condition monitoring.

Companies are expected to develop and maintain documented response protocols by:

- implementing a spill prevention, control, and countermeasure plan or equivalent, aligned with legal and industry requirements;
- equipping and training staff for emergency spill response, including use of appropriate personal protective equipment (PPE) and spill kits;
- conducting regular emergency drills and updating procedures based on post-incident reviews or near-miss reports.

Companies are expected to assign clear roles and responsibilities to qualified personnel for implementing this performance expectation. Personnel should have the authority and resources needed to ensure effective monitoring, compliance, and continuous improvement. Responsibilities should be formally documented and integrated into the company's environmental management system.

Companies are expected to integrate spill and leakage risk information into operational planning and site improvement processes. This includes considering prevention and control measures in equipment upgrades, maintenance strategies, and facility design to ensure proactive and systematic risk management. Spill risk mitigation actions should be embedded in capital investment planning and management reviews.

In the event of a spill or uncontrolled discharge, companies are expected to act promptly to contain and clean up the release using materials and procedures consistent with the documented response protocols. They should assess environmental impacts through soil and water testing, and implement appropriate remediation measures in compliance with local regulations and environmental quality standards. These activities should also include engagement with affected communities, where appropriate. All incidents should be reported to the relevant authorities, and corrective actions documented to ensure accountability and continuous improvement. Post-incident analysis should inform updates to risk and impact assessments and improve preventive measures.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have documented procedures or processes in place to assess potential risks of spills and leakage.	The Company has developed or has started to develop documented procedures and processes or implements some measures to assess potential risks of spills and leakage. Where policies and procedures are in place, in the event of a spillage or uncontrolled discharge, the company takes remediation action.	The Company has documented procedures and processes in place to identify and assess potential risks of spills and leakages. This information is fully integrated into decision making and site improvement plans, and the company takes measures to prevent and manage potential spillages or discharges. In the event of a spillage or uncontrolled discharge, the company remediates any contaminated land and/or water body. Spill risk mitigation measures are regularly reviewed for continual improvement.

Performance Expectation

(g) Energy consumption. Quantify energy consumption and identify technically practical measures for setting energy efficiency targets and implement a plan designed to achieve such targets.

How can the company meet this expectation?

Companies are expected to institutionalize energy management by:

- implementing a formal energy management system to support systematic planning, monitoring, and continuous improvement of energy performance across all operations;
- assigning clear roles and responsibilities to designated personnel such as energy coordinators or teams, including authority to drive implementation, ensure compliance, and report to senior management for integration into strategic decision-making.

Companies are expected to characterize and quantify energy consumption across all operations, including both internally generated and purchased energy, by:

- identifying energy sources (e.g., renewable vs. non-renewable) and end-uses (e.g., heating, process equipment, utilities), including both internally generated and purchased energy;
- conducting comprehensive energy audits in accordance with internationally recognized standards, covering major unit operations and auxiliary systems;
- developing energy flow mapping to pinpoint inefficiencies, prioritize improvements, and support tracking and forecasting;
- establishing an energy baseline and implementing monitoring systems to track total consumption and intensity (e.g., kWh/ton) at key process stages using sub-metering and centralized tools;

- integrating monitoring with data management systems to enable real-time analysis and control, and support decision-making for energy efficiency improvements.

Companies are expected to set SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) targets for energy efficiency and renewable energy use, ensuring alignment with Best Available Techniques (BAT) and applicable regulatory frameworks. Targets should be reviewed regularly and updated based on operational changes or new technological developments.

Companies are expected to implement technical measures to improve energy efficiency by adopting measures appropriate to the context of their operations, which could include but are not limited to:

- upgrading or retrofitting energy-intensive equipment with high-efficiency alternatives;
- adopting low-carbon and energy-efficient process technologies;
- integrating advanced process control system to monitor, control and optimize energy use in real time;
- applying life cycle costing and technical feasibility assessments to guide investment decisions.

Companies are expected to increase the use of renewable energy by adopting onsite renewables where feasible and purchase green electricity or Renewable Energy Certificates (RECs) to cover a portion of demand. Energy sourcing strategies should consider applicable regulatory requirements, regional grid mix, and emissions factors.

Companies are expected to report annually on energy consumption, energy intensity, and progress toward efficiency and renewable energy targets using standardized, quantitative metrics. Reporting should enable transparency and support continuous improvement. Participation in voluntary industry initiatives and disclosure platforms is encouraged to enhance comparability and accountability.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not quantify energy efficiency or consumption and does not have in place programs to improve efficiency or reduce energy consumption or energy intensity or increase use of renewable energy.	The Company has begun to quantify energy efficiency and consumption, to put in place programs to improve efficiency and reduce consumption and/or energy intensity, and to increase renewable energy use, but implementation has not started or is incomplete.	The Company has in place programs to reduce energy consumption and/or energy intensity, improve energy efficiency, and increase use of renewable energy, and publishes quantitative performance data on energy efficiency and energy consumption. Performance and targets are regularly reviewed for continual improvement.

Performance Expectation

(h) Greenhouse Gas (GHG) emissions. Quantify and disclose GHG emission and identify technically practical measures for setting GHG emissions intensity reduction targets and implement a plan designed to achieve such targets.

How can the company meet this expectation?

Companies are expected to quantify Greenhouse Gas (GHG) emissions using internationally recognised methodologies by developing a comprehensive GHG inventory that includes, at a minimum:

- scope 1 emissions: direct emissions from owned or controlled sources;
- scope 2 emissions: indirect emissions resulting from the generation of purchased electricity, heat or stream consumed by the facility;
- scope 3 (if included): other indirect emissions across the value chain, such as those from purchased goods and services, transportation, waste disposal, and product use.

To support accurate quantification of GHG emissions, companies should identify relevant emission sources across all applicable scopes, collect appropriate activity data—such as fuel consumption, electricity usage, or materials purchased—and apply relevant emission factors that represent the emission intensity of each activity. Emissions should be calculated and reported in carbon dioxide equivalent (CO_2e) to ensure consistency and comparability.

Companies are expected to set GHG emissions reduction targets that are:

- SMART (Specific, Measurable, Achievable, Relevant, and Time-bound), typically spanning a 5–10 year timeframe;
- science-based, aligned with a 1.5°C climate pathway;
- relevant to operational output, such as emissions per tonne of lead or per battery unit produced;
- based on frameworks such as the Science Based Targets initiative (SBTi) and the Greenhouse Gas Protocol.

To support achievement of these targets, companies should develop and implement action plans that clearly assign roles, responsibilities, and resources for delivery. Progress should be monitored through structured review mechanisms, and GHG performance should be embedded in operational planning to ensure consistent implementation and continuous improvement.

Companies are expected to manage GHG emissions within the broader environmental management system. This system should support structured data collection, performance monitoring, and continual improvement; enable internal reviews to verify data accuracy and assess the effectiveness of implemented actions; and ensure that GHG performance is regularly reviewed by senior management to drive accountability and integration into strategic decision-making.

Companies are expected to publicly disclose their GHG emissions data and progress toward reduction targets through annual sustainability or integrated reports aligned with recognized reporting frameworks and regulatory requirements, where applicable. Disclosures should be transparent, clearly outlining emission boundaries, data sources, calculation methodologies, assumptions, and references used, as well as the specific actions taken to reduce emissions and track progress over time, in order to enhance transparency and support the credibility of reported figures.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not measure GHG emissions.	The Company has started to measure or measures Scope 1	The Company measures, at a minimum, Scope 1 and Scope 2

	and Scope 2 GHG emissions and has started to establish reduction targets, but implementation has not started or is incomplete.	GHG emissions. The Company sets GHG emissions intensity reduction targets and implements a GHG reduction plan to achieve such targets. The Company's measures for GHG emissions reduction are effective and regularly reviewed for continual improvement. The Company provides disclosure on GHG emissions performance.

Performance Expectation

(i) Water consumption and availability. Quantify water consumption and identify technical and practical measures for setting water intensity reduction targets and implement a plan designed to achieve such targets, to minimize negative impacts on water availability.

How can the company meet this expectation?

Companies are expected to quantify total water consumption across all operational processes, including water intake, use, recycling or reuse, and discharge. This water balance should be broken down by process area and water source, enabling a clear understanding of how and where water is used. Based on this data, companies should identify technical and practical measures to reduce water consumption and improve efficiency—such as closed-loop systems, optimized cleaning cycles, low-flow technologies, and water reuse systems.

Companies are expected to track water performance using key performance indicators (KPIs), such as water use per unit of production and the percentage of water recycled or reused. Data should be reviewed periodically—typically quarterly or annually—to monitor trends, identify inefficiencies, and support corrective actions. These insights form the basis for setting meaningful reduction targets and identifying priority actions.

Companies are expected to set SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) water intensity reduction targets, using baseline data and relevant sector benchmarks. To support achievement of these targets, companies should develop and implement a structured water management plan. This plan should include:

- baseline data and water consumption mapping;
- defined targets and chosen efficiency measures;
- timelines and responsible personnel;
- resource allocation and funding;

- procedures for plan review and update.

Companies are expected to integrate water management into operations, which includes:

- measures to monitor and quantify water consumption, including water intensity, recycling and re-use rates;
- embedding water reduction actions into operational, maintenance, and capital planning;
- assessing water availability and quality risks and impacts as part of the environmental risk and impact assessment, during new project development and on a regular basis throughout operations;
- evaluating water-related risks and impacts in the supply chain during procurement decisions, where relevant;
- training employees on water-saving practices and building a culture of water stewardship across the organization.

To minimize adverse impacts on local water availability, companies are expected to:

- ensure that withdrawals do not exceed local replenishment rates;
- prevent contamination by ensuring that all wastewater discharges comply with environmental standards and permitting conditions;
- evaluate and manage site-specific water-related risks, particularly in water-stressed areas, through environmental and social impact assessments, in alignment with Performance Expectations 1.A I and 1.B I;
- integrate these risk findings into site-level risk registers and business continuity plans.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not quantify its water consumption levels.	The Company quantifies or has started to quantify its water consumption levels and has started to establish water intensity reduction targets.	The Company quantifies water consumption, recycling and re-use and has established water intensity reduction targets. The Company implements a plan designed to achieve such targets, with a view to minimize negative impacts on water availability. Measures for water consumption and/or intensity reduction are effective and regularly reviewed for continual improvement.

Performance Expectation

(j) Hazardous waste management. Minimize and, where possible, avoid the generation of hazardous waste generated by the site's operations, where this is not possible, manage and dispose of waste in a

manner that minimizes negative impacts on human health and the environment through a waste management strategy in accordance with the waste mitigation hierarchy.

How can the company meet this expectation?

Companies are expected to develop a comprehensive hazardous waste inventory to capture waste generation data and to conduct monitoring over time, which includes:

- identifying all sources, types (i.e. the physical or chemical form of waste, such as waste oil, spent solvent, etc.) and categories of hazardous waste across operations;
- quantifying hazardous waste volumes and classifying them by process, location and material.

Companies are expected to prioritize and adopt waste management strategies by adopting the waste mitigation hierarchy:

- avoid, prevent or minimize waste generation at the source through process optimization and material efficiency;
- reuse materials in operations, such as spent process chemicals, recovered reagents, or parts from decommissioned equipment, where it is technically and safely feasible;
- recycle materials, such as lead, spent acid, or other recoverable hazardous process residues, to return them to the supply chain;
- recover materials or energy from non-recyclable waste;
- dispose of waste responsibly, minimizing environmental and health risks.

The effectiveness of each step should be evaluated through outcome-based metrics, such as diversion rates, reductions in hazardous waste toxicity, and environmental impact indicators.

Companies are expected to implement material recovery programs to reclaim valuable resources—such as lead—from waste streams for reintegration into battery production processes. In alignment with Performance Expectations 4.(c), 4.(e) and 4.(k), this involves:

- integrating advanced recycling technologies to enhance recovery efficiency and ensure high purity and quality of recovered materials;
- collaborating with certified recyclers who operate in compliance with recognized environmental, health, and safety standards to guarantee responsible and compliant processing of hazardous and recoverable waste streams;
- ensuring recovered materials meet all relevant safety, quality, and performance specifications before reintegration into production.

If hazardous waste cannot be eliminated, reused, or recycled, companies are expected to ensure that safe and compliant treatment methods are employed, either directly or through qualified, licensed service providers. Companies remain responsible for verifying that all treatment and disposal activities meet applicable regulatory and environmental standards. This may include neutralization, stabilization, or using other chemical processes to reduce the toxicity of waste before disposal. Companies should ensure that treatment practices are regularly reviewed and updated to ensure they meet regulatory standards and minimize environmental risks.

Companies should regularly conduct risk assessments, in accordance with Performance Expectation 1.(c), to evaluate the environmental and health risks associated with hazardous waste. This includes assessing potential accidents or spills and determining the adequacy of current risk mitigation measures. Identifying

potential risks allows companies to implement preventative measures, such as more robust spill containment or emergency response protocols.

To ensure compliance with hazardous waste management procedures, companies should conduct periodic internal audits and reviews. These audits should assess whether the company's waste management system is functioning properly and in line with regulatory requirements. Audit findings should be used to refine processes, implement corrective actions, and improve waste management strategies.

Companies are expected to engage in continuous improvement by regularly reviewing and adjusting processes based on performance data, regulatory updates, and advancements in technology. They should establish feedback mechanisms to integrate lessons learned into future strategies, actively pursue innovative solutions to reduce waste and enhance waste management practices, and adjust strategies as needed to ensure ongoing improvement and alignment with industry best practices.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not measure its volumes of hazardous waste, nor does it have in place measures to reduce the generation of hazardous waste or to ensure the safe treatment/disposal of such waste.	The Company has started to measure or measures its volumes of hazardous waste. The Company has started to adopt measures to reduce the generation of hazardous waste and ensures the safe treatment/disposal of such waste.	The Company measures its volumes of hazardous waste. The Company adopts measures to reduce the generation of hazardous waste and ensures the safe treatment/disposal of such waste. The Company implements the waste mitigation hierarchy to avoid, and, where avoidance is not possible, manage and dispose of waste in a manner that minimizes negative impacts on human health and the environment. The measures adopted through the mitigation hierarchy are effective and are regularly reviewed for continual improvement.

Performance Expectation

(k) Recycling Efficiency. Ensure that recycling processes reduce the production of waste by maximizing recycling efficiencies and the levels of recovered materials.

How can the company meet this expectation?

Companies are expected to measure and track recycling efficiency through specific key performance indicators (KPIs), including the recovery rates of lead, plastics, sulfuric acid, and other components from used lead-acid batteries, and to set and monitor recycling targets that ensure a minimum recycling rate of 65% by average dry weight of used lead-acid batteries.

Companies are expected to optimize collection and sorting processes through:

- implementing streamlined systems for waste collection to reduce contamination and improve material purity;
- using automated sorting technologies where possible to enhance the efficiency and accuracy of material separation;
- ensuring proper segregation of recyclable and non-recyclable materials at the source, ensuring minimal cross-contamination;
- continuously evaluating and upgrading collection and sorting methods based on performance data, technological advancements, and industry best practices.

Companies are expected to implement efficient recovery technologies by adopting advanced, context-appropriate methods to maximize material extraction. Where suitable, technological solutions such as automation may be used to improve recovery rates and reduce operational errors, provided they are evaluated for potential social impacts. Energy-efficient technologies should be prioritized to minimize energy consumption during recovery processes.

Companies are expected to achieve recycling efficiency through a process of continuous improvement. This includes regularly reviewing recycling operations, analyzing performance data, and incorporating structured feedback from technical personnel and subject matter experts to identify bottlenecks, inefficiencies, and opportunities for innovation. Process adjustments should be informed by emerging technologies, industry trends, regulatory developments, and internal insights to maintain or improve recycling rates. These activities should be integrated into broader internal review mechanisms—such as management system reviews or internal assessments—to ensure recycling practices remain efficient, compliant, and aligned with organizational goals.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not measure the recycling efficiency of its processes.	The Company measures the recycling efficiency of its processes. For lead battery recyclers, recycling efficiencies of the process have not been fully optimized and is less than 65% by average dry weight of used lead-acid batteries. Actions have been identified to improve recycling and recovery efficiency.	The Company measures the recycling efficiency of its processes. For lead battery recyclers, a minimum recycling of 65% by average dry weight of used lead-acid batteries. The Company monitors that measures taken to achieve recycling efficiency targets are effective and regularly reviewed for continual improvement.

Performance Expectation

(l) Biodiversity protection. Respect legally protected areas in accordance with local laws, understand potential negative impacts on biodiversity, and apply the biodiversity mitigation hierarchy to avoid, and manage potential negative impacts.

How can the company meet this expectation?

Companies are expected to ensure that their operations do not infringe upon areas protected by local, national, or international law. This includes:

- identifying and mapping all operational sites and assess proximity to:
  - legally protected areas, as defined by national or regional legislation;
  - Critical Habitats, particularly those that support Endangered or Vulnerable Species;
  - UNESCO World Heritage Sites and other internationally recognized conservation areas.
- integrating legal and environmental constraints into early-stage project planning to prevent encroachment on restricted or high-risk zones;
- ensuring all activities comply with applicable laws and permitting requirements related to protected areas;
- maintaining up-to-date documentation of site assessments and regulatory compliance as part of the environmental risk and impact assessment process, aligned with Performance Expectation 1B.(c).

Companies are expected to conduct comprehensive biodiversity impact assessments on a regular basis, as well as prior to the development of new operations or significant modifications. These assessments should establish a baseline of local biodiversity conditions; identify direct, indirect, and cumulative impacts on ecosystems; and document the presence of threatened species. All assessments should comply with local legal and licensing requirements and be consistent with international best practices. The findings should be fully documented and directly inform the design and implementation of mitigation measures.

Companies are expected to manage negative impacts on biodiversity by applying the mitigation hierarchy by:

- avoiding impacts through site selection and design to exclude Critical Habitats and areas with Endangered Species;
- minimizing residual impacts via operational controls, buffer zones, and activity timing;
- rehabilitating/restoring affected areas using native species and ecological restoration practices;
- offsetting only as a last resort; with measurable, verifiable, and long-term conservation outcomes ensuring no net loss of biodiversity.

Companies are expected to establish systems to track biodiversity impacts using measurable indicators. Monitoring results should be reviewed regularly, with adaptive management measures implemented to respond to changes or shortcomings in mitigation performance.

Companies should avoid conducting operations within UNESCO World Heritage Sites in order to fully meet the requirements of this Code. Companies should also take all necessary measures to prevent adverse impacts on Critical Habitats and habitats that support Endangered Species. Where activities take place in Natural or Modified Habitats, companies should implement enhanced mitigation and biodiversity management practices to maintain or improve ecosystem integrity. A formal screening process should be in place to identify and exclude high-risk or no-go areas during project planning and permitting stages.

Biodiversity and ecosystem impact assessments should be informed by stakeholder feedback, including input from local communities, Indigenous groups, non-governmental organizations (NGOs), and relevant experts, to ensure that risks, dependencies, and mitigation strategies are context-appropriate and socially responsible. This documentation should be reviewed regularly and, where appropriate, made available for audit and public disclosure.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place procedures and processes to apply a mitigation hierarchy to manage and avoid adverse impacts on critical and protected areas.	The company has begun to develop policies, procedures and practices to follow a mitigation hierarchy for the management of their impact on biodiversity; to avoid adverse impacts on Critical Habitats or Endangered Species; and, to disallow operational activities in designated protected areas, but implementation has not started or is incomplete.	The Company has fully implemented the mitigation hierarchy for the management of their impact on biodiversity; they avoid adverse impacts on Critical Habitats and Endangered Species; and do not operate in any World Heritage sites. Performance is regularly reviewed for continual improvement.

Performance Expectation

(m) Decommissioning, closure and rehabilitation. Adopt a documented closure plan, allocate adequate financial resources and engage with stakeholders on social and environmental aspects associated with closure and decommissioning.

How can the company meet this expectation?

Companies are expected to develop and maintain a site-specific decommissioning, closure and rehabilitation plan for each operational site. At minimum, the plan should include:

- time-bound implementation schedules;
- detailed cost estimates for closure and post-closure phases;
- measures to prevent or mitigate environmental impacts at the end of the site lifecycle, including degradation of ecosystems, biodiversity, soil, water, and air quality;
- provisions to protect ecosystems and habitats after decommissioning and closure;
- defined contingency protocols and emergency response mechanisms for residual or unforeseen risks.

Each plan should be reviewed and updated at defined intervals throughout the site's lifecycle, and should be aligned with internationally recognized best practices in cases where national regulations are absent, unclear, or not adequately enforced.

Companies are expected to allocate adequate financial resources to fully implement their decommissioning, closure and rehabilitation plans. This means establishing funding mechanisms—such as closure bonds, trust funds, or internal reserves—that are sufficient to cover the total estimated costs of closure and post-closure obligations. The financial allocation should be based on comprehensive cost modelling that takes into account site-specific closure activities, risk levels, regulatory requirements, and third-party validation where appropriate. Cost estimates should be regularly reviewed and adjusted to reflect inflation, evolving closure practices, and site changes over time. Cost estimates should be transparently reported in financial disclosures where applicable.

In the case of closure, companies are expected to take stakeholder preferences into account when determining final land use and closure outcomes; describe the anticipated future use or disposition of site infrastructure, land, and equipment; and include clear provisions for post-closure monitoring and maintenance. These provisions should outline roles, responsibilities, performance indicators, and mechanisms for periodic review and adaptive management.

Companies are expected to engage relevant stakeholders—including workers, affected communities, and local authorities—through structured, inclusive, and well-documented consultation processes that inform the development of the closure plan and ensure that social, economic, and environmental concerns are considered. These engagement efforts should align with applicable regulatory consultation requirements and reflect stakeholder expectations throughout the planning process. Where relevant, companies should also consider social aspects of closure, such as providing training or job transition support for workers and addressing long-term land use impacts on local communities.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have a documented closure plan at its site.	The Company has started to develop or has developed a documented closure plan at its site.	The Company has a documented closure and rehabilitation plan and has engaged key stakeholders including workers,

		affected communities and local authorities, as applicable, to understand expectations on decommissioning, closure and rehabilitation. In the absence of relevant regulation, the decommissioning, closure and rehabilitation plan is developed in accordance with international norms. This means that, in the absence of relevant regulation, the plan, at a minimum: - Includes implementation cost and timeline estimates; - Includes provisions to mitigate adverse social and economic impacts on workers and local communities affected by site decommissioning or closure; - Ensures that ecosystems and habitats are not degraded due to decommissioning and closure; - Contains mechanisms for contingency and response planning and implementation. In the case of closure, the plan: - Takes account of stakeholders preferences; - Describe the future use of facilities and infrastructure, where these are known; - Include provisions for post-closure monitoring and maintenance of plan implementation. Plans, including cost estimates, are regularly reviewed and

		updated for continual improvement.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 1 – 1.B Environment is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
1.B.(a) Environmental Legal Compliance	√	√	√
1.B.(b) Environmental Policy	√	√	√
1.B.(c) Environmental Risks and Impacts Assessment and Management	√	√	√
1.B.(d) Air quality	√	√	√
1.B.(e) Water quality	√	√	√
1.B.(f) Spills and Leakages	√	√	√
1.B.(g) Energy consumption	√	√	√
1.B.(h) Greenhouse Gas (GHG) emissions	√	√	√
1.B.(i) Water consumption and availability	√	√	√
1.B.(j) Hazardous waste management	√	√	√
1.B.(k) Recycling Efficiency		√	
1.B.(l) Biodiversity protection	√	√	√
1.B.(m) Decommissioning, closure and rehabilitation	√	√	√

Data Collection Method

Conformance with the Performance Expectations of Principle 1 – 1.B Environment is assessed through:

Performance Expectation	Observation	Document Review	Interviews			
			Board and Management	Employees	Contracted Workers	Other Stakeholders
1.B.(a) Environment		√	√			√

al Legal Compliance						
1.B.(b) Environmental Policy		√	√	√		
1.B.(c) Environmental Risks and Impacts Assessment and Management	√	√	√	√		√
1.B.(d) Air quality	√	√	√	√		
1.B.(e) Water quality	√	√	√	√		√
1.B.(f) Spills and Leakages	√	√	√	√		
1.B.(g) Energy consumption	√	√	√	√		
1.B.(h) Greenhouse Gas (GHG) emissions		√	√			
1.B.(i) Water consumption and availability	√	√	√	√		√
1.B.(j) Hazardous waste management	√	√	√	√		
1.B.(k) Recycling Efficiency	√	√	√			√
1.B.(l) Biodiversity protection	√	√	√	√		√
1.B.(m) Decommissioning,		√	√	√		√

closure and rehabilitation						

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during assessment:

- A register of the environmental legal and regulatory requirements that are applicable to the site;
- A procedure for regularly evaluating compliance with applicable environmental legal and regulatory requirements;
- Evidence of monitoring changes in applicable environmental legal and regulatory requirements;
- Licences and permits related to environmental performance;
- Board, corporate and/or site level Environmental Policy or other document including a formal commitment to environmental protection;
- Evidence of communication of such Policy to employees;
- Environmental management systems manual or procedures for the implementation of the Environmental Policy;
- Corrective action plans implemented to correct identified non-compliances;
- Organizational charts showing roles, responsibilities and authorities for the implementation of the Environmental Policy;
- Job descriptions and procedures identifying roles and responsibilities to implement the Environmental Policy;
- Evidence of allocation of budgetary resources to Environmental Policy implementation;
- Government inspections, surveillance and monitoring reports;
- Records of results of measurements of lead contaminants in effluent discharges;
- Documented targets and actions taken to minimize impacts and achieve set targets;
- Improvement plans;
- Environmental committee meeting minutes;
- Management review meeting minutes;
- Environmental risk assessments;
- Environmental impact assessments;
- Internal environmental audit;
- Evidence of compliance with regulatory frameworks, such as RCRA and MACT;
- Internal and external environmental audit reports;
- Third-party verification report or certificate of a formal management system that covers the management of environmental issues, such as ISO 14001 and ISO 50001;
- A risk register assessing the significance or severity, probability, and consequences of the full range of potential risks and impacts associated with the company operations;
- A management plan or procedures describing targets and actions taken by the company to minimize and manage environmental risks and impacts, including through the mitigation hierarchy;
- Sustainability or Corporate Social Responsibility reports in line with the GRI Standards, the Sustainability Accounting Standards Board (SASB) Standards, or other equivalent reports;
- Assurance claim on publicly available website, annual report, or corporate sustainability report relating to environmental data.
- Documented plans, procedures and/or protocols on the management and monitoring of critical site emissions to air (e.g. lead, arsenic, SO_2, NO_x particulate matter etc), effluent discharges, land and soil quality;

- Evidence of compliance with regulatory emission, air, water and soil quality standards;
- Inventory of activities, structures and operating processes that have the potential to cause: dust emissions and the severity of the impact of those emissions on workers and communities;
- Documented objectives and targets for emissions reduction;
- Documented objectives and targets for the improvement of water quality in effluent discharges;
- Assessments of potential contamination of polluted land;
- Assessments and reports before and after remediation of polluted land;
- Corrective action plan/remediation and prevention plans for spills;
- Documented energy reduction measures;
- Documented GHG emissions intensity reduction targets and plans to achieve such targets;
- GHG emissions and energy intensity monitoring protocols, calculation files and methodology;
- Water consumption monitoring protocols, calculation files and methodology;
- Procedures for monitoring water use and implementing efficiency initiatives, e.g., meter reading records, energy and utility database reports and bills;
- Water monitoring reports;
- Records of any energy and water efficiency initiatives implemented;
- Assessments of the areas of operation, carried out to determine whether it represents a water-scarce area;
- Waste management procedures;
- Policies that state the company' commitment to conform with laws and regulations and implement best practices for the closure and reclamation of the company operations; for the planning, design, and operation of waste impoundments and containment facilities and the handling of chemicals and hazardous wastes;
- Waste management plan;
- Hazardous waste management plan;
- Hazardous waste disposal contracts and manifests;
- Documented recycling efficiency targets and plans to achieve such targets;
- Assessment of potential biodiversity impacts, including a documented assessment of the presence of important biodiversity, ecosystems, and the nature of land use in the area of operations and the actual and potential risk of activities on these features;
- A register of protected areas and other designated areas that are in area of operation;
- Legal documentation or agreement from a government agent, such as a permit or license, authorising operation in a protected area and the conditions associated with that operation;
- A record of consultations with relevant stakeholders demonstrating their involvement in decisions regarding measures taken to offset or compensate for the loss of biodiversity when in or near their territory or community and measures taken for closure and reclamation near their territory or community;
- A procedure for using mitigation hierarchy to avoid, minimise, rehabilitate or offset impacts on biodiversity and ecosystem services;
- Biodiversity action plans;
- Documented evidence of actions to mitigate potential biodiversity impacts;
- A procedure for preventing adverse impacts on areas of critical habitat; Implemented action plans to deliver biodiversity benefits;
- A documented plan and detailed procedures or protocols for different aspects of closure and reclamation covering social, labor, and environmental aspects of closure and including the goals, targets, success criteria, indicators and monitoring protocols for the closure and reclamation process;

- An analysis and estimation of the costs of decommissioning, closure and rehabilitation, taking into account progressive reclamation, and both direct and indirect costs;
- An analysis and estimation of the costs of decommissioning, closure and rehabilitation, taking into account progressive reclamation, and both direct and indirect costs;
- A procedure for engaging local stakeholders, communities, decisions about closure and rehabilitation plans;
- Records of regular engagements with local stakeholders;
- Cost estimates for implementing rehabilitation and closure plans;
- Records of financial provisions for rehabilitation and closure;
- A procedure for rehabilitating environments disturbed or occupied by the site.

Interviews

During interviews with management, managers can demonstrate or describe:

- A good understanding of the company's Environmental Policy;
- A good understanding of the legal and regulatory requirements;
- A good understanding of required licences and permits;
- A good understanding of the procedure for evaluating compliance with applicable environmental legal and regulatory requirements;
- How environmental legal and regulatory monitoring is done;
- Examples of how the Environmental Policy is implemented;
- Understanding environmental terminology in regard to a lead site;
- How the company has established roles and responsibilities, including expectations for Board, senior, middle level, and operational management;
- How the company has allocated resources for the implementation of the Environmental Policy and how it has determined whether such resources are sufficient;
- How the implementation of the Policy is regularly reviewed and continuously improved;
- A good understanding of the company's policy, procedures or protocols to identify environmental risks and impacts associated with the company's operations;
- Examples of the significance or severity, probability, and consequences of potential environmental risks and impacts associated with the company operations;
- The company's plan to minimize and manage environmental risks and impacts associated with the company's operations, including through the mitigation hierarchy;
- The applicable laws and regulations regarding air emissions, effluent discharges, land and soil quality, GHG emissions, water consumption, waste, and hazardous waste;
- How data for the measurement of emissions, water quality, GHG emissions, water consumption, waste is gathered, and whose responsibility it is to gather such information;
- The areas, structure, and activities that generate or have the potential to generate dust and the mitigation measures to manage such emissions;
- The areas, structure, and activities that generate or have the potential to cause spillages or leakages;
- Examples of key indicators used to monitor and calculate emissions, the quality of effluent discharges, GHG emissions, energy intensity, water consumption, waste management and to set targets;
- A good understanding of corrective action plans/remediation and prevention plans for spills;
- A good understanding energy reduction measures;
- A good understanding of GHG emissions intensity reduction targets; and how GHG targets are implemented

- Examples of key indicators used to monitor and calculate recycling efficiency and to set targets;
- A good understanding of the measures taken to improve recycling efficiency and material recovery to the industry standard;
- How they have determined the risks to biodiversity and land use associated with their activities;
- A good understanding of waste management and hazardous waste management;
- How they have identified and documented their plans to achieve long term goals for conservation or land use outcomes;
- Whether options for alternatives to operating in critical natural habitat were explored with relevant planning authorities and conservation groups working locally, if applicable;
- Whether there are any known threatened species in the areas of companies' operations;
- A good understanding of companies' policy to implement the mitigation hierarchy for the management of impacts on biodiversity, priority ecosystems, or productive lands;
- Examples of activities to compensate for unavoidable loss of biodiversity through conservation actions, such as protecting an area of high biodiversity value land or contributing financially to the management of a formally designated protected area;
- A good understanding of companies' strategies for closure and reclamation, including the vision for the areas post closure and activities to contribute to the transition of former workers and business with strong ties with the operation in the post-closure economy;
- Examples of how land disturbed by the company's operations is being progressively rehabilitated and how companies have allocated resources to such efforts;
- The measures/criteria for success of the closure and reclamation process;
  the concerns of local stakeholders regarding closure and reclamation;
  the cost estimate for the closure and reclamation process.

During interviews with employees, they can demonstrate or describe:

- A basic understanding of the company's Environmental Policy and whom to ask for more information in case of feedback on environmental management practices;
- The type and content of the training they have received on the company's Environmental Policy;
- A basic understanding of the company's policy, procedures or protocols to identify environmental risks and impacts associated with the company's operations;
- Examples of environmental risks and impacts associated with their position and how to prevent and minimize those risks and impacts;
- A basic understanding of the measures that the company has taken to manage and minimize environmental risks and impacts;
- A basic understanding of the company's policy, procedures or protocols on the management of emissions, effluent discharges, potential spillages or leakages, GHG emissions, water consumption, waste management;
- For those tasked with monitoring pollutant and GHG emissions, energy use, effluent discharges, water consumption or waste management, a thorough understanding of monitoring procedure, indicators and internal and external reporting requirements;
- For those tasked with monitoring discharges, a thorough understanding of the company's policy, procedures or protocols for the management of potential spillages or leakages and for decontamination where relevant;
- For those tasked with managing waste, a thorough understanding of management and monitoring procedure, indicators and internal and external reporting requirements;
- For those tasked with managing hazardous waste, a thorough understanding of management and monitoring procedure, indicators and handling and disposal requirements;

- A broad understanding of the company's policy, procedures and/or protocols on biodiversity conservation;
- For those tasked with implementing biodiversity conservation procedures, a thorough understanding of management and monitoring procedure, indicators and internal and external reporting requirements;
- A basic understanding of company's policies on closure and reclamation;
- A basic understanding of what they can expect in terms of preparing to transition to a post-closure economy if they are employed at the time of closure of the site;
- To whom they can discuss matters related to closure and the process for employee engagement by the company's management.

During interviews with affected communities and stakeholders, they can demonstrate or describe:

- Whether options for alternatives to operating in critical natural habitat were explored with relevant planning authorities and conservation groups working locally, if applicable;
- Whether they are aware of the company's conservation actions and whether such actions compensate for loss of biodiversity from actions associated with the company operations;
- Whether the closure plans related to operations in a protected area are carried out in accordance with the plans and goal of the relevant government agency or department, if applicable;
- The frequency, content, and nature of consultation meetings with the company on issues related to closure and reclamation;
- Whether there will be a lasting residual impact from closure;
- Whether there will be any economic or social impacts from the company's activities during the closure and reclamation process, or post closure.

<u>Observations</u>

During the site walk through, the assessor observes:

Primary Lead production

- Raw material receipt and storage facilities
- Furnaces
- Refinery and casting facilities
- Pollution controls (e.g. desulphurisation, bag house and scrubbers, waste-water treatment facility etc)
- Finished product storage and transportation

Secondary Lead Production (Recycler)

- Raw material receipt and storage facilities
- Battery breaker
- Furnaces
- Refinery and casting facilities
- Pollution controls (e.g. desulphurisation, bag house and scrubbers, waste-water treatment facility etc)
- Finished product storage and transportation

Battery Production

- Raw material receipt and storage facilities
- Oxide plant

- Pasting and formation
- Pollution controls (e.g. bag house and scrubbers, waste-water treatment facility)
- Finished product storage and transportation
- Measures taken for managing and minimizing environmental risks and impacts, in line with the Company's action plans.
- Engineering control measures that are in place to minimize point and fugitive lead emissions;
- Water discharge and waste water treatment measures;
- Spill prevention and control measures;
- Energy efficiency measures;
- Biodiversity protection and conservation measures;
- Control measures are in place to cover lead bearing materials to prevent rainwater contamination and thereby minimize contaminated any run-off; or
- Methods for the collection and treatment of water that has come into contact with lead-bearing materials are in place;
- Evidence of plant and fence-line air monitoring;
- Check that emissions are captured by an extraction system and ventilated to the baghouse that is regularly tested for effectiveness;
- Check that off gases are directed to scrubber;
- Check raw material/scrap storage shed or areas;
- Check battery breaker and flow of product;
- Check chemical and hazardous waste storage areas for control measures such as secondary containment;
- Check storage of materials outside the site.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
    - European Union (1992). EU Habitats Directive (Directive 92/43/EEC) (link)
    - European Parliament and Council (2000). Directive 2000/60/EC establishing a framework for Community action in the field of water policy (Water Framework Directive) (link)
    - European Parliament and Council (2004). Directive 2004/35/EC on Environmental Liability with regard to the prevention and remedying of environmental damage (ELD Directive) (link)
    - European Parliament and Council (2004). Directive 2004/35/EC on Environmental Liability (link)
    - European Parliament and Council (2006). Directive 2006/21/EC on the Management of Waste from Extractive Industries (Mining Waste Directive) (link)
    - European Union (2006). REACH Regulation (EC) No 1907/2006 (link)
    - European Union (2008). Directive 2008/98/EC on Waste (Waste Framework Directive) (link)
    - European Union (2022). Corporate Sustainability Reporting Directive (CSRD) (Directive (EU) 2022/2464) (link)
    - European Parliament and Council (2008). Ambient Air Quality Directive 2008/50/EC (link)

- European Parliament and Council (2009). Regulation (EC) No 1221/2009 on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS) (link)
- European Parliament and Council (2010). Directive 2010/75/EU on industrial emissions (IED) (link)
- European Commission (2012). Regulation (EU) No 601/2012 on the monitoring and reporting of greenhouse gas emissions (link)
- European Parliament and Council. (2012). Seveso III Directive 2012/18/EU) (link)
- European Parliament and Council. (2014). Environmental Impact Assessment (EIA) Directive 2011/92/EU (as amended by 2014/52/EU) (link)
- European Commission (2021). Regulation (EU) 2021/1119 establishing the framework for achieving climate neutrality (European Climate Law) (link)
- European Parliament and Council (2023). Directive (EU) 2023/1791 on Energy Efficiency (recast of 2012/27/EU) (link)
- European Union (2023). EU Battery Regulation (Regulation (EU) 2023/1542) (link)

- In the United Kingdom:
  - UK Parliament (1991). Water Industry Act 1991 (link)
  - UK Government (2002). Control of Substances Hazardous to Health (COSHH) Regulations 2002 (link)
  - UK Government (2005). Hazardous Waste Regulations (link)
  - UK Government (2008). Climate Change Act 2008, establishing legally binding GHG reduction targets and carbon budgets (link)
  - UK Government (2008). Batteries and Accumulators (Placing on the Market) Regulations 2008 (link)
  - UK Government (2010). Air Quality Standards Regulations 2010 (link)
  - UK Government (2013). The Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2013 (link)
  - UK Environment Agency (2014). Energy Savings Opportunity Scheme (ESOS) Regulations (link)
  - UK Health and Safety Executive (HSE) (2014). The Mines Regulations (link)
  - UK Government (2015). Control of Major Accident Hazards (COMAH) Regulations 2015 (link)
  - UK Government (2016). Environmental Permitting (England and Wales) Regulations (link)
  - UK Government (2017). The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (link)
  - UK Government. (2017). Environmental Impact Assessment Regulations 2017 (link)
  - Environment Agency (2017). Water abstraction: getting and using a licence (link)
  - UK Government (2017). Habitats Regulations 2017 (link)
  - UK Government (2021). Environment Act 2021 (link)
  - UK Government (2021). The UK REACH Regulation (Retained EU Regulation 1907/2006) (link)

- In the United States:
  - U.S. Congress (1967). Clean Air Act (CAA), 42 U.S.C. §7401 et seq. (link)
  - U.S. Congress (1972). Federal Water Pollution Control Act (Clean Water Act), 33 U.S.C. §1251 et seq (link)
  - U.S. Government (1973). Endangered Species Act (ESA) (link)

- United States Congress (1976). Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6901 et seq. (link)
- US Congress (1980) Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (link)
- United States Congress (1986). National Environmental Policy Act (NEPA), 42 U.S.C. §4321 et seq. (link)
- U.S. Government (1986). Emergency Planning and Community Right-to-Know Act (EPCRA), 42 U.S.C. §11001 et seq. (link)
- U.S. Environmental Protection Agency (EPA) (1992). National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63 (link)
- U.S. Congress (2007). Energy Independence and Security Act (EISA) (link)
- U.S. Environmental Protection Agency (EPA) (2009). Mandatory Greenhouse Gas Reporting Rule (40 CFR Part 98) (link)
- U.S. Environmental Protection Agency (2014). Resource Conservation and Recovery Act (RCRA) (link)
- U.S. Environmental Protection Agency (EPA) (2021). Effluent Guidelines for Battery Manufacturing (40 CFR Part 461) (link)
- U.S. Government (2023). National Environmental Policy Act (NEPA) (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- BBOP (Business and Biodiversity Offset Programme) (2012). Standard on Biodiversity Offsets (link)
- CDP (2023). CDP Climate Change Questionnaire Guidance (link)
- European Commission (2017). Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metals Industries (NFM BREF) (link)
- European Commission (2020). EU Biodiversity Strategy for 2030 (link)
- Global Reporting Initiative (2021). GRI Standards 2021 (link)
- International Finance Corporation (2012). IFC Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources (link)
- International Finance Corporation (IFC) (2012). Performance Standards on Environmental and Social Sustainability (link)
- International Organization for Standardization (ISO) (2015). ISO 14001:2015 – Environmental management systems – Requirements with guidance for use (link)
- International Organization for Standardization (2014). ISO 14046: Environmental management – Water footprint – Principles, requirements and guidelines (link)
- International Organization for Standardization (ISO) (2018). ISO 14064-1:2018 – Greenhouse gases – Part 1: Specification with guidance at the organization level for quantification and reporting of GHG emissions and removals (link)
- Sustainability Accounting Standards Board (2018). SASB Standards – Industry-Specific Sustainability Disclosure Standards (link)
- Science Based Targets initiative (SBTi) (2021). Foundations for Science-Based Net-Zero Target Setting in the Corporate Sector (link)
- Task Force on Climate-related Financial Disclosures (TCFD) (2017). Final Recommendations Report (link)
- Taskforce on Nature-related Financial Disclosures (TNFD) (2023). Recommendations of the Taskforce on Nature-related Financial Disclosures (link)

- UNEP (2023). LeadBattery360 Report – Technical Guidelines for the Environmentally Sound Management of Waste Lead-Acid Batteries (link)
- UNEP and Partners of the Lead Battery 360° Initiative (2023). LeadBattery360 Report – A Guidance Manual for Policymakers and Regulators for the Environmentally Sound Management of Waste or Used Lead-Acid Batteries in Africa (link)
- World Bank Group (2007). Environmental, Health and Safety Guidelines (link)
- World Resources Institute (WRI) & World Business Council for Sustainable Development (WBCSD) (2004). The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition) (link)

PRINCIPLE 2. Pursue zero harm and manage all potential lead exposure and emissions by setting continuous improvement targets and sharing best practice

Performance Expectations, Guidance and Conformance Determination

Performance Expectation

(a) Lead Exposure Legal Compliance. Ensure compliance with applicable standards, laws, and regulations related to workers' occupational lead exposure.

How can the company meet this expectation?

Companies are expected to establish, implement, and maintain a process(es) to ensure compliance with applicable OH&S standards, laws, and regulations as per Performance Expectation 1.A.(a).

In alignment with the general expectations on OH&S legal compliance, companies must ensure compliance with specific applicable requirements related to occupational lead exposure, which is recognized as a serious health risk and subject to strict regulatory oversight in many jurisdictions.

Companies are expected to:

- Identify applicable legal requirements specific to occupational lead exposure, such as:
    - occupational exposure limits for airborne lead and blood lead levels;
    - requirements for air monitoring, biological monitoring, and medical surveillance;
    - engineering controls and Personal Protective Equipment (PPE);
    - obligations for worker training and awareness.
- Incorporate these legal requirements into the company's OH&S management system (as per Performance Expectations of Principle 1.A.) and lead exposure control program (as per Performance Expectations of Principle 2).

In addition to legal requirements, companies should consider other applicable requirements that the company has to or chooses to comply with, for example, in addition to those listed in Performance Expectation 1.A.(a):

- Trade associations' voluntary programs, such as the company's commitments to achieving the International Lead Association (ILA), Battery Council International (BCI), Association of Battery Recyclers (ABR), and/or the Association of European Automotive and Industrial Battery Manufacturers (EUROBAT) voluntary target.

Companies are expected to maintain and retain documented information on their occupational lead exposure requirements and compliance evaluation. Compliance evaluations for lead-specific requirements should be undertaken, at a minimum, at pre-planned intervals, and should include the monitoring and reviewing of results of air sampling and medical tests. The frequency and timing of compliance evaluation can vary depending on variations in operating conditions, changes in legal requirements, and the company's past performance.

Should non-compliances be identified, companies are expected to take immediate corrective actions.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place procedures and processes, including appointed staff members with responsibility to monitor and ensure compliance with national requirements related to site operations and workers' occupational lead exposure.	The Company has started to develop or has in place basic procedures and processes, including appointed staff members to ensure full compliance with national legal requirements related to site operations and workers' occupational lead exposure. If non-compliances are identified, the company can demonstrate that action was, and in the future, will be taken to remedy the non-compliance.	The Company has in place and implements procedures and processes to monitor and ensure compliance with national legal requirements related to site operations and workers' occupational lead exposure. If non-compliances are identified, the Company demonstrates that no willful or repeated violations were found. In addition, the Company demonstrates timely and effective action has been implemented to remedy the non-compliance and to prevent further non-compliances from recurring.

Performance Expectation

(b) Workers' occupational lead exposure assessment. Document and implement a system to assess and regularly monitor the equipment-, job- and process-related risks of workers' occupational lead exposure through occupational hygiene measurements and appropriate medical surveillance including regular biological monitoring (e.g. blood lead measurements).

How can the company meet this expectation?

Companies are expected to identify, assess, and document all job-related, equipment-related, and process-related risks of occupational lead exposure. This includes regularly monitoring tasks, work areas, materials, and equipment that may generate airborne lead or lead-containing dust or fumes.

A structured exposure assessment system based on occupational hygiene measurements should be implemented, including:

- personal air monitoring, to determine the lead concentration in the breathing zone of workers;
- static (area) air monitoring, to evaluate general environmental concentrations in work zones.

Companies are expected to conduct regular biological monitoring of workers, primarily through Blood Lead Level (BLL) Testing. Monitoring frequency should be based on the level of exposure risk, but should occur at least once per year for all potentially exposed workers. Higher-risk jobs should be monitored more frequently in line with occupational health standards and medical advice, and all workers (including contractors) should receive training on lead risks and protective measures.

Companies should ensure that the exposure monitoring program is documented, overseen by competent professionals, and aligned with current scientific and regulatory standards. Monitoring results should be:

- tracked over time to identify trends, evaluate the effectiveness of control measures, and take corrective action when necessary;
- integrated into their occupational health and safety (OH&S) and risk management systems (as per Performance Expectations of Principle 1.A.);
- communicated to workers, including their exposure levels;
- interpreted by medical professionals, particularly biological results that require advising on necessary follow-up actions, such as removal from exposure or medical evaluation.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have a process in place to document, monitor and assess job-related or process-related risks of lead exposure.	The Company has started to develop a process to document, monitor and assess job-related and process-related risks of lead exposure.	The Company understands, documents and assesses both the job-related and process-related risks of lead exposure and documents and implements a system to monitor workers' occupational lead exposure regularly through occupational hygiene (personal and static air monitoring) measurements and a regular biological monitoring (i.e. blood lead measurements). Biological monitoring is undertaken at a frequency that is dependent upon exposure risk but at least once per year.

Performance Expectation

(c) Workers' occupational lead exposure management. Have a system in place to minimize lead exposure risks through application of the Hierarchy of Controls and integration of the Hierarchy of Controls into the decision-making processes, to achieve levels that prevent or mitigate the development of adverse health effects among the workforce.

How can the company meet this expectation?

Companies are expected to develop and implement a lead exposure control system based on the Hierarchy of Controls, prioritizing elimination and substitution of lead hazards where feasible. This system should be applied across all operations and work areas where occupational lead exposure risks exist. The Hierarchy of Controls should be applied in the following order:

- engineering controls – use physical controls such as local exhaust ventilation, process isolation, and enclosure systems to minimize airborne lead exposure;

- administrative controls – implement procedures such as task rotation, restricted access, and training to limit exposure duration and intensity;
- PPE – provide and maintain appropriate PPE such as respirators, protective clothing when other controls are insufficient.

Companies are expected to integrate the Hierarchy of Controls into decision-making processes, including project design, procurement, process changes, and capital investment planning. Lead exposure risk should be a core consideration when introducing new equipment, modifying processes, or restructuring workflows.

Companies are also expected to establish and implement a medical removal and return-to-work policy for lead-exposed workers. This policy should:

- define clear BLL thresholds for temporary removal from lead-exposed tasks, in accordance with Performance Expectation 2.(b);
- provide for reassignment to non-lead exposure duties to protect worker health while maintaining employment;
- specify conditions for return to lead-exposed work, including clearance by a qualified medical professional based on follow-up testing.

Companies should ensure that occupational health professionals are involved in reviewing worker health data and that lead exposure control measures are continuously evaluated and improved based on monitoring results, technological developments, and medical feedback.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place a system to implement the Hierarchy of Controls to minimize lead exposure risks or to mitigate adverse health effects on the workforce.	The Company has started to develop a system to implement the Hierarchy of Controls to minimize lead exposure risks, to mitigate adverse health effects on the workforce, and to integrate it into decision-making processes. The system is not fully implemented or is incomplete.	The Company applies and fully implements the Hierarchy of Controls to minimize lead exposure risks, mitigate adverse health effects on the workforce, and has integrated it into decision-making processes. The Company has established a removal and return to work policy to allow temporary re-assignment of any worker to non-lead exposed activities should blood lead measurements indicate a significant risk to health.

Performance Expectation

(d) Provision of Personal Protective Equipment (PPE). Ensure companies provide workers with Personal Protective Equipment (PPE) to protect them from lead exposure risks.

How can the company meet this expectation?

Companies are expected to provide Personal Protective Equipment (PPE) to all workers and site visitors who may be exposed to lead hazards. PPE must be appropriate for the specific tasks performed and effective in preventing or reducing exposure to lead dust, fumes, and contaminated surfaces. It must be provided to workers free of charge. PPE should be selected based on a risk assessment that considers the task type, exposure level, and work environment, and must be fit for purpose, compliant with applicable safety standards, and suitable for protecting against both airborne and surface lead contamination. This includes, where applicable:

- respiratory protection (e.g., half- or full-face respirators with lead-rated filters);
- protective clothing (e.g., disposable or washable coveralls, gloves, boots);
- eye and face protection, if there is a risk of splashes or airborne particles.

To ensure protection from lead exposure with PPE, companies are expected to:

- clearly mark each area of the facility with visible signage indicating the required PPE for entry or activity within that zone;
- enforce through access control and supervision all PPE requirements specific to the exposure risks in each operational area;
- provide training to all personnel and visitors on the correct use, limitations, storage, and disposal of PPE, including:
    - donning and doffing procedures;
    - proper handling to prevent contamination;
    - actions in case of equipment failure or damage;
- establish a cleaning, maintenance, and replacement program for all reusable PPE that includes:
    - respirators should be individually fit-tested and maintained in accordance with manufacturer specifications and regulatory standards;
    - damaged or contaminated PPE should be promptly replaced.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not provide PPE that protects workers or visitors from lead exposures.	The Company provides PPE that protects workers and visitors from lead exposures. However, there may be gaps in implementation (e.g. inappropriate or insufficient PPE, inadequate fit testing of respirators, infrequent maintenance or training procedures, or there is evidence that PPE use is not always followed or enforced.).	The Company provides appropriate PPE that protects workers and visitors from lead exposure. Each area of the facility has clear notices and signs posted outlining what PPE should be worn while in that given area and appropriate training is provided.

		PPE is regularly cleaned and maintained, and any respirators used are properly fit tested.

Performance Expectation

(e) Workers' occupational lead exposure performance. Based on the results of individual workers' occupational lead exposure assessment (b), establishment of an Occupational Lead Management program which clearly identifies who is subject to testing and describes the testing methodology and frequency. Conform with the provisions of such a written program, set targets to minimize and control workers' occupational lead exposure, implement a plan to achieve set targets and ensure continuous improvement towards the ILA/BCI/ABR/EUROBAT voluntary target and/or more stringent targets set by the Company.

How can the company meet this expectation?

Companies are expected to develop, implement, and maintain a written occupational lead management program that clearly outlines the company's approach to minimizing and managing lead exposure among workers, which includes:

- identification of workers subject to occupational lead monitoring, including job roles and areas of exposure risk;
- defined testing methodologies and monitoring frequencies, based on exposure risk and aligned with national regulations and international best practices (e.g. blood lead level testing at minimum once per year);
- clearly assigned responsibilities and oversight mechanisms for implementing, reviewing, and updating the program, including performance tracking and regular reporting to company leadership.

The program should apply to all employees and contractors who work in, or may enter, lead bearing areas or handle lead-containing materials.

Companies are also expected to:

- publicly commit to achieving the voluntary blood lead target set by ILA/BCI/ABR/EUROBAT (≤20 µg/dL or stricter), or to adopt a more stringent internal target, and shared in company policies or sustainability disclosures;
- implement a formal action plan to achieve this target, including:
    - engineering and administrative controls to reduce exposure;
    - enhanced biological and air monitoring;
    - medical surveillance and removal/return-to-work policies.

- demonstrate continuous improvement by reducing both average and high-end blood lead levels among lead-exposed workers over time, reviewing data regularly to assess progress and inform updates to the program.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company has not established an Occupational Lead Management program to implement biological monitoring and testing.	The Company has established an Occupational Lead Management program which clearly identifies who is subject to biological monitoring. The Company has established a testing methodology and frequency, and conforms with the provisions of that written program. The Company is able to demonstrate continuous improvement towards the ILA/BCI/ABR/EUROBAT voluntary target but has >20% of lead-exposed workers employed in the facility for at least 1 year exceeding the ILA/BCI/ABR/EUROBAT voluntary target.	The Company's written Occupational Lead Management Program includes all employees and contractors who work or are likely to work in lead bearing areas or physically handle lead components. The Company has publicly committed to achieving the ILA/BCI/ABR/EUROBAT voluntary target and can demonstrate continuous improvement towards the ILA/BCI/ABR/EUROBAT voluntary target and has <20% of lead-exposed workers with blood lead exceeding the ILA/BCI/ABR/EUROBAT voluntary target.

Performance Expectation

(f) Provision of Hygiene and Welfare Facilities. Document, communicate, educate and implement policies that clearly state that lead soiled workwear is not permitted to be worn in non-leaded work or amenity areas. Provide appropriate hygiene facilities for lead-exposed workers and implement measures to ensure that common areas, such as a canteens, are kept as free as practicable from lead contamination.

How can the company meet this expectation?

Companies are expected to establish and enforce clear hygiene and facility-use policies prohibiting the wearing of lead-contaminated workwear in non-leaded work or amenity areas such as offices, canteens, and break rooms. These policies should be written, communicated, and reinforced through signage, training, and supervision.

Companies are expected to provide segregated hygiene and welfare facilities for lead-exposed workers, such as:

- clean-side and plant-side locker areas to separate personal clothing and contaminated workwear;

- handwashing stations, showers, and changing rooms positioned at transition points between work and clean zones;
- designated storage for soiled PPE and footwear, physically separated from areas used for clean clothing and personal items.

Companies are expected to implement additional contamination control measures, especially in facilities with high potential for airborne lead exposure. These should include:

- air showers or workwear high-efficiency particulate air (HEPA) vacuums at facility exits;
- boot cleaning stations (automatic or manual wash) with defined procedures;
- mandatory removal of outer contaminated workwear in cloakrooms or designated areas before entering clean zones.

Companies are expected to conduct regular inspections and effectiveness checks of hygiene protocols, facilities, and air handling systems to ensure clean areas remain free from lead contamination. These checks should be documented and should result in corrective actions where issues are identified.

Companies are expected to train all lead-exposed workers and facility staff on the importance of hygiene controls, proper use of welfare facilities, contamination risks, and company policies. Training should be refreshed regularly and supported by clear signage and routine supervision.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have adequate segregated clean and plant- side locker areas with handwashing stations, showers, or separate locations to store clean work or personal clothing (and other personal items). There are no effective procedures in place to ensure that eating areas and/or offices are free from lead contamination.	The Company makes available adequate segregated clean and plant- side locker areas with handwashing stations, showers, and separate locations to store clean work or personal clothing (and other personal items). Soiled footwear, uniforms, and PPE are stored or deposited in designated locations separate from clean clothing storage when not in use. Written policies are in place, and it is readily understood that lead contaminated workwear is not permitted to be worn in non-leaded areas of the facility, such as eating areas and offices. Companies may implement limited policies to allow exceptions where it has been demonstrated that procedures	The Company makes available adequate segregated clean and plant- side locker areas with handwashing stations, showers, and separate locations to store clean work or personal clothing (and other personal items). Soiled footwear, uniforms, and PPE are stored or deposited in designated locations separate from clean clothing storage when not in use. Written policies are in place, and it is readily understood that lead contaminated workwear is not permitted to be worn in non-leaded areas of the facility, such as eating areas and offices. The Company has established additional measures to prevent lead contamination of clean areas such as :

	such as coveralls or overshoes reduce opportunity for lead contamination of such areas. Procedures are facilitated by regular training and education. There is evidence that rules are not always followed or enforced.	• air showers or workwear HEPA vacuum with procedures and training on effective operation. • boot cleaning station or manual wash with procedures. • requirement to leave contaminated outer work clothing and equipment in cloak room or storage area. If located in close proximity to production areas such that there is risk of lead in air, break rooms and canteens are either kept under positive pressure or have a HEPA filtered clean air system in place. Procedures are regularly checked to ensure they are effective to minimize lead contamination in areas where PPE is not worn.

Performance Expectation

(g) Take-home Lead. Document, communicate, educate, and implement policies that clearly state that lead soiled workwear is not permitted to be worn or taken home under any circumstance. Provide appropriate hygiene facilities for lead-exposed workers and implement measures to ensure that workers always wash, shower, and change out of work clothes and work shoes before leaving work in appropriate changing rooms equipped with separate storage facilities for protective work clothing and equipment and for clean home going or street clothes.

How can the company meet this expectation?

Companies are expected to establish and enforce written policies that strictly prohibit the removal of contaminated workwear or PPE from the workplace. These policies should clearly state that under no circumstances may workers wear or take-home lead-soiled clothing, shoes, or PPE, and this rule should be communicated through signage, onboarding, and regular training.

Companies are expected to provide dedicated hygiene facilities that support effective decontamination before workers leave the site. These facilities should include:

- segregated changing rooms with separate, clearly labelled storage areas for clean home-going clothes and contaminated work clothing;
- shower and handwashing stations, positioned between plant-side and clean-side locker areas, to enable thorough decontamination;

- time provisions within the paid workday for workers to shower and change before exiting the facility.

Companies are expected to ensure that contaminated workwear is either professionally laundered on-site or collected and laundered off-site by a licensed third-party service provider. In either case, the collection, laundering, and distribution of clean uniforms should be managed under controlled conditions to prevent cross-contamination and ensure that no lead-contaminated clothing is taken home by workers.

Companies are expected to regularly inspect and monitor hygiene systems and take-home lead prevention protocols. This includes observing whether workers correctly use changing areas (e.g., following clean-to-dirty zone flow, storing workwear separately), verifying that laundering services are functioning as intended, and ensuring that clothing separation procedures are being followed. Inspections may involve visual checks, spot audits, interviews, and review of facility logs or camera footage. All findings should be documented, and corrective actions should be taken promptly where non-compliance is identified.

Companies are expected to train all lead-exposed workers on take-home lead risks, safe hygiene practices, and proper use of facilities. Training should emphasize the importance of preventing lead contamination in vehicles and homes, particularly to protect vulnerable populations such as children. Refresher training should be held regularly, and completion documented.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place measures to ensure that any lead contaminated clothing does not leave the facility or ensure that workers always wash, shower, and change out of work clothes and work shoes before leaving work.	In addition to procedures described in 2(f), the Company makes provisions for washing dirty work wear so that it is not taken home by the employee. Written policies are in place and readily understood that lead bearing workwear is not permitted to be worn or taken home under any circumstance. This is facilitated by regular training and education, but the effectiveness of procedures is not regularly checked and/or employees may not be given sufficient paid time to wash, shower and change out of work clothes at the end of their shift.	In addition to procedures described in 2(f), the Company makes provisions for washing dirty work wear so that it is not taken home by the employee. Written policies are in place and readily understood that lead bearing workwear is not permitted to be worn or taken home under any circumstance. This is facilitated by regular training and education. Procedures are regularly checked for effectiveness and employees are given sufficient paid time to wash, shower and change out of work clothes at the end of their shift.

Performance Expectation

(h) Control of Point and Fugitive Lead Emissions. Correct design, implement and maintain engineering, technical and procedural measures to control and minimize the release of gaseous or particulate lead emissions from battery breaking, smelting, refining and casting areas, emission points (stacks), material handling and storage areas, vehicular traffic and cleaning, and other uncontrolled sources.

How can the company meet this expectation?

Companies are expected to enclose lead-generating equipment and processes using physical barriers or housing structures suited to the level of emission risk. The degree of enclosure should correspond to the amount of dust or fume generated. Enclosure systems are generally categorized as follows:

- level 1: partial enclosures (e.g. walls, curtains) that provide basic containment but allow some emissions to escape;
- level 2: full enclosures with ventilation or extraction systems that capture emissions at the source—required for full compliance.

Companies are expected to install local exhaust ventilation systems positioned as close as possible to emission sources. These systems must be connected to high-efficiency particulate air (HEPA) filters or equivalent emission control technologies before air is released to the atmosphere. This applies especially to stack emission points, where engineering controls should ensure that lead emissions are ≤1 mg/Nm³, in line with the EU Best Available Techniques - Associated Emission Levels (BAT-AELs).

Companies are expected to enclose or effectively control dust from material handling, transfer, and storage activities. This includes covering conveyors and hoppers, and enclosing or stabilizing storage piles with covers, water sprays, or chemical dust suppressants to reduce wind erosion. Handling systems should be fully enclosed wherever practical to contain airborne lead particles.

To further minimize fugitive emissions and maintain effective control systems, companies should also:

- reduce dust from on-site vehicle traffic by paving high-traffic routes, using wheel wash stations, and applying access restrictions in dusty areas. Routine cleaning should be carried out using wet sweeping or controlled vacuuming to prevent dust build-up and spread;
- establish and implement preventive maintenance schedules for all emission control systems, including filters, ventilation units, and enclosures. These tasks should be planned, documented, and reviewed regularly to avoid failures;
- verify the effectiveness of emission controls through regular air quality monitoring and performance checks, conducted at emission points, within work areas, and near high-risk processes;
- provide training to all workers on emission control procedures, including the correct use of enclosed systems, cleaning equipment, access restrictions in lead-sensitive areas, and maintenance protocols. Training should emphasize awareness, accountability, and routine best practices.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not employ appropriate measures to limit stack emissions of lead and other hazardous substances at the site and does not have controls in place that effectively reduce fugitive emissions.	The Company employs level 1 enclosures and a baghouse (or equivalent) to limit stack emissions but may not have all the controls necessary to limit fugitive lead emissions or measures in place to minimize such emissions. The Company understands its "hotspot" areas and is investigating how to capture the generation of fumes. Measures adopted are regularly checked for their effectiveness.	The Company implements level 2 enclosures as a minimum and maintains technical and procedural measures to control and minimize the release of gaseous or particulate lead emissions and other hazardous substances from stacks, material handling, vehicular traffic, wind erosion from storage piles, and other uncontrolled sources. The Company has in place engineering design to capture fume generation at its source. Lead emissions from stacks should be no greater than the BAT Associated Emission Values described in the latest EU BAT) Reference Document for the Non-Ferrous Metals Industries (i.e. <1mg/Nm3). Measures adopted are regularly checked for their effectiveness.

Performance Expectation

(i) Management of Slags and Residues. Regularly review and improve the recovery of lead by treatment of slags and other residues. Assess opportunities for increasing recycling of treated lead residues and assess options to minimize and responsibly manage the disposal of slags and residues that are technically and commercially viable.

How can the company meet this expectation?

Companies are expected to assess current slag and residue management practices and set specific, measurable, and time-bound targets to increase the recovery of lead from slags, furnace dusts, and other lead-containing byproducts. In particular, companies should aim to recover more than 95% of the lead from these materials. These targets should be reviewed periodically to assess progress, identify improvement opportunities, and ensure that performance goals remain ambitious yet achievable.

Companies should optimize the recycling of treated lead residues by regularly evaluating and improving recovery processes. This includes the integration of advanced technologies (e.g., high-efficiency furnaces, slag cleaning, or metal separation systems) to enhance lead yield and reduce residual waste.

Companies are expected to minimize the generation of slags and residues by identifying and implementing process efficiency improvements, such as better raw material input control, optimized furnace operation, or recovery of secondary materials before they enter the smelting process. Companies should develop responsible management and disposal methods for lead-containing residues that cannot be recycled. These methods should align with regulatory requirements and aim to minimize environmental and human health impacts through proper containment, storage, transport, and final disposal.

Companies are expected to monitor and report lead recovery and residue disposal performance, using automated or manual systems to track recovery rates, tonnage of residues, and compliance with legal and environmental requirements. These records should be maintained for audit purposes and used to inform continuous improvement.

Companies are expected to train employees involved in lead recovery and residue handling. Training should include safe handling procedures, the use of PPE, risk awareness, and emergency response. Refresher training should be conducted regularly to maintain high safety standards.

Finally, companies are expected to invest in technological innovation and process improvement to enhance lead recovery rates and reduce waste. This includes researching and piloting new technologies for slag treatment and staying informed about market-ready solutions that support circular economy goals.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company has not set targets to improve the "recovery" of lead or to reduce waste tonnage through the production of slag and the recycling of other lead containing products and furnace residues.	The Company has started to set targets to improve the "recovery" of lead and reduce waste tonnage through the production of slag and the recycling of other lead containing products and furnace residues, but procedures are yet to be fully implemented. The Company can demonstrate that any lead containing slag and furnace residues are managed and disposed of responsibly and according to prevailing legislative requirements.	The Company sets continuous improvement targets for the "recovery" of lead and reduces waste tonnage through the production of slag and the recycling of other lead containing products and furnace residues. Recycling ensures that greater than 95% of lead is recovered. The Company can demonstrate that any lead containing slag and furnace residues are managed and disposed of responsibly and according to prevailing legislative requirements.

Performance Expectation

(j) Battery Breaking. Disassemble used lead batteries and manage used lead batteries components (sulfuric acid, lead paste, metallic grids, and deleterious materials such as heavy plastics and separators) in a manner that limits potential for occupational lead exposure and environmental contamination and provides for efficient material recovery and recycling.

How can the company meet this expectation?

Companies are expected to utilize automated and enclosed battery breaking systems equipped with ventilation or negative pressure containment to minimize the release of airborne lead and acid fumes.

Companies are expected to collect spent acid from batteries through closed-loop systems. The acid should either be neutralized and treated on-site in a compliant wastewater treatment facility or processed to remove impurities for recycling and reuse. All handling should be conducted in a way that prevents spills or contact with workers or the environment.

Manual battery breaking or dismantling should be prohibited, except in exceptional cases involving large-format industrial batteries. In these rare situations:

- procedures should be environmentally sound and strictly controlled;
- safety protocols should be detailed and documented;
- emissions and worker exposure should be limited using strict containment and environmental controls.

Companies are expected to manage all recovered components—such as lead paste, metallic grids, plastics, and separators—using sealed, clearly labelled containers, stored on impermeable surfaces with secondary containment to prevent soil or water contamination. These materials should be promptly routed for recycling or responsible treatment.

Companies are expected to implement strong exposure controls in all battery breaking areas, including:

- high-efficiency particulate air (HEPA)-filtered local exhaust ventilation;
- PPE requirements for all workers;
- air and surface lead monitoring programs;
- routine biological monitoring (e.g., blood lead testing) for exposed workers.

Companies should maintain standard operating procedures for battery disassembly and emergency response, and provide regular training to all workers involved. Training should include safe handling techniques, use of PPE, emergency spill containment, and equipment operation. Completion of training should be documented, and refresher sessions should be held periodically to reinforce knowledge and maintain safe practices.

Companies should also ensure the following are in place:

- standard operating procedures for disassembly and emergency response, supported by regular training and documented confirmation of worker competency;
- comprehensive cleaning and inspection protocols, including preventive maintenance and environmental checks for lead and acid contamination;
- performance tracking systems to monitor air emissions, acid recovery, and worker exposure, with internal audits and corrective actions where needed;
- spill response protocols with emergency equipment, clear responsibilities, evacuation procedures, and incident communication plans in all dismantling areas.

Non-recyclable or hazardous residues should be disposed of through licensed hazardous waste contractors in accordance with regulations, in alignment with Performance Expectation 1.B (j) Hazardous Waste Management. All residues should be properly tracked and documented to ensure that they are disposed of in compliance with environmental laws.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company employs manual battery disassembly and breaking procedures (e.g. using machetes, hammers or axes) that has potential for significant workplace lead exposure and environmental contamination from lead and acid.	The Company employs procedures for used battery disassembling that mitigate potential for significant workplace occupational lead exposure and minimize potential for environmental contamination from lead and acid. In particular, the company utilizes battery saws and/or mechanical breakers that are contained and minimize the risk of lead emissions and acid fumes or spills. There is no manual breaking or dismantling (except in exceptional circumstances for large format industrial batteries for which environmentally sound procedures are adopted). All spent electrolyte (acid) is collected and neutralized before disposal through a municipal wastewater treatment facility.	The Company employs procedures for used battery disassembling that mitigate potential for significant workplace occupational lead exposure and minimize potential for environmental contamination from lead and acid. In particular, the company utilizes automated battery saws and/or mechanical breakers that are contained and ventilated or are under negative pressure to minimize the risk of lead emissions and acid fumes or spills. There is no manual breaking or dismantling (except in exceptional circumstances for large format industrial batteries for which environmentally sound procedures are adopted) . All spent electrolyte (acid) is collected and neutralized before disposal through an on-site wastewater treatment plant or impurities are removed and the acid recycled and reused directly or converted to other saleable products such as gypsum. The Company manages all components of used lead batteries in a manner that limits potential for significant

		workplace lead exposure and minimizes the risk of environmental contamination including as they are moved for storage, treatment or disposal.

Performance Expectation

(k) Lead Materials Handling and Storage. Whole and complete used lead batteries are stored in areas that ensure that they remain intact. Damaged used lead batteries are stored with secondary containment to limit lead exposure.
Intact used lead batteries, damaged used lead batteries, and other collected lead waste and lead bearing input material are stored in areas that:
i. Are undercover and protected from precipitation to prevent rainwater collection and minimize contaminated run-off or in areas where run-off is collected or treated prior to discharge,
ii. Have an impermeable and acid-resistant floor, with some means of containment for spills.

How can the company meet this expectation?

Companies are expected to design and maintain storage areas that prevent damage to intact used lead batteries and control contamination risks from damaged batteries. Storage areas should:

- be fully covered and protected from precipitation, with systems in place to collect or treat any runoff;
- have impermeable, acid-resistant flooring capable of withstanding exposure to battery acid and lead compounds;
- have flooring systems that include integrated spill containment features, such as bunds or controlled drainage, to prevent the spread of contaminants;
- have drainage systems designed to direct runoff either to treatment facilities or to sealed containment for safe neutralization or disposal;
- be inspected routinely to verify that secondary containment, spill control systems, and environmental protection measures are functioning correctly;
- be regularly audited for integrity, with corrective actions taken promptly as needed.

Damaged batteries should be stored with secondary containment, such as sealed, labelled containers or bunded areas with spill control measures.

Companies are expected to maintain detailed and accessible records covering storage practices, inspection findings, maintenance activities, spill management, and employee training. Companies should ensure that any rainwater or runoff contacting lead bearing materials is properly contained and treated.

Companies are expected to establish comprehensive spill response protocols for battery storage areas, including the provision of emergency containment kits equipped with absorbent materials, acid neutralizers, and protective PPE. Emergency procedures should be clearly communicated to all employees, and regular drills should be conducted to ensure preparedness for leak or spill incidents in alignment with Performance Expectation 1.A (h) Emergency Response.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have any appropriate material storage areas in place to ensure storage of used lead batteries to reduce risks of lead contamination.	The Company has material storage areas that ensure that intact used lead batteries remain intact and that reduce potential for lead contamination before processing. The Company stores damaged used lead batteries with secondary containment to limit lead exposure. However, not all design features articulated in the PE (i-ii) have been implemented. For example, the storage facility may not be adequately covered, or the floor may be of a permeable nature.	The Company has material storage areas that ensure that used lead batteries remain intact or loaded into bunkers that minimize potential for lead contamination. The Company stores damaged used lead batteries with secondary containment to limit lead exposure and the leakage or electrolyte. All design features articulated in the PE (i-ii) have been implemented. Rainwater or runoff contacting lead bearing materials is properly contained and treated. Spill response protocols are regularly checked for effectiveness.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 2 is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
2.(a) Lead Exposure Legal Compliance	√	√	√
2.(b) Workers' occupational lead exposure assessment	√	√	√
2.(c) Workers' occupational lead exposure management	√	√	√
2.(d) Provision of Personal Protective Equipment (PPE)	√	√	√

2.(e) Workers' occupational lead exposure performance	√	√	√
2.(f) Provision of Employee Hygiene and Welfare Facilities	√	√	√
2.(g) Take-home Lead	√	√	√
2.(h) Control of Point and Fugitive Lead Emissions	√	√	√
2.(i) Management of Slags and Residues	√	√	
2.(j) Battery Breaking		√	
2.(k) Lead Materials Handling and Storage		√	

Data Collection Method

Conformance with the Performance Expectations of Principle 2 is assessed through:

Performance Expectation	Observation	Document Review	Interviews			
			Board and Management	Employees	Contracted Workers	Other Stakeholders
2.(a) Lead Exposure Legal Compliance		√	√			
2.(b) Workers' occupational lead exposure assessment		√	√	√	√	
2.(c) Workers' occupational lead exposure management	√	√	√	√	√	
2.(d) Provision of Personal Protective Equipment (PPE)	√	√	√	√	√	

2.(e) Workers' occupational lead exposure performance	√	√	√	√	√	
2.(f) Provision of Employee Hygiene and Welfare Facilities	√	√	√	√	√	
2.(g) Take-home Lead	√	√	√	√	√	
2.(h) Control of Point and Fugitive Lead Emissions	√	√	√	√	√	
2.(i) Management of Slags and Residues		√	√			
2.(j) Battery Breaking	√	√	√	√	√	
2.(k) Lead Materials Handling and Storage	√	√	√	√	√	

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during assessment:

- A register of the legal obligations in relation to workers' occupational exposure to lead; /slag and other product disposal; battery breaking; lead materials handling and storage;
- Evidence of compliance with applicable laws and regulations on occupational exposure limits and biological exposure (blood lead) standards;
- Corrective action plans for identified non-conformances;
- Preventative action plans for identified non-conformances;
- Documented medical surveillance programme;
- Personal, static and environmental air monitoring for lead;
- Reports on testing of ventilation controls in place;
- Reports of measurement programme for the airborne exposure to lead;
- Documented occupational Health programs;
- Drawings and engineering work on the site related to lead exposure, including programmed improvements;

- A risk register assessing the significance or severity, probability, and consequences of the full range of potential risks and impacts associated with workers' lead exposure;
- Company policies, procedures and/or protocols describing the frequency and methods for occupational/Industrial hygiene monitoring procedures and campaigns, and the engagement of workers and staff in the process;
- Company policies, procedures and/or protocols on slag and other product disposal;
- Records of materials that have been disposed from the site, and the category/classification of said waste;
- Stack test results and other air quality measurements, such as boundary positions;
- System to identify the "hot spots" in the operations (e.g. to identify the initial source of the fume, emission, etc);
- Procedures to limit stack emissions;
- Company policies, procedures and/or protocols for battery breaking and the recovery of the battery components materials;
- Documentation of the slag produced including analysis, sampling procedures and methodology.
- Analysis methodology, including sampling protocols, for all lead-based products including slag and other waste; documentation of how this data is used onsite to drive decision-making in respect of environmental performance.
- Company policies, procedures and/or protocols requiring showering and changing clothes and related hygiene practices;
- A management plan or procedures describing targets and actions adopted and taken by the company to minimize and manage workers' occupational lead exposure, including through the hierarchy of controls;
- Occupational Lead Management program which clearly identifies employees who are subject to biological monitoring, a testing methodology and frequency, and conforms with the provisions of that written program;
- Evidence of performance against the ILA/BCI/ABR/EUROBAT voluntary target
- Evidence of continuous improvement towards the ILA/BCI/ABR/EUROBAT voluntary target;
- Public statement or policy committing to achieving the ILA/BCI/ABR/EUROBAT voluntary target;
- Evidence of implemented engineering controls e.g., isolating the exposure source or using other engineering methods, such as local exhaust ventilation, to minimize exposure to lead;
- Evidence of implemented administrative controls e.g., limiting the amount of time a worker performs work involving potential exposure to lead;
- Documented SOPs for good housekeeping practices to prevent surface contamination;
- Evidence that RPE provided has high enough APF to control risks from inhalation;
- PPE issue records;
- PPE use training records;
- PPE maintenance and fit testing procedures;
- Understanding the plans and structure of the education and counselling of workers regarding lead exposure;
- Evidence of regular occupational/industrial hygiene measurements and training/education;
- Evidence of effective medical surveillance including regular employee blood lead measurements;
- Identification and CV of analytical chemistry service provider(s);
- Government inspections or monitoring reports;
- Internal and external occupational health and exposure audit reports;
- Third-party verification report or certificate of a formal management system that covers the management of OHS, such as ISO 45001;

- Sustainability or Corporate Social Responsibility reports, in line with the GRI Standards, the Sustainability Accounting Standards Board (SASB) Standards, or other equivalent reports;
- Evidence of use of action, removal education, counselling and return to work blood lead levels for workers;
- Records of consultation, training and participation with workers relating to occupational health and safety, including the identification of adverse health effects in workers;
- An inventory of PPE and records of inspection, cleaning/replacement and testing of PPE;
- Data calculation files developed to monitor, calculate, and set targets, including monitoring and calculation files for the measurement of material recovery and recycling and for the setting of objectives and targets; monitoring and calculation files for the measurement of lead recovery by treatment and the setting objectives and targets;
- Records of management reviews conducted to monitor targets and set continuous improvement objectives;
- An assessment of workers' occupational lead exposure and contamination in common clean areas;
- Written policies on leaded workwear;
- Procedures for decontaminating hygiene facilities and common areas cleaning records;
- Photographic evidence of hygiene facilities and locker areas for lead exposed workers;
- Air Showers or Workwear HEPA Vacuum with procedures and training on effective operation;
- HEPA filtered break rooms and canteens;
- Boot cleaning station or manual wash with procedures;
- Respirator cleaning stations and the appropriate training for effective cleaning and decontamination;
- Inventory of activities and structures and operating processes that have been identified that have the potential to cause fugitive lead emissions; water contamination and contaminated run-off;
- Inventory of activities and structures and operating processes that have the potential to cause occupational lead exposure and environmental contamination during battery breaking and recycling.
- Hazardous waste shipment inventories and contracts with transport company and waste treatment facilities/hazardous waste landfill sites for any applicable hazardous material.

<u>Interviews</u>

During interviews with management, managers can demonstrate or describe:

- A good understanding of applicable regulations regarding lead process emissions and fugitive emissions; the overall treatment of all products in the smelter and their movement through the whole process including battery breaker products, drosses for the furnace and slag for disposal;
- A good understanding of the company's policy, procedures or protocols to identify risks and impacts associated with workers' occupational exposure to lead; minimize and manage workers' exposure to lead;
- How non-compliances are handled;
- The engineering ability of the company in relation to minimizing lead exposure and emissions;
- Examples of the significance or severity, probability, and consequences of workers' lead exposure;
- How the company has established roles and responsibilities, including expectations for senior, middle level, and operational management, in relation to workers' exposure to lead;
- A good understanding of current data and on workers' occupational lead exposure and the company's objectives and targets to control and minimize such exposure (including target blood lead levels);

- Knowledge of how the company has established the targets and examples of measure taken to achieve such targets;
- How the company has allocated resources for the implementation of measures to minimize and control workers' occupational lead exposure;
- A good understanding of the engineering and administrative controls that have been implemented to mitigate risks;
- A good understanding of PPE issued to employees;
- The process for conducting effective consultation and participation with workers relating to occupational health and safety matters, including workers' lead exposure;
- Current data and on workers' occupational lead exposure and the company's objectives and targets to control and minimize such exposure;
- Examples of measures taken by the company to achieve such objectives and targets (including how to protect sensitive subpopulations);
- Relative performance of site compared to industry trends/practices and how this data is obtained and accessed;
- A good understanding of the company's housekeeping and hygiene practices;
- Are able to describe procedures undertaken by the company to ensure that workers decontaminate after shifts and that lead-contaminated clothing does not leave site.
- Examples of measures taken by the company to provide and improve hygiene facilities and to ensure that common areas are kept as free as practical from lead contamination; and how the company has allocated resources for the monitoring and review of such measures;
- How data for the measurement of lead to air emissions is gathered, and whose responsibility it is to gather such information;
- A good understanding of the areas, structure, and activities that generate or have the potential to generate fugitive lead emissions; examples of measures taken by the company to prevent and control such emissions; and how the company has allocated resources for the monitoring and review of such measures;
- A good understanding of procedures for used battery disassembling;
- How alternatives to disposal have been assessed and evaluated, including the production of other compounds, such as ammonium sulphate over sodium sulphate;
- A good understanding of set targets to improve "recovery" of lead and reduce waste tonnage and actions taken to achieve set targets;
- A good understanding of the areas, structure, and activities that generate or have that have the potential to cause occupational lead exposure and environmental contamination during battery breaking and recycling; examples of measures taken by the company to prevent and control occupational lead exposure and environmental contamination from battery breaking activities; and how the company has set recycling and recovery targets and how such targets are periodically reviewed.
- A good understanding of the areas, structure, and activities that generate or have the potential to cause water contamination and contaminated run-off; examples of measures taken by the company to prevent and control water contamination; and how the company has allocated resources for the monitoring and review of such measures;
- A good understanding of the process for periodically reviewing targets and setting continuous improvement objectives.

During interviews with workers (including employees and contractors), they can demonstrate or describe:

- A good understanding of the company's policy, procedures or protocols on the identification of risks and impacts associated with workers' exposure to lead;

- Examples of risks and impacts associated with lead exposure and how to prevent and minimize those risks and adverse impacts;
- Examples of lead exposure risks associated with their position and how to prevent and minimize those risks;
- Measures that the company has taken to manage and minimize workers' occupational lead exposure;
- How to raise concerns related to workers' occupational lead exposure;
- Participation in consultations on risk identification and assessment in relation to workers' occupational lead exposure;
- Confirmation of the provision and training provided for use of PPE free of charge;
- Knowledge of the target blood lead levels;
- Understanding of procedures for medical surveillance and for removal from occupational exposure if the target blood lead levels are exceeded;
- A basic understanding of the company's targets on workers' occupational lead exposure;
- Examples of measures taken by the company to achieve such targets;
- A good understanding of the company's housekeeping and hygiene practices;
- Examples of measures taken by the company to achieve such targets;
- A good understanding of "hotspot" areas and procedures to investigate how to capture the generation of fumes;
- A good understanding of hygiene procedures to be undertaken by an employee before breaks, visits to the canteen and at the end of a shift;
- A good understanding of training received on the company's housekeeping and hygiene practices;
- For those tasked with implementing measures and monitoring emissions, a thorough understanding of the monitoring procedures, indicators and internal and external reporting requirements;
- A good understanding of procedures for battery disassembling;
- A good understanding of activities that generate or that have the potential to cause occupational lead exposure and environmental contamination;
- For those tasked with implementing measures and monitoring lead recovery by treatment, a thorough understanding of monitoring procedure, indicators and internal and external reporting requirements; documentation of the path of that data through the company i.e. how is it being used;
- For those tasked with implementing control measures, a thorough understanding of monitoring procedure, indicators and internal and external reporting requirements;
- For those tasked with implementing measures, a thorough understanding of monitoring procedure, indicators and internal and external reporting requirements;
- A good understanding of the areas, structure, and activities that generate or have the potential to cause water contamination and contaminated run-off from lead bearing material; examples of measures taken by the company to prevent and control water contamination.

Observations

During the site walk through, the assessor observes:

Primary Lead production

- Raw material receipt and storage facilities
- Furnaces
- Refinery and casting facilities

- Welfare areas (canteens, control rooms, washrooms, shower block etc)
- Occupational Health/Medical Centre
- Finished product storage and transportation

Secondary Lead Production (Recycler)

- Raw material receipt and storage facilities
- Battery breaker
- Furnaces
- Refinery and casting facilities
- Welfare areas (canteens, control rooms, washrooms, shower block etc)
- Occupational Health/Medical Centre
- Finished product storage and transportation

Battery Production

- Raw material receipt and storage facilities
- Oxide plant
- Pasting and formation
- Welfare areas (canteens, control rooms, washrooms, shower block etc)
- Occupational Health/Medical Centre
- Finished product storage and transportation
- Facilities available to handle leaded work wear;
- Absence of dust loading at the site;
- The measures taken for the minimization and control of workers' occupational lead exposure;
- Signs in workplace areas highlighting PPE use requirements
- Workers' effective use of PPE;
- Facilities for cleaning and the maintenance/replacement of PPE;
- Housekeeping and hygiene practices are in place;
- Appropriate hygiene facilities (e.g. male and female showers and changing rooms) are provided for lead exposed workers;
- Control measures are in place to ensure that common areas (e.g. canteen and break rooms) are kept as free as practical from lead contamination;
- Control measures are in place to minimize point and fugitive lead emissions;
- Control measures are in place to prevent or control occupational lead exposure and environmental contamination resulting from battery breaking activities;
- Control measures are in place to cover lead bearing materials to prevent rainwater contamination and thereby minimize contaminated any run-off;
- Methods for the collection and treatment of water that has come into contact with lead bearing materials are in place;
- Engineering controls e.g., isolating the exposure source or using other engineering methods, such as local exhaust ventilation, to minimize exposure to lead;
- Handling of lead bearing products in the operations, such as the transport of drosses from the refinery and casting, to the appropriate storage areas;
- Storage of lead bearing materials including the storage vessel for items such as dross, and for the larger bulkier material from the battery breaker;
- Storage of the slag produced;
- Storage limits of lead bearing products;
- Observation of dust and overall cleanliness of site;
- Layout and structure of site;

- Smelting, tapping operation;
- Check baghouse for cleanliness and no dust observed;
- Check scrap storage shed or areas;
- Check battery breaker and flow of product;
- Check storage of materials outside the site.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
    - European Parliament and Council (1989). Framework Directive on Occupational Safety and Health (Directive 89/391/EEC) (link)
    - European Parliament and Council (1998). Directive 98/24/EC on the protection of workers from chemical agents at work (link)
    - European Union (2006). REACH Regulation (EC) No 1907/2006 (link)
    - European Union (2006). Directive 2006/66/EC — Batteries and Waste Batteries (Battery Directive) (link)
    - European Union (2008). Directive 2008/98/EC on Waste (Waste Framework Directive) (link)
    -
    - European Parliament and Council (2008). Directive 2008/50/EC on Ambient Air Quality (link)
    - European Parliament and Council (2010). Directive 2010/75/EU on Industrial Emissions (IED) (link)
    - European Parliament and Council (2016). Regulation (EU) 2016/425 on personal protective equipment (link)
    - European Parliament and Council (2022). Directive (EU) 2022/431 amending Directive 2004/37/EC on the protection of workers from risks related to exposure to carcinogens, mutagens or reprotoxic substances at work (link)
    - European Parliament and Council (2024). Directive (EU) 2024/869 amending Directive 2004/37/EC and Directive 98/24/EC as regards the limit values for lead and its inorganic compounds and for diisocyanates (link)

- In the United Kingdom:
    - UK Government (1974). Health and Safety at Work etc. Act 1974 (link)
    - UK Government (1992). Personal Protective Equipment at Work Regulations 1992 (as amended 2022) (link)
    - UK Government (2002). The Control of Lead at Work Regulations 2002 (link)
    - UK Government (2002). Control of Lead at Work Regulations 2002 (CLAW) (link)
    - UK Government (2005). Hazardous Waste Regulations (link)
    - UK Government (2009). Waste Batteries and Accumulators Regulations (link)
    - UK Government (2010). Air Quality Standards Regulations 2010 (link)
    - UK Government (2002). Control of Substances Hazardous to Health (COSHH) Regulations (link)

- UK Government (2016). Environmental Permitting (England and Wales) Regulations 2016 (link)

- In the United States:
  - U.S. Department of Labor (1970). Occupational Safety and Health Act (OSH Act) of 1970 (link)
  - U.S. Environmental Protection Agency (1976). Resource Conservation and Recovery Act (RCRA) (link)
  - Occupational Safety and Health Administration (OSHA) (1978). Lead Standard, 29 CFR 1910.1025. (link)
  - U.S. Environmental Protection Agency (2007). 40 CFR Part 63 Subpart PPPPPP – NESHAP for Lead Battery Manufacturing (link)
  - U.S. Environmental Protection Agency (2012). 40 CFR Part 63 Subpart X – NESHAP for Secondary Lead Smelting (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- European Commission (2017). BAT Reference Document for the Non-Ferrous Metals Industries (link)
- International Lead Association (ILA) (2022). Guidance Note: Managing Change in Lead Battery Manufacturing and Recycling (link)
- International Labour Organization (ILO) (2023). Guidelines for the protection of workers from the risks related to exposure to lead and its compounds (link)
- International Organization for Standardization (2015). ISO 14001: Environmental Management Systems (link)
- International Organization for Standardization (2018). ISO 45001: Occupational Health and Safety Management Systems – Requirements with Guidance for Use (link)
- CEC (2016) CEC. 2016. Environmentally Sound Management of Spent Lead-acid Batteries in North America: Technical Guidelines. Montreal, Canada: Commission for Environmental Cooperation. (link)
- SRI (2021) Standard Operating Procedures for Environmentally Sound Management of Used Lead-acid Batteries. Sustainable Recycling Industries (link)
- UNEP (2003). LeadBattery360 Report – Technical Guidelines for the Environmentally Sound Management of Waste Lead-Acid Batteries (link)
- UNEP and Partners of the Lead Battery 360° Initiative (2023). LeadBattery360 Report – A Guidance Manual for Policymakers and Regulators for the Environmentally Sound Management of Waste or Used Lead-Acid Batteries in Africa (link)

PRINCIPLE 3: Adopt responsible sourcing policies for lead containing materials, seek to identify risks in the supply chain, and use our influence to promote best practices for EHS performance in suppliers' operations.

Performance Expectations and Performance Determination

Performance Expectation

(a) Responsible Sourcing Policy. Document, regularly review and communicate publicly and to suppliers a Responsible Sourcing Policy for lead-containing materials, articulating the company's environmental, social, and governance requirements for suppliers, including with respect to sourcing from Conflict-Affected and High-Risk Areas (Performance Expectation (b)) and lead exposure and emissions, endorsed by the Board and senior management, and anchored in key purchasing functions and processes.

How can the company meet this expectation?

Companies are expected to develop and implement a Responsible Sourcing Policy covering, at a minimum, lead-containing materials. The policy should:

- articulate the company's ESG commitments and define ESG requirements for suppliers, including suppliers of mined and secondary (recycled) materials, Used Lead-Acid Batteries (ULABs) and other lead containing scrap, and suppliers of materials under toll agreements; in line with the standards of the Lead Battery 360° Code, and with special attention paid to lead exposure and emissions;
- be aligned with the model policy included in Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Due Diligence Guidance);
- be endorsed by senior management, including the Board or equivalent governance body;
- be appropriate to the purpose, size and context of the company's supply chains;
- be endorsed by senior leadership, including the Board or equivalent oversight body;
- include a commitment to continuous improvement.

To align with the model policy included in Annex II of the OECD Due Diligence Guidance), the policy should:

- include commitments to:
    - responsible sourcing of minerals from Conflict-Affected and High-Risk Areas (CAHRAs);
    - refrain from any action which contributes to the financing of conflict; and
    - comply with relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions;
- cover, at a minimum, all risks associated with extracting, trading, handling and exporting minerals from CAHRAs, which include:
    - serious abuses defined as (i) any forms of torture, cruel, inhuman and degrading treatment; ii) any forms of forced or compulsory labor; iii) the worst forms of child labor; iv) other gross human rights violations and abuses such as widespread sexual violence; v) war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
    - direct or indirect support to non-state armed groups;
    - risks associated with the contracting of public or private security forces;
    - bribery and the fraudulent misrepresentation of the origin of minerals;

    - money laundering; and
    - non-payment of taxes, fees and royalties due to governments;
- outline, for each Annex II risk, the appropriate risk mitigation strategy (i.e., continued engagement while supporting mitigation actions, immediate suspension, or disengagement), in line with the standards set forth in Annex II of the OECD Guidance;
- include a commitment to implement due diligence in line with the 5-step framework of the OECD Due Diligence Guidance:
    - Step 1: Establish a strong due diligence management system;
    - Step 2: Identify and assess supply chain risks;
    - Step 3: Design and implement a strategy to respond to identified risks;
    - Step 4: Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain;
    - Step 5: Report annually on supply chain due diligence.

As sourcing risks for lead for battery production go beyond mined materials, companies should also include in their responsible sourcing policy a commitment to implement due diligence in line with the 5-step framework of the OECD Due Diligence Guidance for any secondary (recycled) material they procure.

Companies are expected to embed the policy in procurement systems and supplier management procedures, such as:

- supplier qualification, onboarding, and audit criteria;
- supplier contracts or agreements;
- staff training for procurement and supply chain teams.

Companies are expected to communicate the policy proactively within the organization, to suppliers, and to make it publicly available.

The scope of the responsible sourcing policy should include materials procured from metal producers, traders and suppliers of ULABs and other lead-containing scrap.

Companies are expected to demonstrate leadership and commitment to responsible sourcing, including by ensuring that there are sufficient human and financial resources available to establish, implement, maintain and improve robust, credible, and reliable due diligence procedures consistent with the objectives of the policy.

Those involved in the company's due diligence management system should have a clear understanding of their role, responsibility and authority for achieving the intended outcomes of the policy, while senior management retains ultimate accountability. This includes ensuring that the company has the necessary resources and qualified personnel to manage these issues internally and along the supply chain, through supplier engagement.

To ensure effectiveness and improvement, companies are expected to:

- review the policy at least annually, or when significant operational or regulatory changes occur, as part of management review to ensure its suitability and adequacy;
- use insights from the results of due diligence (e.g. supplier engagement, supply chain assessments, internal audits, and stakeholder input) to update the policy and implementation plan, including risk management;
- integrate policy findings into decision making.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not currently have in place a Responsible Sourcing Policy for lead-containing materials.	The Company has in place a documented Responsible Sourcing Policy for lead-containing materials (primary and secondary [recycled] lead, ULABs and other lead containing scrap). The Policy has been endorsed by the Board and senior management; responsibilities and accountabilities for oversight and implementation are broadly understood by relevant employees. The Policy includes a commitment to continuous improvement, for example, a commitment to obtain increased visibility over the supply chains, to increasingly source input materials from suppliers that operate responsibly, and to help suppliers improve performance along the supply chain. The Policy is communicated to suppliers, including suppliers of mined and secondary materials, ULABs and other lead containing scrap, and suppliers of materials under toll agreements.	The Company has a documented Responsible Sourcing Policy in place for lead-containing materials (primary and secondary [recycled] lead, ULABs and other lead containing scrap). The Policy has been endorsed by the Board and senior management; responsibilities and accountabilities for oversight and implementation are broadly understood by relevant employees The Company's Responsible Sourcing Policy is included in contracts or agreements and made publicly available. The Policy is anchored in key purchasing functions and processes. Senior management demonstrates strong control and oversight. Roles and responsibilities are clearly understood by relevant employees. The Policy is regularly reviewed to ensure effectiveness and continuous improvement and findings are fully integrated into planning and decision making. The Policy implementation is supported through the provision of sufficient human and financial resources.

Performance Expectation

(b) Sourcing from Conflict-Affected and High-Risk Areas (CAHRAs). Conduct risk-based due diligence in line with the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas to identify, assess, and where relevant address risks associated with the extraction, trading, handling, and export of minerals from CAHRAs. For companies in scope, adopt and implement the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc.

How can the company meet this expectation?

Companies are expected to implement a due diligence system to identify, assess, and mitigate actual or potential risks associated with sourcing lead-containing materials from Conflict-Affected and High-Risk Areas (CAHRAs). The approach should be aligned with the OECD 5-step framework:

- establish strong company management systems by:
  - adopting a Responsible Sourcing Policy as per Performance Expectation 4.(a);
  - structuring internal management to support supply chain due diligence by ensuring adequate financial and human resources, assigning responsibilities and authorities for implementation, and providing regular training;
  - establishing a system of controls and transparency over the mineral supply chain, that is:
    - a system to collect and retain information necessary to implement all applicable steps of the due diligence process
    - a system of material control and inventory management.
  - strengthening engagement with suppliers;
  - establishing and proactively communicating a grievance mechanism that is accessible to internal and external stakeholders and allows for anonymous reporting as per Performance Expectation 6.(b).
- identify and assess supply chain risks by:
  - mapping the supply chain by identifying the location, activities and relationships of upstream suppliers;
  - identifying potential or actual Annex II risks in scope of the Responsible Sourcing Policy of Performance Expectation 4.(a) by considering whether any of the following red flags may trigger an alert:
    - the minerals originate from or have been transported via a CAHRA;
    - the minerals are claimed to originate from a country that has limited known reserves, likely resources or expected production levels of the mineral in question;
    - the minerals are claimed to originate from a country in which minerals from CAHRAs are known to transit;
    - the company's suppliers or other known upstream companies have shareholder or other interests in companies that supply minerals from or operate in a CAHRA;
    - the company's suppliers' or other known upstream companies are known to have sourced materials from a CAHRA in the last 12 months.
    - To this end, companies are expected to develop and consistently implement a CAHRA determination procedure that clearly outlines the methodology used by the company to determine that a country or region is a CAHRA;

- where red flags are triggered, conduct enhanced due diligence to determine the actual presence of Annex II risks, design and implement a strategy to respond to identified risks, including supplier engagement for the purpose of risk mitigation, suspension or disengagement where necessary, in line with the standards set forth in Annex II of the OECD Due Diligence Guidance;
- conduct third-party audits of supply chain due diligence at identified or control points in the supply chain;
- publicly report on due diligence activities and findings, providing transparency and accountability.

Where applicable, companies are expected to adopt and implement the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc, which provides additional sector-specific expectations for managing CAHRA-related risks in the non-ferrous metals industry.

Due diligence systems should be appropriate to the company's role in the supply chain as per Performance Expectation 4.(a). Expectations for upstream and downstream actors will differ in scope, but all companies should undertake the five steps outlined in this guidance, and demonstrate:

- a clear system of control and transparency, such as a traceability or chain of custody system or the identification of upstream actors in the supply chain, for the collection of supply chain information and material control;
- mechanisms to flag and investigate red flags or anomalies in sourcing;
- internal processes to engage with suppliers, report risks to senior management, and manage risk effectively.

For companies sourcing recycled material, it is essential to document and verify that materials are post-consumer or pre-consumer scrap, and not derived from mining.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company has not started to implement measures to identify risks associated with the extraction, trading, handling, and export of minerals from CAHRAs, appropriate to the Company's position in the supply chain.	The Company has established their CAHRA methodology. The Company has started to implement measures to identify risks associated with the extraction, trading, handling, and export of minerals from CAHRAs, appropriate to the Company's position in the supply chain. Where risks are identified, the company implements some measures to address such risks.	The Company has fully implemented measures to identify risks associated with the extraction, trading, handling, and export of minerals from CAHRAs, appropriate to the Company's position in the supply chain. Where risks are identified, the company implements measures to address such risks. Additionally, the Company implements a due diligence system in line with the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs,

		appropriate to the Company's position in the supply chain. If in scope, the Company adopts and implements the Joint Due Diligence Standard to identify, assess, and where relevant address risks associated with the extraction, trading, handling, and export of minerals from CAHRAs.

Performance Expectation

(c) Environmental, Health and Safety Performance of Suppliers – Lead Exposures and Emissions. Collect information on suppliers' policies and control measures to minimize occupational lead exposure and site lead emissions. Suspend or discontinue engagement with suppliers who fail to meet the Company's standards of environmental, health & safety performance as defined in the Company's Responsible Sourcing Policy (Performance Expectation (a)) or continue to perform below regulatory requirements after reasonable efforts have been made to encourage improvement.

How can the company meet this expectation?

Companies are expected to actively manage supply chain risks related to occupational lead exposure and environmental lead emissions by incorporating supplier performance requirements into sourcing expectations and due diligence systems.

Companies should establish and communicate clear environmental, health and safety (EHS) performance expectations to suppliers handling lead-containing materials. These expectations should be:

- based on internationally recognized good practice as well as applicable local regulations;
- aligned with the company's Responsible Sourcing Policy and supplier code of conduct or equivalent;
- communicated proactively, for example via policy briefings, or onboarding documentation;
- integrated into contracts or agreements.

Companies are expected to:

- routinely request and collect data from suppliers on their performance against occupational exposure limits, biological monitoring results, air emission values, and waste handling protocols;
- use a risk-based approach—a method that allocates greater attention and resources to suppliers presenting higher potential for lead-related health and environmental risk—to prioritize supplier engagement based on factors such as material volume, country of operation, historical compliance issues, or the presence of high-risk processes (e.g. smelting, battery breaking).

Companies should establish a supplier performance assessment process that includes:

- questionnaires, audits, or third-party verification;
- documentation reviews of control measures, PPE use, training, emission controls, and medical surveillance;
- mechanisms for suppliers to report and improve performance over time, including capacity-building support where feasible.

Where metal traders are involved in the supply chain, companies should request information about the provenance of the purchased materials and request that the trading partner meets expectations required by GP3.

Where suppliers fail to meet expectations or regulatory requirements and do not demonstrate improvement despite reasonable engagement efforts, companies are expected to follow a defined escalation process that may include corrective action plans, increased oversight, and, if necessary, suspension or termination of the business relationship.

Companies should ensure that results of supplier assessments are fully integrated into procurement decisions, contract renewals, and sourcing strategies. Procurement staff should be trained to understand and act on environmental and occupational health performance data during supplier selection and review processes.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not request its suppliers to provide information on the management of workplace lead exposure and site lead emissions.	The Company has started to request suppliers to provide information on the management of workplace lead exposure and site lead emissions but may not have received information from all priority suppliers and/or may not have fully integrated the results of the supplier assessments into procurement decision-making processes.	The Company routinely requests suppliers to provide information on performance against regulatory standards. Additionally, the Company adopts a risk-based approach to collect and assess supplier performance in the management of workplace lead exposure and site lead emissions. The Company's performance expectations in relation to lead exposure are clearly communicated, documented, and monitored. The Company fully integrates the results of the supplier assessment into procurement decision-making processes.

Performance Expectation

(d) Sourcing of Used Lead-Acid Batteries (ULABs), Battery Components (paste and plates) and Other Lead Containing Scrap. Implement a system of control and transparency (for example, a traceability or chain of custody system or the identification of upstream actors in the supply chain) and ensure, as a minimum, that suppliers meet applicable regulatory requirements and that compounds are not sourced from informal battery breakers.

How can the company meet this expectation?

Companies are expected to implement a robust and transparent sourcing system to ensure that used lead-acid batteries (ULABs), battery components, and other lead-containing scrap are sourced legally, responsibly, and from formally regulated supply chain actors. This includes:

- establishing a system of control and transparency, such as a traceability or chain of custody system or the identification of upstream actors in the supply chain, that enables the company to identify and map upstream suppliers and intermediaries involved in the collection, handling, and transport of ULABs, battery components, and other lead containing scrap;
- implementing screening and verification procedures with priorities given to high-risk suppliers, including on-site audits where feasible;
- requiring suppliers to provide evidence of compliance with environmental, occupational health and safety, and waste management laws and regulations, including permits and transport documentation;
- setting clear contractual expectations that suppliers should not source material from informal battery breaking operations, which are often linked to child labor, environmental contamination, and serious health risks.

These sourcing expectations should align with Performance Expectations of Principle 4, which calls for minimizing the environmental impact of lead products by promoting effective collection, transportation, and environmentally sound recycling of used lead-acid batteries.

Companies should maintain records that demonstrate:

- the origin and supply chain journey for all ULABs, battery components, and other lead scrap received;
- the identity and compliance status of all first-tier suppliers and upstream actors, to the extent possible;
- internal processes for verifying supplier claims and documenting supplier performance.

Procurement teams should integrate findings into the procurement decision-making process, including sourcing decisions, supplier selection, and renewal or termination of contracts.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have a system in place to collect information on supply chain links upstream and confirm alignment of its suppliers to applicable regulatory requirements related to recycled lead battery materials and other lead containing scrap. The Company is not able to confirm that the sourcing of its materials does not originate from informal battery breakers.	The Company has started to implement or has a system in place and makes best efforts to collect information on supply chain links upstream. The Company has systems in place to collect information on whether suppliers meet applicable regulatory requirements related to recycled lead battery materials and other lead containing scrap. The Company makes some efforts to try to ensure that materials are not sourced from informal battery breakers.	The Company has a robust traceability system in place to collect information on supply chain links upstream. The Company verifies information collected from key suppliers and can demonstrate that they meet applicable regulatory requirements. The Company can demonstrate that scrap is not sourced from informal battery breakers or traders that obtain such material from informal operations. The information collected is fully integrated into the procurement decision-making process.

Performance Expectation

(e) Sourcing of Lead Bullion and Refined Lead. Implement a system of control and transparency (for example, a traceability or chain of custody system or the identification of upstream actors in the supply chain) and ensure, as a minimum, that suppliers meet applicable regulatory requirements, and that lead is not sourced from informal lead smelters.

How can the company meet this expectation?

Companies are expected to implement a robust and transparent sourcing system to ensure that lead bullion and refined lead are sourced legally, responsibly, and from formally regulated producers. This applies to materials directly purchased and those procured via metal commodity traders.

This includes:

- establishing a system of control and transparency, such as a traceability or chain of custody system or a method to identify upstream actors in the supply chain. The system should enable the company to identify and map upstream suppliers and intermediaries involved in the extraction, smelting, refining, and trade of lead materials;
- implementing screening and verification procedures, with priority given to high-risk suppliers. This includes:
    - supplier self-assessments or declarations confirming compliance with regulatory and company-specific standards;

    - documentation reviews (e.g., permits, emission controls, shipment records, inspection reports);
    - audits or site visits (performed internally or by third parties), especially in regions or contexts where the risk of informal or unregulated sourcing is elevated.
- requiring suppliers to provide evidence of regulatory compliance, including environmental and occupational health and safety permits, emission controls, and waste management documentation;
- setting clear contractual expectations that suppliers must not source material from informal lead smelters, which are often associated with significant health hazards, environmental degradation, and regulatory non-compliance.

This approach should align with the Performance Expectations of Principle 4, which calls for minimizing the environmental and human health impacts of lead production and use by promoting effective traceability, regulatory compliance, and responsible sourcing throughout the supply chain.

Companies should maintain records that demonstrate:

- the origin and supply chain journey of all lead bullion and refined lead received;
- the identity and compliance status of all first-tier suppliers and upstream actors, to the extent possible;
- internal processes for verifying supplier claims and documenting supplier performance.

Procurement teams should be trained to:

- evaluate suppliers against due diligence and regulatory benchmarks;
- flag, restrict, or disqualify suppliers with elevated risk profiles or insufficient traceability;
- incorporate traceability and risk insights into sourcing decisions, contract renewals, and supplier approvals.

<u>How will performance be determined?</u>

Does not meet	Partially meets	Fully meets
The Company does not have a system in place to collect information on supply chain links upstream and confirm alignment of its suppliers to applicable regulatory requirements on the sourcing of lead bullion and refined lead. The Company is not able to confirm the sourcing of lead bullion and refined lead and does not originate from informal lead smelters or a smelter operating to poor EHS standards.	The Company has started to implement or has a system in place and makes best efforts to collect information on supply chain links upstream. The Company has systems in place to collect information on whether suppliers meet applicable regulatory requirements and are not informal operations without a valid permit to operate.	The Company has a robust traceability system in place to collect information on supply chain links upstream. The Company verifies information collected from key suppliers and can demonstrate that they meet applicable regulatory requirements. The Company can demonstrate that lead is not sourced from informal lead smelters or traders that obtain such material from informal operations.

		The company (or trading partner) follow procedures described in Performance Expectation 3(f) to share best practices and build capacity for continuous improvement in the supply chain. The information collected is fully integrated into the procurement decision-making process.

Performance Expectation

(f) Supplier Engagement. Communicate and engage with significant suppliers to promote responsible business practices and adoption of relevant Principles of the LB 360 Code and use influence to share practices and build capacity for continuous improvement, with a focus specifically on occupational lead exposure and site lead emissions.

How can the company meet this expectation?

Companies are expected to maintain an active and structured approach to engaging with their most significant suppliers —including those involved in the sourcing, handling, processing, or transport of lead-containing materials. This engagement should be designed to improve supplier performance in alignment with the environmental, social, and governance (ESG) principles outlined in the Lead Battery 360° Code. To meet this, companies should:

- develop a documented supplier engagement plan, which identifies significant and high-risk suppliers and outlines engagement objectives, communication methods, support mechanisms, and follow-up procedures;
- communicate the company's ESG expectations clearly, particularly those related to occupational lead exposure control, site emissions, environmental impacts, human rights, labor standards, anti-corruption, responsible sourcing, and waste management;
- integrate these expectations into supplier onboarding, training sessions, and contracts;
- share guidance materials, technical tools, and best practices to promote capacity-building and enable continuous improvement.

Companies are expected to use their commercial leverage and influence to promote improvements in supplier practices. This may include:

- organizing joint workshops, training sessions, or technical assistance visits to support improved EHS performance;
- facilitating peer learning and sharing of success stories across suppliers;
- offering extended timelines or incentives for improvement where appropriate, while maintaining non-negotiable minimum standards.

- Introducing a responsible disengagement protocol for suppliers who, despite repeated engagement and support, consistently fail to meet expectations

Regular follow-up and performance monitoring should be built into the engagement plan to assess the impact of engagement activities. Companies are also expected to track progress and update their approach based on results and feedback.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have measures in place to communicate or engage with suppliers to promote responsible business practices and the adoption of the ESG principles covered by the LB 360 code.	The Company has started to adopt or has in place some measures to communicate responsible business practices and the adoption of the ESG principles covered by the LB 360 code.	The Company has in place and implements measures to communicate and engage with suppliers to promote responsible business practices and promote adoption of the ESG principles covered by the LB 360 code. The Company has developed a documented supplier engagement plan to engage with significant/key suppliers and uses its influence to share practices and build capacity for continuous improvement in line with all relevant Principles of this Code with a focus on workplace lead exposure and site lead emissions.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 3 is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
3.(a) Responsible Sourcing Policy	√	√	√
3.(b) Sourcing from Conflict-Affected and High-Risk Areas (CAHRAs)	√	√	√

3.(c) Environmental, Health and Safety Performance of Suppliers – Lead Exposures and Emissions	√	√	√
3.(d) Sourcing of Used Lead-Acid Batteries (ULABs), Battery Components (paste and plates) and Other Lead Containing Scrap	√	√	
3.(e) Sourcing of Lead Bullion and Refined Lead		√	√
3.(f) Supplier Engagement	√	√	√

Data Collection Method

Conformance with the Performance Expectation of Principle 3 is assessed through:

Performance Expectations	Observation	Document Review	Interviews			
			Board and Management	Employees	Contracted Workers	Other Stakeholders
3.(a) Responsible Sourcing Policy		√	√			
3.(b) Sourcing from Conflict-Affected and High-Risk Areas (CAHRAs)		√	√			√
3.(c) Environmental, Health and Safety Performance of Suppliers – Lead Exposures and Emissions		√	√			√

3.(d) Sourcing of Used Lead-Acid Batteries (ULABs), Battery Components (paste and plates) and Other Lead Containing Scrap		√	√			
3.(e) Sourcing of Lead Bullion and Refined Lead		√	√			
3.(f) Supplier Engagement		√	√			√

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during assessment:

- Responsible Sourcing or Responsible Supply Chain Policy or other equivalent policy or policies;
- Evidence of endorsement of the policy by the Board and senior management;
- Budgetary allocation for sufficient human and financial resources to support the implementation of the policy;
- Qualifications of assigned personnel to implement the policy;
- Evidence of review of the policy;
- Evidence of communication of the Responsible Sourcing or Responsible Supply Chain Policy with internal and external stakeholders;
- Organizational chart with roles and responsibilities;
- Code of Conduct for Suppliers and/or Business Partners;
- Screening procedures;
- Screening analysis report(s);
- Procedures, methodologies or definitions used to define what is a CAHRA;
- Risk assessment report(s);
- Examples of contractual agreements incorporating the Responsible Sourcing or Responsible Supply Chain Policy, the Code of Conduct for Suppliers or Business Partners, or other equivalent policy;
- Examples of contractual agreements incorporating provisions on expectations for adherence to this Code or equivalent social, environmental, and governance requirements;
- Template and completed KYC forms, procedures, and supporting documentation;
- Risks (including, HSE risks) identification and risk assessment procedures;
- Responsible business practice scorecards of the business partners or suppliers;
- Due diligence procedures, including procedures for the determination of CAHRAs, red flags identification, and enhanced due diligence;

- Due diligence reports;
- Chain of custody, traceability, or other system of control and transparency used to obtain visibility over the supply chain upstream;
- Evidence of competence of senior staff in charge of overseeing due diligence, and evidence of training of relevant employees on due diligence;
- Evidence of communication with or engagement of business partners or suppliers to collect information on workplace occupational lead exposure and site lead emissions, targets, and progress made;
- Evidence of communication with or engagement with business partners or suppliers to promote responsible business practices (e.g. minutes of meetings with business partners or suppliers);
- Supplier engagement plan;
- Examples of supplier engagement (e.g. emails, self-assessments, surveys, meetings, etc.);
- Assessment reports for the identification of potential high-risk business partners or suppliers as per the company's risk assessment methodology;
- Third party-assured reporting on the implementation the Responsible Sourcing or Supply Chain Policy and due diligence system;
- Evidence of requests to suppliers to provide information on the management of workplace lead exposure and site lead emissions;
- Evidence of use of assessment results in decision making;
- Step 5 due diligence reports or other public reports in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs.

Interviews

During interviews with management, managers can demonstrate or describe:

- A good understanding of the company's Responsible Sourcing Policy;
- Examples of how the Responsible Sourcing Policy is implemented;
- A good understanding of how the policy is operationalized;
- How the company has established roles and responsibilities, including expectations for the Board, senior, middle level, and operational management;
- How the company has allocated resources for the implementation of the Responsible Sourcing Policy and how it has determined whether such resources are sufficient;
- A good understanding of chain of custody, traceability, or other system of control and transparency used to obtain visibility over the supply chain upstream;
- How data collected is used in decision making;
- Whether implementation of the Policy is regularly reviewed and continuously improved;
- How the company identifies business partners or suppliers, and establishes the level and nature of risks attributed to them;
- A good understanding of the company's Responsible Sourcing Policy with respect to sourcing from or operating in CAHRAs;
- A good understanding of how to conduct due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs;
- How the company exercises due diligence in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs;
- A good understanding of how to identify CAHRAs;
- A good understanding of the screening procedure;
- How the company conducts screening;

- Clear lines of accountability and responsibility within the company for the oversight, implementation and reporting of the due diligence system;
- How the company collects information on business partners' or suppliers' performance for the management of workplace occupational lead exposure and site emissions and discharges and monitors and engages with business partners or suppliers to ensure adherence to set standards;
- How the company monitors business partners' or suppliers' conform with regulatory requirements and the Basel Convention and the Technical Guidelines on the Environmentally Sound Management of Waste Lead-acid Batteries
- How the company engages with its suppliers (including metal traders);
- Understanding of the measure taken to engage with significant suppliers on the environmental, social and governance areas covered by the Principles of this Code;
- How the company influences business partners or suppliers to promote responsible business practices;
- How the company analyzes suppliers' data and information to assess conformance with the Company's policy and requirements for business partners or suppliers;
- How the company ensures that compounds are not sourced from informal battery breakers;
- How the company ensures that lead is not sourced from informal lead smelters.
- Suppliers, including contractors, confirm that they have been made aware about the company's commitments and expectations regarding responsible practices, including the Responsible Sourcing Policy, and have demonstrated conformance;
- How the policy is communicated;
- How the company engages with supplier.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
    - European Parliament and Council (2006). REACH Regulation (Regulation (EC) No 1907/2006) (link)
    - European Parliament and Council (2006). Directive 2006/66/EC on Batteries and Accumulators and Waste Batteries and Accumulators (link)
    - European Union (2006). Regulation (EC) No 1013/2006 on Shipments of Waste (link)
    - European Union (2008). Directive 2008/98/EC on Waste (Waste Framework Directive) (link)
    - European Parliament and Council (2010). Directive 2010/75/EU on industrial emissions (IED) (link)
    - European Parliament and Council (2021). Regulation (EU) 2017/821 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold from conflict-affected and high-risk areas (link)
    - European Parliament and Council (2023). Corporate Sustainability Due Diligence Directive (CSDDD) (link)

- In the United Kingdom:
    - UK Government (2002). Health and Safety Executive (HSE). Control of Lead at Work

Regulations 2002 (link)
    - UK Government (2008). Batteries and Accumulators (Placing on the Market) Regulations 2008 (link)
    - UK Government (2015). Modern Slavery Act 2015 (link)
    - UK Government (2016). Environmental Permitting (England and Wales) Regulations (link)
    - UK Government (2021). Environment Act 2021 (link)

- In the United States:
    - U.S. Congress (1967). Clean Air Act (CAA) (link)
    - U.S. Department of Transportation (2005). DOT Regulations (49 CFR Parts 171–180) (link)
    - U.S. Congress (2010). Dodd-Frank Wall Street Reform and Consumer Protection Act (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- Copper Mark Joint Due Diligence Standards (2023). Joint Due Diligence Standard for Copper, Lead, Nickel, and Zinc (link)
- Organisation for Economic Co-operation and Development (OECD) (2018), OECD Due Diligence Guidance for Responsible Business Conduct (link)
- OECD (2016). OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (link)
- United Nations Environment Programme (UNEP) (1989). Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (link)
- UNEP and the Secretariat of the Basel Convention (2003). LeadBattery360 Report - Technical Guidelines for the Environmentally Sound Management of Waste Lead-acid Batteries (link)

PRINCIPLE 4: Minimise the environmental impact of our products by encouraging the development of programmes that ensure effective collection, transportation, and environmentally sound recycling of used lead batteries.

Performance Expectations and Performance Determination

Performance Expectation

(a) Undertake Due Diligence of Available Recyclers. Before marketing batteries, undertake appropriate due diligence of the country/region to ensure that there is sufficient capacity available in ULAB recyclers that meet the Company's expectations for EHS, as defined in the Company's policies for responsible supply chain management. If marketing via distributors and resellers, ensure that these have systems in place to assess the EHS practices of ULAB recyclers.

How can the company meet this expectation?

Companies are expected to conduct a comprehensive mapping of Used Lead-Acid Battery (ULAB) recyclers in the countries or regions where products are placed on the market, and to evaluate whether available recyclers meet their EHS standards. EHS standards should be assessed against the Company's Responsible Sourcing Policy of Performance Expectation 3.(a), including but not limited to those related to emissions, waste management, and lead exposure.

To this end, companies are expected to define clear minimum EHS and operational performance criteria that recyclers must meet in order to be approved, and to monitor conformance over time. Companies are encouraged to conduct recyclers' performance assessment and ongoing monitoring through second-party or third-party audits, or by engaging with relevant certifications or industry schemes. In accordance with Performance Expectation 3.(c), companies should suspend or discontinue engagement with recyclers that do not meet their standards, unless there is documented evidence of active efforts to improve within reasonable timelines.

Companies marketing via distributors or resellers are expected to require that all distributors and resellers also have due diligence systems in place to assess whether available ULAB recyclers meet the same EHS standards set by the company. This alignment should be formalized through contracts or agreements.

If, as a result of due diligence, companies determine that no recycling facilities meeting their EHS standards are available in the country or region where products are placed on the market, Companies are expected to conduct due diligence of available ULAB recyclers abroad.

Companies are expected to implement reliable systems for the collection and transport of ULAB that prevent informal or unsafe handling, in accordance with Performance Expectation 4.(d). Where approved recyclers are abroad, companies are expected to establish lawful and responsible import and export arrangements that comply with the Basel Convention, an international treaty controlling transboundary movements of hazardous waste, and the OECD Decision of the Council on the Control of Transboundary Movements of Wastes Destined for Recovery Operations, a multilateral agreement ensuring environmentally sound management of waste among OECD countries, and applicable import and export regulations.

Companies should regularly review the effectiveness of their due diligence systems. These reviews should identify risks and drive continuous improvement in line with regulatory changes and evolving stakeholder expectations.

Companies are expected to maintain full documentation of all due diligence activities, including recycler approvals, audit results, contracts, and shipment records. A system of control and transparency, including a traceability or chain of custody system or the identification of downstream actors should be in place to ensure that ULABs are delivered to approved recyclers only.

Companies are expected to engage with relevant authorities, industry associations, and Extended Producer Responsibility (EPR) schemes to align practices with regulatory requirements and support responsible end-of-life battery management.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not undertake appropriate due diligence on available ULAB recyclers to check whether they have sufficient capacity and systems in place aligned with the Company's expectations for EHS.	The Company has started to collect information on available ULAB recyclers to check whether they have sufficient capacity and systems in place aligned with the Company's expectations for EHS.	Before placing batteries on the market (either directly or through distributors), the Company ensures that available ULAB recyclers have sufficient capacity and that they have policies and systems in place aligned with the Company's expectations for EHS. The Company puts in place measures to ensure batteries are collected and delivered only to approved treatment and recycling facilities. If no appropriate recycling facilities are available in the country or region, the Company ensures that used batteries are collected and exported to a country that has recyclers meeting the necessary minimum standards. The measures taken are regularly reviewed for effectiveness and continuous improvement opportunities.

Performance Expectation

(b) Producer Responsibility. Adopt business practices in all regions of battery sales that encourage a high collection rate of end-of-life batteries from responsible supply chain operators.

How can the company meet this expectation?

Companies are expected to implement legally compliant and operationally robust strategies to promote responsible recycling and maximize the return of end-of-life batteries. These strategies may include mandatory or voluntary deposit-return schemes, contractual take-back obligations with distributors, and targeted consumer outreach initiatives to promote responsible battery disposal practices.

To encourage a high collection rate of ULABs, companies may establish or collaborate with Producer Responsibility Organizations (PROs) or authorized retailers to provide adequate and proportionate collection infrastructure. This could include ensuring frequent collection, as well as partnerships with retailers, or designing programs and incentives with logistics partners. A high collection rate refers to the retrieval of as many used batteries as possible, which helps prevent environmental harm and supports a circular economy by recovering valuable materials.

Companies are expected to ensure that collection and treatment of end-of-life batteries is performed by responsible supply chain operators. This means that companies are expected to implement measures to prevent collected ULABs from being sent to substandard or informal recyclers, as per Performance Expectation 4.(a), especially in high-risk export destinations. Companies should engage only with recyclers that demonstrate compliance with applicable environmental, health, and safety regulations—substantiated through valid permits, third-party audit results, or recognized certifications such as Lead Battery 360° or equivalent. Companies are also encouraged to establish contractual clauses that require traceability and proper documentation for all downstream waste management activities.

Finally, companies should develop and maintain systems to calculate, verify, and report collection rates across all jurisdictions. Companies are expected to implement data-driven systems capable of:

- quantifying ULAB collection volumes by region, collection partner, and product type;
- cross-referencing collection data against market placement figures to assess collection effectiveness;
- supporting internal audits or third-party verification processes, ensuring data transparency and alignment with reporting obligations under extended producer responsibility (EPR) schemes.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company has not adopted business practices in all regions of battery sales that encourage a high collection rate of end-of-life batteries and subsequent transport, preparation, treatment, and environmentally sound recycling	In all regions of battery sales, the Company adopts business practices that encourage a high collection rate of end-of-life batteries and subsequent transport, preparation, treatment, and environmentally sound recycling. However, the effectiveness of such practices has not been verified.	In all regions of battery sales, the Company adopts business practices that encourage a high collection rate of end-of-life batteries and subsequent transport, preparation, treatment, and environmentally sound recycling The producers, retailers, or Producer Responsibility Organizations (PRO) working on their behalf, provide collection points and collect the used lead-acid batteries (ULABs) with a frequency that is proportionate to the storage capacity of the collection infrastructure and the volume of used waste batteries available. The producers, retailers, or Producer Responsibility Organizations (PRO) working on their behalf adopt measures to mitigate risks that any end-of life batteries collected are not delivered to sub-standard recyclers, for example, exporting to countries where recycling facilities are likely to result in adverse human health and/or environmental consequences. The Company has means for calculating and verifying collection rates.

Performance Expectation

(c) Battery Recycling. Ensure that end-of-life products are supplied to formal, licensed recyclers that meet applicable regulations, or the Basel Technical Guidelines for the Environmentally Sound Management of Waste Lead-acid Batteries, and adopt EHS business practices aligned with the Lead Battery 360° requirements. At no time shall the company intentionally direct used batteries to informal recyclers.

How can the company meet this expectation?

Companies are expected to verify that all of their downstream recyclers:

- operate in full compliance with national and international regulations in alignment with Performance Expectations 1.A on OH&S and 1.B.(a) on Environmental Legal Compliance. This includes but is not limited to holding valid environmental and operating licenses, waste handling permits, and business registrations;
- operate in full compliance with applicable local legal requirements on waste battery management.

If no local recycling regulations are available, companies are expected to:

- apply the Basel Technical Guidelines for the Environmentally Sound Management of Waste Lead-acid Batteries;
- demonstrate adherence to the Lead Battery 360° Code, with special attention paid to the EHS requirements of this Code.

Companies are expected to conduct thorough due diligence, per Performance Expectation 4.(a), to ensure third-party collectors, transporters, and recyclers meet legal requirements and the EHS standards of this Code, with a preference for those demonstrating compliance through audits or third-party certifications. This includes maintaining certification records, conducting periodic audits with on-site checks, taking corrective actions where needed, and terminating contracts should repeat violations occur.

A robust traceability system should be established to monitor the full journey of used batteries—from collection to final treatment. This includes tracking quantities, intermediaries, transport documentation, and ensuring that final recycling destinations are licensed facilities. Companies are encouraged to use digital platforms and serialized tracking to enhance traceability and ensure accountability throughout the supply chain. Tracking systems should be periodically tested for data accuracy and integrity.

Companies should establish binding agreements with service providers and transporters that clearly define expectations for regulatory compliance, safe handling, and delivery to authorized recyclers. These contracts should prohibit subcontracting to informal actors and require traceable documentation of responsible disposal.

All employees and external partners involved in the reverse logistics chain should receive training on legal compliance, environmental risks, and proper recycling protocols, including how to identify and report informal practices, as well as how to follow documentation and traceability procedures.

Active engagement with local communities, authorities, and stakeholders is essential to support formal recycling infrastructure and prevent the proliferation of informal practices. Companies should participate in or support initiatives that strengthen regulatory enforcement, promote formal collection networks, and raise public awareness about the hazards of informal battery recycling. Collaboration with industry associations, NGOs, and public-sector agencies is encouraged to enhance the formalization of end-of-life battery recycling.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have measures in place to promote the recycling of collected end-of-life products by formal, licensed recyclers in line with applicable regulations or the standards described in the Basel Technical Guidelines on the Environmentally Sound Management of Waste Lead-acid Batteries. The informal sector may still play a significant role in the collection and unlicensed recycling of used lead-acid batteries (ULABs).	The Company implements measures to promote the recycling of collected end-of-life products by formal, licensed recyclers that meet applicable regulations, or the standards described in the Basel Technical Guidelines on the Environmentally Sound Management of Waste Lead-acid Batteries. The effectiveness of these measures has not been verified and there may still be a small number of informal actors in the supply chain.	The Company implements measures to promote the recycling of collected end-of-life products by formal, licensed recyclers that meet applicable regulations, or the standards described in the Basel Technical Guidelines on the Environmentally Sound Management of Waste Lead-acid Batteries. Measures are reviewed and the Company can demonstrate that all collected batteries are processed by treatment and recycling facilities that are licensed and operate to acceptable standards and that there is no involvement of informal recyclers in the supply chain.

Performance Expectation

(d) Transportation of Used Lead-Acid Batteries (ULABs). Ensure operators engaged to ship or transport ULABs package them intact and in a manner that avoids damage to batteries and leakage of electrolyte (battery acid) during transport and handling. Where batteries are damaged, ensure operators ship or transport ULABs adopting appropriate control measures that avoid negative effects on human health and the environment.

How can the company meet this expectation?

Companies are expected to ensure ULABs are packaged securely to prevent damage and leakage during transport. This means that intact batteries should be placed in acid-resistant containers and secured to prevent movement. Companies should also ensure all transport operators are qualified, comply with hazardous materials regulations, and use properly equipped vehicles clearly marked with internationally recognized symbols for corrosive and hazardous materials, including both in-house logistics and third-party transport services.

Companies should engage only certified and qualified transporters for ULAB shipments, ensuring full compliance with local and international hazardous materials transport regulations. A system should be in place for regularly verifying transporter competency through updated certifications and training, including training to drivers and auxiliary staff of emergency procedures, supported by thorough record-keeping, routine audits, and feedback mechanisms to drive continuous improvement and ensure accountability.

To avoid negative effects on human health and the environment, companies and operators should supply appropriate personal protective equipment (PPE) to all personnel, including acid-resistant gloves, goggles, and protective clothing, to protect against potential hazards during handling and transportation.

If the ULABs are damaged, companies are expected to ensure that transporters use specialized procedures and containment methods to handle them safely. Damaged or leaking batteries should be sealed in acid-resistant containers with absorbent material, in compliance with local regulations for the transportation of hazardous materials.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have measures in place to ensure correct handling, shipment, and transportation of Used Lead-Acid Batteries (ULABs) by engaged operators.	The Company has started to implement measures to ensure that operators engaged to ship or transport ULABs, package them intact and in a manner that avoids damage to batteries, leakage of electrolyte (battery acid) during transport and handling. Broken batteries are shipped and handled in accordance with local regulations for the transportation of hazardous materials.	The Company consistently implements measures to ensure that operators engaged to ship or transport ULABs, package them intact and in a manner that avoids damage to batteries, leakage of electrolyte (battery acid) during transport and handling. Broken batteries are shipped and handled in accordance with local regulations for the transportation of hazardous materials. Additionally, the Company is able to verify the operators' responsible transportation practices for ULABs. Drivers and auxiliary staff are trained in emergency procedures and are provided with appropriate PPE.

Performance Expectation

(e) Maximizing use of recycled materials for battery manufacturing. Design new battery products with maximal use of recovered/recycled material in new battery manufacturing and implement this concept in new product design.

How can the company meet this expectation?

Companies are expected to establish, implement, and maintain systems and processes to:

- assess the current utilization of recycled and recovered materials across all battery product lines through comprehensive material flow analyses;
- define clear, quantifiable targets for the integration of recycled and recovered materials, aligned with technical specifications, market needs, and regulatory requirements;
- embed these targets into early-stage research and development, product design, and innovation pipelines to ensure systematic integration;
- identify and evaluate technical and commercial feasibility for incorporating recycled and recovered materials at each stage of product development, from concept through scale-up;
- integrate recycled/recovered material specifications into design requirements, sourcing strategies, and manufacturing protocols to ensure alignment with the company's circular economy objectives and relevant industry or regulatory frameworks;
- ensure robust traceability and performance monitoring systems are in place to validate data integrity, identify deviations, and verify compliance with recycled content targets;
- set up performance monitoring mechanisms to track progress toward material circularity, ensuring alignment with regulatory thresholds and industry benchmarks;
- implement internal controls and corrective action protocols to respond to deviations from recycled and recovered content targets or traceability failures.

Material inputs should comply with all applicable safety, performance, and regulatory requirements.

Product development should be guided by circular economy principles, emphasizing:

- design for disassembly, reuse, and recyclability;
- maximizing material recovery potential and reducing end-of-life environmental impacts;
- prioritizing recovered inputs over virgin materials where technically feasible and commercially viable.

Lifecycle assessments (LCAs) may be used to evaluate the environmental and economic benefits of recycled content integration. Findings from LCA studies may directly inform product design, material selection, and process improvements to support long-term sustainability.

Companies are expected to implement robust traceability and performance monitoring systems. Recycled content must be tracked and reported across all product lines, sites, and material categories. Key metrics include:

- % recycled content per unit or product line;
- % reduction in virgin material use year-over-year.

New battery products are expected to contain, on average, more than 80% secondary lead unless specific technical or performance requirements necessitate the use of virgin material. This reinforces circular economy principles and supports reduced reliance on primary resource extraction.

Regular audits and performance reviews can be conducted to verify data integrity and evaluate progress. Results should drive adaptive management, corrective action planning, and ongoing innovation in recycled material utilization.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have measures in place to promote use of recovered/recycled material in new battery manufacturing.	The Company uses some recovered/recycled material in new battery manufacturing and has started to take measures for process improvement. New products are not specifically designed to maximize use of recycled materials.	The Company maximises the use of recovered/recycled material in new battery manufacturing and consistently implements measures for process improvement. Additionally, the Company has started to assess the lifecycle benefits of maximizing use of recovered/recycled material in new product design. Unless there are specific performance/technical reasons for using virgin material, new products contain on average more than 80% secondary lead.

Performance Expectation

(f) Reducing carbon footprint of battery manufacturing processes. Measure the carbon footprint of batteries along their lifecycle (including raw materials production/extraction, manufacturing and recycling) and take steps to reduce the carbon footprint by implementing actions that result in improved energy and manufacturing efficiency.

How can the company meet this expectation?

Companies are expected to establish, implement, and maintain systems and processes to measure the carbon footprint of batteries throughout their lifecycle (BCF). This may include conducting comprehensive lifecycle assessments (LCAs) to quantify the environmental impacts at each stage—from raw material extraction, manufacturing and use, to recycling or disposal. LCAs must follow standardized methodologies (e.g., ISO 14040, ISO 14044) to ensure consistency, accuracy, and reliability. The results of these assessments should be integrated into product design, process optimization and strategic decision-making to identify emission hotspots, evaluate trade-offs and support decarbonization strategies.

The battery carbon footprint should quantify the total amount of greenhouse gases emitted along the life-cycle of the battery, in terms of kg of CO_2 equivalent per functional unit.

It should cover the following three scopes of greenhouse gas (GHG) emissions:

- Scope 1: Direct emissions from on-site activities, including manufacturing processes, facility operations, and fuel combustion;
- Scope 2: Indirect emissions from purchased electricity, steam, heating, or cooling consumed by the company;
- Scope 3: Indirect emissions across the value chain, including both upstream and downstream activities.

Companies are expected to develop and operationalize a decarbonization and resource efficiency roadmap informed by BCF or LCA outcomes. This roadmap should include the following strategic actions:

- optimize production energy performance through the deployment of high-efficiency equipment, advanced process control, and integrated energy management systems;
- minimize raw material losses by enhancing material throughput efficiency, implementing waste reduction measures, and establishing closed-loop systems for the recovery and reintegration of process residues;
- implement low-emission logistics solutions, including transport route optimization, modal shifts to lower-emission carriers, and localized sourcing strategies to reduce supply chain emissions;
- establish and maintain robust monitoring, reporting, and verification systems to track GHG emissions, energy usage, material flows, and recycled content, utilizing recognized reporting standards and methodologies.

To ensure effective implementation of the decarbonization roadmap, companies are expected to:

- deploy clean process technologies by electrifying heat-intensive operations, eliminating fossil fuel dependency, and integrating renewable energy sources via on-site generation systems or certified green power procurement;
- enhance emissions performance through the adoption of best available technologies (BAT), modernization of outdated infrastructure, and integration of real-time emissions monitoring, control systems, and automation tools;
- collaborate across the supply chain to procure certified low-carbon and recycled materials, ensuring full traceability, conformance to quality and performance standards, and alignment with defined environmental and decarbonization objectives.

All carbon footprint mitigation actions must be systematically documented and subjected to periodic performance reviews to assess effectiveness. Implementation efforts should be evaluated against defined metrics, with corrective measures and continuous improvement initiatives integrated as required to ensure alignment with decarbonization targets. Adjustments should be data-driven, based on ongoing performance monitoring, and informed by advancements in technology and industry best practices.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have measures in place to quantify and reduce the carbon footprint of battery manufacturing.	The Company has started to take measures to quantify and reduce the carbon footprint of battery manufacturing, however these are not fully embedded in business processes.	The Company has implemented procedures and processes to measure the carbon footprint of a battery along its lifecycle and has taken steps to reduce the carbon footprint by taking actions to improve its own energy and manufacturing efficiency and encouraging similar activities by its key suppliers. Actions taken are documented and reviewed for effectiveness and continuous improvement.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 4 is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
4.(a) Undertake Due Diligence of Available Recyclers			√
4.(b) Producer Responsibility			√
4.(c) Battery Recycling			√
4.(d) Transportation of Used Lead-Acid Batteries (ULABs)		√	√
4.(e) Maximizing use of recycled materials for battery manufacturing			√
4.(f) Reducing carbon footprint of battery manufacturing processes			√

Data Collection Method

Conformance with the Performance Expectations of Principle 4 is assessed through:

	Observation		Interviews

Performance Expectation		Document Review	Board and Management	Employees	Contracted Workers	Other Stakeholders
4.(a) Undertake Due Diligence of Available Recyclers		√	√			√
4.(b) Producer Responsibility		√	√			√
4.(c) Battery Recycling		√	√			√
4.(d) Transportation of Used Lead-Acid Batteries (ULABs)		√	√			√
4.(e) Maximizing use of recycled materials for battery manufacturing		√	√			
4.(f) Reducing carbon footprint of battery manufacturing processes		√	√			√

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during assessment:

- Responsible Supply Chain Policy or other equivalent policy or policies such as EPR;
- Evidence of communication of the Responsible Supply Chain Policy with internal and external stakeholders;
- Code of Conduct for Business Partners;
- Examples of contractual agreements incorporating the Responsible Supply Chain Policy, the Code of Conduct for Business Partners, or other equivalent policy;

- Examples of contractual agreements incorporating provisions on expectations for adherence to this Code or equivalent social, environmental, and governance requirements;
- Risk identification and risk assessment procedures;
- Responsible business practice scorecards of business partners;
- Country- and/or regional analysis of ULABs recyclers capacity;
- Due diligence procedures and reports showing that the company is dealing with formal, licensed recyclers that meet applicable regulations or the standards described in the Basel Technical Guidelines on the Environmentally Sound Management of Waste Lead-acid Batteries;
- Risk assessment identifying supply chains and suppliers that are high risk;
- Pre-battery placement analysis reports showing that ULAB recyclers have policies and systems in place aligned with the Company's expectations for EHS;
- Documented measures and procedures to ensure that batteries are collected and delivered only to approved treatment and recycling facilities;
- Membership of approved producer responsibility schemes.
- Documented measures to mitigate risks that end-of life batteries collected are delivered to sub-standard recyclers;
- Export documents showing that used batteries are collected and exported to a country that have recyclers meeting the necessary minimum standards;
- Evidence of review of measures and procedures;
- Evidence of communication with or engagement of business partners to collect information on battery recycling or transportation practices;
- ULAB collection and recycling rate data;
- EPR action plan;
- Evidence of communication with or engagement of business partners to promote responsible business practices (e.g. minutes of meetings with business partners);
- Collection, transport, preparation, treatment, and recycling of used battery procedures;
- ULABs transportation criteria and handling procedure;
- Evidence of communication of ULABs criteria and handling procedures to transport and shipping companies;
- Completed transport and shipping checklist;
- Training records and material for drivers and auxiliary staff providing evidence that they are trained in emergency procedures;
- PPE issue record for drivers and auxiliary staff;
- Training records on PPE for drivers and auxiliary staff;
- Documented continuous improvement processes;
- Documented evidence of new product designs;
- Documentation showing that new products contain on average 80% secondary lead;
- Evidence of implementation of a deposit-refund scheme or similar;
- Environmental policy;
- GHG emission data;
- BCF and LCAs;
- Documented measures to quantify and reduce carbon footprint;
- Carbon footprint report;
- Documented procedures to measure the carbon footprint along its lifecycle;
- Documented evidence of actions implemented to improve energy and manufacturing efficiency;
- Third party-assured reporting on the implementation the Responsible Supply Chain Policy and due diligence system;

- Sustainability or Corporate Social Responsibility reports, in line with the GRI Standards, the Sustainability Accounting Standards Board (SASB) Standards, or other equivalent reports.

Interviews

During interviews with management, managers can demonstrate or describe:

- A good understanding of the market dynamics and risks associated with battery recycling;
- A good understanding of the Basel Technical Guidelines for the Environmentally Sound Management of Waste Lead-acid Batteries;
- A good understanding of the company's Responsible Supply Chain Policy, Code of Conduct for Business Partners, or equivalent;
- Examples of how the Responsible Supply Chain Policy is implemented;
- How the company has established roles and responsibilities, including expectations for Board, senior, middle level, and operational management;
- A good understanding of the company 's supply chain and business partners;
- A good understanding of the company's global EPR practices and systems;
- How the company has allocated resources for the implementation of the Responsible Supply Chain Policy and how it has determined whether such resources are sufficient;
- Whether implementation of the Policy is regularly reviewed and continuously improved;
- How the company identifies and undertakes due diligence of potential business partners, including recyclers and transport operators, and establishes the level and nature of risks attributed to business partners;
- Clear lines of accountability and responsibility within the company for the oversight, implementation and reporting of due diligence and EPR systems;
- How the company collects information on business partners' performance and monitors and engages with business partners to ensure adherence to set standards;
- How the company monitors business partners' conformance with regulatory requirements; the Basel Technical Guidelines on the Environmentally Sound Management of Waste Lead-acid Batteries; and the minimum requirements of Lead Battery 360°;
- Understanding of the mitigation measures adopted to ensure that batteries collected are not delivered to sub-standard recyclers;
- A good understanding of the transportation, preparation, treatment and recycling process and procedure;
- A good understanding of how to calculate and verify ULAB collection rates;
- Understanding of the transportation and shipping procedures;
- Understanding of training provided to auxiliary staff and drivers;
- A good understanding of the company's recycling processes for battery manufacturing;
- How the company ensures that new products contain on average 80% secondary lead;
- How the company is using its ability to influence business partners to promote responsible business practices;
- A good understanding of the environmental policy and climate actions practices undertaken by the company to reduces its carbon footprint;
- A good understanding of carbon footprint and LCA methodologies and results;
- How carbon emission data is collected and reviewed for continuous improvement.
- Business partners confirm that they have been communicated about the company's commitments and expectations regarding responsible practices, including the Responsible Supply Chain Policy or Code of Conduct for Business Partners, and have demonstrated conformance;

- Business partners have a good understanding of the Company's expectations for supply chain management;
- Transport business partners have received information on expected performance for the transportation and shipping of ULABs.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
  - European Commission (2006). Regulation (EC) No 1013/2006 on Shipments of Waste (link)
  - European Union (2006). Regulation (EC) No 1013/2006 on Shipments of Waste (link)
  - European Commission (2007). Commission Regulation (EC) No 1418/2007 Concerning the Export for Recovery of Certain Waste (link)
  - European Union (2008). Directive 2008/98/EC on Waste (Waste Framework Directive) (link)
  - European Union (2008). Directive 2008/68/EC on the Inland Transport of Dangerous Goods (link)
  - European Union (2009). Ecodesign Directive (Directive 2009/125/EC) (link)
  - European Commission (2019). The European Green Deal (link)
  - European Union (2023). Regulation (EU) 2023/1542 on Batteries and Waste Batteries (link)
  - European Commission (2024). Fit for 55 Package (link)

- In the United Kingdom:
  - UK Government (2009). The Waste Batteries and Accumulators Regulations 2009 (link)
  - UK Government (2009). The Carriage of Dangerous Goods Regulations 2009 (link)
  - UK Government (2019). Streamlined Energy and Carbon Reporting (SECR) (link)
  - UK Government (2021). Environment Act 2021 (link)

- In the United States:
  - U.S. Department of Transportation (2005). DOT Regulations (49 CFR Parts 171–180) (link)
  - U.S. Environmental Protection Agency (2009). 40 CFR Part 98 – Mandatory Greenhouse Gas Reporting (link)
  - U.S. Environmental Protection Agency (2014). Resource Conservation and Recovery Act (RCRA) (link)
  - U.S. Environmental Protection Agency (2015). Sustainable Materials Management (SMM) Program (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- International Organization for Standardization (2006). ISO 14064: Greenhouse Gas Accounting and Verification (link)
- International Organization for Standardization (2006). ISO 14040/14044: Life Cycle Assessment (LCA) (link)

- International Organization for Standardization (2015). ISO 14001: Environmental Management Systems (link)
- International Organization for Standardization (2020). ISO 14006: Ecodesign Management (link)
- OECD (2016). Guidelines for Extended Producer Responsibility (EPR) (link)
- Organisation for Economic Co-operation and Development (2018), OECD Due Diligence Guidance for Responsible Business Conduct (link)
- International Organization for Standardization (2018). ISO 50001: Energy Management Systems (link)
- EU Battery Regulation (EU 2023/1542). (link)
- JRC (2025). Rules for the calculation of the Carbon Footprint of Industrial Batteries without external storage (CFB-IND), Publications Office of the European Union, Luxembourg. (link)
- LeadBattery360° (2020). Consequences of a Mobile Future: Creating an Environmentally Conscious Life Cycle for Lead-Acid Batteries (link)
- Organisation for Economic Co-operation and Development (2001). OECD Decision C(2001)107/Final on the Control of Transboundary Movements of Wastes Destined for Recovery Operations (link)
- United Nations Environment Programme (UNEP) (2022). LeadBattery360 Report - A Guidance Manual For Policymakers and Regulators for the Environmentally Sound Management of Waste or Used Lead Acid Batteries in Africa (link)
- United Nations Environment Programme (UNEP) (2024). Technical Guidelines on the Environmentally Sound Management of Used Lead-Acid Batteries (ULABs) (link)
- United Nations Environment Programme (UNEP) (1989). Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (link)
- World Bank Group (2022). Recycling of Used Lead-Acid Batteries: Guidelines for Appraisal of Environmental Health Impacts (link)
- World Resources Institute & World Business Council for Sustainable Development (2004). GHG Protocol (link)

PRINCIPLE 5: Adopt business practices that consider the communities impacted by our operations, respect the human and labor rights of our employees and work against corruption in all its forms.

5.A. Communities

Performance Expectations and Performance Determination

Performance Expectation

(a) Community Health and Safety Risks and Impacts Assessments. Maintain and implement procedures and processes to regularly identify, assess, and monitor the risks and adverse impacts of the company's operations on community health and safety. To this end, establish and monitor indicators of community health and safety in consultation with impacted communities and local government agencies and authorities, as appropriate.

How can the company meet this expectation?

Companies are expected to establish community health and safety risks and impacts assessments. These assessments should cover both direct and indirect impacts from operational activities, such as air emissions, water contamination, noise, traffic, hazardous waste, and emergency scenarios.

Risk assessments should be carried out regularly and whenever operations change significantly, such as during site expansions, process changes, or introduction of new materials. The process should include participatory risk mapping and health baseline studies, in consultation with impacted communities and local government agencies and authorities, as appropriate, to identify health and safety risks, with special attention paid to vulnerable groups.

Engagement should be inclusive, documented, and appropriate to the local context, ensuring participation by vulnerable groups, including but not limited to Indigenous or Tribal Peoples, where relevant.

Based on the results of the risks and impacts assessments, companies are expected to implement mitigation measures to avoid, reduce, or minimize the identified risks, as appropriate, for example via:

- engineering controls such as water, air, and soil filtration systems to prevent contamination from operational discharge;
- procedural safeguards, such as hazardous material handling protocols, site access restrictions during high-risk activities, and restrictions on blasting times or noise-generating operations;
- emergency preparedness plans that are co-designed with communities and local authorities;
- buffer zones and physical barriers;
- improvements to site access and traffic routing.

Controls should be proportionate to the severity and likelihood of the identified risks.

Companies should establish and monitor indicators of community health and safety, in consultation with local stakeholders, to evaluate the effectiveness of the mitigation measures. Indicators should be relevant, measurable, and monitored over time, with a focus on risks related to lead exposure and contamination. Examples of indicators include:

- local air, water, and soil lead concentration levels in areas potentially affected by operations;
- blood lead level data from voluntary community health screenings, where appropriate and privacy-compliant;
- incidence of community complaints related to lead-related dust, odors, or other emissions;
- traffic accident data associated with company transport routes;
- general community health data and trends, where appropriate, especially in relation to environmental exposure.

Companies are expected to ensure that relevant results and actions are integrated into company planning and decision-making, including environmental and social management systems, site operations, and emergency preparedness. Information should also be shared transparently with local authorities and the public, where appropriate.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have a policy to assess, avoid, minimize, reduce adverse impacts of company operations on community health and safety.	The Company has started to develop or has in place a basic policy or procedure to assess, avoid, minimize, reduce adverse impacts of company operations on community health and safety. Assessments are regularly reviewed, and findings are integrated into decision-making with a view to continuous improvement.	The Company has in place and implements procedures and processes to avoid, minimize, reduce, and compensate for adverse impacts of company operations on community health and safety. Additionally, the Company establishes and monitors indicators of community health and safety in consultation with affected communities and local government agencies and authorities, as appropriate.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 5 - 5.A Communities is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
5.A.(a) Community Health and Safety Risks and Impacts Assessments	√	√	√

Data Collection Method

Conformance with the Performance Expectations of Principle 5 - 5.A Communities is assessed through:

Performance Expectation	Observation	Document Review	Interviews			
			Board and Management	Employees	Contracted Workers	Other Stakeholders
5.A.(a) Community Health and Safety Risks and Impacts Assessments	√	√	√			√

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during the assessment:

- Corporate or site level policy formalising the company's commitment to community health and safety;
- Legal register of applicable local and national regulations;
- Environmental, social, and human rights impacts assessments or standalone community health and safety risk and impact assessments;
- Stakeholder engagement plans and reports;
- Community health and safety indicators and monitoring reports, including those developed for regulatory purposes where applicable;
- Community health and safety management plans or procedures;
- Records of lodged grievances relating to community health and safety and records of grievance resolutions;
- Reports relating to community health and safety measures and data;
- Third-party assurance or certification of the community health and safety management systems;
- A procedure document explaining the process to quantify the significance and consequence of risks and impacts on community health and safety;
- A decision tree or similar mapping the possible options to mitigate each risk and impact identified in the assessment;
- Community health performance targets;
- Sustainability or Corporate Social Responsibility reports, in line with the GRI Standards, the Sustainability Accounting Standards Board (SASB) Standards, or other equivalent reports.

Interviews

During interviews with management, managers can demonstrate or describe:

- A good understanding of the Company's potential and actual risks and impacts on the community's health and safety;

- A good understanding of how community health and safety risks were scoped;
- How the company carries out health and safety risk and impacts assessments to identify risks and adverse impacts to community health and safety;
- How the company implements mitigation measures if potential adverse impacts are identified;
- How the company engages relevant stakeholders, including affected communities, to identify community health and safety risks and impacts and for monitoring and reporting on mitigation measures;
- Clear lines of accountability and responsibility and competence within the organization for the oversight and implementation of the community health and safety impacts mitigation measures.

During interviews with community members and other stakeholders, they can describe or demonstrate:

- A basic understanding of the Company's health and safety measures;
- Whether they have been engaged for the purpose of the health and safety risk and impact assessment;
- Whether they received a copy of the health and safety risk and impact assessment reports;
- Whether they have been engaged for the establishment and monitoring of mitigation measures;
- Whether they receive reports relating to community health and safety;
- How to lodge grievances if they have concerns on community health and safety.

Observations

During the site walk through and visits to local communities, the assessor does not observe any visible adverse impacts on community health and safety caused by the company operations, in addition to those potentially already raised by the community.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
    - European Parliament and Council (2010). Directive 2010/75/EU on industrial emissions (IED) (link)
    - European Parliament and Council. (2014). Environmental Impact Assessment (EIA) Directive 2011/92/EU (as amended by 2014/52/EU) (link)

- In the United Kingdom:
    - UK Government (1974). Health and Safety at Work etc. Act 1974 (link)
    - UK Government (2017). Environmental Impact Assessment Regulations 2017 (link)

- In the United States:
    - United States Congress (1986). National Environmental Policy Act (NEPA), 42 U.S.C. §4321 et seq. (link)
    - Occupational Safety and Health Administration (OSHA) (1978). Lead Standard, 29 CFR 1910.1025. (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- World Health Organization (WHO) (2001). Health Impact Assessment: A Guide for Decision Makers (link)
- International Finance Corporation (IFC) (2012). Performance Standard 4: Community Health, Safety and Security (link)
- International Organization for Standardization (2018). ISO 45001: Occupational Health and Safety Management Systems – Requirements with Guidance for Use (link)

5.B. Human and Labor Rights

Performance Expectations and Performance Determination

Performance Expectation

(a) Human Rights Assessment and Management. Maintain and implement policies, procedures, and processes to regularly identify, assess and manage potential or actual human rights risks and impacts caused, contributed by, and/or linked to the company's operations.

How can the company meet this expectation?

Companies are expected to adopt a formal human rights policy that is aligned with internationally recognized human rights frameworks, such as:

- the UN Guiding Principles on Business and Human Rights (UNGPs);
- the OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct;
- the International Bill of Human Rights;
- the ILO Core Labour Standards.

The policy should:

- be approved at the highest level of the company (e.g. Board of Directors);
- articulate the company's commitment to respect human rights;
- be communicated publicly and embedded in corporate governance and management systems.

Companies are expected to establish and implement procedures to regularly identify, assess, and manage actual or potential human rights risks and impacts. These assessments should:

- be proactive and risk-based;
- address risks that are caused by, contributed to, or directly linked to the company's operations, products, or services;
- cover all internationally recognized human rights, including:
    - rights set out in the International Bill of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social and Cultural Rights);

    - fundamental labor rights defined by the ILO Declaration on Fundamental Principles and Rights at Work, including:
        - non-discrimination;
        - freedom of association and collective bargaining;
        - prohibition of forced and child labor;
        - safe and healthy working conditions;
- consider additional human rights instruments where individuals belonging to specific groups or populations may require particular attention due to heightened risk of vulnerability or marginalization, including but not limited to Indigenous or Tribal Peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers. Such instruments include:
    - International Convention on the Elimination of All Forms of Racial Discrimination;
    - Convention on the Elimination of All Forms of Discrimination Against Women;
    - Convention on the Rights of Persons with Disabilities;
    - Convention on the Rights of the Child;
    - UN Declaration on the Rights of Indigenous Peoples;
    - ILO Convention 169 Indigenous and Tribal Peoples;
    - International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families;
- include input from relevant stakeholders and rights-holders, including affected groups and human rights experts where appropriate, and draw on information received through the company's stakeholder feedback mechanism, in alignment with Performance Expectation 6.(b).

Companies are expected to integrate the findings of human rights assessments into relevant decision-making and risk management processes, and to develop and implement appropriate plans for prevention, mitigation, or remediation, as needed. Responsibilities should be clearly assigned, with oversight from senior management. Where harms have occurred, companies should provide or cooperate in providing effective remediation, which may include restitution such as reinstating employment or access to resources, compensation (financial or in-kind), formal apology or acknowledgment of harm, and rehabilitation (medical or psychological care), as appropriate to the context and in consultation with affected stakeholders.

Companies are expected to regularly review and update their human rights policies and procedures to ensure continuous improvement. Reviews should take into account:

- lessons learned from previous assessments;
- changes in operations or stakeholder context;
- updates to applicable laws or international expectations.

Companies are expected to publicly disclose their human rights performance at least annually. Disclosures should include:

- a description of the company's human rights policy and governance structure;
- a summary of key risks identified and how they were assessed;
- actions taken to mitigate or remediate impacts;
- metrics or indicators of progress, where feasible.

<u>How will performance be determined?</u>

Does not meet	Partially meets	Fully meets
The Company does not have in place procedures or processes to promote and uphold human rights and conduct due diligence in line with internationally recognized frameworks on human rights.	The Company has started to develop or has in place basic procedures and processes to promote and uphold human rights in line with internationally recognized frameworks on human rights and to regularly identify, assess and manage potential or actual human rights risks and impacts caused, contributed by, and/or linked to the company's operations, in line with internationally recognized frameworks on human rights.	The Company has in place and implements procedures and processes to promote and uphold human rights in line with internationally recognized frameworks on human rights and to regularly identify, assess and manage potential or actual human rights risks and impacts caused, contributed by, and/or linked to the company's operations, in line with internationally recognized frameworks on human rights. Policies, procedures, and processes are regularly reviewed to ensure effectiveness and continuous improvement. The Company discloses annual performance on its human rights commitment annually.

Performance Expectation

(b) Employment Terms. Provide employees with clear information, including in writing and in the relevant language, regarding their employment rights under all applicable laws and collective agreements, where applicable, including information on their rights relating to working hours and remuneration.

How can the company meet this expectation?

Companies are expected to provide all employees with clear, written information about their terms and conditions of employment at the time of hiring and when material changes occur. This information should be communicated in a language the worker understands and in a format that is accessible, considering literacy levels where relevant.

The written information should clearly outline:

- employment status (e.g., full-time, part-time, fixed-term);
- working hours, rest periods, and overtime policies;
- wages or salary, including payment frequency and method;
- deductions, bonuses, or incentive schemes;

- leave entitlements (e.g., annual, sick, parental);
- termination and notice period terms;
- applicable benefits, social insurance, and pension arrangements;
- reference to relevant collective agreements, if applicable.

Additionally, companies are expected to:

- comply with all applicable national and local labor laws and regulations;
- ensure that employees are aware of their rights, including those established under applicable labor laws, company policies, and, where relevant, collective agreements;
- make sure that employment terms and conditions are not only disclosed but also explained as needed, particularly where workers may face language or education barriers. (e.g., verbal briefings, FAQs, induction training).

Where third-party labor is used (e.g., contractors, agency workers, temporary staff), companies are expected to ensure that employment terms are clearly communicated by the labor provider and are aligned with applicable legal requirements and the standards outlined in this Code. The company should assess and monitor such arrangements to ensure compliance.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not communicate to its employees information regarding their employment rights.	The Company provides employees with clear information, including in writing, regarding their employment rights.	The Company provides employees with clear information, including in the relevant language, regarding their employment rights under all applicable laws and collective agreements, where applicable, including information on their rights relating to working hours and remuneration. The Company ensures employment terms are clearly communicated to workers by third-party labor providers, where applicable.

Performance Expectation

(c) Working Hours. Apply regular working hours in accordance with applicable laws and, where no applicable law exists, with internationally recognized standards, and maintain procedures and processes to ensure that overtime is voluntary, the sum of regular and overtime hours does not exceed 60 hours per week 'and workers are provided with one rest day in seven.

How can the company meet this expectation?

Companies are expected to comply with all national labor laws governing working hours, overtime, and rest periods. Where no local law exists or the law is less protective, companies should align their practices with internationally recognized labor standards, such as those set out in ILO Convention No. 1 (Hours of Work - Industry) and ILO Convention No. 14 (Weekly Rest).

Companies are expected to establish and implement procedures to ensure that:

- regular working hours do not exceed 48 hours per week;
- total working hours, including overtime, do not exceed 60 hours per week, except in genuinely exceptional circumstances;
- overtime is voluntary, compensated at a premium rate (where applicable), and does not become routine or coercive;
- workers receive at least one full rest day in every seven-day period;
- workers are provided with annual leave entitlements, in accordance with legal and contractual terms and in alignment with Performance Expectation 5.B.(d) Paid Leave.

Companies should document and communicate working hour expectations in employment contracts and handbooks, and ensure that shift schedules and production targets are designed to prevent excessive working hours. In situations where long hours are legally permissible (e.g., seasonal peaks), controls should be in place to ensure health and safety are not compromised.

Companies are expected to maintain accurate records of working time, including overtime, and to monitor trends in hours worked to detect and correct overwork. Timekeeping systems should be transparent, tamper-proof, and accessible for verification by employees and auditors.

Where labor is supplied through contractors or agencies, companies are expected to ensure that working time protections are extended to all workers, and that labor providers are monitored for compliance.

How will performance be determined?

Does not meet	Partially meets	Fully meets
Employees' regular and overtime working hours exceeds legally required limits or, where no legal limits exist, exceeds forty-eight regular hours and twelve hours overtime in the week. The Company does not provide employees with one day of rest in seven.	The Company has started to develop policies, procedures and practices to keep employees' regular and overtime working hours within legally required limits or, where no legal limits exist, within forty-eight regular hours and twelve hours overtime in the week; and to ensure employees receive one day of rest in seven; but implementation has not started or is incomplete.	The Company has procedures and practices in place to keep employees' regular and overtime working hours within legally required limits or, where no legal limits exist, within forty-eight regular hours and twelve hours overtime in the week; and to ensure employees receive one day of rest in seven. In practice, overtime working hours never exceed legally required limits or, where no legal limits exist, never exceed forty-

	In practice, overtime working hours do not regularly exceed legally required limits or, where no legal limits exist, do not exceed forty-eight regular hours and twelve hours overtime in the week. Employees regularly receive one day of rest in seven.	eight regular hours and twelve hours overtime in the week. Employees always receive one day of rest in seven. The Company has in place and implements procedures and processes to ensure that working time protections are extended to contractor and/or agency workers, where applicable.

Performance Expectation

(d) Paid Leave. Provide employees with all legally mandated leave. Where no applicable law exists, provide paid annual leave in accordance with internationally recognized standards.

How can the company meet this expectation?

Companies are expected to comply with all national and local laws governing paid leave entitlements. This includes not only annual leave, but also other legally required forms of paid leave such as sick leave, maternity or paternity leave, family or caregiving leave, and public holidays.

Where no specific national laws exist or local laws provide less protection, companies are expected to align with internationally recognized standards, such as those established by the ILO. This includes at least three weeks (15 working days) of paid annual leave, as recommended in ILO Convention No. 132.

Companies are expected to clearly document leave policies and communicate them to all workers in a language and format they understand. Employment contracts, handbooks, or onboarding materials should clearly describe:

- types of leave available;
- entitlement levels;
- procedures for requesting and approving leave;
- rules for accrual, rollover, or forfeiture.

Companies should maintain accurate records of leave balances and usage and ensure that supervisors and human resources staff are trained to administer leave fairly and consistently. Leave practices should be non-discriminatory, with equitable access provided and consistently applied, regardless of employment status, gender, or contract type. Workers should not face retaliation or pressure for taking legally entitled leave.

Leave practices should be non-discriminatory, with equitable access provided and consistently applied, regardless of employment status, gender, or contract type. Workers should not face retaliation or pressure for taking legally entitled leave. Where labor is supplied through contractors or agencies, companies are

expected to ensure that paid leave protections are extended to all workers, and that labor providers are monitored for compliance.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not provide employees with legally mandated leave, or, where no legal requirements exist, three weeks annually.	The Company has started to develop procedures which ensure employees are provided with legally mandated leave, but implementation has not started or is incomplete. In practice, employees regularly receive legally mandated or internationally aligned annual leave.	The Company has in place and implements which ensure employees are provided with legally mandated leave. Where no applicable law exists, the Company provides paid annual leave in accordance with internationally recognized standards. In practice, employees always receive legally mandated or internationally aligned annual leave. The Company has in place and implements procedures and processes to ensure that annual leave protections are extended to contractor and/or agency workers, where applicable.

Performance Expectation

(e) Remuneration. Apply wages that meet or exceed the legal minimum national wages or wages agreed through collective agreements, where applicable.

How can the company meet this expectation?

Companies are expected to pay all employees wages that meet or exceed applicable national minimum wage laws. Where a collective bargaining agreement exists, companies should apply the agreed wage rates and conditions to all covered employees. Where multiple wage standards exist, the most protective or favorable to the employee should be applied. This includes base wages as well as legally required benefits, overtime premiums, and allowances.

Companies are expected to implement clear, transparent payroll systems and procedures to:

- ensure that wages are paid accurately and on time;
- provide detailed wage slips showing hours worked, wage rates, deductions, bonuses, and net pay;

- track compliance with national and contractual wage requirements across all employee categories.

Wage policies and payment procedures should be communicated clearly to employees in a language they understand. This includes during onboarding and whenever terms change. Workers should have a clear understanding of how their pay is calculated and what deductions (if any) are made.

Where third-party labor providers or contractors are used, companies are expected to verify that workers are paid according to the same wage standards, where applicable.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place procedures and processes which define payment to employees of wages that meet or exceed applicable national minimum wages or wages agreed through collective wage agreements.	The Company has started to develop procedures and practices which define payment to employees of wages that meet or exceed applicable national minimum wages or wages agreed through collective wage agreements. In practice, wages are paid accurately and on time and include detailed wage slips.	The Company has in place and implements procedures and processes to define payment to employees of wages that meet or exceed applicable legal minimum wages or wages agreed through collective wage agreements. In practice, wages are paid accurately and on time and include detailed wage slips. The Company tracks compliance with national and contractual wage requirements across all employee categories. The Company has in place and implements procedures and processes to ensure that contractor and/or agency workers are paid according to the same wage standards, where applicable.

Performance Expectation

(f) Child Labor. Maintain and implement procedures and processes to comply with minimum age standards; prohibit, and, where necessary, remediate, work by children who are under the age of 15, the age for completing compulsory education, or the legal minimum age for employment in the country, whichever age is greatest and to prohibit exposure to hazardous work to employees under 18 years of age.

How can the company meet this expectation?

Companies are expected to establish and enforce procedures that prohibit the employment of children below the minimum working age, defined as the highest of the following:

- 15 years of age;
- the age for completing compulsory education in the country; or
- the legal minimum age for employment under national law.

These procedures should apply not only to the company's direct operations, but also to contractors, suppliers, and recruitment agencies. The company should clearly communicate this standard to all business partners through contracts, policies, and training.

Companies are expected to prohibit the employment of workers under the age of 18 in hazardous work, as defined by national laws and international standards, including ILO Convention No. 182 on the Worst Forms of Child Labour. Hazardous work includes tasks that, by their nature or the circumstances in which they are carried out, are likely to harm the health, safety, or morals of children. This includes, but is not limited to, work involving heavy machinery, exposure to toxic substances (e.g., lead), night shifts, and physically or mentally strenuous activities.

To meet these expectations, companies should:

- implement robust age verification systems at the point of recruitment;
- maintain records of employee ages, particularly for younger workers;
- train HR and line managers to recognize and manage age-related compliance risks.

In cases where child labor is identified, companies are expected to have a documented remediation plan that prioritizes the best interests of the child. This should include:

- immediate removal of the child from work;
- support for school reintegration;
- continued family income support or transitional employment of an adult household member, where feasible.

Companies are expected to periodically review and update their procedures to prevent, identify, and address child labor to ensure continued effectiveness. This includes responding to assessment findings, regulatory updates, stakeholder input, and evolving good practice standards.

Where third-party labor providers or contractors are used, companies are expected to verify that labor providers comply with minimum age standards and to monitor labor providers for compliance.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have in place procedures and processes to comply with minimum age standards and prohibit exposure to hazardous work by employees who are below 18 years of age.	The Company has started to develop or has in place procedures and processes to comply with minimum age standards and to prohibit work by children who are under the age of 15, the age for completing compulsory education, or the legal minimum age for employment in the country (whichever age is greatest) and to prohibit the Worst Forms of Child Labour, including through the identification of potentially hazardous tasks, from which employees under 18 years of age are prevented. The Company has started to develop or has in place procedures and processes to ensure that third-party labor providers comply with minimum age standards, but implementation is incomplete.	The Company has in place and implements procedures and processes to comply with minimum age standards and to prohibit work by children who are under the age of 15, the age for completing compulsory education, or the legal minimum age for employment in the country (whichever age is greatest) and to prohibit the Worst Forms of Child Labour, including through the identification of potentially hazardous tasks, from which employees under 18 years of age are prevented. The Company maintains documented action plans for the remediation of potential instances of child labor, where necessary. The Company has in place and implements procedures and processes to ensure that third-party labor providers comply with minimum age standards, where applicable. Such procedures and processes are regularly reviewed to ensure effectiveness and continuous improvement.

Performance Expectation

(g) Forced Labor. Maintain and implement procedures and processes to prohibit and in no way support or benefit from the use of any form of forced labor, modern slavery or human trafficking.

How can the company meet this expectation?

Companies are expected to adopt and implement a clear, company-wide policy prohibiting all forms of forced labor or modern slavery, including bonded labor, involuntary overtime, debt bondage, human

trafficking, and restrictions on workers' freedom of movement. This policy should apply to all parts of the business, including direct operations, contractors, suppliers, and recruitment agents. Key elements of the policy and related procedures should include:

- a ban on withholding identity documents, travel permits, or wages;
- prohibition of recruitment fees charged to workers;
- respect for the right of workers to terminate employment freely with reasonable notice;
- prohibition of coercive practices such as threats, deception, or abuse of vulnerability.

Companies are expected to conduct human rights due diligence to identify and assess risks of forced labor within their own operations and extended supply chains in alignment with Performance Expectation 3.(a): Responsible Sourcing Policy. Risk indicators may include:

- recruitment of migrant or temporary workers;
- use of third-party labor brokers or intermediaries;
- unclear or deceptive contract terms;
- reports of excessive overtime or wage withholding.

Companies should take preventative and corrective action when forced labor risks are identified. While companies, as a general principle, are encouraged to engage with their business partners for the purpose of advancing human rights standards, companies are expected to immediately disengage from any supplier involved in forced labor, until the risk is effectively managed. Companies are expected to provide for or cooperate in remediation where abuse has occurred.

To ensure continuous improvement, companies are expected to regularly review their procedures and risk controls related to forced labor. This includes internal audits, worker interviews, and engagement with civil society, labor rights experts, and worker representative bodies. These measures should focus on the company's own operations and contracted workforce. Related due diligence in the supply chain should be conducted in accordance with Performance Expectation 3.(a): Responsible Sourcing Policy and associated sourcing PEs. Where labor is supplied through contractors or agencies, companies are expected to monitor labor providers for compliance.

Training should be provided to relevant staff (e.g., HR, procurement, security) on how to detect, prevent, and report forced labor indicators. Workers should have access to confidential grievance mechanisms to report abuses without fear of retaliation, in alignment with Performance Expectation 5.B.(k): Workers' Grievance and Whistle-Blowing Mechanisms.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have in place procedures and processes to prohibit and in no way support or benefit any form of forced labor, modern slavery or human trafficking.	The Company has started to develop or has in place procedures and processes to prohibit and in no way support or benefit any form of forced labor, modern slavery or human trafficking. The Company has started to develop or has in place procedures and processes to ensure that third-party labor providers and recruitment agencies do not use forced labor, but implementation is incomplete.	The Company has in place and implements procedures and processes to prohibit and in no way support or benefit any form of forced labor, modern slavery or human trafficking. The Company has in place and implements procedures and processes to ensure that third-party labor providers and recruitment agencies do not use forced labor, where applicable. Such procedures and processes are regularly reviewed to ensure effectiveness and continuous improvement.

Performance Expectation

(h) Freedom of Association and Collective Bargaining. Respect the rights of employees to associate freely without interference to the extent possible under applicable law, in accordance with internationally recognized standards. Respect the rights of employees to collective bargaining, participate in any collective bargaining process in good faith to the extent possible under applicable law and adhere to collective bargaining agreements where such agreements exist.

How can the company meet this expectation?

Companies are expected to respect the rights of employees to form, join, or refrain from joining trade unions or other representative organizations of their own choosing, without fear of retaliation, discrimination, or interference. These rights should be upheld in line with internationally recognized standards, such as:

- ILO Convention No. 87 (Freedom of Association and Protection of the Right to Organise);
- ILO Convention No. 98 (Right to Organise and Collective Bargaining).

Companies are expected to ensure that these rights are:

- formally stated in internal policies and codes of conduct;
- clearly communicated to employees at the time of hire and at regular intervals (e.g. handbooks, training, induction materials);
- integrated into management systems, with clear roles and responsibilities assigned for compliance and monitoring.

Where workers choose to be represented by a union or workers' organization, companies are expected to:

- engage in collective bargaining in good faith;

- adhere to the terms of collective bargaining agreements, including on employment terms such as wages, working hours, and benefits;
- provide union representatives with reasonable access to workers and relevant information, subject to confidentiality and operational needs.

If operating in a jurisdiction where legal restrictions limit the right to freedom of association or collective bargaining, companies are expected to:

- refrain from obstructing or retaliating against any lawful form of worker representation;
- support or permit alternative worker engagement mechanisms, such as elected worker committees, in accordance with applicable law and respecting the spirit of international labor rights.

Companies should ensure that management personnel and supervisors are trained to understand and uphold these rights. Effective grievance mechanisms should be available for workers to raise concerns if their rights to association or collective representation are violated, in alignment with Performance Expectation 5.B.(k): Workers' Grievance and Whistle-Blowing Mechanisms.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have any procedures and processes to ensure respect for employee rights to freedom of association and collective bargaining.	The Company has started to develop or has in place procedures and processes to ensure respect for employee rights to freedom of association and collective bargaining, but implementation has not started or is incomplete.	The Company has in place and implements procedures and processes to ensure respect for employee rights to freedom of association and collective bargaining. These rights are communicated to employees, including upon hire, formalized, and embedded within the company's policies and procedures. If operating in countries where applicable law restricts the right to freedom of association and collective bargaining, the company does not obstruct workers from developing alternative mechanisms that are allowed under applicable law.

Performance Expectation

(i) Non-Discrimination. Maintain and implement procedures and processes to provide equal opportunities for all employees, and to prevent and address all forms of discrimination and harassment in the workplace.

How can the company meet this expectation?

Companies are expected to develop and enforce non-discrimination and equal opportunity policies that prohibit any form of discrimination or harassment in employment based on race, color, gender, gender identity, age, religion, national origin, disability, pregnancy, marital status, sexual orientation, union affiliation, political opinion, or any other protected characteristic under applicable law.
These policies should apply across all aspects of the employment relationship, including:

- recruitment and hiring;
- compensation and benefits;
- training and development;
- performance evaluation and promotion;
- work assignments and transfers;
- discipline, termination, or retirement.

Companies are expected to integrate these principles into HR systems and daily operations. This includes:

- establishing transparent and merit-based hiring and promotion procedures;
- ensuring reasonable accommodations for individuals with disabilities or medical restrictions;
- ensuring any restrictions on task assignment (e.g., in lead-exposed areas) are based on objective, legally supported occupational health criteria, not on discriminatory assumptions.

Companies are expected to implement mechanisms for identifying, preventing, and responding to incidents of discrimination or harassment, including:

- confidential grievance and reporting channels;
- prompt and impartial investigation procedures;
- proportional and protective corrective action.

To support continuous improvement, companies are expected to:

- train all employees and supervisors on workplace non-discrimination, harassment prevention, and inclusive behavior;
- periodically review policies and data to identify disparities or patterns requiring corrective action;
- engage with affected workers or worker representatives in designing inclusive practices.

Where third-party labor providers, recruitment agencies or contractors are used, companies are expected to ensure that labor providers have policies, procedures and practices in place to identify and prevent discrimination and to monitor labor providers for compliance.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The company does not have in place policies, procedures or practices to identify and prevent discrimination in all aspects of employment practices including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination or retirement.	The Company has started to develop policies, procedures and practices to identify and prevent discrimination in all aspects of employment practices including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination, or retirement, but implementation has not started or is incomplete. The Company has started to develop or has in place policies, procedures and practices to ensure that third-party labor providers have established systems to identify and prevent discrimination, but implementation has not started or is incomplete.	The Company has in place and implements policies, procedures and practices that ensure they identify and prevent discrimination in all aspects of employment practices including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination, or retirement. The Company has in place and implements policies, procedures and practices to ensure that third-party labor providers have established systems to identify and prevent discrimination, where applicable. Such processes, procedures, and measures taken are reviewed regularly to ensure effectiveness and continuous improvement.

Performance Expectation

(j) Disciplinary Practices & Harassment. Maintain and implement procedures and processes to prevent and address harassment, intimidation, and/or exploitation in the workplace and to ensure that employees are not subjected to any threat or form of corporal punishment, harsh or degrading treatment, harassment, mental, physical, or verbal abuse, coercion or intimidation, or monetary fines as disciplinary measures.

How can the company meet this expectation?

Companies are expected to develop and enforce a formal policy prohibiting all forms of workplace abuse, harassment, intimidation, and degrading treatment. This policy should:

- apply to all employees, supervisors, contractors, and third parties operating on behalf of the company;
- be clearly communicated to employees upon hire and made accessible in a language they understand;
- be embedded within the company's wider human resources and compliance systems.

Companies are expected to ensure that disciplinary procedures are fair, consistent, and transparent. These procedures should:

- be clearly documented and explained to all employees;
- exclude the use of any physical punishment, verbal abuse, or humiliating practices;
- prohibit the use of financial penalties as a form of punishment, unless legally justified and contractually agreed;
- include progressive disciplinary measures and allow for worker input and appeal.

Companies are expected to implement mechanisms to prevent, detect, and address workplace harassment and intimidation, including:

- confidential grievance channels accessible to all workers, in alignment with Performance Expectation 5.B.(k): Workers' Grievance and Whistle-Blowing Mechanisms;
- procedures for impartial investigation and timely resolution of complaints;
- corrective actions, support for victims, and protection from retaliation.

Where third-party labor providers, recruitment agencies or contractors are used, companies are expected to ensure that labor providers have policies, procedures and practices in place to prevent and, where necessary, address, harassment, intimidation, and/or exploitation in the workplace; and to monitor labor providers for compliance.

Managers, supervisors, and HR staff should be trained regularly on respectful conduct, fair disciplinary practices, and how to respond appropriately to misconduct or complaints. Companies should also ensure that a respectful workplace culture is fostered, and that employees at all levels, including contractors, agency workers and temporary staff, understand and uphold standards of professional behavior.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have in place procedures and processes to prevent and, where necessary, address, harassment, intimidation, and/or exploitation in the workplace.	The Company has started to develop procedures and processes to prevent and, where necessary, address, harassment, intimidation, and/or exploitation in the workplace and to ensure that employees are not subjected to any threat or form of corporal punishment, harsh or degrading treatment, harassment, mental, physical, or verbal abuse, coercion or intimidation, or monetary fines as disciplinary measures. The Company has started to develop or has in place policies, procedures and practices to ensure that third-party labor	The Company has in place and implements procedures and processes to prevent and, where necessary, address, harassment, intimidation, and/or exploitation in the workplace and to ensure that employees are not subjected to any threat or form of corporal punishment, harsh or degrading treatment, harassment, mental, physical, or verbal abuse, coercion or intimidation, or monetary fines as disciplinary measures. The Company has in place and implements policies, procedures and practices to ensure that third-party labor providers to

	providers to prevent and, where necessary, address, harassment, intimidation, and/or exploitation in the workplace.	prevent and, where necessary, address, harassment, intimidation, and/or exploitation in the workplace, where applicable. Such processes, procedures, and measures taken are reviewed regularly to ensure effectiveness and continuous improvement.

Performance Expectation

(k) Workers' Grievance and Whistle-Blowing Mechanisms. Establish and implement a workers' grievance and whistle-blowing mechanism available to all employees.

How can the company meet this expectation?

Companies are expected to establish and implement a grievance and whistle-blowing mechanism for all employees. The mechanism should:

- be available to all categories of workers, including permanent, temporary, contract, and third-party workers;
- cover a wide range of issues, including workplace concerns, ethical violations, labor rights abuses, harassment, and safety complaints;
- and allow for both anonymous and identified confidential submissions, where legally permissible;
- be aligned with the UN Guiding Principles on Business and Human Rights' eight effectiveness criteria for company grievance mechanisms.

The grievance mechanism should be clearly documented and described in relevant languages and accessible formats, regularly communicated to workers through onboarding sessions, training programs, workplace posters, and employee handbooks. It should also include multiple reporting channels—such as a hotline, online portal, direct manager, or third-party provider—to ensure broad accessibility for all workers.

Companies are expected to follow up on grievances and whistle-blower reports using a clear, fair, and time-bound process, which should include:

- acknowledgement of receipt;
- confidential investigation;
- fair and impartial resolution procedures;

- protection against retaliation for whistle-blowers and complainants.

Companies are expected to document all cases, outcomes, and actions taken, while protecting worker confidentiality. Where appropriate, companies should report on the number and type of grievances received and how they were resolved. To ensure continuous improvement, companies are expected to:

- regularly review and assess the effectiveness of the grievance mechanism;
- collect worker feedback on usability and trust in the system;
- adjust and improve the mechanism based on insights from use, audits, or external feedback.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have a grievance mechanism in place to collect worker grievances and whistle-blowing reports.	The Company has started to develop a grievance mechanism to collect worker grievances and whistle-blowing reports but implementation is incomplete.	The Company has in place and implements a grievance mechanism to collect worker grievances and whistle-blowing reports. The Company's worker grievance mechanism is documented, communicated to all workers, and regularly reviewed for effectiveness and continuous improvement.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 5 – 5.A Human and Labor Rights is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
5.B.(a) Human Rights Assessment and Management	√	√	√
5.B.(b) Employment Terms	√	√	√
5.B.(c) Working Hours	√	√	√
5.B.(d) Paid Leave	√	√	√
5.B.(e) Remuneration	√	√	√

5.B.(f) Child Labor	√	√	√
5.B.(g) Forced Labor	√	√	√
5.B.(h) Freedom of Association and Collective Bargaining	√	√	√
5.B.(i) Non-Discrimination	√	√	√
5.B.(j) Disciplinary Practices & Harassment	√	√	√
5.B.(k) Workers' Grievance and Whistle-Blowing Mechanisms	√	√	√

Data Collection Method

Conformance with the Performance Expectations of Principle 5 – 5.A Human and Labor Rights is assessed through:

Performance Expectation	Observation	Document Review	Interviews			
			Board and Management	Employees	Contracted Workers	Other Stakeholders
5.B.(a) Human Rights Assessment and Management		√	√	√		√
5.B.(b) Employment Terms		√	√	√		
5.B.(c) Working Hours	√	√	√	√	√	
5.B.(d) Paid Leave		√	√	√		
5.B.(e) Remuneration		√	√	√	√	
5.B.(f) Child Labor	√	√	√	√	√	√
5.B.(g) Forced Labor	√	√	√	√	√	√

5.B.(h) Freedom of Association and Collective Bargaining		√	√	√		√
5.B.(i) Non-Discrimination	√	√	√	√	√	
5.B.(j) Disciplinary Practices & Harassment	√	√	√	√	√	
5.B.(k) Workers' Grievance and Whistle-Blowing Mechanisms	√	√	√	√	√	

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during the assessment:

- Legal register of applicable standards, laws, and regulations in the areas of human rights and labor rights;
- Procedure for regularly evaluating compliance with applicable standards, laws, and regulations;
- Government inspections reports;
- Human rights policy, corporate responsibility policy, or other policy or policies covering for human rights and labor rights;
- Employment or other policy that contains information on anti-discrimination, equal opportunity and fair treatment in employment;
- Evidence of communication of relevant policies and procedures to employees and contractors, as appropriate;
- Human rights risk and impact assessment methodology and reports;
- Documentation of measures taken to avoid and/or mitigate, remediate and compensate human rights impacts;
- Monitoring and evaluation reports on effectiveness of implemented measures including mitigation and remediation measures;
- Documentation of stakeholder consultations, communications, and outreach related to developing the methodology, conducting the human rights risk and impact assessment and sharing the results;
- Documentation of communications with host countries or others involved in mitigation or remediation of company-related human rights impacts;
- Employment contracts and letters of employment in local language (anonymized or following employee approval, as appropriate);
- Employee handbooks;

- Human resources policies;
- Voluntary overtime policy;
- Payroll records;
- Working time schedules;
- Time records;
- Collective bargaining agreements where applicable;
- Wage rates matrix;
- Wage slips (anonymized or following employee approval, as appropriate);
- Documentary evidence of payment to employees through bank transfer, cash or check
- Anti-child labor and forced labor policies
- Recruitment policy and age verification procedure for new hires;
- HR records for employees and copies of proof of identification and age, e.g., passport, national identity card;
- Contracts with recruitment agencies if applicable;
- Communication of prohibition of forced labor to labor brokers and employment agencies;
- Procedures to identify HSE risks work (if employing persons below the age of 18);
- Third-party assurance of a formal management system covering social issues, such as SA8000;
- Modern Slavery Report, or equivalent, where required by national law;
- Evidence that the company informs employees that they are free to join a workers' organization of their choosing without any negative consequences or retaliation;
- Records of meetings with workers' representatives and other relevant stakeholders; trade union election records;
- Recruitment and hiring documentation and interview notes (anonymized or following employee approval, as appropriate);
- Training, promotion, retirement, and dismissal procedures and records;
- Job advertisements;
- New employee selection criteria;
- Disciplinary procedure;
- Disciplinary notices (anonymized or following employee approval, as appropriate);
- Documented evidence of communication/training for workers and management on the disciplinary procedure;
- Performance reviews, including disciplinary and promotion records;
- Recruitment procedure, promotion procedure, professional development procedure, termination procedure;
- Termination records;
- Grievance mechanism procedures;
- Whistleblowing policy;
- Accommodation rules if applicable;
- Freedom of association policy (or equivalent);
- Records of communication/training of employees on freedom of association policy;
- Communications issued by the union or workers' association to employees, minutes of both the union or workers' association meetings and the meetings between company and the union or workers' association;
- Contractual clauses in contracts with business partners and third-party labor providers, including contractor companies, recruitment agencies, and suppliers related to expectations around labor standards compliance and monitoring, where applicable;
- Evidence of monitoring of business partners and third-party labor providers' compliance with labor standards, where applicable;

- Records of grievances lodged, investigation, and company responses;
- Sustainability or Corporate Social Responsibility reports, in line with the GRI Standards, the Sustainability Accounting Standards Board (SASB) Standards, or other equivalent reports.

Interviews

During interviews with management (including the Board, where appropriate), managers can demonstrate or describe:

- The company's commitment(s) to human rights and labor rights and where to find a formal written or an electronic copy of relevant policies;
- A good understanding of applicable laws and norms in the areas of human rights and labor rights;
- Clear lines of accountability and responsibility within the organization for the oversight and implementation of the policies and procedures related to human rights and labor rights;
- How the company assesses human rights risks and impacts;
- How the operating company has prevented, mitigated, and/or remediated identified impacts;
- How the company integrates the findings across relevant internal functions and processes, including identification, prevention, mitigation and remediation of adverse human rights impacts;
- A good understanding of the company's recruitment procedures;
- Where to find a formal legal register or repository of applicable standards, laws and regulations on employment terms and contracts;
- A good understanding of the new hire onboarding process;
- The company's approach to keeping employee files and payroll and time records;
- A good understanding of the company's policies on working hours, rest periods, and remuneration, and where to find a formal written or electronic copy of the policy;
- The daily and weekly hours allowed by law or collective bargaining agreement;
- The company pays the minimum wages set by law or collective bargaining agreement;
- A good knowledge of the prevailing wage if applicable;
- How the company records working hours and how it uses it to monitor and control working hours and overtime, provide adequate rest periods, and calculate remuneration;
- How the company regulates overtime and guarantees that it is voluntary;
- What type of benefits including paid annual leave and any other types of leave the company provides;
- A good understanding of the company leave policy that details the benefits including the leave employees are entitled to;
- A good understanding of how the company records and tracks leave days;
- A good understanding of the process of applying for leave;
- How the company keeps payroll records and ensures that all payments are made on time and directly to the employee and not to another party or intermediary; the process to ensure that workers receive a clear written or formal record of payments made to them;
- That, to the extent of their knowledge, there are no children working for the company below the stipulated age and/or employed in potentially hazardous work;
- The age verification process for the purpose of preventing child labor, including how the company performs checks on the validity of documentation and whether they require proof of age before employment;
- How the company identifies potentially hazardous tasks and how employees under 18 are prevented from conducting potentially hazardous work, if applicable;
- The company approach to apprenticeships;

- The remediation process in the event that children are found working at the company or on the premises of its business partners such as contractors;
- A good understanding of the company's forced labor and human trafficking policy;
- Systems in place to prevent the risks of forced labor and human trafficking;
- A good understanding of forced labor indicators such as abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions and excessive overtime;
- Whether contractors are informed of the company's position regarding forced labor and human trafficking;
- How the company monitors contractors to prevent the employment of trafficked labor;
- How the company allows employees to freely elect representatives;
- How the company negotiates with workers' organizations;
- How the company prevents discrimination or sanctions against employees who belong to or represent a workers' organization;
- A good understanding of a current company's collective bargaining agreement, if it exists;
- A good understanding of the company's anti-discrimination policy;
- Examples of measures the company has in place to prevent and address discrimination in in the workplace in terms of hiring, continued employment, remuneration, overtime, access to training, professional development, promotion, termination, or retirement;
- What remediation actions are taken in the event that the discriminatory practices are found;
- How employees and, where appropriate, contractors, are trained on relevant policies and procedures;
- Can explain the company's disciplinary processes including examples of disciplinary sanctions in cases of disciplinary misconduct;
- How employees and contracted workers can lodge grievances and whistleblowing reports, including reporting cases of harassment, abuse, and unjustified disciplinary measures;
- How company investigates grievances and whistleblowing reports, including cases of harassment, abuse, and unjustified disciplinary measures;
- That where a trade union, a workers' committee or other type of workers' organizations exists, it can lodge grievances and it is consulted and involved in handling them; that the company maintains grievance records and resolutions;
- A good understanding of the company's position regarding freedom of association.

During interviews with workers (including employees and contractors), they can demonstrate or describe:

- The type of training they have received on the company's relevant policies and procedures;
- That, to the extent of their knowledge, there are no children working for the company below the stipulated age and/or employed in potentially hazardous work;
- That they are not under the legally stipulated age, are not performing hazardous work if under 18 years of age, and did not start working for the company when they were below the legally stipulated age;
- Whether they are aware of the forced labor policy;
- That they can move and potentially quit the employment freely;
- That original documents are not withheld;
- That their wages are not withheld;
- Confirmation that they are working voluntarily and not under the threat of a penalty;
- How to lodge grievances.

During interviews with employees, they can demonstrate, describe or confirm:

- A basic understanding of the company's policy on human rights;
- Whether the company has identified human rights impacts;
- The type and content of the training they have received on the company's human rights policy;
- How to report human rights-related grievance;
- Whether lodged grievances are resolved;
- A good understanding of their employment terms and rights under contract;
- That they have received their contract in a language that they understand;
- That they have been provided with a copy of their employment contract, and know how to obtain a copy of their employment contracts from the employer;
- A basic understanding of the employee legal obligations;
- Knowledge of managers or supervisors responsible for managing human resources at the company;
- How they record working hours in the time records;
- Whether they are informed of the working schedule and shift patterns including standard working hours overtime hours and weekly rest breaks;
- Whether the standard working hours overtime hours and weekly rest breaks are included in the employment contract;
- Whether there is a collective bargaining agreement that covers working hours and weekly rest breaks, where applicable;
- How many hours they work per day and per week and how many days they work per week;
- What information is contained in their pay slips.
- A basic understanding of applicable limits on working hours including overtime and their entitlement to rest days and annual leave;
- That overtime working hours including are within legal limits; paid at a premium rate, and they can decline to work overtime, without fear of negative consequences or retribution;
- Whether there are systems to ensure that employees do not work excessive overtime and get adequate weekly rest breaks;
- That wages are paid on time and they receive a formal record of the payment on or before the payment is made;
- That wages are paid to their bank accounts or by using other methods, directly or indirectly, and, when indirectly, without incurring any costs, fees, or deposits in exchange for securing employment;
- That wages are paid in full as written in the signed employment contract;
- Whether employees were informed of the prevailing minimum wage rate(s) if applicable;
- Good understanding of the company leave policy;
- What type of leave employees are entitled to;
- What is the process of applying for leave;
- When can employees take leave;
- How the leave days are recorded and tracked;
- That they are free to join a trade union or an organization of their own choosing without fear of being treated unfairly;
- That they are not being discriminated against or subjected to unfair labor practices due to their affiliation with a worker's organization; nor pressured to join a company-controlled organization in place of an organization created and controlled by employees;
- Whether they are made aware of what constitutes discrimination;
- How discriminatory practices in terms of hiring, continued employment, remuneration, overtime, access to training, professional development, promotion, termination, or retirement are prevented;

- How discriminatory practices are reported to company management and how they respond to such reports;
- Can describe the company disciplinary processes including examples of disciplinary sanctions in cases of disciplinary misconduct;
- That they are made aware of the disciplinary procedure or code of conduct;
- That they are not subjected to corporal punishment, harsh or degrading treatment, sexual or physical harassment, mental, physical or verbal abuse, coercion or intimidation during disciplinary process
- That a grievance mechanism exists;
- That the grievance and whistle blowing mechanism provides for timely resolution, allows for complaints and grievances to be filed without retribution; enables complaints to be filed anonymously; allows workers' representatives to be present if requested by workers; and ensures that using the mechanism does not bar a worker from seeking remedy for that issue through other mechanisms.

During interviews with union representatives or representatives of worker organizations, representatives demonstrate or describe:

- That the company does not restrict access to or interfere with employees' efforts to organize or bargain collectively.

During interviews with suppliers and business partners (including contractor companies and recruitment agencies, where applicable), they can demonstrate or describe:

- Whether they are aware of the company's policies on child labor, forced labor, working hours, remuneration, and non-discrimination;
- How they ensure they are complying with labor standards;
- Whether the company monitors their compliance with labor standards.

<u>Observations</u>

During the site walk through, the assessor:

- Observes relevant documentation related to the working hours, such as working time schedule, posted prominently in designated locations.
- Does not observe any children working at the site under the legally stipulated age;
- Does not observe any children working at the site or employees under the age of 18 engaged in potentially hazardous work;
- Does not observe restrictions on employees' freedom of movement or employees who appear to be working at the company involuntarily;
- Does not observe any visible signs of discrimination at the company;
- Does not observe any visible signs of harassment or unacceptable disciplinary measures applied at the company;
- Relevant documentation related to the grievance mechanism, such as information on how to lodge grievances posted prominently in designated locations;
- Check for whistle blower hotlines and grievance/suggestion boxes.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
    - European Parliament and Council (1994). Directive 94/33/EC on the protection of young people at work (link)
    - European Parliament and Council (2000). Directive 2000/78/EC establishing a general framework for equal treatment in employment and occupation (link)
    - European Parliament and Council (2000). Charter of Fundamental Rights of the European Union, Article 31 (link)
    - European Parliament and Council (2002). Directive 2002/14/EC establishing a general framework for informing and consulting employees in the European Community (link)
    - European Parliament and Council (2003). Directive 2003/88/EC concerning certain aspects of the organization of working time (link)
    - European Parliament and Council (2011). Directive 2011/36/EU on preventing and combating trafficking in human beings and protecting its victims (link)
    - European Parliament and Council (2016). General Data Protection Regulation (GDPR) (EU) 2016/679 (link)
    - European Parliament and Council (2019). Directive (EU) 2019/1152 on Transparent and Predictable Working Conditions (link)
    - European Parliament and Council (2019). Charter of Fundamental Rights of the European Union, Article 5 (link)
    - European Parliament and Council (2019). Charter of Fundamental Rights of the European Union, Article 12 and Article 28 (link)
    - European Parliament and Council (2019). Charter of Fundamental Rights of the European Union, Article 32 (link)
    - European Parliament and Council (2019). Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (Whistleblower Protection Directive) (link)
    - European Parliament and Council (2022). Corporate Sustainability Reporting Directive (CSRD) (Directive (EU) 2022/2464) (link)
    - European Parliament and Council (2022). Directive (EU) 2022/2041 on adequate minimum wages in the European Union (link)
    - European Parliament and Council (2023). Corporate Sustainability Due Diligence Directive (CSDDD) (link)

- In the United Kingdom:
    - UK Government (1933). Children and Young Persons Act 1933 (link)
    - UK Government (1963). Children and Young Persons Act 1963 (link)
    - UK Government (1974). Health and Safety at Work etc. Act 1974 (link)
    - UK Government (1992). Trade Union and Labour Relations (Consolidation) Act 1992 (link)
    - UK Government (1996). Employment Rights Act 1996 (link)
    - UK Government (1998). National Minimum Wage Act 1998 (link)
    - UK Government (1998). Public Interest Disclosure Act (PIDA) 1998 (link)

    - UK Government (1998). Working Time Regulations 1998 (as amended) (link)
    - UK Government (2002). The Employment Act 2002 (link)
    - UK Government (2010). Equality Act 2010 (link)
    - UK Government (2015). Modern Slavery Act 2015 (link)

- In the United States:
    - U.S. Congress (1935). National Labor Relations Act (NLRA) (link)
    - U.S. Department of Labor. (1938). Fair Labor Standards Act (FLSA) (link)
    - U.S. Department of Labor. (1935). National Labor Relations Act (link)
    - U.S. Congress (1964). Civil Rights Act, Title VII (link)
    - U.S. Congress (2002). Sarbanes-Oxley Act (SOX), Section 806 (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- Ethical Trading Initiative (ETI) (2014). Base Code Guidance: Freedom of Association (link)
- International Labour Organization (ILO) (1919). Convention No. 1 on Hours of Work (Industry) (link)
- International Labour Organization (ILO) (1921). Convention No. 14 on Weekly Rest (Industry) (link)
- International Labour Organization (ILO) (1930). Convention No. 29 on Forced Labour (link), and Protocol to Convention No. 29 on Forced Labor and Recommendation No. 203 (link)
- International Labour Organization (ILO) (1948). Convention No. 87 on Freedom of Association and Protection of the Right to Organise (link)
- International Labour Organization (ILO) (1949). Convention No. 98 on the Right to Organise and Collective Bargaining (link)
- International Labour Organization (ILO) (1958). Convention No. 111 on Discrimination (Employment and Occupation) (link)
- International Labour Organization (ILO) (2008). Convention No. 122 on Employment Policy (link)
- International Labour Organization (ILO) (1970). Convention No. 131 on Minimum Wage Fixing (link)
- International Labour Organization (ILO) (1970). Convention No. 132 on Holidays with Pay (link)
- International Labour Organization (ILO) (1973). Convention No. 138 on the Minimum Age for Admission to Employment (link)
- International Labour Organization (ILO) (1994). Recommendation No. 166 concerning Termination of Employment (link)
- International Labour Organization (ILO) (1998). ILO Declaration on Fundamental Principles and Rights at Work (link)
- International Labour Organization (ILO) (1999). Convention No. 182 on the Worst Forms of Child Labour (link)
- International Labour Organization (ILO) (2019). Convention No. 190 on Violence and Harassment in the World of Work (link)
- OECD (2018). OECD Due Diligence Guidance for Responsible Business Conduct (link)
- UNICEF and ILO (2021). Child Labour: Global Estimates 2020, Trends and the Road Forward (link)
- United Nations (2011). Guiding Principles on Business and Human Rights (UNGPs) (link)

5.C. Compliance and Anti-Corruption

Performance Expectations and Performance Determination

Performance Expectation

(a) Legal Compliance. Ensure compliance with applicable standards, laws, and regulations.

How can the company meet this expectation?

Companies are expected to implement a legal compliance framework that ensures all operations are conducted in accordance with applicable national, regional, and local laws, regulations, and industry standards. This includes—but is not limited to—laws related to environmental protection, occupational health and safety, labor rights, hazardous materials handling, emissions, waste management, and permitting. To achieve this, companies should:

- designate qualified personnel or compliance officers with clearly defined responsibilities for monitoring and maintaining legal compliance;
- maintain an up-to-date legal and regulatory register relevant to site operations, including permit requirements, reporting obligations, and applicable standards;
- secure and maintain all required site permits, licenses, and approvals, and ensure they are reviewed and renewed in a timely manner;
- establish documented procedures that define how the company will comply with legal requirements in practice, including:
    - regular compliance audits and inspections;
    - timely reporting to authorities;
    - corrective actions where gaps or violations are identified.

Companies are expected to regularly review and update compliance procedures in response to:

- changes in laws and regulations;
- site expansions or process changes;
- audit findings or enforcement actions;
- emerging risks or stakeholder expectations.

Companies should also provide ongoing training to relevant staff to ensure awareness of current legal obligations and internal compliance responsibilities. Internal reporting mechanisms should allow employees to raise compliance concerns confidentially and without retaliation.

The legal compliance framework should be comprehensive, covering, at a minimum, the areas addressed in the Code's Performance Expectations—such as occupational health and safety (Performance Expectation 1.A.(a)), environmental compliance (1.B.(a)), lead exposure controls (2.(a)), and labor rights (5.B). This ensures that compliance obligations across all relevant regulatory domains are consistently identified, monitored, and fulfilled.

How will performance be determined?

Does not meet	Partially meets	Fully meets

The Company does not have in place procedures or processes to ensure compliance with applicable standards, laws, and regulations place, and has not appointed staff members with responsibility to monitor and ensure legal compliance of the company operations or ensure regulatory site permit requirements are in place in line with applicable standards, laws, and regulations in the country of operation.	The Company has procedures and processes to ensure compliance with applicable standards, laws, and regulations, including appointed staff members with responsibility to monitor and ensure legal compliance of the site operations and ensure regulatory site permit requirements are in place in line with applicable standards, laws, and regulations in the country of operation. However, there are gaps identified in implementation.	The Company has in place and implements procedures and processes to ensure compliance with applicable standards, laws, and regulations place, including appointed staff members with responsibility to monitor and ensure legal compliance of the site operations and ensure regulatory site permit requirements are in place in line with applicable standards, laws, and regulations in the country of operation. Procedures and processes are regularly reviewed to ensure effectiveness and continuous improvement.

Performance Expectation

(b) Anti-Corruption Policy. Document, communicate, and regularly review an Anti-Corruption policy designed for continuous improvement, endorsed by the Board and supported through the provision of human and financial resources.

How can the company meet this expectation?

Companies are expected to adopt and implement a formal Anti-Corruption Policy that prohibits all forms of bribery, corruption, extortion, and improper influence in both the public and private sectors. The policy should:

- clearly define corruption, including facilitation payments, kickbacks, and conflicts of interest;
- be aligned with applicable national laws and international frameworks, such as the UN Convention Against Corruption and OECD Anti-Bribery Convention;
- apply to all employees, officers, contractors, suppliers, agents, and other business partners;
- be documented and made publicly available, such as through the company website;
- be endorsed by senior leadership, such as the Board of Directors or equivalent governing body;
- be communicated effectively to all employees, officers, contractors, suppliers, agents, and other business partners, through training sessions, onboarding materials, and relevant contractual clauses in alignment with Performance Expectation 3.(a) Responsible Sourcing Policy, where applicable.

Companies are expected to ensure the policy is:

- integrated into the company's compliance and risk management systems;
- supported by sufficient financial and human resources, including the appointment of personnel responsible for anti-corruption oversight;

- enforced through internal controls, including risk identification, transaction monitoring, due diligence, audits, reporting mechanisms, and disciplinary procedures.

Companies should provide accessible and confidential channels for employees and third parties to report suspected bribery or corruption. All reports should be investigated impartially, and appropriate corrective action taken. These reporting channels should be aligned with the company's grievance and whistle-blowing procedures, in accordance with Performance Expectation 5.B.(k): Workers' Grievance and Whistle-Blowing Mechanisms.

To drive continuous improvement, companies are expected to:

- regularly review and update the policy and its implementation procedures;
- monitor trends, risks, and lessons learned from internal and external corruption cases;
- integrate findings into planning and decision-making processes, especially in high-risk markets or transactions.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have a documented Anti-corruption policy in place.	The Company has developed an Anti-corruption policy but it is not publicly available and/or has not been fully implemented or communicated to all employees and business partners.	The Company has a documented and publicly available Anti-Corruption Policy endorsed by senior management, which demonstrates strong control and oversight. Roles and responsibilities are clearly understood by employees, officers, contractors, suppliers, agents, and other business partners. The Policy is regularly reviewed to ensure effectiveness and continuous improvement and findings are fully integrated into planning and decision making. The Policy implementation is supported through the provision of sufficient human and financial resources.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 5 - 5.C Compliance and Anti-Corruption is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
5.C.(a) Legal Compliance	√	√	√
5.C.(b) Anti-Corruption Policy	√	√	√

Data Collection Method

Conformance with the Performance Expectations of Principle 5 - 5.C Compliance and Anti-Corruption is assessed through:

Performance Expectation	Observation	Document Review	Interviews			
			Board and Management	Employees	Contracted Workers	Other Stakeholders
5.C.(a) Legal Compliance	√	√	√	√		
5.C.(b) Anti-Corruption Policy	√	√	√	√	√	√

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during the assessment:

- Register of applicable standards, laws, and regulations;
- Register of required licenses, permits, and certifications, and their compliance status;
- Procedures defining the roles, responsibilities and processes for regularly evaluating compliance with applicable standards, laws, and regulations, as part of the legal system and/ or relevant management systems (e.g. environmental system for environmental compliance);
- Qualifications and job descriptions of designated legal compliance staff;
- Legal compliance audits;
- Evidence of court cases and dispute resolutions;
- Training records;
- Corporate or site-level anti-corruption policy and supporting documentation, including procedures for reporting and investigating instances of corruption and suspicious transactions;
- Evidence of review of the policy;
- Third-party audit report of an anti-corruption system;
- Corruption risk assessment methodology and findings;
- Clear lines of accountability and responsibility within the organization for the oversight and implementation of the policies and procedures related to corruption;
- Evidence of budgetary allocation for human and financial resources to implement the policy;
- Gift register;

- A procedure for identifying and monitoring identified parts of the business that carry a high bribery risk;
- A procedure for, and records of, investigating bribery and records of sanctions implemented for bribery or attempted bribery;
- Register of bribery incidents;
- Register of charitable donations and political contributions.

Interviews

During interviews with the Board and management, members of the Board and managers can demonstrate or describe:

- A good understanding of the company's compliance procedures;
- Where to find a formal legal register or repository of applicable standards, laws, and regulations and a good understanding of their intent;
- Knowledge of systems in place to ensure compliance with laws and regulations;
- A good understanding of the company's anti-corruption policy and procedures and where to find a formal written or electronic copy;
- Clear lines of accountability and responsibility for the oversight and implementation of the anti-corruption policies and procedures;
- A procedure for reporting and investigating incidents of corruption;
- The training programme in place to raise awareness on legal compliance and anti-corruption;
- Examples of action taken to investigate and, where relevant, manage anti-corruption risks;
- Oversight mechanisms and checks and balances for identified employees in high-risk positions (e.g. those with financial authority; those who interact with government officials).

During interviews with employees, they can demonstrate or describe:

- Where to find a formal legal register or repository of applicable standards, laws, and regulations relevant to their function and a basic understanding of their intent;
- The training received on compliance and anti-corruption policies and procedures;
- How to file a report of allegations of corruption.

Observations

During the site walk through, the assessor:

- Checks for posted standards, laws, and regulations;
- Checks for posted anti-corruption policy; and
- Posted anti bribery hotline numbers, and suggestion boxes.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
    - Council of Europe (1999). Criminal Law Convention on Corruption (link)

    - European Parliament and Council (2019). Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (Whistleblower Protection Directive) (link)

- In the United Kingdom:
    - UK Parliament (2010). Bribery Act 2010 (link)
    - UK Financial Reporting Council (2018). The UK Corporate Governance Code (link)

- In the United States:
    - U.S. Congress (1977). Foreign Corrupt Practices Act (FCPA) (link)
    - U.S. Congress (2002). Sarbanes-Oxley Act (SOX), Public Law 107-204 (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- International Organization for Standardization (2021). ISO 37301:2021. Compliance Management Systems (link)
- Organisation for Economic Co-operation and Development (OECD) (2009). OECD Anti-Bribery Convention (link)
- Organisation for Economic Co-operation and Development (OECD) (2018). OECD Due Diligence Guidance for Responsible Business Conduct (link)
- Organisation for Economic Co-operation and Development (OECD) (2011). OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (link)
- Transparency International (2022). Anti-Corruption in ESG standards (link)
- United Nations (2003). UN Convention Against Corruption (UNCAC) (link)

PRINCIPLE 6: Proactively engage key stakeholders in an open and transparent manner.

Performance Expectations and Performance Determination

Performance Expectation

(a) Stakeholder Engagement. Document, implement, communicate, and regularly review a stakeholder engagement plan scaled to the company operations' risks and impacts, tailored to the characteristics and interests of identified stakeholders including host governments, civil society, and impacted communities.

How can the company meet this expectation?

Companies are expected to identify all relevant internal and external stakeholders, including workers, unions and worker organizations, local authorities and host governments, civil society, and impacted communities, through structured and documented stakeholder mapping. This means:

- assessing the interests, influence, and vulnerability of each group, and evaluating how each stakeholder is or may be affected by the company's operations;
- for each stakeholder group, identifying their legitimate representatives.

When conducting stakeholder mapping, companies should pay special attention to stakeholder groups which may be at heightened risk of vulnerability or marginalization, including but not limited to Indigenous or Tribal Peoples; women; national or ethnic, religious and linguistic minorities; children; persons with disabilities; and migrant workers.

Based on the results of stakeholder mapping, companies are expected to develop and implement a stakeholder engagement plan and to communicate it to all relevant stakeholders.

Companies are expected to implement the stakeholder engagement plan by:

- identifying the appropriate channel(s) for engagement;
- conducting engagement activities regularly, in line with pre-determined timeframes and when new circumstances arise requiring engagement;
- defining roles and responsibilities for internal teams managing engagement activities;
- incorporating measurable indicators to track the effectiveness of engagement;
- keeping a central record of all engagement activities.

To effectively communicate the stakeholder engagement plan, companies should:

- share the plan with internal teams and relevant departments;
- disseminate the stakeholder engagement activities externally through stakeholder meetings, community boards, emails, or the Company website;
- hold information sessions or workshops to explain the plan's goals and how stakeholders can participate, to both internal and external stakeholders;
- translate the plan and associated communications material into local languages and formats suitable for each audience.

Companies should ensure that stakeholder engagement activities focus on topics that are relevant and material for both stakeholders and the company. At a minimum, stakeholders should be consulted on decisions or operations that could impact community health, safety, and wellbeing. Engagement should also address issues such as employment practices, environmental performance, and emergency preparedness. Additionally, companies should establish a feedback mechanism that allows stakeholders to express concerns and submit grievances, as per Performance Expectation 6.(b).

To support continuous improvement and long-term relationship building, the engagement plan should be regularly reviewed and updated based on stakeholder feedback, changes in operations, or evolving social and environmental conditions. This means setting periodic review intervals, at least annually, and documenting changes and lessons learned.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not identify relevant or impacted stakeholders through documented stakeholder mapping activities, nor does it have in place engagement mechanisms or measures.	The Company has started to conduct or conducts documented stakeholder mapping to identify impacted stakeholders; has developed and has started to implement measures for stakeholder engagement.	The Company identifies relevant and impacted stakeholders through documented stakeholder mapping activities. The Company has developed and implemented a stakeholder engagement plan which is communicated to all relevant stakeholders. The stakeholder engagement plan is regularly reviewed for effectiveness and continuous improvement.

Performance Expectation

(b) Stakeholder Feedback Mechanism. Document, implement, communicate, and regularly review a mechanism for collecting, investigating, and where appropriate addressing feedback and potential grievances from impacted communities and other stakeholders.

How can the company meet this expectation?

Companies are expected to develop a formal feedback mechanism that outlines how concerns and grievances from stakeholders are collected, reviewed and addressed. This includes defining:

- the channel(s) available to internal and external stakeholders to submit feedback and potential grievances;
- the roles and responsibilities of relevant personnel in charge of collecting, investigating, and addressing grievances;
- the timelines and processes for investigating and addressing feedback;
- the process for escalating matters internally and providing opportunities for appeals;
- how the results of the investigation process are communicated to relevant stakeholders;
- how feedback or grievances are recorded;
- how confidentiality and non-retaliation is maintained, including opportunities for submitting feedback on grievances anonymously.

Companies should implement the feedback mechanism making sure it is accessible to all stakeholders. This means companies should inform stakeholders about how to submit feedback or concerns, and the company's timelines and procedures for responding to such feedback.

To ensure that different stakeholder groups have appropriate access to the feedback mechanism, companies should consider setting up multiple channels, such as phone lines, suggestion boxes, online forms, and community relations officers. All relevant information concerning the feedback mechanism should be translated and adapted to the local language(s) and context.

When grievances are received, companies should focus on reaching agreed solutions with stakeholders through dialogue. Where adjudication is required, this should be provided by a legitimate, independent third-party mechanism. Companies should ensure the mechanism aligns with the UN Guiding Principles on Business and Human Rights' eight effectiveness criteria for company grievance mechanisms.

Companies are expected to regularly review the feedback mechanism for effectiveness. This means monitoring how feedback channels are used, how quickly feedback is resolved, and stakeholders' satisfaction with the processes. Companies should use this information to make improvements over time and update the mechanism as needed to ensure they continue to meet stakeholder needs and expectations.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not have a mechanism in place to collect stakeholder feedback and potential grievances.	The Company has started to develop or has mechanisms in place to collect stakeholder feedback and potential grievances.	The Company has in place and implements a grievance mechanism which is documented, communicated, and easily accessible to all stakeholders. The mechanism includes a clear process for investigating the grievances lodged by the

		community and other stakeholders and communicating the results of such investigations as appropriate. The mechanism is regularly reviewed for effectiveness and continuous improvement.

Performance Expectation

(c) Transparency and Disclosure. Publicly annually disclose environmental, social and governance performance in line with internationally reporting standards, including against business practices relevant to this Code.

How can the company meet this expectation?

Companies are expected to publicly disclose their Environmental, Social, and Governance (ESG) performance at least once per year, using recognized international reporting standards. This means sharing clear, accurate, and material information on the company's impacts, progress and challenges related to ESG topics, including all topics relevant to this Code:

- environmental performance, such as EHS practices, lead exposure and emissions management, and lead battery recycling and waste management;
- social performance, including OH&S and labor practices, responsible sourcing and supply chain management, stakeholder engagement, and human rights;
- governance practices, such as board oversight of ESG topics, supply chain due diligence, anti-corruption, knowledge sharing and capacity building, and feedback mechanisms.

Companies should conduct a materiality assessment to identify topics that are most relevant to its business and stakeholders, focusing on issues with significant environmental or social impacts and material financial implications. Companies should align their reporting with internationally accepted frameworks to ensure comparability and credibility. Common comprehensive reporting standards include:

- Global Reporting Initiative (GRI) Standards;
- Sustainability Accounting Standards Board (SASB);
- International Sustainability Standards Board (ISSB).

Common topic-specific reporting standards include:

- Carbon Disclosure Project (CDP);
- TCFD (Task Force on Climate-related Financial Disclosures);
- TNFD (Taskforce on Nature-related Financial Disclosures.

Companies should report:

- both qualitative and quantitative data and performance indicators, as applicable;
- targets and progress made towards each goal;
- a description of how ESG risks are managed and integrated into business strategy.

To make disclosures easily accessible and understandable for all stakeholders, companies should use clear language and leverage the use of visual aids, like charts and infographics, and case studies to show accountability and continuous improvement.

Reporting can be done through sustainability reports or integrated annual reports. Companies should regularly update their disclosures and independently assure them, where possible.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not publicly report on its ESG performance, including on business practices relevant to this Code.	The Company has started to report on its ESG performance, including on business practices relevant to this Code in line with international reporting standards.	The Company conducts a materiality assessment and annually publicly reports on its ESG performance including on business practices relevant to this Code, in line with international reporting standards via a Sustainability Report or equivalent.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 6 is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
6.(a) Stakeholder Engagement	√	√	√
6.(b) Stakeholder Feedback Mechanism	√	√	√
6.(c) Transparency and Disclosure	√	√	√

Data Collection Method

Conformance with the Performance Expectations of Principle 6 is assessed through:

	Observation		Interviews

Performance Expectation		Document Review	Board and Management	Employees	Contracted Workers	Other Stakeholders
6.(a) Stakeholder Engagement		√	√			√
6.(b) Stakeholder Feedback Mechanism		√	√			√
6.(c) Transparency and Disclosure		√	√			

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during the assessment:

- Board, Corporate or site level stakeholder engagement policies and procedures;
- Stakeholder identification or mapping;
- Stakeholder engagement plan, including implementation schedule and register of completed stakeholder engagement activities;
- Board, Corporate or site level stakeholder engagement policies and procedures;
- Stakeholder engagement database;
- Stakeholder engagement reports;
- Evidence of communicating the stakeholder engagement plan;
- Records of engagement and consultation activities, including minutes of the meetings;
- Job description of community liaison staff;
- Evidence of training of relevant staff;
- Grievance mechanism procedures;
- Records of feedback, including potential complaints or grievances received; company investigations and action taken;
- Grievance root cause analysis reports;
- Evidence of training of management on handling grievances;
- Documentation of surveys or reviews carried out to evaluate the effectiveness of the grievance mechanism;
- Analysis reports of the capacity of communities to engage with the company;
- Documented evidence of assistance relating to stakeholder engagement provided to stakeholders;
- Documented evidence of regular review of the effectiveness of assistance offered to facilitate stakeholder engagement;
- Capacity building training materials and records;
- Records of funding or other in-kind support to stakeholders;
- Reports or summaries of stakeholder input on capacity building and company feedback to stakeholders;

- Records of disclosed cases of non-compliance with applicable regulations and information relating to the company;
- Records of publicly disclosed summaries of the assessment report provided the Lead Battery 360 upon provision of the Lead Battery 360 claim;
- Records of requests made by stakeholders;
- Materiality assessment for the purpose of sustainability reporting;
- Sustainability data collection and aggregation files, including Lead Battery 360 KPIs;
- Publicly available reports on business practices relevant to the Code;
- Memos to stakeholders on business practices relevant to the Code; and
- Sustainability or Corporate Social Responsibility reports, in line with the GRI Standards, the Sustainability Accounting Standards Board (SASB) Standards, or other equivalent reports;
- Annual sustainability report or equivalent, publicly disclosed on the Company's website;
- Evidence of communication of the Company's performance on business practices relevant to this Code such as a public website, social media, newsletters, meetings presentations, etc.;
- Materiality assessment for the purpose of sustainability reporting;

Interviews

During interviews with management, managers can demonstrate or describe:

- Applicable legal requirements on stakeholder engagement and disclosure;
- The company's policy and procedures on stakeholder engagement;
- Overall effectiveness of the company's ability to promote stakeholder engagement initiatives with specific reference to the team/division responsible for implementing such activities;
- A good understanding of the applicable legal requirements on stakeholder engagement and disclosure;
- A good understanding of the company's policy and procedures on stakeholder engagement;
- How the company identifies and engages with stakeholders including impacted stakeholders;
- A good understanding of impacted stakeholders;
- Knowledge of the outcomes of the stakeholder analysis process;
- How the company communicates the stakeholder engagement plan to relevant stakeholders and examples of actions taken by the company to build capacity to ensure effective stakeholder engagement;
- How the stakeholder engagement plan is reviewed;
- How the company identifies and engages with stakeholders including impacted stakeholders,
- How the company communicates the stakeholder engagement plan to relevant stakeholders and examples of actions taken by the company to build capacity to ensure effective stakeholder engagement;
- How stakeholders can and do provide feedback or potential complaints or grievances; and how the company responds to such feedback through dialogue, remediation action, etc. as appropriate;
- Clear lines of accountability and responsibility or the oversight and implementation of stakeholder engagement activities;
- How stakeholders can and do provide feedback or potential complaints or grievances; and how the company responds to such feedback through dialogue, remediation action, etc. as appropriate;
- A good understanding of the grievance mechanism and how grievances are filed, acknowledged, investigated, and resolved, including general timeframes for each phase;
- How to measure the effectiveness of the grievance mechanism;

- How information on the company's sustainability performance is reported and disseminated to key stakeholders on an on-going basis, including information on the company's objectives and targets and continuous improvement plans;
- How to assess the capacity of stakeholders to effectively engage;
- Knowledge of assistance provided to stakeholders to facilitate effective stakeholder engagement;
- Knowledge of funding or other in-kind support offered to stakeholders;
- Knowledge of capacity building training offered to stakeholders;
- How non-compliance with applicable regulations and information relating to the company the Code is disclosed;
- Knowledge of requests made by stakeholders;
- Type of information relating to performance against Lead Battery 360° that is made publicly available;
- How the materiality assessment for the purpose of sustainability reporting is done;
- How sustainability data is collected collection and aggregated;
- How the company communicates with stakeholders;
- Knowledge of the frequency of reporting to stakeholders;
- How the company engages with stakeholders to manage stakeholder feedback across different communications channels.

During interviews with community members and other stakeholders, they can describe or demonstrate:

- The company's stakeholder engagement plan and its implementation process;
- Their company's participation in stakeholder engagement processes;
- How they participate in stakeholder engagement processes;
- How to provide feedback or make complaints and how such feedback or complaints are addressed or investigated by the company;
- How the company handles lodged grievances;
- Time taken by the company to address grievances;
- Types of remedy provided by the company;
- Effectiveness of the grievance mechanism;
- How the company assess the capacity of stakeholders to effectively engage;
- Types of capacity building related to stakeholder engagement offered by the company;
- Types of funding or in-kind support offered to stakeholders;
- Type of communication used by the company;
- Frequency of communication;
- How the company reports on its ESG performance;
- Type of communication used by the company;
- Content of reports, memos or newsletters;
- How to obtain information on the company's performance in relation to the areas covered in the Code and the company's participation in Lead Battery 360°.

Key References

Key Regulatory Frameworks

Key regulatory frameworks that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:

    - European Commission (2014). Non-Financial Reporting Directive (Directive 2014/95/EU) (link)
    - European Parliament and Council (2023). Corporate Sustainability Due Diligence Directive (CSDDD) (link)

- In the United Kingdom:
    - UK Government (2013). Companies Act 2006 (Strategic Report and Directors' Report) Regulations (link)

- In the United States:
    - U.S. SEC (2022). Proposed Rules on Human Capital and Climate Disclosure (emerging) (link)

Additional Guidance

Key reference standards that companies can rely on for additional guidance include:

- AccountAbility (2015). AA1000 Stakeholder Engagement Standard (AA1000SES) (link)
- Carbon Disclosure Project (CDP) (2023). Disclosure System for Environmental Impact (link)
- Global Reporting Initiative (GRI) (2021). GRI Standards for Sustainability Reporting (link)
- International Council on Mining & Metals (ICMM). Community Development Toolkit (link)
- International Council on Mining & Metals (ICMM). Stakeholder Research Toolkit (link)
- International Finance Corporation (IFC) (2007). Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets (link)
- International Institute for Environment and Development (2016). Meaningful Community Engagement in the Extractive Industries (link)
- International Organization for Standardization (2010). ISO 26000:2010 – Guidance on Social Responsibility (link)
- International Sustainability Standards Board (ISSB) (2023). IFRS Sustainability Disclosure Standards (link)
- OECD (2017) Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector (link)
- OECD (2018). Due Diligence Guidance for Responsible Business Conduct (link)
- OECD (2011). OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (link)

PRINCIPLE 7: Partner with key stakeholders and government agencies to share our expertise and promote environmentally sound recycling of lead batteries in low and middle-income countries.

Performance Expectations and Performance Determination

Performance Expectation

(a) Support International Initiatives Designed to Eliminate Lead Pollution.
Support G7, G20, OECD, UNEP, WHO, UNICEF, the World Bank, FAO, and others; existing international policy structures such as Basel Convention, Rotterdam Convention, SAICM, GEF, and Sustainable Development Goals (SDGs); and existing international partnerships.

How can the company meet this expectation?

Companies are expected to establish, implement, and maintain a process(es) to:

- identify and stay informed about international initiatives and frameworks aimed at eliminating lead pollution and promoting responsible lead battery recycling, through activities such as signing up for industry newsletters, desktop research, or networking events;
- evaluate how relevant these initiatives are for business, based on their required commitments, applicability, and context;
- integrate relevant initiatives and commitments, such as those related to lead pollution prevention and mitigation, into their environmental, social, and governance (ESG) strategies and into budget planning, where applicable;
- maintain knowledge of developments on lead pollution and its impact on public health and the environment, particularly in low and middle income economies.

Companies should document the international initiatives they support and how they operationalize that support. This means:

- maintaining information of the designated responsible personnel for each initiative;
- regularly reviewing and updating their alignment with international developments and expectations;
- publicly reporting on their support for and contributions to these initiatives. Support may include but is not limited to:
    - technical collaboration and knowledge sharing;
    - participation in educational campaigns;
    - Trade Association memberships;
    - advocacy for stricter lead control regulations in regions where poor standards prevail.
    - financial contributions or co-financing relevant programs designed to improve the lifecycle management of lead and lead-based batteries.

Companies are expected to publicly support international policy structures and initiatives designed to improve practices in lead battery value chains to help eliminate pollution.

International policy structures and frameworks include, but are not limited to:

- The Basel Convention on the Technical Guidelines for the Environmentally Sound Management of Waste Lead-acid Batteries, which provides a global legal framework for the safe movement and disposal of hazardous waste, aiming to minimize environmental and human health impacts from improper battery recycling;
- The Rotterdam Convention on hazardous chemicals and pesticides, which promotes shared responsibilities among stakeholders in the international trade of hazardous chemicals, including lead compounds;
- The Strategic Approach to International Chemicals Management (SAICM), which provides a global policy framework fostering the sound management of chemicals throughout their life cycle, including those used in lead battery manufacturing and recycling;
- Global Environment Facility (GEF) projects, such as Reducing Environmental and Health Risks to Vulnerable Communities from Lead Contamination from Lead Paint and Recycling of Used Lead Acid Batteries, which support developing countries in addressing the environmental challenges related to lead pollution;
- Sustainable Development Goals (SDGs), which provide a blueprint for achieving a better and more sustainable future, including goals directly linked to good health and well-being, responsible consumption and production, and climate action.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company is not aware of initiatives and frameworks aimed at eliminating lead pollution and promoting responsible lead battery recycling and does not provide any support to international initiatives, policy structures or partnerships designed to eliminate lead pollution.	The Company is aware of initiatives and frameworks aimed at eliminating lead pollution and promoting responsible lead battery recycling and has started to support international initiatives, policy structures or partnerships designed to eliminate lead pollution. They have not established associated processes or have not publicly reported their efforts.	The Company is aware of initiatives and frameworks aimed at eliminating lead pollution and promoting responsible lead battery recycling. They publicly support either through Trade Association membership or at an individual company level international policy structures and initiatives or partnerships designed to improve practices in lead battery value chains to help eliminate pollution.

Performance Expectation

(b) Knowledge Sharing. Support Trade Association efforts to develop and share best practices in EHS performance in the lead battery value chain both domestically and in other regions.

How can the company meet this expectation?

Companies are expected to identify and participate (e.g., through trade associations) in technical working groups and relevant professional forums focused on environmental, health, and safety (EHS) performance in the lead battery value chain. This means actively contributing to the development of best practices in EHS management, facilitating internal and external sharing of technical innovations and lessons learned, and supporting knowledge transfer locally and with other regions. By supporting knowledge-sharing, companies can help raise EHS standards across the lead battery value chain globally, reduce risks of lead exposure, and enhance the sustainability and reputation of the industry as a whole.

Knowledge sharing may include, but is not limited to:

- membership in and engagement with relevant trade associations such as:
  - International Lead Association (ILA);
  - The Association of European Automotive and Industrial Battery Manufacturers (EUROBAT);
  - Battery Council International (BCI);
  - The Association of Battery Recyclers (ABR).
- Activities such as:
  - hosting or providing sufficient resources for staff to attend webinars, conferences, and workshops on EHS topics;
  - supporting the publication of case studies or white papers by providing relevant information;
  - contributing EHS data for benchmarking and industry-wide reporting efforts;
  - providing technical support or training to partners domestically or in other geographies;
  - participating in the Lead Battery 360° programme and engaging with its founding partners in collaborative projects to develop new guidelines and tools.

Companies should maintain documented information on knowledge-sharing activities, including the company's roles and responsibilities, and the nature of best practices shared. Best practice areas may include:

- lead exposure prevention and control;
- emissions monitoring and abatement;
- waste and recycling management;
- occupational health surveillance and safety programs;
- stakeholder engagement.

Companies should define clear roles and responsibilities for engagement with Trade Associations within the organization, document their contributions, including meetings, technical submissions, and stakeholder collaborations, and ensure top management is committed to these engagements.

Does not meet	Partially meets	Fully meets
The Company does not support trade association efforts or other initiatives to develop and share best practices in EHS performance in the lead battery value chain.	The Company has started to support trade association efforts or other initiatives but has not undertaken or participated in specific activities to develop and share best practices in EHS performance in the lead battery value chain.	The Company supports trade association efforts or other initiatives to develop and share best practices in EHS performance in the lead battery value chain.

		The Company encourages and provides sufficient resources for staff to attend and participate in EHS conferences and workshops designed to facilitate advancement of EHS practices. Where opportunities exist, the Company provides EHS resources to support best practice sharing activities designed to reduce lead exposures in LMICs initiated by NGOs, and other stakeholders.

Performance Expectation

(c) Support Policy Makers to Develop National Strategies. Work with Policy Makers, NGOs and other stakeholders to develop National Strategies that encourage development of circular economies for lead batteries that consider environmental, health and safety practices.

How can the company meet this expectation?

Companies are expected to identify and work collaboratively with stakeholders, including policy makers, NGOs, and other key groups to develop national strategies that encourage the development of circular economies for lead batteries and EHS standards. By supporting policy makers, companies can reduce the risk of regulatory uncertainty, drive up standards in regions with weaker oversight, and ensure the long-term competitiveness of lead batteries in an increasingly lithium-focused market, as well as protecting both people and the planet.

Working collaboratively with stakeholders can include:

- engaging in dialogue with regulators to exchange technical expertise and industry insights;
- participating in consultations and forums to help shape practical and informed policies;
- encouraging and supporting the creation of platforms for collaboration;
- sharing experiences related to lead batteries recycling;
- supporting research by providing data on EHS topics.

Companies should focus on both global best practices and local realities and priorities to support the development of national strategies to encourage the development of circular economies for lead batteries, especially if they operate in regions where substandard supply chain actors are prevalent. This could include, for example, promoting end-of-life collection and recycling by operations that are licensed and operate to acceptable EHS standards.

Companies should define clear roles and responsibilities for policy engagement within the organization, document their contributions, including meetings, technical submissions, and stakeholder collaborations, and ensure top management is committed to these engagements.

Does not meet	Partially meets	Fully meets
The Company does not work with Policy Makers, NGOs or other stakeholders to support the development of circular economies for lead batteries that consider environmental, health and safety practices.	The Company has started to work with Policy Makers, NGOs and other stakeholders, either through Trade Association participation or individually, to support the development of circular economies for lead batteries that consider EHS practices.	The Company can demonstrate that it engages with Policy Makers, NGOs and other stakeholders, either through Trade Association participation or individually, to support the development of circular economies for lead batteries that consider EHS practices. If operating in a region or country where substandard supply chain actors are prevalent, the Company takes an active role to work with Policy Makers, NGOs and other stakeholders to develop National Strategies that deliver closed loop economies where batteries are effectively collected at the end-of-life and recycled by operations that are licensed and operate to acceptable EHS standards.

Performance Expectation

(d) Sustainable Development of Impacted Communities. Support the social, economic, and institutional development of communities in which they have operations that are impacted along the lead and lead batteries supply chains in countries with low regulatory oversight and where substandard supply chain actors are prevalent.

How can the company meet this expectation?

Companies are expected to take an active role in supporting the sustainable development of communities in which they have operations that are impacted by the lead and lead battery supply chains, especially in regions with low regulatory oversight and a high presence of substandard or informal actors. While especially relevant to companies which operate in such areas, this responsibility applies to all companies covered by this Standard. Companies can support such efforts either individually or through Trade Associations or industry collaborations.

To fully meet this expectation, companies should understand the social, economic, and environmental challenges facing the communities in which they operate, by assessing local context and identifying the most urgent needs for social, economic, and institutional development, in collaboration with stakeholders.

Where companies identify such needs locally, they should work collaboratively with stakeholders to develop and implement context-appropriate initiatives that contribute to local development. In cases where no immediate local needs are identified, companies should engage with industry Trade Associations to explore opportunities for contributing to broader global industry development, whether through financial support or technical expertise and capacity building.

Companies can support sustainable development of impacted communities by:

- Improving quality of life, health, and well-being, through:
    - health outreach programs, such as blood lead testing and access to treatment;
    - community education on the risks of lead and effective prevention measures;
    - child-focused safety and wellbeing services, such as ensuring access to education and providing remediation support for children previously involved in informal battery recycling;
    - public awareness campaigns promoting safe waste handling and environmental protection.
- Creating safe and dignified livelihoods that prevent or reduce dependence on harmful informal work. Examples include:
    - small business development support and microfinance initiatives;
    - job creation and local hiring in formal operations;
    - transition assistance for workers moving out of informal recycling.
- Building capacity for institutional development, by:
    - supporting local health departments with training and equipment;
    - funding or helping to develop environmental monitoring systems;
    - strengthening local governance;
    - facilitating long-term community planning with multi-stakeholder platforms.

Companies should document their efforts and outcomes, define internal roles and responsibilities for community support initiatives, and ensure that senior leadership is involved in guiding and approving strategies. Companies should also demonstrate their commitment to sustainable development of impacted communities through transparent reporting.

How will performance be determined?

Does not meet	Partially meets	Fully meets
The Company does not support the social, economic, and institutional development of communities impacted along the lead and lead batteries supply chains in countries with low regulatory oversight and prevalence of substandard supply chain actors.	The Company has started to support (either individually or through Trade Association membership) the social, economic, and institutional development of communities impacted along the lead and lead batteries supply chains in countries with low regulatory oversight and prevalence of substandard supply chain actors.	The Company supports (either individually or through Trade Association membership) the social, economic, and institutional development of communities in which they have operations that are impacted along the lead and lead batteries supply chains in countries with low regulatory oversight and prevalence of substandard supply chain actors. If operating in a region or country with low regulatory oversight and prevalence of substandard supply chain actors, the company takes an active role in supporting the social, economic, and institutional development of communities impacted by lead pollution.

Assessment Methodology

Applicability

Conformance with the Performance Expectations of Principle 7 is required for Company sites which include the following activities:

Performance Expectation	Primary lead production	Secondary lead production	Battery manufacturing
7.(a) Support International Initiatives Designed to Eliminate Lead Pollution	√	√	√
7.(b) Knowledge Sharing	√	√	√
7.(c) Support Policy Makers to Develop National Strategies	√	√	√
7.(d) Sustainable Development of Impacted Communities	√	√	√

Data Collection Method

Conformance with the Performance Expectations of Principle 7 is assessed through:

Performance Expectation	Observation	Document Review	Interviews			
			Board and Management	Employees	Contracted Workers	Other Stakeholders
7.(a) Support International Initiatives Designed to Eliminate Lead Pollution		√	√			
7.(b) Knowledge Sharing		√	√			
7.(c) Support Policy Makers to Develop National Strategies		√	√			√
7.(d) Sustainable Development of Impacted Communities	√	√	√			√

Examples and Types of Evidence

Please find below an indicative, non-prescriptive list of evidence that could be provided during the assessment:

- Records of employees attending EHS development activities designed to share best practices such as conferences and workshops;
- Sales or manufacturing footprint that highlight the company is operating in a region (either manufacturing batteries or selling into a market or operating battery breaking/recycling) where substandard recycling practices are prevalent;
- Evidence, either through Trade Association membership or as individual companies through philanthropic initiatives, of support for international initiatives designed to eliminate lead pollution;
- Records of initiatives supported by the company on responsible lead battery manufacturing and recycling;

- Evidence of investment in high standard recycling facilities designed to increase capacity in a region where substandard supply chain actors are prevalent;
- Evidence of good practice guidelines on responsible lead battery manufacturing recycling shared with key stakeholders and government agencies that have either been developed by a Trade Association in which the company is a member or directly be the company itself;
- Evidence of engagement with government agencies on lead battery manufacturing recycling;
- Records of community initiatives undertaken/in progress;
- Community needs assessments;
- Planned annual budget or register of planned financial and non-financial contributions to community development initiatives that are designed to promote best practices in lead battery manufacturing and/or recycling;
- Audited accounts or company warrant confirming community investment spending;
- Community development plan monitoring reports;
- Evidence of engagement (e.g., meeting minutes) with Policy Makers, NGOs and other stakeholders;
- Sustainability or Corporate Social Responsibility reports, annual reports, or newsletters with details of community development initiatives.

Interviews

During interviews with management, managers can demonstrate or describe:

- The Board and Company's participation in Lead Battery 360° consultations and initiatives;
- Knowledge of community development commitments by the company;
- Understanding/knowledge of the topic by the company and extent of concern;
- Awareness of the problems associated with lead pollution in LMICs and initiatives undertaken by stakeholders (e.g., Partnership for a lead-free future) to address the problem;
- The community development plans designed and implemented by the company, and how they are monitored and evaluated;
- Good understanding of the community development projects done/being done by the company;
- A good understanding of the resources that are allocated towards supporting in Lead Battery 360° meetings and consultations;
- Knowledge of Lead Battery 360° consultations and initiatives;
- Understanding of corporate or site level community development policies and plans;
- Knowledge of resources allocated towards supporting Lead Battery 360° meetings and consultations;
- Knowledge of initiatives supported by the company on responsible lead battery recycling;
- A good understanding of good practice guidelines on responsible lead battery recycling shared with key stakeholders and government agencies;
- Understanding of community initiatives undertaken/in progress;
- Community needs assessments;
- How annual budget financial and non-financial budgets for contributions towards community development initiatives are planned;
- How impacted communities and community needs are identified and responded to;
- A good understanding of consultation with Policy Makers, NGOs, and other stakeholders;
- A good understanding of road maps or white papers drafted to develop national strategies that encourage the development of circular economy for lead batteries;
- A good understanding of countries with low regulatory oversight where substandard supply chain actors are prevalent.

During interviews with community members, Policy Makers, and other stakeholders:

- They can describe or demonstrate a basic understanding of the company's community development initiatives and confirm that they are consulted on community development needs and receive reports relating to community development initiatives;
- Relevant stakeholders are aware of resources the company is allocating to contribute to good practice guidelines;
- Relevant stakeholders are aware of good practice guidelines on responsible lead battery recycling shared with government agencies;
- How the company participates in Lead Battery 360° meetings and stakeholder consultations on topics related to promoting environmentally sound recycling of lead batteries in regions where substandard supply chain actors are prevalent;
- How the company participates in stakeholder consultations with Policy Makers, NGOs and other stakeholders to develop National Strategies that encourage development of circular economies for lead batteries that consider environmental, health and safety practices.

Observations

During the site walk through and visits to local communities, the assessor observes programmes to support social, economic, and institutional development, where applicable.

Key References

Key Applicable Legal Requirements

Key applicable legal requirements that companies must comply with include, depending on their applicable jurisdiction:

- In the European Union:
  - European Commission (2006). Regulation (EC) No 1013/2006 on Shipments of Waste (link)
  - European Commission (2020). Circular Economy Action Plan (link)
  - European Parliament and Council (2023). Regulation (EU) 2023/1542 on Batteries and Waste Batteries (link)

- In the United Kingdom:
  - UK Government (2021). Environment Act 2021 (link)

- In the United States:
  - U.S. Environmental Protection Agency (2014). Resource Conservation and Recovery Act (RCRA) (link)
  - U.S. Environmental Protection Agency (2021). National Recycling Strategy (link)

Additional Regulatory Frameworks

Key applicable regulatory frameworks that companies should follow may include:

- Rotterdam Convention (2004). On the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides (link)

- UNEP (1989). Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (link)
- UNEP and the Secretariat of the Basel Convention (2003). LeadBattery360 Report - Technical Guidelines for the Environmentally Sound Management of Waste Lead-acid Batteries (link)

Additional Guidance

Key reference standards and initiative documents that companies can rely on for additional guidance include:

- Association of Battery Recyclers (ABR) (link)
- Association of European Automotive and Industrial Battery Manufacturers (EUROBAT) (link)
- Battery Council International (link)
- European Battery Alliance (link)
- Unicef & Pure Earth (2020) The Toxic Truth: Children's Exposure to Lead Pollution Undermines a Generation of Future Potential. (link)
- Partnership for a Lead-Free Future (link).
- FAO (2021). Code of Practice for the Prevention and Reduction of Lead Contamination in Foods (link)
- G7 (2023). Environment Ministers' Communiqué & Visioning Document on Lead Pollution and Exposure (link)
- G20 (2023–2024). Ministerial Declaration on Environmental Health and 2024 G20 Intersectoral Webinar on Lead Exposure (link)
- Global Environment Facility (GEF) (2014). Reducing Environmental and Health Risks to Vulnerable Communities from Lead Contamination from Lead Paint and Recycling of Used Lead Acid Batteries (GEF Project 5701) (link)
- Global Environment Facility (GEF) (2022). Green Production and Sustainable Development in Secondary Aluminum, Lead, Zinc and Lithium Sectors in China (GEF Project 10673) (link)
- IFC (2012). Performance Standards on Environmental and Social Sustainability (link)
- International Lead Association (link)
- OECD (2025). Declaration on Risk Reduction for Lead (link)
- Partnership for a Lead-Free Future (PLF) (2024). (link)
- SAICM (2006). Global policy framework for chemicals and waste (link)
- UNEP (2022). A Guidance Manual For Policymakers and Regulators for the Environmentally Sound Management of Waste or Used Lead Acid Batteries in Africa (link)
- UN Environment Programme (UNEP) (2009). Global Alliance to Eliminate Lead Paint (link)
- UN Environment Programme (UNEP) (2017). The Global Alliance to Eliminate Lead Paint (Lead Paint Alliance) (link)
- UN Environment Programme (UNEP) (2022). Useful information on lead (link)
- UN Environment Programme (UNEP) (2022). Used Lead Acid Batteries (ULAB) - Waste Lead Acid Batteries (WLAB) (link)
- UN Environment Programme (UNEP) (2020). Toxic Truth report and child health advocacy (link)

United Nations (2015). Sustainable Development Goals (SDGs) – SDGs 3, 6, 12, 13 (link)

World Health Organization (WHO) (2021). WHO Guideline for Clinical Management of Exposure to Lead (link)

World Bank (2020). Pollution Management and Environmental Health Program (link)

World Bank Group (2022). Recycling of Used Lead-Acid Batteries: Guidelines for Appraisal of Environmental Health Impacts (link)

Glossary

Air Emissions: Pollutants released into the atmosphere from industrial activities. These include both point sources (e.g., stacks, vents) and fugitive or diffuse sources (e.g., leaks, open storage).

Accredited Testing Services: Third-party laboratories or services certified to perform emissions testing to recognized standards.

Accredited Laboratories: Independent testing facilities certified to conduct environmental analyses using approved and reliable methods.

Advanced Technologies: Modern equipment or processes that improve lead recovery rates or reduce environmental impact.

Anti-Corruption Policy: A formal company policy outlining rules and commitments to prevent, detect, and address bribery, fraud, and other corrupt practices in business operations and relationships. Often aligned with legal frameworks such as the U.S. Foreign Corrupt Practices Act or the UK Bribery Act.

Automated Enclosed Systems: Mechanized equipment enclosed to prevent the release of hazardous substances during battery dismantling, often with integrated ventilation or negative pressure systems.

Basel Convention: A legally binding international treaty that controls the transboundary movement and disposal of hazardous wastes, including specific technical guidelines for managing waste lead-acid batteries.

Baseline: A reference point representing initial or historical conditions (e.g., water consumption, energy use, land condition) against which future performance is measured. Establishing a baseline is essential for setting meaningful targets and tracking progress over time.

Benchmarking: Comparing a company's performance against industry standards, peer companies, or recognized best practices to identify gaps and opportunities for improvement.

Best Available Techniques (BAT): The most effective and advanced stage of development of activities and technologies that can be implemented to prevent or minimize emissions and impacts on the environment.

Best Available Techniques – Associated Emission Level (BAT-AEL): Emission limits defined in EU BAT Reference Documents that represent achievable performance using best available techniques (e.g., <1 mg/Nm^3 for lead).

Biological Monitoring: The regular testing of biological samples (typically blood) from workers to assess internal exposure to lead. It helps identify elevated lead levels before clinical symptoms appear and supports medical decision-making.

Blood Lead Levels (BLL): The concentration of lead in the blood.

Board Endorsement / Senior Management Oversight: Formal approval and visible support of the environmental policy by top leadership, indicating accountability and strategic alignment.

Board of Directors: The group of individuals elected or appointed to oversee a company's governance, strategic direction, and overall accountability to shareholders and stakeholders. The board plays a critical role in ESG oversight, including legal compliance, human rights, environmental risk, and ethical conduct.

Business partner: A business partner is an organization, business or other type of entity with which a company has a direct business relationship. This relationship can involve a contractual agreement to buy or sell any product or service that supports or contributes to the activities of the company. Business partners may include contractors, agents, customers, suppliers, local and international intermediaries or traders, and joint venture partners.

Calibrated In-house Systems: Internal monitoring equipment that is regularly adjusted against known standards to ensure accurate measurement of emissions.

Carbon Dioxide Equivalent (CO_2e): A standard unit for measuring carbon footprints. It expresses the impact of each different greenhouse gas in terms of the amount of CO_2 that would create the same amount of warming.

Carbon Footprint: The total greenhouse gas (GHG) emissions—measured in CO_2-equivalents—associated with a product, process, or organization throughout its life cycle. In battery manufacturing, this includes emissions from raw material extraction, production, distribution, use, and end-of-life management.

Centralized Hazardous Waste Tracking System: A system used to monitor, categorize, and track hazardous waste generated by a company. This system tracks waste by type, volume, origin, and helps in implementing waste reduction targets.

Child Labour: Work performed by persons under the minimum legal working age as defined by national laws or international standards (e.g., ILO Convention No. 138), and which is likely to interfere with their education or be harmful to their health, safety, or development. Not all work by children is considered child labour—light work under safe conditions may be permissible depending on age and local law.

Circular Economy: An economic model focused on designing out waste and pollution, keeping products and materials in use, and regenerating natural systems. In battery manufacturing, this includes maximizing recycled content, designing for reuse, and minimizing end-of-life environmental impacts.

Closed-Loop Recycling Systems: A recycling approach in which materials are collected, processed, and reused to manufacture the same or similar products, creating a continuous cycle with minimal material loss. In a closed-loop system, waste is returned to the production process, reducing the need for virgin raw materials and minimizing environmental impact. For example, lead from used batteries is recovered and reused to produce new batteries within the same supply chain.

Closed-Loop Water System: A system in which water is continuously recycled and reused within a process, reducing the need for external water input.

Collective Bargaining: The process through which workers, typically represented by a union or labor organization, negotiate with employers to establish the terms and conditions of employment, including pay, hours, benefits, and workplace rights.

Collective Bargaining Agreements (CBAs): Legally binding agreements resulting from the collective bargaining process between an employer and workers' representatives. CBAs outline specific rights and responsibilities related to working conditions, grievance mechanisms, and labor-management cooperation.

Community Health and Safety: The well-being of people living in areas affected by a company's operations, including physical, mental, and social health. This includes exposure to hazards such as air and water pollution, traffic accidents, noise, and communicable diseases.

Company: A legal entity formed by a group of individuals or companies to engage in and operate a business. For the purpose of this Code, the term is used to indicate a business of any business and ownership structure including a partnership, proprietorship, corporation or cooperative.

Compliance Monitoring Tools: Systems or instruments used to track adherence to environmental regulations. Examples include audit programs, risk registers, and legal registers.

Corrective Actions: Steps taken by a company to address identified non-compliance, remedy impacts, and prevent recurrence.

Decarbonization Roadmap: A strategic plan outlining steps to reduce GHG emissions across a company's operations and supply chain. This includes energy efficiency, process optimization, material circularity, and transition to low-carbon energy sources.

Decommissioning, Closure and Rehabilitation: The process of safely retiring and dismantling industrial or production facilities at the end of their operational life, followed by the restoration of the site to a stable and environmentally sound condition. This includes removal of equipment and hazardous materials (decommissioning), implementation of long-term environmental and social measures (closure), and actions to restore land, ecosystems, and community use (rehabilitation). Planning for this process must consider regulatory requirements, stakeholder expectations, and long-term monitoring and maintenance.

Designated and High Conservation Value Areas and Natural Habitats: an area falling into one or more of the following categories:

- World Heritage sites;
- Areas falling within IUCN protected area management categories I to III;
- Core areas of UNESCO biosphere reserves;
- Ramsar sites;
- Key Biodiversity Areas.

Digital Compliance Platforms: Technology-based solutions used to manage and monitor legal compliance, often involving real-time tracking, alerts, and document management.

Discharge Permits: Regulatory approvals that specify conditions under which wastewater can be released, including limits on pollutant concentrations.

Disciplinary Practices: Procedures used by employers to address violations of workplace rules or standards. These practices should be fair, transparent, and consistent, and must avoid abuse, humiliation, or physical punishment.

Disposal: Any operation which is not recovery, even where the operation has as a secondary consequence the recovery of energy.[1] Disposal is the end-of-life management of discarded products, materials, and resources in a sink or through a chemical or thermal transformation that makes these products, materials, and resources unavailable for further use.

Diversion Rates: The percentage of waste materials redirected from final disposal (e.g., landfill or incineration without energy recovery) to reuse, recycling, or recovery. This measures the effectiveness of waste management in preserving material value and reducing environmental harm.

Due Diligence: A risk-based process that companies undertake to identify, assess, prevent, mitigate and account for actual or potential adverse impacts in their operations and supply chains. Due diligence includes ongoing monitoring, stakeholder engagement and public reporting, and is a core element of responsible business conduct and regulatory compliance.

Dust Suppressants: Materials (e.g., water, chemical agents) applied to surfaces or piles to reduce dust release.

Early Warning Systems: Mechanisms to proactively identify potential compliance risks before they escalate, helping prevent violations.

Emergency Scenarios: Unplanned or accidental events (e.g., chemical spills, equipment failure) that can cause environmental harm and require preparedness.

Enclosure Systems: Physical barriers used to contain processes that emit dust or fumes, ranging from partial (Level 1) to full with ventilation (Level 2).

Energy Efficiency: Using less energy to perform the same task or produce the same outcome, typically through upgraded equipment, process optimization, or behavior change.

Environmental Impact Indicators: Metrics used to measure the environmental effects of waste management practices, such as reductions in emissions, resource consumption, and environmental degradation.

Environment, Health, and Safety (EHS): An integrated management approach focused on ensuring compliance with environmental laws, protecting employee health, and maintaining safe workplaces. EHS programs often include hazard control, emissions monitoring, safety training, and emergency preparedness.

Environmental Policy: A formal statement outlining a Company's commitments to environmental protection, including compliance, pollution prevention, resource efficiency, and continuous improvement.

[1] European Union (EU), Waste Framework Directive, 2008 (Directive 2008/98/EC)

Environmental Risk Assessment: Evaluation of how emissions affect environmental and human health, used to prioritize actions and resources.

Environmental, Social, and Governance (ESG): A set of non-financial performance criteria used to evaluate a company's environmental stewardship, social responsibility, and governance practices. ESG principles are increasingly used by investors, regulators, and customers to assess corporate sustainability and ethical conduct.

Extended Producer Responsibility (EPR) schemes: Environmental policy approaches that hold producers responsible for the entire lifecycle of their products, especially for take-back, recycling, and final disposal. EPR schemes aim to incentivize sustainable product design and ensure proper collection and treatment of end-of-life products such as batteries.

FAO: Food and Agriculture Organization focuses on food systems and agriculture. FAO provides guidance on environmental contaminants in the food chain and promotes sustainable agricultural practices.

Forced Labour: Any work or service which people are forced to do against their will, under threat of punishment or coercion. This includes debt bondage, trafficking, or restrictions on movement and wages. Defined and prohibited under ILO Conventions No. 29 and No. 105 on Forced Labour.

Fugitive Emissions: Uncontrolled or unintentional releases of gases or dust from industrial activities, not captured by exhaust systems.

G7: A forum composed of seven of the world's most industrialized nations (Canada, France, Germany, Italy, Japan, the United Kingdom, and the United States). Group of leaders who come together to discuss and coordinate on various international economic and security issues, including environmental health and chemical safety, where relevant.

G20: A broader international forum that brings together the world's major economies—including both developed and emerging countries—to discuss global financial and development issues, including sustainability, pollution, and environmental governance.

GEF: The Global Environment Facility is a financial mechanism that funds environmental projects in developing countries, including initiatives to manage hazardous substances like lead and strengthen waste systems.

Greenhouse Gases (GHG): Gases in the Earth's atmosphere that trap heat and contribute to the greenhouse effect, leading to global warming.

GHG Inventory: A comprehensive accounting of all GHG emissions and removals from a company's operations, typically including both Scope 1 and Scope 2 emissions, and often Scope 3 (optional or voluntary depending on the framework).

GHG Intensity: The amount of GHG emissions produced per unit of activity, output, or revenue (e.g., tonnes CO_2e per tonne of lead produced).

Green Power Procurement: The purchase of electricity generated from renewable energy sources (solar, wind, hydro) through contracts or certificates to offset or replace conventional energy use.

Grievance: perceived injustice evoking an individual's or a group's sense of entitlement, which may be based on law, contract, explicit or implicit promises, customary practice, or general notions of fairness of aggrieved communities.[2]

Harassment: Unwelcomed conduct—verbal, physical, or psychological—that creates an intimidating, hostile, or offensive work environment. This includes sexual harassment and bullying, and is often addressed through specific company policies and disciplinary protocols.

Hazardous waste: Waste that possesses any of the characteristics contained in Annex III of the Basel Convention, or that is considered to be hazardous by national legislation.[3]

Hazard and Operability Studies (HAZOP): Structured, systematic techniques used to identify potential safety and environmental hazards in processes and operations.

Health Impact Assessment (HIA): A systematic process to evaluate the potential health effects of a project or policy on a population, particularly vulnerable or marginalized groups, and to develop strategies for managing identified risks.

HEPA-Filtered Ventilation: High-Efficiency Particulate Air filters used to trap airborne lead particles and other contaminants in ventilation systems.

Hierarchy of Controls: A recognized framework for minimizing workplace hazards, arranged in order of effectiveness: (1) Elimination – Remove the hazard entirely; (2) Substitution – Replace the hazard with a safer alternative; (3) Engineering Controls – Isolate people from the hazard (e.g., enclosures, ventilation); (4) Administrative Controls – Change work practices (e.g., rotation, signage, procedures); (5) Personal Protective Equipment (PPE) – Provide protective clothing or gear to reduce exposure.

HR Systems (Human Resources Systems): Organizational structures, policies, procedures, and digital tools used to manage the employee lifecycle—from recruitment and onboarding to performance management, compensation, training, and exit. HR systems are key for ensuring compliance with labor laws and implementation of workplace standards.

Human Rights (Impact) Assessment: A process used to identify, understand, and evaluate actual or potential human rights impacts that a company may cause, contribute to, or be linked to through its operations or value chain. This typically includes stakeholder and rights-holder engagement, risk analysis, and prioritization of salient human rights issues.

Hygiene Measurements: The process of monitoring and assessing levels of contaminants in the workplace environment—especially airborne lead dust or fumes—using static and personal air sampling. These measurements help evaluate occupational exposure and the effectiveness of control systems.

[2] United Nations (UN), Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011

[3] United Nations Environment Programme (UNEP), Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, 1989

IFC: The International Finance Corporation is a member of the World Bank Group that supports private sector development. IFC provides funding and environmental performance standards for industry operations, including waste and chemical management.

ILA/BCI/ABR/EUROBAT: Refers to a coalition of lead battery industry organizations—International Lead Association (ILA), Battery Council International (BCI), Association of Battery Recyclers (ABR), and EUROBAT (Association of European Automotive and Industrial Battery Manufacturers)—which have jointly developed voluntary targets and guidance for managing lead exposure, including recommended blood lead level (BLL) thresholds (e.g., ≤30 µg/dL) for workers.

Impact Assessment: An overarching term for evaluating potential environmental, social, human rights, cultural, economic, and/or health effects of a proposed project or activity before it is carried out. Types of impact assessment include Environmental and Social Impact Assessments (ESIA), Health Impact Assessments (HIA), and Human Rights Impact Assessments (HRIA).

Incineration: controlled burning of waste at high temperatures.[4] Incineration of waste can be carried out with or without energy recovery. Incineration with energy recovery is also known as waste to energy. In the context of waste reporting, incineration with energy recovery is considered a disposal operation.

Informal Sector Operations: Commonly defined as unregulated, unlicensed, and often illegal economic activities, informal recyclers typically recycle <10,000 tonnes of used lead acid batteries per annum, do not employ appropriate EHS control measures and result in widespread pollution.

Injury or Ill Health: Negative impacts on health arising from exposure to hazards at work.
Note: 'Ill health' indicates damage to health and includes diseases, illnesses, and disorders. The terms 'disease', 'illness', and 'disorder' are often used interchangeably and refer to conditions with specific symptoms and diagnoses.

Intact Used Lead Batteries: Batteries that remain structurally sound and have not leaked or been physically compromised.

Landfilling: Final depositing of solid waste at, below, or above ground level at engineered disposal sites.[5] In the context of waste reporting, landfilling refers to depositing of solid waste in sanitary landfills, and excludes uncontrolled waste disposal such as open burning and dumping.

Lead Bullion: A partially refined form of lead, often produced in the early stages of smelting or recycling. It contains various impurities and requires further refining before it can be used in battery manufacturing or other applications.

Lead-Containing Materials: Includes mined and secondary materials, Used Lead-Acid Batteries (ULABs) and other lead containing scrap.

Lead Exposures: The presence of lead in air, dust, soil, or materials that can cause harmful health effects when inhaled or ingested. Occupational lead exposure is a major risk in the production, recycling, and handling of lead-containing materials, especially in informal or poorly regulated sectors.

[4] United Nations (UN), Glossary of Environment Statistics, Studies in Methods, Series F, No. 67, 1997

[5] United Nations (UN), Glossary of Environment Statistics, Studies in Methods, Series F, No. 67, 1997

Lead Recovery: The process of extracting usable lead from used batteries, slags, or other lead-containing residue.

Lifecycle Assessment (LCA): A methodology used to assess the environmental impacts of a product throughout its entire life cycle—from raw material extraction through production, use, and end-of-life. LCAs help inform material selection, process improvements, and sustainability strategies.

Local Replenishment Rates: The rate at which a specific water source (e.g., aquifer, watershed, or surface body) is naturally or artificially recharged within a defined geographic area and time period. This includes inputs from precipitation, upstream flows, infiltration, or managed aquifer recharge. Understanding local replenishment rates is critical for assessing the sustainability of water withdrawal and avoiding long-term depletion.

Manual Battery Breaking: The physical dismantling of batteries by hand—generally prohibited due to high exposure risks unless under exceptional, tightly controlled conditions.

Material Handling Systems: Equipment and processes used to move raw materials, often associated with dust generation (e.g., conveyors, hoppers).

Maximize: To increase something desirable, such as a positive impact or effect, to the greatest possible amount or degree, taking into consideration economic, financial, and practical viability.

Medical Surveillance: A systematic program of medical examinations and evaluations used to monitor the health of workers exposed to hazardous substances such as lead. It includes pre-placement, periodic, and exit examinations, often guided by biological monitoring results.

Minimize: To reduce or to keep to a lowest level possible something undesirable, such as an adverse impact, to the smallest possible amount or degree, taking into consideration economic, financial, and practical viability.

Mitigation Hierarchy: A set of prioritised action steps that are designed to be implemented sequentially to alleviate harm to the environment as far as possible by prioritising options in a sequential way as follows: broad: (1) avoid, (2) minimize, (3) remediate, (4) restore or rehabilitate, and (5) offset.

Neutralization: A chemical treatment process that adjusts the pH of acidic or alkaline substances to neutral (pH ~7), thereby rendering them non-hazardous and safe for handling, discharge, or further processing. In the context of lead-acid battery recycling, neutralization is typically applied to sulfuric acid electrolytes to eliminate their corrosive and toxic properties before treatment or disposal.

Non-Discrimination: The principle of treating all individuals equally and fairly in employment and workplace practices, without bias based on characteristics such as race, gender, age, religion, disability, sexual orientation, or political opinion. It is a core human rights and labor standard, enshrined in international frameworks such as ILO Convention No. 111 on Discrimination.

Non-Governmental Organizations (NGOs): Independent, non-profit organizations that operate outside of government control and advocate for social, environmental, or humanitarian issues. NGOs often play a

critical role in holding companies accountable, conducting advocacy, providing technical expertise, and representing community or environmental interests.

OECD: The Organisation for Economic Co-operation and Development is an international organization that promotes policy standards and best practices across economic, environmental, and social domains. It runs specific programs on chemicals, waste, and lead battery management.

Operational Water Use: Water used directly in industrial processes, such as cooling, cleaning, chemical reactions, or material preparation.

Personal Protective Equipment (PPE): Specialized clothing or equipment worn by workers to protect against health and safety hazards. In lead operations, this includes gloves, respirators, face shields, chemical-resistant clothing, and other gear designed to minimize exposure to lead and other hazardous substances.

Plant Management Systems: Integrated operational platforms that track environmental performance, guide decision-making, and support compliance.

Policy Makers: Individuals or institutions—such as government officials, regulators, or legislators—responsible for developing, enacting, and enforcing laws, regulations, and public policies. In the context of ESG, policy makers shape the legal and regulatory frameworks that govern corporate conduct, sustainability, and human rights.

Preparation for reuse: Checking, cleaning, or repairing operations, by which products or components of products that have become waste are prepared to be put to use for the same purpose for which they were conceived.[6]

Preventive Actions: Steps taken by a company to proactively identify and address potential risks of non-compliance or negative impacts before they occur, ensuring continuous compliance and reducing the likelihood of issues arising in the future.

Producer Responsibility Organizations (PROs): Entities authorized to support the implementation of Extended Producer Responsibility (EPR) schemes. PROs act on behalf of producers to organize the collection, treatment, recycling and end-of-life products, ensuring compliance with regulatory obligations and promoting efficient waste management systems.

Recovered Material: Components or substances extracted from end-of-life products (used batteries) or manufacturing scrap that are reused with minimal reprocessing. Recovery includes dismantling, cleaning, and testing of parts for direct reuse or minor modification.

Recovery: Operation wherein products, components of products, or materials that have become waste are prepared to fulfill a purpose in place of new products, components, or materials that would otherwise have been used for that purpose.[7] In the context of waste reporting, recovery operations do not include energy recovery.

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[6] European Union (EU), Waste Framework Directive, 2008 (Directive 2008/98/EC); modified

[7] United Nations Environment Programme (UNEP), Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, 1989; modified

Recycled Material: Materials that have been reprocessed from waste into usable raw materials through physical or chemical means. In the context of battery manufacturing, this often includes secondary lead, recovered plastics, and reclaimed electrolytes.

Recycled input material: Material that replaces virgin materials, which are purchased or obtained from internal or external sources, and that are not by-products and non-product outputs (NPO) produced by the Company.

Recycling: reprocessing waste components or materials into new materials or products.

Recordable work-related injuries or ill-health: Work-related injuries or ill-health that results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, or loss of consciousness; or significant injury or ill health diagnosed by a physician or other licensed healthcare professional and determined to be work-related, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid, or loss of consciousness.[8]

Refined Lead: High-purity lead produced through a refining process, used in applications such as battery manufacturing, radiation shielding, and industrial processes. Refined lead meets strict chemical specifications and environmental standards.

Remediation action/process: an action/process aiming at providing remedy for a given adverse impact.

Remuneration: The full range of financial and non-financial compensation provided to an employee in exchange for their labor. This includes wages or salary, bonuses, benefits, allowances, and other incentives.

Renewable Energy: Energy derived from natural sources that are replenished constantly, such as solar, wind, hydro, and geothermal power.

Residue: Any remaining solid or semi-solid material after the treatment or processing of lead, which may contain lead or other hazardous materials.

Resource Efficiency: The practice of using materials, energy, and water efficiently across the production cycle to reduce waste and emissions, increase yield, and optimize inputs.

Responsible Sourcing Policy: A formal policy that outlines a company's commitment to sourcing materials and products in a way that respects human rights, promotes environmental protection, and ensures ethical business practices throughout the supply chain.

Risk Assessment: The process of identifying potential hazards, evaluating the likelihood and severity of their impacts, and determining appropriate control measures. This often includes qualitative and quantitative analysis.

[8] United States Occupational Safety and Health Administration, General recording criteria 1904.7, https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_ table=STANDARDS&p_id=9638, accessed on 1 June 2018.

Root cause analysis: A systematic process used to identify the underlying reasons and fundamental causes why a problem, non-compliance, or adverse event occurred.

Rotterdam Convention: A multilateral agreement that promotes shared responsibility and cooperative efforts in the trade of hazardous chemicals and pesticides, ensuring prior informed consent procedures are followed.

Routine and Non-routine Activities: Regular (daily operations) and irregular (shutdowns, emergencies) activities that may have environmental consequences.

Safety Risks (Community): Potential hazards posed to local communities by company operations, infrastructure, or supply chain activities. These can include chemical spills or releases, explosions, traffic accidents, water contamination, or unsafe waste disposal.

SAICM: The Strategic Approach to International Chemicals Management is a voluntary global policy framework for promoting sound management of chemicals throughout their life cycle to reduce risks to human health and the environment.

Science-Based Targets: GHG emissions reduction targets that are in line with climate science, specifically with limiting global warming to 1.5°C above pre-industrial levels, as established by the Science Based Targets initiative (SBTi).

Scope 1 Emissions: Direct GHG emissions from owned or controlled sources. Examples include emissions from combustion in boilers, furnaces, vehicles, or other equipment owned or operated by the company.

Scope 2 Emissions: Indirect greenhouse gas emissions from the generation of purchased electricity, heat, or steam that is consumed by the reporting company.

Scope 3 Emissions: Indirect GHG emissions from a company's value chain, not included in Scope 1 or 2. These include upstream and downstream activities such as purchased goods, transportation, business travel, product use, and waste.

Secondary Containment: A backup containment system designed to capture leaks, spills, or discharges from a primary container holding hazardous materials. It serves as a protective barrier to prevent the release of contaminants into the environment. Examples include bunded areas, drip trays, double-walled tanks, or sealed containers. Secondary containment is especially important for storing damaged lead batteries or other lead bearing materials to limit exposure and environmental contamination.

Secondary Lead: Lead obtained through the recycling of used lead-acid batteries or lead-containing residues. Secondary lead is a key circular input that can replace virgin lead in battery manufacturing.

Significant air emissions: Air emissions that are regulated under international conventions and/or national laws or regulations.

Significant instances of non-compliance: includes instances of non-compliance that resulted in administrative or judicial sanctions and fines that are being appealed during the reporting period. Non-monetary sanctions can include restrictions imposed by governments, regulatory authorities, or public agencies on the organization's activities or operations, such as withdrawal of trading licenses or licenses to

operate in highly regulated industries. They can also include directives to cease or remediate an unlawful activity. The organization can use information about fines that have been reported in its audited consolidated financial statements or in the financial information filed on public record, including fines that are being appealed and which may appear as balance sheet reserves in the financial statements.[9]

Site: Operations involved in the smelting, refining, and recycling or other intermediary steps for lead production, or in the manufacturing or recycling or other intermediary steps for lead battery production. A site may comprise several activities in different locations in the same geographic area (e.g. wastewater treatment facilities, refineries, ports and associated infrastructure), and under the same management control. Integrated sites, where the point of extraction and transformation or processing are critical operations to the output of the site, will generally be treated as one site.

Site-Specific Risk Matrices: Visual tools that categorize and prioritize spill or leakage risks based on likelihood and severity, tailored to each facility's conditions.

Slag: A byproduct generated during smelting or refining processes, typically containing metal oxides and other impurities.

SMART objectives or targets: A framework for setting objectives that are Specific, Measurable, Achievable, Relevant, and Time-bound.

Sourcing from Conflict-Affected and High-Risk Areas (CAHRAs): The procurement of materials or products from regions characterized by armed conflict, widespread violence, weak governance, or serious human rights abuses. Special due diligence measures are required when sourcing from CAHRAs, as outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs.

Stabilization: A physical or chemical process used to transform hazardous waste into a more stable, less mobile, and less toxic form. Stabilization reduces the risk of environmental contamination by immobilizing harmful constituents—such as lead compounds in battery recycling residues—prior to landfilling or secondary use, thereby preventing leaching and long-term environmental exposure.

Stakeholder: individual or group that has an interest that is impacted or could be impacted by the company.[10] For example: business partners, civil society organizations, consumers, customers, employees and other workers, governments, local communities, non-governmental organizations, shareholders and other investors, suppliers, trade unions, vulnerable and/or marginalised groups.

Stakeholder Engagement: A structured process through which a company interacts with individuals or groups that are affected by or can affect its operations. Stakeholders may include employees, local communities, regulators, investors, NGOs, and suppliers. Engagement helps build trust, identify risks, and inform decision-making.

Stakeholder Feedback Mechanism: A formalized process that allows stakeholders to submit comments, concerns, complaints, grievances, or suggestions related to a company's operations, impacts, or

[9] Consolidated Set of the GRI Standards 2021, page 83

[10] Organisation for Economic Co-operation and Development (OECD), OECD Due Diligence Guidance for Responsible Business Conduct, 2018; modified

performance. Feedback mechanisms support transparency, responsiveness, and continuous improvement in areas such as environmental management, labor rights, and community relations.

Structured Methodologies: Systematic, repeatable approaches (e.g., risk matrices, impact assessments) used to evaluate environmental risks and impacts.

Substance of concern: Substances that cause irreversible damage to the waterbody, ecosystem, or human health.

Supplier Engagement: The process of actively working with suppliers to communicate expectations, build capacity, assess risks, and support continuous improvement related to responsible sourcing, environmental standards, and human rights practices.

Sustainable Development: Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. It balances economic growth, social inclusion, and environmental protection. The concept is underpinned by the UN Sustainable Development Goals (SDGs), a global framework of 17 goals adopted by all UN Member States in 2015.

Third-party labor providers: External entities (e.g., contractors, brokers, agents, or intermediaries) that employ and supply workers to perform work or provide services directly related to the company's core business processes.

Traceability System: A system or set of controls used to document and verify the origin, classification, movement, processing history, and proportion of recycled or recovered content of materials throughout the supply chain. Traceability enables companies to identify the sources of inputs, assess risks, and ensure compliance with responsible sourcing commitments.

Transparent Records: Documented evidence of compliance efforts, audit results, corrective actions, and communication, maintained to support accountability and continuous improvement.

UNEP: The United Nations Environment Programme is the leading global authority on environmental issues. UNEP develops international policy, coordinates global responses, and manages initiatives related to pollution, biodiversity, chemicals, and waste.

UNICEF: The United Nations International Children's Emergency Fund is a UN agency focused on children's rights and well-being. UNICEF runs campaigns to address environmental health risks for children, including those posed by lead exposure.

Used Lead-Acid Battery (ULAB): A lead-acid battery that has reached the end of its useful life and is no longer suitable for its original purpose. ULABs are classified as hazardous waste due to their lead content and corrosive sulfuric acid and must be managed through environmentally sound collection, transport, treatment, and recycling systems to prevent harm to human health and the environment.

Wage: The monetary compensation paid to a worker, typically on an hourly, daily, or monthly basis, in return for work performed. Wages must comply with applicable laws, such as minimum wage legislation, and are a component of overall remuneration.

Waste: anything that the Company discards, intends to discard, or is required to discard.[11] Waste can be defined according to the national legislation at the point of generation.

Water Consumption: Sum of all water that has been withdrawn and incorporated into products, has evaporated, transpired, or been consumed by company workers, or is polluted to the point of being unusable by other users, and is therefore not released back to surface water, groundwater, seawater, or a third party over the course of the reporting period. Water consumption includes water that has been stored during the reporting period for use or discharge in a subsequent reporting period.[12]

Water discharge: Sum of effluents, used water, and unused water released to surface water, groundwater, seawater, or a third party, for which the organization has no further use, over the course of the reporting period.

Water-Scarce: A more severe condition than water stress, water scarcity refers to the long-term imbalance between water demand and supply, often due to climatic, geographic, or systemic constraints. A region is typically considered water-scarce when annual water availability falls below 1,000 m^3 per person, as defined by the Falkenmark indicator.

Water-Stressed: A condition in which the demand for water exceeds the available amount during a certain period, or when poor quality restricts its use. Water stress reflects challenges in meeting water needs due to overuse, seasonal variability, or distribution inefficiencies. It can occur even in regions with relatively high overall water availability.

Water Withdrawal: The total volume of water drawn from all sources—including surface water, groundwater, seawater, or third-party suppliers—for any use over the course of the reporting period. This includes water used in operations regardless of whether it is consumed, returned, or discharged elsewhere.

Whistle-Blowing Mechanisms: Confidential channels provided by companies to allow employees or stakeholders to report unethical, illegal, or unsafe behavior—including fraud, corruption, or violations of internal policies—without fear of retaliation. These mechanisms should provide the option for anonymity and include follow-up procedures.

WHO: The World Health Organization is a UN agency responsible for public health. WHO provides guidelines, action plans, and research to reduce health risks from environmental contaminants, including lead exposure.

Worker: A person that performs work for the Company. For the purpose of this Guidance, and unless otherwise specified, workers include direct employees, contracted workers, and all other workers as applicable (e.g., agency workers, apprentices, interns).

Workers' Grievance Mechanism: A formal process that allows employees to raise concerns or complaints about workplace conditions, rights violations, or misconduct, with the expectation of a timely and fair

[11] United Nations Environment Programme (UNEP), Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, 1989

[12] Adapted from GRI Global Reporting Standards 2020, based on CDP, CDP Water Security Reporting Guidance, 2018

resolution. Effective grievance mechanisms are essential for conflict prevention and resolution, and for labor rights protection.

Work-related injury or ill-health: Negative impacts on health arising from exposure to hazards at work.[13]

- 'Ill health' indicates damage to health and includes diseases, illnesses, and disorders. The terms 'disease', 'illness', and 'disorder' are often used interchangeably and refer to conditions with specific symptoms and diagnoses.
- Work-related injuries and ill health are those that arise from exposure to hazards at work.
- Injuries and ill health that occur while a worker is traveling are work related if, at the time of the injury or ill health, the worker was engaged in work activities 'in the interest of the employer'.
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World Bank: A global financial institution that provides funding and technical support for development projects, including those focused on environmental infrastructure, pollution control, and sustainable industry practices.

[13] International Labour Organization (ILO), Guidelines on Occupational Safety and Health Management Systems, ILO-OSH 2001, 2001