

# LEAD BATTERY

# 360°

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Policy of Association for  
Lead Battery 360°

| V1.0

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## I. Purpose and Scope

This policy applies to Participants of the Lead Battery 360° Programme.

The Lead Battery 360° Secretariat shall conduct due diligence on any Participant that joins with the Lead Battery 360° Assurance Programme, to seek certification. The Lead Battery 360° requirements for due diligence are documented in Lead Battery 360° Due Diligence Procedure.

Participants and third parties consulting to Participants on the Lead Battery 360° Assurance Programme and providing implementation support services are encouraged to review and be familiar with this policy.

## II. Overview

The Lead Battery 360° Programme is a comprehensive assurance process that allows participating companies to demonstrate their commitment to implementing the seven Guiding Principles. It has been designed to: define the fundamental elements that characterize responsible sourcing and production of lead and lead batteries; and allow independent assessment of such elements through the definition and third-party assessment of clear Performance Expectations.

For this Policy on Association, “Association” with Lead Battery 360° means a contractual relationship between Lead Battery 360° and a participant that is seeking to achieve or has achieved certification to the Lead Battery 360° Assurance Programme.

Lead Battery 360° may associate with supporters or participants that are part of, or affiliated with, a corporate entity that might also control operations that do not adopt the Lead Battery 360° Guiding Principles, and which could be responsible for activities that have adverse effects. Lead Battery 360° mission could be undermined where participants are involved in activities that are broadly unacceptable. Therefore, before associating with a site, either as a Supporter or Participant, Lead Battery 360° conducts due diligence to identify and evaluate risks to Lead Battery 360° reputation, credibility, legal or financial good standing.

## III. Risk Management Process

Due diligence, whether completed by Lead Battery 360° or a third-party contractor will conform to Lead Battery 360° Due Diligence Procedure. Lead Battery 360° Secretariat is responsible for ensuring the completion of due diligence and uses its discretion to consult with appropriate Lead Battery 360° staff, third-party consultants and Lead Battery 360° approved Assessors as needed.

Due diligence can be triggered by:

- A Participant seeking certification to the Lead Battery 360° Programme and having successfully completed their annual participation fee.
- Periodically, to monitor unacceptable activities that could plausibly be regarded as 'risk events'.

If no potential issues arise from due diligence, sites will be asked to sign a Letter of Commitment outlining their obligations towards the Lead Battery 360°. Once this letter is countersigned by Lead Battery 360°, Participants start their certification cycle.

If Lead Battery 360° determines that due diligence findings require direct engagement, it will seek to initiate discussions with the Participant at the earliest opportunity. The Lead Battery 360° Board of Directors will receive a summary of due diligence reviews at each Board meeting.

If the Board decides not to enter association, the site may be provided with a statement providing the Board's decision.

#### IV. Investigation, Suspension and Disassociation

Before deciding on disassociation, the Lead Battery 360° Board will investigate the alleged risk event or unacceptable activity. Depending on the gravity of the allegation, the Board may suspend the Participant - either upon identification of the issue and/or during the investigation - and provide a defined period to remedy the conduct and any resulting negative effects.

The Board will not decide on disassociation unless it has first provided the following to the Supporter or Participant:

- At least seven days' notice of the meeting at which the decision will be considered, including the nature of the alleged misconduct and potential remedy implemented; and
- An opportunity to provide an explanation, either in writing or orally.

If the Board determines that the issues have been satisfactorily resolved within the provided period, it may decide not to proceed with disassociation. If, after this process, the Lead Battery 360° Board concludes that the conduct constitutes an unacceptable activity and/or inadequate corrective action, the Board may decide to disassociate from the Participant. Such a decision is final and not subject to appeal.

Following a decision to disassociate, the following actions will be taken:

- Removal of the Participant from the Lead Battery 360° website.
- Monitoring to ensure that the disassociated entity no longer uses any Lead Battery 360° logos or claims.
- Upon Board of Director consideration, communicating an internal notice of disassociation to other Participants.

A timeline and conditions for renewal of the association with the Lead Battery 360° will be provided with the disassociation notice, unless disassociation was a result of proven false evidence provided by the entity to the Assessors during the site assessments.