



STAKEHOLDER CONSULTATION - BRIEFING BOOK

Drive Sustainability Battery SAQ

About the Briefing book

Thank you for accepting the invitation to participate in the Drive Sustainability Stakeholder Consultation on the *DS Battery SAQ*.

This briefing book will help you prepare for the event. It includes content related and practical information. Should you still have any questions, please contact Luciana Rendace, Senior Project Manager at CSR Europe: lr@csreurope.org.

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INTRODUCTION

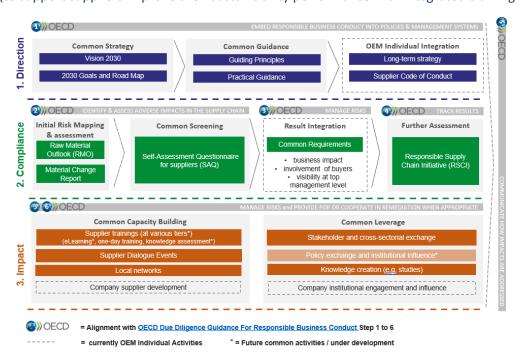
Context

About Drive Sustainability

<u>Drive Sustainability</u> (DS), the leading Automotive Partnership facilitated by CSR Europe, aims to drive sustainability throughout the automotive supply chain by promoting a common approach within the industry and by integrating sustainability into the overall procurement process.

The achievement of long-term, systemic improvement requires a long-term **integrated approach**. This approach consists of the following interconnected workstreams that complement each other:

- Direction (to provide guidance on sustainability expectations by setting the <u>Global Automotive</u> <u>Sustainability Guiding Principles</u>)
- Compliance (to assess organizational adherence of suppliers to international regulations and standards as well as internal guidelines and targets along the supply chain)
- Impact (to support suppliers improve their sustainability performance with integrated training offers)



DS Sustainability Assessment Questionnaire (SAQ)

In 2014, DS members developed a <u>Sustainability Assessment Questionnaire (SAQ)</u> on CSR/ Sustainability as part of the industry's long-term aim to improve sustainability performance in the automotive supply chain. The SAQ is based on the <u>Global Automotive Sustainability Guiding Principles</u> and covers topics in areas such as social and environmental sustainability, business ethics, responsible supply chain management, and responsible sourcing of raw materials.

This solution allows to reduce the burden on suppliers (having to fill in many different questionnaires on sustainability from different buyers). The common SAQ is filled in by suppliers on an external service provider's platform, allowing suppliers to share the completed SAQ with several buyers.

The SAQ has the objective to indicate and verify supplier compliance on CSR/Sustainability topics through the assessment and verification of implementing a management system/s – defined as a combination of policies, processes, functions, tools, and internal controls— that help an organization to control its

operations, reach objectives and ensure continuous improvement. Usually, it represents one of the first steps in buyers' due diligence activities to assess and prioritize ESG risks. Based on the results of the SAQ, buyers may decide, on an individual basis, to conduct further due diligence activities. It is also important to keep in mind that this tool is intended to identify potential for improvement and not to exclude suppliers from buyers' supply chains.

The Battery SAQ

Considering the European Union's Batteries Regulation (EU-Batt-R), Drive Sustainability initiated the development of a **Battery SAQ** in February 2024 to reflect and to integrate the due diligence requirements of the legislation, with a specific focus on the risk categories outlined in Annex X.

The Battery SAQ builds upon Drive Sustainability's existing SAQ framework. While SAQ primarily assesses the sustainability performance of direct suppliers, the Battery SAQ extends this assessment to include midstream and upstream suppliers.

Following a gap analysis of SAQ against the risk categories outlined in Annex X of the EU-Batt-R (see Annex 2), Drive Sustainability tailored the standard questionnaire to cover all identified gaps and remove irrelevant questions. The questionnaire has also been tailored to all battery supply chain actors (tier 1-N), considering their use of SAQ. Indeed, unlike SAQ, which is mainly used for direct suppliers, the Battery SAQ has been designed to cover the entire battery supply chain. For suppliers who already have completed SAQ, there will be only a limited number of additional questions and the SAQ results will be fully considered.

The implementation of the Battery SAQ would work as described in Figure 1.

Like the standard SAQ, the primary objective of the Battery SAQ is to conduct a comprehensive risk assessment not to exclude any supplier but to enable them to collaboratively enhance human rights and environmental performance throughout the entire battery supply chain, pliers. Each OEM will incorporate this information into their own risk analysis tools to develop specific measures, such as audits, training sessions, or on-the-ground projects.

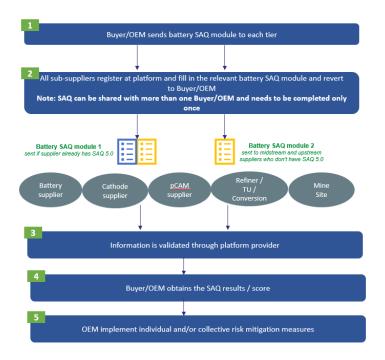


Figure 1: Battery SAQ architecture

The European Union's Batteries Regulation

The Regulation was adopted on 17 August 2023 and repeals the previous Battery Directive of 2006 (Directive 2006/66/EC)14. The EU-Batt-R will take effect on 18 August 2025. The Regulation outlines the new EU framework for the responsible production of batteries. It aims to 1) reduce the environmental and social impacts throughout all stages of the battery life cycle, 2) promote a circular economy, and 3) strengthen the functioning of the internal market. The Regulation sets a broader perspective on due diligence, which extends beyond specific regions or isolated interventions. It aligns due diligence expectations with authoritative international normative due diligence instruments: the OECD MNE Guidelines, the OECD RBC Guidance, and the UNGPs. A high-level overview of the due diligence obligations is outlined below.

Supply chain actor	Which Articles apply	Overview of obligations
Supplier (tier n)	 Chapter VII, Article 49 (2b,2d) Chapter VII, Article 50 (1b(iii)) 	 Article 49(2b,2d): Provide name, address, and country of origin to the economic operator, as well as disclose any preceding market transactions Article 50 (1b(iii)): engage in mitigation with economic operator implementing risk management Article 39: Share supply chain information with economic operator free of charge
The economic operator that places battery on the market	 Chapter III Chapter VII Chapter VIII (specifically, Articles 56 and 59) 	 Article 7: Carbon footprint declaration Article 11: Removability and replaceability of batteries Article 13: Marking, labelling, and information obligations <u>Due diligence requirements</u> Establish a comprehensive due diligence management system (detailed overview provided in <u>Section 3</u> and <u>Section 4</u> of this report)¹
Recycler	 Chapter VI, Article 45 Chapter VIII, Article 61, 71, 73 	 Recycling companies have specific obligations under this Regulation, which include: They need to make sure that any components subjected to these operations meet quality control and safety standards (Article 45). Batteries they handle must comply with this Regulation and other relevant laws concerning product quality, environmental protection, human health, and transport safety. This is important because these operations might change the battery's category (Article 45). If they're involved in remanufacturing, they must be able to prove that the battery meets the Regulation's requirements (Article 45). Recycling facilities must accept and prepare batteries for re-use, repurposing, or recycling, as required (Article 71(1)). Recyclers must ensure that their recycling processes meet the targets for recycling efficiency and material recovery set out in Annex XII (Article 71(2))
Waste Manager	 Chapter VIII 'Management of Waster Batteries', specifically Articles 57 and 75. 	 Report to the competent authority for each calendar year the amount of waste portable batteries and waste LMT batteries collected (incl. origin) according to their chemistry

(Source: Levin Sources' report "Analysis of the EU Batteries Regulation" (2023)

¹ Levin Sources, What the EU Batteries Directive Means for Battery Mineral Supply Chains - Levin Sources, 5 October 2023

STAKEHOLDER CONSULTATION

Objective

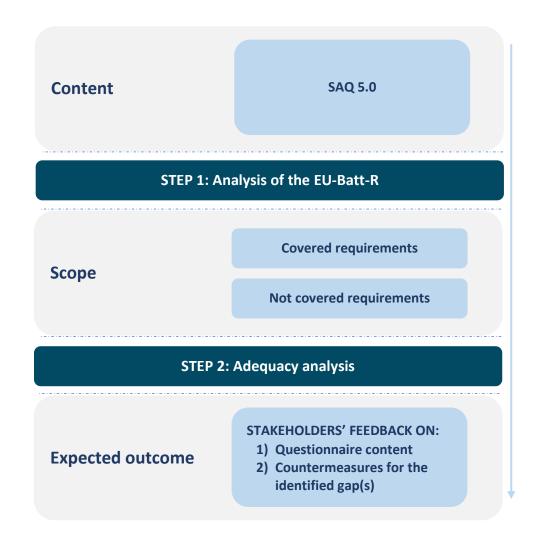
The Stakeholder Consultation aims to consult subject matter experts (SMEs) and relevant stakeholders on the validity of the Battery SAQ as a tool to meet the requirements of the EU-Batt-R.

Participating stakeholders (policymakers, civil society organizations, companies, and associations) will be requested to provide feedback on the implemented changes and the content of the questionnaire.

The primary objective of the consultation will be to assess to what extent the Battery SAQ covers the due diligence requirements outlined in the regulation and the risk categories in Annex X, serving its main purpose and essence of being an evidence-based tool for the automotive industry, as well as detecting any potential gap(s) that should be addressed through different tools and frameworks.

We highly value your feedback and assure you that it will be carefully considered, though we cannot guarantee that every suggestion will be incorporated.

Step-by-step revision process (exchange guidelines)



PRACTICAL INFORMATION

Feedback form

Please provide written feedback using this form by 15 September 2024 EOB.

Contact details

- Luciana Rendace, <u>lr@csreurope.org</u>
- Catalina Pislaru: cp@csreurope.org

Useful Sources

EU Batteries Regulation 2023

Levin Sources' report "Analysis of the EU Batteries Regulation" (2023)

Drive Sustainability <u>SAQ 5.0</u> (standard SAQ, available in 13 languages)

Gap analysis of the SAQ against the risk categories of the EU-Batt-R (pages 38-40)

We look forward to your contribution!

ANNEX 1



Self-Assessment Questionnaire on the due diligence requirements of the EU-Batt-R for Automotive Sector Suppliers

The questionnaire relates to both parent company and site level:

- > Site refers to "the industrial location where production takes place";
- > Parent company refers to the "group top parent of the requested location/site";
- > Headquarters refers to "the local administrative centre of an enterprise".

Site:
Name:
Address of site (country, city and/or street):
Number of employees working on site (incl. agency workers):
0-9
10-49
50-99
100-249
250-499
≥500
≥1000
≥2000
≥3000
≥4000
≥5000
≥10000
≥50000
Headquarter: Yes/No
Site Supplier ID: (fill in those that apply)
DUNS number:
Other (please specify):
Parent Company:
Name:
Address of parent company (country, city and/or street):
Number of employees working on site (incl. contract workers):
0-9
10-49
50-99
100-249
250-499
≥500

≥100	00			
≥200	00			
≥300	00			
≥400	00			
≥500	00			
≥100				
≥500				
		er ID: (fill in those that apply	<i>(</i>)	
	IS numbe			
Busi	ness area	;		
			·	
		ANAGEMENT (GENERAL)	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
	-	pany appointed senior presentation for	Companies are expected to appoint a senior management representative	
	•	social, ethics or human	who, irrespective of other	
right	s?		responsibilities, serves as a management person responsible for	
	Yes		ensuring that the company meets its	
	No		commitment related to social sustainability, compliance/business	
			ethics and environmental	
		ompany have a management	sustainability. Companies should also	
perso		ble for Social Sustainability? *	determine clear responsibilities (in terms of time dedication) of	
	Yes		designated representatives to the	
	No		respective function, with proper documentation (e.g. job description).	
	If yes, ple	ase provide:	documentation (e.g. job description).	
	Name:		For companies that fall within the scope of the German Supply Chain	
	E-mail:		Due Diligence Act (LkSG), the official	
	Job		person responsible for social	
	title:		sustainability may also be considered responsible for human rights-related	
41- 5			topics required by the law.	
		ompany have a management ble for Compliance/Business	The contact details that you provide	
Ethic	-		in response to this question will not	
	Yes		be contacted without prior notice. In the first instance, enquiries will be	
	No		directed to the person that	
	If yes, ple	ase provide:	completes this sustainability-	
	Name:		assessment questionnaire.	
	E-mail:		Social sustainability relates to	
	Job		practices that contribute to the quality of life of both employees and	
	title:		communities that could be impacted	
			by the company's operations. Companies should respect the	
		ompany have a management	human rights of workers and treat all	
-	on responsi ainability? *	ble for Environmental	people with dignity as recognized by	
	Yes		the international community. Examples of social topics to address	
	No		include non-discrimination, freedom	
		ase provide:	of association and health and safety. (See Section B - Working Conditions	
	Name:	ase provide.	and Human Rights)	
İ		i l	1	

1-1-	Compliance relates to the principles
Job	that guide business conduct in its
title:	relations towards its business
	partners and customers. Companies
	are expected to uphold the highest
	standards of integrity and to operate
	honestly and equitably throughout
	the supply chain in accordance with
	local laws. Examples of unethical
	business practice include corruption,
	unfair competition, and conflicts of
	interest. (See Section C - Business
	Ethics)
	Environmental quateinability valatas
	Environmental sustainability relates
	to practices that contribute to the
	quality of the environment on a long-
	term basis. Companies are expected to support a proactive approach to
	environmental responsibility by
	protecting the environment,
	conserving natural resources and
	reducing the environmental footprint
	of their production, products and
	services throughout their life cycle.
	Examples of company practices
	include reducing greenhouse gas
	emissions and waste reduction
	programmes. (See Section D -
	Environment)

A. CC	MPANY MANAGEMENT (GENERAL)	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
mana moni	oes your company have a agement person responsible for toring sustainability risks (e.g. a Human s Officer)? * Yes No If yes, please provide: Name: E-mail: Job title: * Please fill out the contact details, even if the person is the same as above.	Companies benefit significantly from appointing a Human Rights Officer (HRO) or similar title, with the task of monitoring sustainability and/or human rights risks. This task is best performed if kept strictly separate from the everyday ongoing operational due diligence. The six criteria below demonstrate if this is the case: > The HRO regularly checks operational compliance with the company's human rights and environmental policies and statutory requirements. > The HRO is available to all staff for advice on human-rights and environmental issues. > The HRO might make suggestions for remedial actions regarding violations identified but other staff carries out the action. > The HRO liaises with senior management and proposes risk management improvements. > The HRO reports to senior management but is not bound by superiors' instructions (e.g. the HRO is, by contract, protected	

		against dismissal). > The HRO briefs senior management, at least once a year, on risk management position.	
2. Does your company publish a Corporate Social Responsibility (CSR)/Sustainability Report?		A CSR/Sustainability report is an organisational report that gives information about economic,	
	Yes, as a separate report according to Global Reporting Initiative (GRI) or other globally accepted standard Please upload report and specify which standard	environmental, social, and ethical performance. Examples of CSR/Sustainability reports aligned to internationally recognized standards and frameworks are: Series GRI (GRI's Sustainability Reporting Standards) ISO 26000 Guidance on Social Responsibility Climate Disclosure Standards Board (CDP-CDSB) United Nations Global Compact - Communication on Progress (UNGC-COP)	Currently accepted evidence: GRI (GRI's Sustainability Reporting Standards) ISO 26000 Guidance Social Responsibility Climate Disclosure Standards Board (CDP-CDSB) United Nations Global Compact - Communication on Progress (UNGC-COP) AFAQ 26000 Sustainable Development
	Yes, as an integrated part of the Annual Report, e.g. Annual and Sustainability Report, according to GRI or other globally accepted standard Please provide the name of the globally accepted standard Yes, but not according to globally	> AFAQ 26000 Sustainable Development In the European Union (EU), the EU Directive on the disclosure of non- financial and diversity information Directive 2014/95/EU sets out the rules on disclosure of non-financial and diversity information by large companies. Subsequently, the Directive was transposed into the national legislation of EU Member States with some differences in implementation between	Currently accepted evidence: Sustainability Accounting Standards Board (SASB) International Integrated Reporting Council (IIRC) United Nations Environment Program Finance Initiative (UNEPFI) International Financial Reporting Standards (IFRS) Currently accepted evidence:
	accepted standards Please provide the name of the alternative standard	<u>countries</u> .	A document covering CSR/Sustainability that follows a report format
	No		-
	answered "Yes" to Q2, is the most nt report assured by a third party?		
	Yes, the assurance letter is included in the report		Currently accepted evidence: A third- party auditors letter or statement that contains the third party auditors assurance of the CSR/sustainability report
	Parts are assured, the scope is explained in the assurance letter Please upload the relevant document		Currently accepted evidence: A third- party auditors letter or a document that contains the third party auditors assurance of the CSR/sustainability report

□ No -

A. CON	MPANY MANAGEMENT (GENERAL)	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
	f answered "Yes" to Q2, what human elements are disclosed in the CSR ?		-
	Our company's identified potential and actual human rights risks		
c a r	Description of existing measures that our company has already taken to address human rights risks and a review of the effectiveness of these measures		
c	Description of future measures that our company plans to take to manage our human rights risks		
	We do not report on our company's numan rights risks		
enviro	f answered "Yes" to Q2, what nmental elements are disclosed in R report?		-
	Our company's identified environmental risks		
c a r	Description of existing measures that our company has already taken to address environmental risks and a review of the effectiveness of these measures		
C	Description of future measures that our company plans to take to manage our environmental risks		
	We do not report on our company's environmental risks		
compa of stat	inswered "Yes" to Q2, does your any report annually on the fulfilment utory due diligence obligations (e.g. erman LkSG) in the previous year?		-
F	es Please upload relevant document		Currently accepted evidence: Report focused on due diligence related activities CSR/Sustainability report that covers due diligence activities Integrated report that includes due diligence activities
⊔ N	No		-
3. Doe Condu	s your company have a Code of ct?	A Code of Conduct is a set of rules outlining the responsibilities or proper	

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	Yes Please upload relevant document	practice for an individual (employee) and organisation. It should cover social, ethical, and environmental aspects.	Currently accepted evidence: Code of Conduct Code of Ethics Employee Handbook Contractual terms and conditions if there is reference to Code of Conduct/Policies CSR/Sustainability Policy if there is reference to employees and organisational responsibilities ZVEI - Code of Conduct for Social Responsibility
	No		-
com	f answered "Yes" to Q3, does your pany organise training for your loyees on the Code of Conduct?		
	Yes Please upload relevant document		Currently accepted evidence: Training certificates E-learning screenshots Training materials e.g. slide deck presentations Relevant management system certification e.g. environmental or health and safety Other documents that evidence the topic area
	No, but we communicate the Code of Conduct through extranet/brochures, etc. Please upload relevant document		Currently accepted evidence: Screenshot of intranet Human resources (HR) or personnel manual Employment contract covering relevant topic Other documents that evidence communication on the code of conduct
	No		-

A. COMPANY MANAGEMENT (GENERAL)	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
 4. Does your company have a grievance mechanism or documented complaints procedure established at this location? Yes Please upload relevant document 	According to the UN "Protect, Respect and Remedy" Framework, companies must respect human rights and provide a remedy if their operations caused or contributed to adverse human rights impacts. Operational-level grievance	Currently accepted evidence: SA8000 Social

		mechanisms, for those potentially impacted by a company's activities, are recommended as an effective process through which companies can enable remediation.		Management System Company handbook if it covers relevant issues Human resources (HR) or personnel manual Employment contract covering relevant topic Instructions on how to access a mechanism (e.g. an employee handbook or training materials) A process/procedure that is followed Evidence of the grievance mechanism itself (e.g. screenshot of intranet portal or external portal agreement letter/invoice) Screenshot of online mechanism
	No			
char mecl	answered "Yes" to Q4, what are the acteristics of your company's grievance nanism or complaints procedure? Tick at apply.		-	
	Outlines who is responsible for the complaints procedure if applicable (there is a complaint body in place which third parties can contact directly or via an external service provider)			
	Please provide the contact details			
	The responsible person(s) entrusted by the enterprise is impartial, independent, and not bound by instructions			
	The written rules of the complaints procedure outline the ways in which a complaint may proceed and indicates the approximate time each step may take			
	The written rules of the complaint procedure are publicly made available in relevant local languages in all countries in which we operate			
	Complainant is provided confirmation of receipt upon reporting the complaint			
	The complainant 's identity is treated confidentially			
	Commitment to non-retaliation against complainants			

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B. HI	UMAN RIGHTS AND WORKING	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
	None of the above		
	complaint procedure		
	☐ App By participating in a joint industry		
	_		
	□ Email		
	□ Phone		
	□ Online		
	By different media		
	By carrying out trainings		
com com stake	f answered "Yes" to Q4, how does your pany optimise accessibility of the plaints procedure for all the eholder groups that are entitled to use ick all that apply.		
	Others		
	External Stakeholders (contractors, indirect suppliers, local communities etc.)		
	Internal Stakeholders (company/non- permanent employees, direct suppliers, service providers etc.)		
stak	f answered "Yes" to Q4, which eholder groups is the complaints hanism available to? Tick all that apply.		
A. C	OMPANY MANAGEMENT (GENERAL)	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
	Unethical business practices		
	Environmental complaints	_	
	Human rights complaints		
1	f answered "Yes" to Q4, what kind of plaints can be submitted? Tick all that y.		
	None of the above		
	Appeal procedure		
	Evaluation of complaints procedure effectiveness at least once every 12 months and on an adhoc basis		
	The complainant or their representative is consulted during remediation/resolution		
	Complaints can be reported anonymously		

cove	A human rights and working conditions overing working conditions and human ights? A human rights and working conditions policy is a formal document, agreed upon by senior management, that		
	Yes	demonstrates a company's commitment to treating	Currently accepted
	Please upload relevant document	employees and wider stakeholders with dignity, fairness and respect. The policy should outline the company's responsibility to respect and protect human rights based on compliance with law and international guidelines. In the workplace, human rights include the right to a safe working environment, the right to fair remuneration and equal pay for equal work, the right to organise and participate in collective bargaining and the right to be protected from forced labour and trafficking. The list presented refers to the Global Automotive Sustainability Guiding Principles	evidence: Human rights and working conditions policy Social/labour standards policy Employee handbook if it covers relevant issues CSR/sustainability policy if it covers relevant issues Code of conduct or other business policy if it covers human rights or social issues New supported evidence: For community life, a
	No	Human rights are the rights we are entitled to simply because we are human beings. They represent the universally agreed minimum conditions that enable all people to maintain their dignity. Human rights are inherent to all of us, whatever our nationality, place of residence, sex, national or ethnic origin, colour, religion, or any other status. Source: Universal Declaration of Human Rights	community relations policy can also be uploaded

	Rights of Minorities and Indigenous	Manage and because the males and the	
	Peoples	Wages and benefits relate to the basic or minimum wage or salary and	
	Land, Forest and Water Rights and Forced Eviction	any additional entitlements payable directly or indirectly, in cash or in	
	Use of Private or Public Security Forces	kind, by the employer to the worker and arising out of the worker's	
	Community life	employment. Suppliers must provide their workers with remuneration in	
		accordance with applicable	
	f answered "Yes" to Q5, do you nize training for your employees on this	regulations and prevailing industry practices; such remuneration should be adequate to cover basic needs and enable a decent standard of	
		living for the workers and their	Currently accepted evidence:
Ш	Yes Please upload relevant document	family, which includes respecting minimum wages, overtime	 Training certificates
	·	compensation, medical leave, and	E-learning screenshots Training materials of
		government-mandated benefits. Source: ILO-UNGC and the Global Automotive	 Training materials e.g. slide deck presentations
		Sustainability Practical Guidance	 Relevant management
		Working hours relate to regular	system certification e.g.
		workweeks that should not exceed 48 hours. A workweek shall be	environmental or health and safety
		restricted to 60 hours in emergency	Other documents that
		situations, including overtime. All overtime shall be voluntary.	evidence the topic area
	No, but we communicate it through	Employees should have a minimum	<u>Currently accepted evidence</u> :
	Intranet/ Brochures, etc.	of one day off every seven days. Laws	Screenshot of intranet
	Please upload relevant document	and regulations on the maximum number of working hours and time	 Human resources (HR) or personnel manual
		off shall be respected.	Employment contract
		Source: Ethical Trading Initiative, based on ILO conventions	covering relevant topic
		Modern slavery refers to all work or	Other documents that
		service exacted from any person	evidence communication on human rights and
		under the menace of any penalty and	working conditions policy
	No	for which that person has not offered themself voluntarily. Examples	
		include forced overtime, retention of	
		identity documents, as well as human trafficking. Modern Slavery is subject	
		to the Modern Slavery Act 2015 by	
		the Parliament of the United	
		Kingdom. This Act requires that companies, who meet identified	
		criteria, publish a "slavery and	
		human trafficking statement" every year six months after the end of the	
		company's financial year.	
		Source: International Labour Organisation (ILO) and The National Archives UK	
		Ethical recruiting refers to hiring	
		workers lawfully, in line with the	
		International Labour Standards, and in a fair and transparent manner that	
		respects human rights. Examples of	
		unethical recruitment include misleading or defrauding potential	
		workers about the nature of the	
		work, asking workers to pay recruitment fees, and/or	
		confiscating, destroying, concealing,	
		and/or denying access to worker	

passports and other governmentissued identity documents. Workers must receive a written notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities. Source: ILO and the Global Automotive Sustainability Practical Guidance

Freedom of association relates to the right to freedom of peaceful assembly and to freedom of association at all levels, in particular in political, trade union and civic matters, which implies the right of everyone to form and to join trade unions for the protection of their interests. This includes collective bargaining, as a process of negotiations between employers and a group of employees, aimed at reaching an agreement that regulates working conditions.

Source: EU Charter of Fundamental Rights

Harassment is defined as a harsh and inhumane treatment - or the threat of such treatment - including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers. Source: Global Automotive Sustainability Practical Guidance.

Non-discrimination is a principle that requires the equal treatment of an individual or group, irrespective of their particular characteristics, including sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation. Companies should pay equal remuneration for work of equal value not only with regard to gender but also all other potential bases for discrimination. This does not however, prohibit unequal payment due to different local living costs. Source: EU Charter of Fundamental Rights

Women's rights refers to the principle that women are entitled to political, economic and social equality. Gender inequality underpins problems such as unequal opportunity in employment and unequal pay for equal work. The efforts for the advancement of women have resulted in several declarations and conventions, of which the Convention on the Elimination of All Forms of Discrimination against Women is the

central document. The Convention gives positive affirmation to the principle of equality by requiring States parties to take "all appropriate measures, including legislation, to ensure the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality with men" (article

Source: Convention on the Elimination of All Forms of Discrimination against Women and Global Automotive Sustainability Practical

Diversity, equity and inclusion relates to the principle that companies should develop and promote inclusive cultures where diversity is valued, celebrated and everyone is able to contribute fully and reach their full potential. Companies should encourage

diversity in all levels of their workforce and leadership, including boards of directors.

Source: Global Automotive Sustainability Practical Guidance

Rights of minorities and indigenous peoples refer to respect for the rights of local communities to decent living conditions, education, employment, social activities, and the right to Free, Prior, and informed Consent (FPIC) to developments that affect them and the lands on which they live, with particular consideration for the presence of vulnerable groups. Source: Global Automotive Sustainability

Land, forest and water rights and forced eviction relates to the avoidance of forced eviction and the deprivation of land, forests and waters in the acquisition. development or other use of land, forests and waters. Source: Global Automotive Sustainability

Practical Guidance

Practical Guidance

Private or public security forces

refers to the commission or use private or public security forces to protect the business project if, due to a lack of training or control on the part of the company, the deployment of the security forces may lead to violations of human rights.

Source: Global Automotive Sustainability **Practical Guidance**

Community life may consist of several aspects, among them the

	• Protection of the rights of local and affected communities The concept of communities encompasses a broad range of groupings including minorities, rural communities and other kinds of groups. Although "community rights" is not a defined concept in international law, community members are entitled to the full range of human rights. Moreover, given the social, economic and political structures and cohesion of communities, there may often be a collective aspect to their rights. In this regard, there may be commonalities between community rights and indigenous peoples' rights, especially when projects impact lands and resources that concern entire communities rather than individuals. (Danish Institute of Human Rights) • Forced evictions and/or expropriations of land, forests, bodies of water Forced eviction is "the permanent or temporary removal against their will of individuals, families and/or communities from the homes and/or land which they occupy, without the provision of, and access to, appropriate forms of legal or other protection" (UN OHCHR) Expropriation is the taking by the state of private property for public purposes, normally without compensation. (Oxford) • Protection of the rights of indigenous peoples Risk of indigenous peoples to face a range of human rights issues. Some of the most difficult human rights challenges for indigenous peoples stem from pressures on their lands, territories and resources as a result of activities associated with development and the extraction of resources. Their	
	result of activities associated with development and the	
 6. Does your site have a management system in place to manage the human rights and working conditions issues? Yes, we have an internationally recognised certified management system Please provide the following information: 	A management system is a set of documented controls, processes and /or procedures reviewed by management. It could be internal or developed according to a standard (Certified Management System). Certified management systems provide enhanced assurance to stakeholders that a company is	Currently accepted evidence: SA8000 Social Management System RSCI audit certificate (FULL label)

С. Н	EALTH AND SAFETY	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
	Yes, but the system is uncertified Please upload relevant document No		 Currently accepted evidence: Employee handbook if it covers relevant issues Process flow showing relevant procedures Audit report or audit CAP Screenshot of internal management system if it shows there is a clear link to a designated management system Evidence of human rights and working conditions assessment and improvement
	Certification standard: Awarding body: Certificate number: Valid until: Please upload relevant document		confirming extension of certification as well as the original certificate
	Yes, we have a nationally recognised certified management system Please provide the following information:	the audit standard	 Currently accepted evidence: Any national certificate standards Letter from the certification body
	Valid until: Please upload relevant document	management systems, the highest score is achieved if a management system is certified according to internationally recognised standards. Relevant internationally accepted certification standards include: > SA8000 Social Management System > RSCI audit certificate (FULL label) A relevant third party assurance scheme could be the RMI ESG audit certificate (required evaluation tbd)* *To be confirmed after revision of the audit standard	original certificate New supported evidence: RMI ESG audit certificate (required evaluation tbd)* For community life, RSCI audit certificate (FULL label)* In the future, any due diligence schemes recognized by the Commission (as per Article 53 (1) EUBR) *To be confirmed after revision of the audit standard
	Certification standard: Awarding body: Certificate number:	committed to operate business in a sustainable manner and has implemented all the necessary processes. While the SAQ also recognises internally developed	Letter from the certification body confirming extension of certification as well as the assistant and certificates.

7. Does your company have a formal

written health and safety policy, which complies with local law, industry requirements and international standards?

Please upload relevant document

BACKGROUND INFORMATION

Health and safety refers to the science of the anticipation, recognition, evaluation and control of hazards arising in or from the workplace that could impair the health and well-being of workers, taking into account the possible

SUPPORTED EVIDENCE

Currently accepted evidence:

- Health and Safety Policy
- Employee handbook if it covers relevant issues
- CSR/sustainability policy if it covers relevant issues

□ No	impact on the surrounding communities and the general environment. Source: ILO	Code of conduct or other business policy if it covers health and safety issues
 7a. If answered "Yes" to Q7, which of the following areas are covered by this policy? Please tick all that apply. Personal protective equipment Machine safety Emergency preparedness Incident and accident management Workplace ergonomics Handling of chemical and/or biological substances Fire protection 	A health and safety policy is a formal document, agreed upon by senior management, that demonstrates a company's commitment to relevant health and safety standards. The policy should outline the company's responsibility to operate in compliance with law and international guidelines. A health and safety should highlight the commitment of management and employees to a healthy and safe workplace with a 'zero accidents' goal. It is the responsibility of management to provide sufficient resources and organisation for health and safety and to do regular risk assessment and reporting in order to ensure continuous improvement of	-
7b. If answered "Yes" to Q7, does your company organize training for your employees on this policy?	the system. Health and safety training should include the provision of clear instructions to employees on how to ensure they carry out daily tasks	
☐ Yes Please upload relevant document	safely and without risk of harm to health. Training may cover one or more of the topic areas listed below: Fire evacuation drills and fire safety training Training on use of personal protective equipment	 Currently accepted evidence: Training certificates E-learning screenshots Training materials e.g. slide deck presentations Health and safety management system certification
 □ No, but we communicate it through Intranet/ Brochures, etc. Please upload relevant document 	 Training on company health and safety policy Work environment inspections Training on work with hazardous materials Distribution of educational materials on health and safety procedures Information campaign for workers on health and safety procedures specific to the site 	 Other documents that evidence the topic area Currently accepted evidence: Screenshot of intranet Human resources (HR) or personnel manual Employment contract covering relevant topic Other documents that evidence communication on health and safety policy
□ No		
C. HEALTH AND SAFETY	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
8. Does your site have a health and safety management system in place?	A health and safety management system relates to organised efforts	

and procedures for identifying

accidents and exposure to harmful

workplace hazards, reducing

Yes, we have an internationally

system

recognised certified management

<u>Currently accepted evidence</u>:

ISO 45001

	Please provide the followinformation: Certification standard:	wing	situations and substances. It also includes the training of personnel in accident prevention, accident response, emergency procedures,	Letter from the certification body confirming extension of certification as well as the
	Awarding body:		and use of protective clothing and equipment. A management system	original certificate
	Certificate number:		can be developed internally or in	
	Valid until:		accordance with national or international standards. Certified	
	Please upload the releva	nt document	management systems provide	
	Yes, we have a nationall certified management sy		enhanced assurance to stakeholders that a company is committed to operate business in a sustainable	Currently accepted evidence: Any national certificate
	Please provide the followinformation:	wing 	manner and has implemented all the necessary processes. While the SAQ	standards • Letter from the
	Certification standard:		also recognises internally developed management systems, the highest	certification body confirming extension of
	Awarding body:		score is achieved if a management	certification as well as the
	Certificate number:		system is certified according to internationally recognised standards.	original certificate
	Valid until:		Relevant internationally accepted	
	Please upload the releva	nt document	certification standards include:	
	Yes, but the system is ur	ncertified	> ISO 45001 Occupational health and safety	Currently accepted evidence:
	Please upload the releva		and safety	 Employee Health and Safety Handbook Health and safety procedure documentation Health and safety training logs Hazard prevention and control methods Emergency prevention, preparedness and response procedure Health and Safety System manual Screenshot of internal management system if it shows there is a clear link to a designated management system Risk assessment Audit report or audit CAP
	INU			
ר נו	NVIDONIMENT		PACKEDOLIND INFORMATION	SUDDOBTED EVIDENCE

D. ENVIRONMENT	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
9. Does your company have a formal environmental policy, which includes a commitment to legal compliance, continuous measurement and continuous improvements in environmental performance? Yes Please upload relevant document	An environmental policy shows the company's overall intentions and direction related to its environmental performance. It reflects the company's commitment and is formally expressed by top management. It provides a framework for action, setting environmental objectives which take into account applicable legal and other requirements and the company's environmental impact of	 Currently accepted evidence: Environmental Policy Employee handbook if it covers relevant issues CSR/sustainability policy if

	No If answered "Yes" to Q9, which of the owing areas are covered by this policy?	services, with the purpose of decreasing the environmental impact, saving resources and costs. The policy should ensure that there are no detrimental changes to soil, water pollution, harmful noise emissions or excessive water consumption.	Code of conduct or other business policy if it covers environmental issues
	ase tick all that apply.	The list presented refers to the Global Automotive Sustainability	
	GHG emissions	Guiding Principles and is explained	
	Energy efficiency	in the related Guidance Document.	
	Renewable energy	Greenhouse gases trap heat in the	
	Decarbonisation	atmosphere and contribute to global warming.	
	Water quality, consumption, management, including water seabed, marine environment, water quantities (flooding or droughts)	Energy efficiency refers to the amount of energy productively used given the same amount of energy inputs.	
	Air quality		
	Responsible chemical management	Renewable energy refers to energy that comes from natural resources	
	Sustainable resources management	that are not depleted when used. Examples include wind, solar or	
	Waste, including reduction	geothermal energy.	
	Reuse and recycling	Decarbonisation refers to the	
	Animal welfare	removal of GHG emissions from a	
	Biodiversity, land use and deforestation	company's value chain.	
	Soil pollution, soil erosion and land degradation	Water quality and consumption includes access to clean water and	
	Noise emissions	the conservation for future	
_		generations.	
	Other areas (please specify)	Water, including seabed, marine environment, water quantities (flooding or droughts) Pollution of freshwater systems and coastal environments. Can be a range of physical and chemical drivers resulting from industrial, agricultural and domestic activities. Physical threat of coastal flooding due to extreme sea levels Various factors that are known to affect water supply and quality, such as the sustainability of current consumption, groundwater depletion, reliance on transboundary sources, population growth and the effectiveness of resource governance. (Maplecroft) Air quality is the level of air pollution in the atmosphere. Responsible chemical management takes into account the life cycle of	
l		takes into account the me cycle of	

chemicals including handling, storage and disposal.

Sustainable resource management is the practice of using less to preserve resources.

Waste reduction is the practice of using less resources to minimise waste and preserve resources.

Reuse refers to the practice of using existing materials or products as they are to reduce waste whilst recycling refers turning a product into a raw material that can be used again, often within a completely new product.

Animal welfare refers to the conditions in which an animal lives. An animal is in a good state of welfare if it is healthy, comfortable, wellnourished, safe, able to express innate behavior, and if it is free from unnecessary pain, fear or distress.

Biodiversity, land use, deforestation and soil quality all refer to the maintenance of ecosystems so that flora and fauna are not lost and natural habitats do not suffer irreparable damage. As part of the European Union's Green Deal plans to protect ecosystems and biodiversity, the European Commission has proposed a new law to halt deforestation and minimise the EU's impact on forests worldwide. The proposed law will require companies that sell commodities linked to deforestation and forest degradation - such a soy, palm oil, wood and beef products (e.g. leather) - to ensure they are 'deforestation free' before placing them on the European market or exporting them from the EU. Source: EU Commission (Directorate-General for Environment)

Soil pollution, soil erosion and land degradation

Soil pollution is a chemical degradation process that consumes fertile soils, with implications for global food security and human health. (UNEP)

Land degradation manifests in many ways: land abandonment, declining populations of wild species, loss of soil and soil health, rangelands and fresh water, as well as deforestation (UNESCO)

		Soil quality refers to the measure of the condition of oil to do what it needs to do, specifically in relation to enhancing the environment and human health. Noise emissions relate to the release of noise into the environment from various sources that can be grouped in: transportation activities, industrial activities and daily normal activities. Vibration Risk of negative effects on health from the exposure to noise and vibration at work or surroundings. (ILO)	
con	If answered "Yes" to Q9, does your npany organize training for your ployees on your environmental policy?		
	Yes Please upload relevant document		 Currently accepted evidence: Training certificates E-learning screenshots Training materials e.g. slide deck presentations Environmental management system certification Other documents that evidence the topic area
	No, but we communicate it through Intranet/ Brochures, etc. Please upload relevant document		 Currently accepted evidence: Screenshot of intranet Human resources (HR) or personnel manual Employment contract covering relevant topic Other documents that evidence that you communicate your environmental policy
	No		

D. ENVIRONMENT	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
10. Does your site have an environmental management system in place? Yes, we have an internationally recognised certified management system in place. Please provide the following information: Certification standard: Awarding body:	developed internally or in accordance with national or international standards	Currently accepted evidence: ISO 14001:2015 ISO 14064 GHG PAS2050 Carbon Footprint PAS2060 Carbon Neutrality

Certificate number: Valid until: Please upload the rele	evant document	extent to which a company lives up to the shared values and objectives it has committed itself to. Environmental audits can be conducted internally or by an external body that issues a certificate. Certified management systems provide enhanced assurance to stakeholders that a company is committed to operate business in a sustainable manner and has implemented all the necessary processes. While the SAQ	 BS8555 Certification: Implementation of environmental management systems EU Eco-Management and Audit Scheme (EMAS) Letter from the certification body confirming extension of certification as well as the original certificate
Yes, we have a nation certified management Please provide the fol information: Certification standard: Awarding body: Certificate number: Valid until: Please upload the rele	t system lowing	also recognises internally developed management systems, the highest score is achieved if a management system is certified according to internationally recognised standards. Examples of relevant internationally accepted certification standards include: > ISO14001:2015 EMS > ISO14064 GHG > PAS 2060 Carbon neutrality	 Currently accepted evidence: Any national certificate standards Letter from the certification body confirming extension of certification as well as the original certificate
Yes, but the system is Please upload the rele		 BS8555 Certification: Implementation of environmental management systems PAS2050 Carbon footprint EU Eco-Management and Audit Scheme (EMAS) 	 Currently accepted evidence: Employee handbook if it covers relevant issues Environmental management system manual Screenshot of internal management system if it shows there is a clear link to a designated management system Process flow showing relevant procedures Audit report or audit CAP Evidence of environmental assessment and improvement
No			improvement

D. ENVIRONMENT	BACKGROUND INFORMA	ATION SUPPORTED EVIDENCE
11. Does your site have an energy management system? Yes, we have an internation recognised certified managed Please provide the following information: Certification standard: Awarding body:	systematic process for contimproving energy performations maximising energy savings. ment system management system can b	currently accepted evidence: Currently accepted evidence: ISO 50001 Letter from the certification body confirming extension of certification as well as the original certificate

	Certificate number:		operate business in a sustainable	
	Valid until:		manner and has implemented all the necessary processes. While the	
	Please upload the rele	evant document	SAQ also recognises internally	
	Yes, we have a national certified management Please provide the following the followin	t system	developed management systems, the highest score is achieved if a management system is certified according to internationally	Currently accepted evidence: • Any national certificate standards
	information:		recognised standards.	Letter from the
	Certification standard:		Relevant internationally accepted certification standard: > ISO 50001 - Energy	certification body confirming extension of certification as well as
	Awarding body:		Management	the original certificate
	Certificate number:			
	Valid until:			
	Please upload the rele	evant document		
	Yes, but the system is	uncertified		Currently accepted evidence:
	Please upload the rele	evant document		Employee handbook if it covers relevant issues
				Energy management
				system manualScreenshot of internal
				management system if it
				shows there is a clear
				link to a designated management system
				 Process flow showing
				relevant procedures
				Carbon Trust Report
				Carbon Trust ReportAudit report or audit CAP
				Audit report or audit CAPEvidence of energy
				Audit report or audit CAP
	No			Audit report or audit CAPEvidence of energy assessment and
	No			Audit report or audit CAPEvidence of energy assessment and
you	What percentage of ele		Renewable energy sources are inexhaustible energy sources replenished naturally over time. The	Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy
you	What percentage of ele		inexhaustible energy sources replenished naturally over time. The following energy sources can be	 Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence:
you rene	What percentage of elersite in the last calendarewable sources?		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind	 Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green
you rene	What percentage of elersite in the last calendarewable sources? 91%-100%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable:	Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates
your rene	What percentage of electric in the last calendary wable sources? 91%-100% 81%-90%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro > Biomass	Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it covers renewable energy
your rene	What percentage of electristic in the last calendary wable sources? 91%-100% 81%-90% 71%-80%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro	Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it
your rene	What percentage of electric site in the last calendar wable sources? 91%-100% 81%-90% 71%-80% 61%-70%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro > Biomass > Geothermal	Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it covers renewable energy source Green power purchase agreenment (PPA)
your rene	What percentage of electric in the last calendar wable sources? 91%-100% 81%-90% 71%-80% 61%-70% 51-60%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro > Biomass > Geothermal	 Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it covers renewable energy source Green power purchase
your rene	What percentage of electristic in the last calendar wable sources? 91%-100% 81%-90% 71%-80% 61%-70% 51-60% 41-50%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro > Biomass > Geothermal	 Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it covers renewable energy source Green power purchase agreenment (PPA) Renewable energy certificate (REC) Other documents that
your rene	What percentage of electristic in the last calendar wable sources? 91%-100% 81%-90% 71%-80% 61%-70% 51-60% 41-50% 31-40%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro > Biomass > Geothermal	Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it covers renewable energy source Green power purchase agreenment (PPA) Renewable energy certificate (REC)
your rene	What percentage of electristic in the last calendar wable sources? 91%-100% 81%-90% 71%-80% 61%-70% 51-60% 41-50% 31-40% 21-30%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro > Biomass > Geothermal	 Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it covers renewable energy source Green power purchase agreenment (PPA) Renewable energy certificate (REC) Other documents that evidence that your
your rene	What percentage of electristic in the last calendar wable sources? 91%-100% 81%-90% 71%-80% 61%-70% 51-60% 41-50% 31-40% 21-30% 11-20%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro > Biomass > Geothermal	 Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it covers renewable energy source Green power purchase agreenment (PPA) Renewable energy certificate (REC) Other documents that evidence that your electricity comes from
your reneed and a second a second and a second a second and a second a	What percentage of electristic in the last calendar wable sources? 91%-100% 81%-90% 71%-80% 61%-70% 51-60% 41-50% 31-40% 21-30% 11-20% 1-10%		inexhaustible energy sources replenished naturally over time. The following energy sources can be classified as renewable: > Wind > Solar > Hydro > Biomass > Geothermal	 Audit report or audit CAP Evidence of energy assessment and improvement Currently accepted evidence: Invoices of energy consumption and/or certificates Evidence of green electricity tariffs Energy contract if it covers renewable energy source Green power purchase agreenment (PPA) Renewable energy certificate (REC) Other documents that evidence that your electricity comes from

D. E	NVIRONMENT	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
	Does your company set Greenhouse Gas action targets? Yes Please upload relevant document	According to the Greenhouse Gas Protocol, a key component of effective Greenhouse Gas (GHG) management is setting a GHG emission reduction target and tracking performance against the target. Emission reduction targets could cover: > Scope 1 - Direction company emissions related to burning fossil fuel on-site; > Scope 2 - Indirect company emissions related to the production of purchased electricity, heat or steam;	Currently accepted evidence: A report that includes reduction targets Screenshot of intranet showing reduction targets Screenshot of website showing reduction targets Other documents that evidence your greenhouse gas emission
	No	 Scope 3 - Indirect company emissions related to your company's value chain activities, including upstream 	reduction targets
Scie	If answered "Yes" to Q13, are the targets nce Based Target initiative (SBTi) roved?	and downstream emissions. Companies may set a variety of GHG reduction targets, including:	
	Yes Please provide the International Securities Identification Number (ISIN) associated with your approved SBTi targets	 A single target for all of their emissions (total scope 1 + scope 2 + scope 3 emissions) A single target for their total scope 3 emissions 	SBTi list of approved reduction targets (external check)
	No, but in accordance with other standards (SME Climate Hub, Race to Zero, or equivalent)	 A combination of targets, for example a target for total scope 1 + 2 + 3 emissions as well as targets for individual scope 3 categories. 	
com	If answered "Yes" to Q13, does your pany have emission reduction targets for upstream supply chain emissions (scope	For further information, please refer to the GHG Protocol Corporate Value Chain Scope 3 Standard, chapter 9 Setting a GHG Reduction Target and Tracking Emissions Over	
	Yes Please upload relevant document	Time, page 100.	 Currently accepted evidence: A report that includes scope 3 reduction targets Screenshot of intranet showing scope 3 reduction targets Screenshot of website showing scope 3 reduction targets Other documents that evidence your scope 3 greenhouse gas emission reduction targets

□ No		
D. ENVIRONMENT	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
14. Does your site use any substances with restrictions under any national or international statutory provision in production or operations? ☐ Yes ☐ No 14a. If answered "Yes" to Q14, does your site have written procedures to manage substances with restrictions under any regulations? ☐ Yes	Restrictions are a tool to protect human health and the environment from unacceptable risks posed by chemicals. Restrictions may limit or ban the manufacture, placing on the market or use of a substance. A restriction applies to any substance on its own, in a mixture or in an article, including those that do not require registration. It can also apply to imports. Examples of hazardous (restrictive) substances include but are not limited to: Chrom6, lead, AZO dyes, DMF, PAHs, Phthalates, PFOS, nickel release. Source: European Chemicals Agency	Currently accepted evidence: Management system manual contents page
Please upload relevant document(s) – including REACH, RoHS, ELV 2000/53/EC or other written procedures to manage substances with restrictions	Examples of regulations on restricted substances and chemical handling: REACH (Registration, Evaluation, Authorisation, and Restriction of Chemicals) is a European Union Regulation addressing the productionn and use of chemical substances, and their potential impact on both human health and the environment. The regulation defines and includes substances, preparations, and articles. Manufacturers and importers are required to gather information on the properties of their chemical substances and to register the information in a central database run by the European Chemicals Agency.	showing relevant procedures Safety data sheet Proof of registration with the European Chemicals Agency (ECHA) Process flow showing relevant procedures Restricted substances policy Material Safety Data Sheet (MSDS) REACH or ROHS Compliance Certificate ISO 14001 (if the scope covers restricted substances) EMAS (if the scope covers restricted substances)
□ No	ROHS (Restriction of Hazardous Substances) or the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Directive (2011/65/UE) bans the placing on the EU market of new electrical and electronic equipment containing more than the agreed levels of lead, cadmium, mercury and other substances.	RC 14001 (which includes RCMS) IECQ HSPM certification/IECQ specification QC 080000 SQAS (Safety and Quality Assessment System)
14b. If answered "Yes" to Q14a, which of the following areas are covered by these written	ELV 2000/53/EC lays down	
procedures? Please tick all that apply.	measures which aim at the	
The manufacture of mercury-added products, the use of mercury and mercury compounds in manufacturing	prevention of waster from vehicles and, in addition, at the reuse, recycling and other forms of	-

recovery of end-of life vehicles and processes and the treatment of mercury their components so as to reduce waste (ref. to the Minamata convention) the disposal of waste, as well as the The production and use of Persistent improvement in environmental Organic Pollutants (ref. to the Stockholm performance of all the economic Convention on Persistent Organic operators involved in the life cycle Pollutants) of vehicles and especially the operators directly involved in the The handling, collection, storage and treatment of end-of life vehicles. disposal of waste of Persistent Organic Pollutants (ref. to the Stockholm The Minamata Convention on Convention on Persistent Organic Mercury. The production of Pollutants) mercury- added products is permitted under the exceptions of The export of hazardous waste (ref. to Annex A, under registered the Basel Convention on the Control of exceptions, or if there is an Transboundary Movements of Hazardous alternative strategy for the product Wastes and their Disposal) reported to the Conference of The import of hazardous and other Parties by a country (Art. 4(2) lit. a). wastes (ref. to the Basel Convention on The use of mercury (compounds) in manufacturing processes is the Control of Transboundary permitted under Annex B or under Movements of Hazardous Wastes and registered exceptions (Art. 5(2) and their Disposal) Art. 6). The Convention also Others, please specify addresses interim storage of mercury and its disposal once it becomes waste, sites contaminated by mercury as well as health issues. Mercury waste must be treated according to Art. 11(3). The Stockholm Convention on Persistent Organic Pollutants. The Convention requires its parties to take measures to eliminate or reduce the release of POPs into the environment. The production and use are permitted for laboratoryscale research or as reference standard (Art. 3(5)), under the exceptions of Annex I, under the grace period of Art. 4(2) Sentence 1 Regulation (EU) 2019/1021, or under Annex I, part B Regulation (EC) No. 850/2004. The handling, collection, storage, and disposal is permitted under Art. 6. The Basel Convention prohibits the import and export of hazardous waste from and to third party countries and some of the party countries. In addition to the provisions of the convention, Council Directive 91/689/EEC must be taken into account when defining hazardous waste

D. ENVIRONMENT	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
15. Does your company have a current CDP score?	CDP uses a scoring methodology to incentivise companies to measure	

UNDER EMBARGO - The Battery SAQ module is not published yet - **Do not share**

	Yes Please upload relevant document	and manage environmental impacts through participation in CDP's climate change, water, forests, and supply chain programs. Each of CDP's questionnaires (Climate change, Water and Forests) has an individual scoring methodology.	The CDP Report should be addressed to the company name (headquarter company name is acceptable). The CDP Report should be up to date (issued in the past 12 months or dated 2021 or 2022)
	No		
	If answered "Yes" to Q15, please specify CDP score related to Climate Change		-
-	Score		
	Year		
	If answered "Yes" to Q15, please specify CDP score related to Water		
	Score		
	Year		
your	If answered "Yes" to Q15, please specify CDP score related to Forests Score		
	Year		

E. RESPONSIBLE SUPPLY CHAIN MANAGEMENT	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
16. Does your company have set CSR/Sustainability requirements towards suppliers? ☐ Yes Please upload relevant document	CSR/sustainability requirements for suppliers are often set out in either a specific supplier code of conduct document or a company conduct document which applies to both internal employees as well as external business partners, such as suppliers. The objective, through these CSR requirements, should be to promote healthy working conditions, human rights, and environmental responsibility throughout the entire supply chain	Currently accepted evidence: Supplier Sustainability policy CSR/Sustainability policies that include reference to supplier adherence Supplier Code of Conduct which specifically references supplier adherence General purchasing agreement which applies to suppliers and references sustainability
□ No		
16a. If answered "Yes" to Q16, which areas are covered by these CSR/Sustainability requirements? Please tick all that apply.		

	Human rights and working conditions	
	Child labour and young workers	
	Wages and benefits	
	Working hours	
	Modern slavery (i.e. slavery, servitude and forced or compulsory labour and human trafficking)	
	Ethical recruiting	
	Freedom of association and collective bargaining	
	Non-discrimination and harassment	
	Women's Rights	
	Diversity, Equity, and Inclusion	
	Rights of Minorities and Indigenous Peoples	
	Land, Forest and Water Rights and Forced Eviction	
	Use of Private or Public Security Forces	
	Community life	
	Health and Safety Health and safety	
	Environment	
	GHG emissions	
	Energy efficiency	
	Renewable energy	
	Decarbonisation	
	Water quality, consumption, management, including water seabed, marine environment, water quantities (flooding or droughts)	
	Air quality	
	Responsible chemical management	
	Sustainable resources management	
	Waste, including reduction	
	Reuse and recycling	
	Animal welfare	
	Biodiversity, land use and deforestation	
	Soil pollution, soil erosion and land degradation	
	Noise emissions	
_	Vibration	

Upstream supplier management
Definition and implementation of similar standards towards own tier-1 suppliers
Binding requirements towards Tier-1 suppliers to pass on standards along the supply chain

	RESPONSIBLE SUPPLY CHAIN NAGEMENT	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
con con Rec	o. If answered "Yes" to Q16, does your inpany use any of the following channels to inmunicate its Supplier CSR/Sustainability quirements to your suppliers? Please tick that apply. Included in Terms and Conditions Please upload relevant document		Currently accepted evidence: Supplier terms and conditions which references sustainability General purchasing agreement which applies to suppliers and references sustainability
	Supplier training Please upload relevant document		 Currently accepted evidence: E-learning screenshots Training materials e.g. slide deck presentations Other documents that evidence you plan or deliver training related to the topic area
	Supplier Code of Conduct/ Supplier Sustainability Policy Please upload relevant document		Supplier sustainability policy CSR/Sustainability policies that include reference to supplier adherence Supplier code of conduct which specifically references supplier adherence
	Company website/ Supplier portal Please upload relevant document		 Currently accepted evidence: Screenshot of supplier portal which references sustainability Screenshot of website which reference supplier sustainability requirements

	None		
have	Which processes does your company in place to review if suppliers fulfil your irements? Please tick all that apply.	If a company sets requirements for their suppliers, they must have provisions to monitor the implementation of these	
	3rd party audits conducted by an accredited certification body Please upload relevant document	requirements within the business operations of their supplier. Supplier monitoring provides information and identifies areas for collaborative positive improvements. This can be achieved through: • A 3rd party audit is an external audit performed by independent organisations such as registrars (certification bodies) or regulators.	 Currently accepted evidence: Third party audit report Third party certificates Letter from third party audit company referring to the audits Other documents that evidence you plan or undertake third party audits
	2nd party audits conducted by your company Please upload relevant document	A 2nd party audit is an external audit performed by customers or by others on their behalf. It can also be done by regulators or any external party that has a formal interest in an organisation.	 Currently accepted evidence: Second party audit report Other documents that evidences your company plans to or undertakes audits of your suppliers
		 A sustainability-assessment questionnaire (SAQ) may be used to assess CSR and Sustainability activities of a supply chain, and identify potential improvements. 	 Currently accepted evidence: A self-assessment questionnaire Details of online monitoring system or documentation which
			refers to a supplier self-
	Sustainability-assessment questionnaire (SAQ)		
			refers to a supplier self- assessment process
17. ľ	(SAQ) None Does your company perform sustainability assessments as part of the due diligence		refers to a supplier self- assessment process
17. ľ	None Does your company perform sustainability assessments as part of the due diligence vities?		refers to a supplier self- assessment process NQC customer letter
17. I	(SAQ) None Does your company perform sustainability assessments as part of the due diligence		refers to a supplier self- assessment process NQC customer letter
17. If risk active	None Does your company perform sustainability assessments as part of the due diligence vities? Yes		refers to a supplier self- assessment process NQC customer letter
17. If risk active	None Does your company perform sustainability assessments as part of the due diligence vities? Yes No If answered "yes" to Q17, what is the e of the risk assessment? Please tick all		refers to a supplier self- assessment process NQC customer letter
17. If risk activ	None Does your company perform sustainability assessments as part of the due diligence vities? Yes No If answered "yes" to Q17, what is the e of the risk assessment? Please tick all apply.		refers to a supplier self- assessment process NQC customer letter
17. If risk active acti	None Does your company perform sustainability assessments as part of the due diligence vities? Yes No If answered "yes" to Q17, what is the e of the risk assessment? Please tick all apply. Own business area		refers to a supplier self- assessment process NQC customer letter
17. I risk activ	None Does your company perform sustainability assessments as part of the due diligence vities? Yes No If answered "yes" to Q17, what is the e of the risk assessment? Please tick all apply. Own business area Direct suppliers (Tier 1)		refers to a supplier self- assessment process NQC customer letter
17. I risk activ	None Does your company perform sustainability assessments as part of the due diligence vities? Yes No If answered "yes" to Q17, what is the e of the risk assessment? Please tick all apply. Own business area Direct suppliers (Tier 1) Indirect suppliers (Tier n)		refers to a supplier self- assessment process NQC customer letter
17. If risk active acti	None Does your company perform sustainability assessments as part of the due diligence rities? Yes No If answered "yes" to Q17, what is the e of the risk assessment? Please tick all apply. Own business area Direct suppliers (Tier 1) Indirect suppliers (Tier n) If answered "yes" to Q17, how often syour company conduct risk assessment?		refers to a supplier self- assessment process NQC customer letter

	Ad hoc when we know that there might be a violation, e.g. from a complaint		
	Other		
	SPONSIBLE SOURCING OF RAW ERIALS*	BACKGROUND INFORMATION	SUPPORTED EVIDENCE
cont	Vhich material in scope of EUBR is ained in your products/in scope of your ations? Please Tick all that apply. Cobalt Graphite (natural)		
	Lithium		
	Nickel		
resp	Does your company have a policy on the onsible sourcing of cobalt, lithium, ral graphite and/or nickel? Yes Please upload relevant document	A responsible raw materials policy is a document showing a company's commitment, agreed upon by senior management, to the sustainable and ethical procurement of raw materials, covering social and environmental risk categories listed listed in Annex X.2, international instruments listed in Annex X.3 and internationally recognised due diligence systems referenced in Annex X.4 of the EU-Batt-R. Raw materials are primary commodities that are used to manufacture products. Companies that provide products containing raw materials are expected to conduct due diligence to understand the source of the raw materials used in their products and manage risks. Companies are expected to ensure not to contribute to human rights abuses, bribery and ethics violations, or negatively impact the environment. For more information on priority materials, producer countries, and associated environmental, social, and governance issues please refer to the Raw Materials Outlook and the Material Change report.	Currently accepted evidence: Policy that covers responsible sourcing of raw materials e.g. Responsible Sourcing/ Procurement Policy Battery raw materials Statement/Policy Supplier Code of Conduct that covers responsible sourcing of raw materials CSR/Sustainability Policy that covers responsible sourcing of raw materials Agreement/purchasing documents covering responsible raw materials sourcing
	Does your company participate in raw erial specific initiative(s)? Yes Please upload relevant document		 Currently accepted evidence: Documentation providing membership status Other documents that evidences your company is part of a raw materials

initiative

	No		
18c. If cobalt is in the scope of your activities does your company have a company-scope EMRT (Extended Minerals Reporting Template)?		The Extended Minerals Reporting Template (EMRT) is a free, standardized reporting template developed by the Responsible Minerals Initiative (RMI) to identify	
	Yes	pinch points and collect due diligence	
	Please upload EMRT template, using the latest version from the RMI website	information in the cobalt and mica supply chains.	
	No		
	Please complete and upload EMRT template, using the latest version from the RMI website		
controls and tra	ompany operate a system of nsparency to identify in the supply chain?	System of control: A process of oversight concerning the supply chain incorporates a chain of custody or traceability mechanism to identify	 Currently accepted evidence: Management system that covers responsible sourcing of raw materials
	Please upload relevant	actors upstream to ensure a transparent supply chain (Art. 49 EU-	Raw materials sourcing
	document	Batt-R). (Levin Sources Report)	manual outlining processes and procedures
	No	(ECVIII SOURCES INCPORT)	 Screenshot of internal management system Raw materials sourcing report Evidence of supply chain mapping initiative or report
	(A),		New accepted evidence: RMI Due Diligence Audit Certificate (required score tbd)*
			*To be confirmed after revision of the audit standard
19a. If answered "Yes" to Q18, which processes or tools do you use?		Supply chain mapping in the context of due diligence is the	User manual
Supply chain mapping		process of identifying all involved actors and collecting	For 3 rd party verification:
	With independent 3 rd party verification of collected data	supplier-specific information that is relevant for ESG risk analysis.	3rd or 2nd party (mapping) audit results looking after actual supply chain
	With internal and/or external validation of collected data	Documentation requirements under the system of control and traceability	relationships by reviewing shipping documents, etc.
	Without any validation of verification of collected data	partly overlap with the OECD Minerals Guidance, including disclosure requirements on	
Chain of custody		traceability, suppliers, and market	
	With independent 3 rd party verification of collected data	transactions records. The EU-Batt-R specifies that the documentation	

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	With internal and/or external validation of collected data Without any validation of	required under the systems of controls should include a raw material description (trade name and type), name and address of the	
	verification of collected data	supplier of the raw material, quantities of the raw material in the	
Traceability syst	em	batteries, third party verification reports of the economic operator	
	With independent 3 rd party verification of collected data	and, where available, of suppliers, and traceability information from the	
	With internal and/or external validation of collected data	extraction tier to the immediate supplier of the economic operator including country of origin and subsequent market transactions.	
	Without any validation of verification of collected data	(Levin Sources) Usually, documentation that records	
	Other, please specify:	the sequence of custody, control, transfer, analysis, and disposition of materials, including physical or electronic evidence, is required for proper supply chain mapping.	

G. ADDITIONAL INFORMATION

20. Please use the space below to provide additional information (e.g. comments regarding policy, timing for certification, etc.).

^{*}Not applicable to mine sites

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ANNEX 2 - SAQ mapping against the EU-Batt-R DD requirements

 Legend
 Requirement covered in SAQ 5.0
 Requirement partially covered in SAQ 5.0
 Requirement not covered in SAQ 5.0

SECTION	DUE DILIGENCE REQUIREMENT	Covered in SAQ 5.0
	Air, including air pollution such as greenhouse gas emissions	Q10a, 11
	Water, including seabed and marine environment, and including water pollution, water use, water quantities (flooding or droughts) and access to water	Q10a, 11
	Soil, including soil pollution, soil erosion, land use and land degradation	Q10a, 11
1. Environment, climate and human	Biodiversity, including damage to habitats, wildlife, flora and ecosystems, including ecosystem services	Q10a, 11
health, considering direct, induced, indirect and	Hazardous substances	Q10a, 11, 16, 16a, 16b
cumulative effects	Noise and vibration	Q10a, 11
	Energy use	Q10a, 11, 12, 13, 14
	Waste and residues	Q10a, 11
	Plant safety	Q7, 7a, 7b and 8
	Occupational health and safety	Q7, 7a, 7b and 8
2. Human rights,	Child labour	Q5, 5a and 6
labour rights and industrial relations,	Forced labour	Q5, 5a and 6
including	Discrimination	Q5, 5a and 6
	Trade union freedoms	Q5, 5a and 6
3. Community life, including that of indigenous peoples		Q5, 5a and 6

Reverse gap-analysis² of the SAQ 5.0 against the EU-Batt-R DD requirements

Legend

Required information to fulfil the due diligence obligations in relation to the risk categories or transparency

Information that could be useful to conduct risk assessments in relation to the risk categories or transparency

Information does not seem to be necessary to fulfil the due diligence obligations in relation to the risk categories or transparency

QUESTIONS FROM THE SAQ 5.0	DD REQUIREMENTS IN EU- BATT-R	
1. Has your company appointed senior management representation for environmental, social, ethics or human rights?		
2. Does your company publish a Corporate Social Responsibility (CSR)/Sustainability Report?	Annex X (2) (a), (b), (c)	
3. Does your company have a Code of Conduct?		
4. Does your company have a grievance mechanism or documented complaints procedure established at this location?	Annex X (2) (b), (c)	
5. Does your company have a formal policy covering working conditions and human rights?	Article 49, Annex X (2) (b), (c)	
6. Does your site have a management system in place to manage the human rights and working conditions issues?		
7. Does your company have a formal written health and safety policy, which complies with local law, industry requirements and international standards?	Article 49, Annex X (2) (b) (i)	
8. Does your site have a health and safety management system in place?	, (,,,,,,	
9. Does your company have a formal policy covering business ethics?	Business ethics not covered by EU-Batt-R	
10. Does your company have a formal environmental policy, which includes a commitment to legal compliance, continuous measurement and continuous improvements in environmental performance?	Article 49, Annex X (2) (a) (i)-(vi), (viii), (ix)	
11. Does your site have an environmental management system in place?		
12. Does your site have an energy management system?	Annex X (2) (a) (viii)	
13. What percentage of electricity used at your site in the last calendar year came from renewable sources?	Appay V (2) (a) (viii)	
14. What percentage of heating/cooling used at your site in the last calendar year came from renewable sources?	Annex X (2) (a) (viii)	
15. Does your company set Greenhouse Gas reduction targets?	Annex X (2) (a) (i)	
16. Does your site use any substances with restrictions under any national or international statutory provision in production or operations?	Annex X (2) (a) (v)	
17. Does your company have a current CDP score?	Annex X (2) (a) (ii), (iv)	

² The aim of the reverse analysis was to find out which existing SAQ 5.0 questions are necessary to gain information from suppliers to fulfil the due diligence obligations related to the risk categories and the required transparency of the EUBR as an economic operator.

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18. Does your company have set CSR/Sustainability requirements towards suppliers?	Article 49, Annex X (2) (a), (b), (c)
19. Does your company perform sustainability risk assessment as part of the due diligence activities?	Article 50, Annex X (2) (a), (b), (c)
20a. Does your company have a policy on the responsible sourcing of these raw materials*? 20b. Does your company participate in raw material specific initiative(s)? 20d. If cobalt and/or mica, does your company have a company-scope EMRT (Extended Minerals Reporting Template)	Annex X (1) (a), (b), (c), (d), (e)
21. Does your company have a responsible sourcing raw materials management system or undertake supply chain mapping?	Article 49 (1) (d)