GBA BATTERY PASSPORT

The Battery Benchmarks

Battery Passport Sustainability Benchmarking Framework

Beta Release – September 2025

ABOUT THE BETA RELEASE OF THE BATTERY BENCHMARKS

The Beta Release of the Battery Benchmarks paves the way for a certification scheme for sustainable batteries, which the GBA intends to launch in 2027. The Beta Release documents are published to support early adoption of the GBA Battery Passport, test its functionality in upcoming Operational Trials by leading GBA members, and gather broad-based feedback through a public consultation in October – November 2025. The Benchmarks will be updated based on lessons learned from the Operational Trials and feedback gathered via the consultation, and will form the basis of this certification scheme.

Membership in the GBA, for corporate and non-corporate organisations, is a unique opportunity to participate in Operational Trials, test readiness for incoming requirements, and co-design the parameters of the final certification scheme.

Visit globalbattery.org/join-the-gba/ or contact secretariat@globalbattery.org to join the GBA and shape the Battery Passport!

Disclaimer: The publication of the Beta Release of the GBA Battery Passport Benchmarking Framework does not yet represent content formally endorsed by the GBA Board of Directors. The Board seeks to engage a wide range of stakeholders through an inclusive public consultation process to improve the framework and prepare for finalisation throughout 2026.

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CONTENTS

List of acronyms 2
List of figures 2

PREAMBLE 3

The Global Battery Alliance 3
- What sets us apart? A global, pre-competitive, multi-stakeholder platform for all battery stakeholders 3
- The GBA Battery Passport: An emerging global certification for batteries 4
- Why do we need a global certification for batteries? 4
- About the Beta version of the Battery Passport Sustainability Benchmarking Framework: A major milestone 5
- Box: About the GBA Greenhouse Gas Rulebook 5
- Scope of the Battery Passport 5
- GBA's Strategic Roadmap to 2027: Towards a fully fledged battery sustainability certification 6

PART I: THE GBA BATTERY PASSPORT BETA RELEASE 7

Section A: GBA Battery Benchmarks 7
- Objectives and design principles of the GBA Battery Benchmarks 8
- Regulatory alignment and EU Batteries Regulation readiness support 9
- Benchmarking and recognising Voluntary Sustainability Standards (VSS) 9
- Box: How does the GBA interact with existing Voluntary Sustainability Standards? 10
- Box: How to report against the Battery Passport benchmarks? 12
- Benchmarks beyond the Beta Release 13

Section B: Data Assurance Rulebook for the GBA Battery Passport 14
- Data verification requirements 14
- Data verification and the Assurance Escalator 15
- Frequency of data assurance checks 16
- Requirements for Third-Party Assessment Bodies 16

Section C: Scoring principles 18
- Objectives and guiding principles of scoring 18
- Display of scores 18

PART II: GBA BATTERY BENCHMARKS: REPORTING MODULES 19
- Guidance for reading and interpreting the benchmarks 20
- Core Module: Supply Chain Due Diligence 21
- Core Module: Risk and Sustainability Management 26
- Core Module: Stakeholder Engagement 29
- Issue Module: Greenhouse Gas Emissions and Energy Efficiency 31
- Issue Module: Biodiversity Loss 33
- Issue Module: Pollution 36
- Issue Module: Waste Management 38
- Issue Module: Mine Waste Management 40
- Issue Module: Child Labour 43
- Issue Module: Forced Labour 45
- Issue Module: Use of Security Forces 47
- Issue Module: Employment Terms 49
- Issue Module: Freedom of Association and Collective Bargaining 51
- Issue Module: Occupational Health and Safety 53
- Issue Module: Diversity, Inclusion and Non-discrimination 55
- Issue Module: Community Impacts 57
- Issue Module: Indigenous Peoples' rights 59
- Issue Module: Business Integrity and Transparency 60

ANNEXES 62

Annex I: Glossary of terms 63
Annex II: Standard Recognition Framework 73
Annex III: Summary standard mapping 74

REFERENCES 92
ACKNOWLEDGEMENTS 107

LIST OF ACRONYMS AND TABLES

List of acronyms

3TGs: conflict minerals such as tin, tungsten, tantalum and gold, also referred to as 3TGs

ASI: Aluminium Stewardship Initiative

ASM: Artisanal and Small-Scale Miners

ABs: Conformity Assessment Bodies

ESG: Environmental, social, and governance

ESIA: Environmental and Social Impact Assessment

ESRS: European Sustainability Reporting Standards

EU BR: Battery Regulation

EU: European Union

FSC: Forest Stewardship Council

IAF: International Accreditation Form

ILO: International Labour Organization

ISEAL: International Social and Environmental Accreditation and Labelling Alliance

ITC: International Trade Centre

KYC: Know your counterparty

OECD: Organisation for Economic Cooperation and Development

OECD DDG: Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

OEMs: Original equipment manufacturer

PCF: Product Carbon Footprint

UNEP: United Nations Environment Programme

VSS: Voluntary Sustainability Standards

List of Figures

FIGURE 1. The Battery Passport At A Glance 4
FIGURE 2. Battery Passport Roadmap - Toward A Sustainability Certification For Batteries 6
FIGURE 3. ESG Issues Covered In The Battery Passport Beta Release Benchmarking Framework 8
FIGURE 4. Benchmarking Levels: Charting A Path From Toward Continuous Improvement 9
FIGURE 5: Illustrative reporting, data collection and use of the Battery Benchmarks by supply chain companies and stakeholders 12
FIGURE 6. Battery Passport Assurance Escalator 15
FIGURE 7. Navigating The GBA Battery Benchmarks 20

PREAMBLE

The Global Battery Alliance

Batteries are at the heart of today's clean energy transition. They drive the shift to electric transport, strengthen power grids, and expand access to clean energy worldwide. However, with the unprecedented global growth in demand for critical battery minerals, expected to increase more than fivefold by 2030, we face both a critical challenge and a great opportunity. To truly deliver on their promise of reducing risks and ensuring long-term economic and environmental viability, battery supply chains must be resilient, transparent, and sustainable.

This is where the Global Battery Alliance (GBA) plays a unique role: convening actors across the value chain to jointly design sustainability performance expectations for batteries around principles of transparency, traceability, accountability and circularity. As the only multi-stakeholder platform bringing together the entire battery value chain, we are setting the global benchmarks for sustainability and transparency in battery production and use.

Since its inception in 2017, the GBA has brought together a unique and growing coalition of public and private stakeholders, united by a common vision: to establish sustainable, responsible, and circular battery value chains by 2030. Founded under the World Economic Forum in 2017, the GBA pools the ambition and expertise of around 150 leading organisations across the battery value chain from mining to recycling. Businesses, standard setters, NGOs, academia, governments, and international organizations come together to build consensus in a pre-competitive approach, to drive systemic change along the entire battery value chain.

The flagship initiative of the GBA is the Battery Passport.

What sets us apart? A global, pre-competitive, multi-stakeholder platform for all battery stakeholders

As the largest and most diverse multi-stakeholder platform in the global battery value chain, the GBA is uniquely positioned to foster dialogue, develop practical solutions, and build common understanding on sustainable batteries.

Multi-stakeholder consensus building and decision-making lie at the heart of the GBA, with equal representation of non-corporate and corporate actors across all governance bodies, enshrined in the GBA Charter. The principal governance mechanism of the GBA is the Board of Directors, elected by GBA members, with equal representation between 10 non-corporate and 10 corporate members. Technical steering of the GBA's work programmes, including the Battery Passport, is delegated to Steering Committees, which also have equal representation of corporate and non-corporate members.

The multi-stakeholder consensus building on the Battery Passport framework takes place in the GBA's Working Groups, which were established to define what stakeholders expect from sustainable battery value chains and co-develop implementation models for the Battery Passport. Beginning with the development of prototype performance expectations for child labour and human rights due diligence and the development of the Greenhouse Gas rulebook in 2021, and continuing from late 2024 to mid-2025, this first-ever set of GBA Battery Benchmarks has been developed by GBA Working Groups, in which GBA Members deliberated and agreed on commonly acceptable positions across the 18 issues covered in the 2025 Beta Release.

The GBA's unique role in developing harmonised, trusted, and widely accepted benchmarks is also underpinned by our coverage of the entire end-to-end battery value chain, our global reach, and our representation of different battery and energy storage users from automotive companies to power, utilities, and technology companies. The GBA framework is technology- and mineral-agnostic and applicable to different battery chemistries. The GBA brings together technology partners in a pre-competitive setting to implement digital solutions for supply chain companies based on these rules and frameworks. To create market demand and opportunities for product differentiation based on GBA certification, we unite our membership with investors and battery buyers to consolidate demand and mobilise financing for progressively transparent and sustainability-assured batteries.

The GBA Battery Passport: An emerging global certification for batteries

The GBA Battery Passport is breaking new ground by defining tools for responsible sourcing, due diligence, digital technology, and product carbon footprinting through multi-stakeholder consensus building.
The GBA Battery Passport is an emerging global sustainability reporting and certification scheme for batteries, underpinned by benchmarks that allow data on facility-level sustainability performance in the battery supply chain to be gathered, verified, scored, aggregated, and compared. It is built on innovative Digital Product Passport protocols and technologies to enable trusted and harmonised supply chain data to be harnessed effectively. The gathered data allows physical batteries to be graded for their supply chain sustainability attributes and carbon footprint and, in the future, to achieve GBA certification.

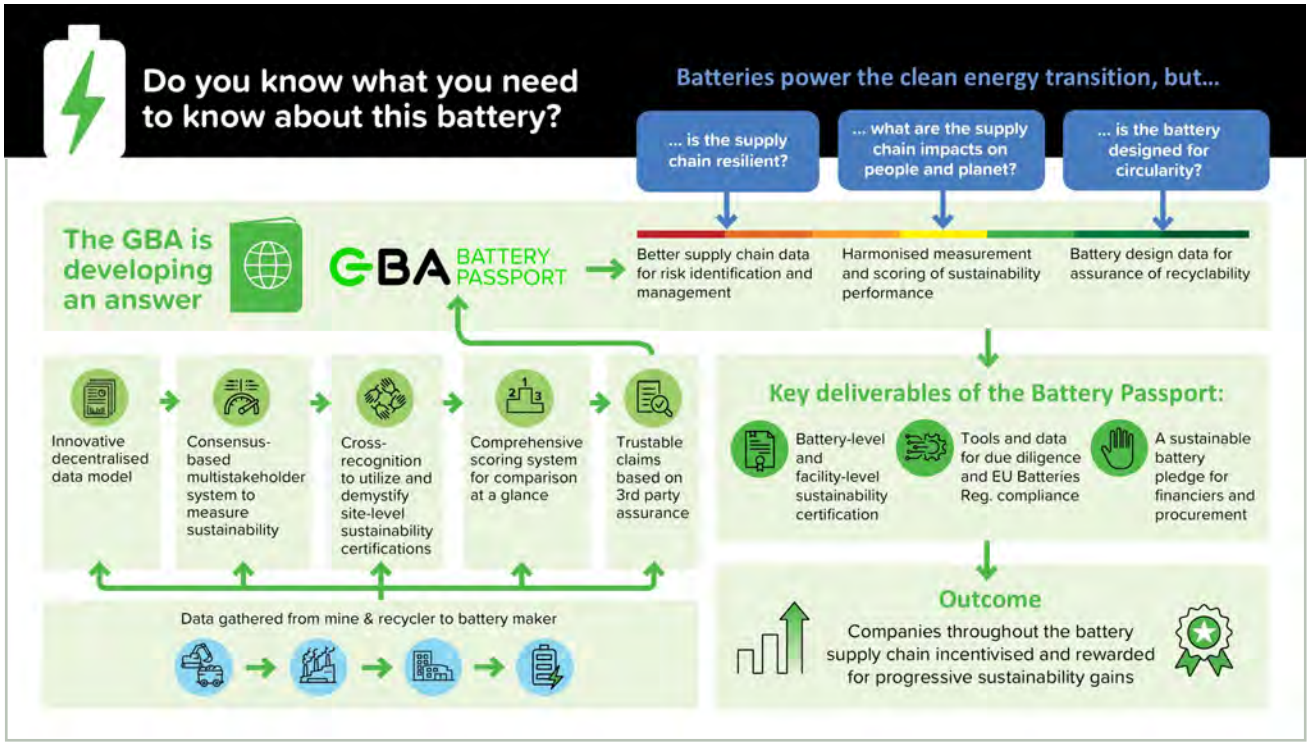
In addition to defining a measurement framework for facilities' sustainability performance, the GBA Battery Passport sets rules for how data is passed between organisations, how supply chains are modelled and mapped, and how the trustworthiness of data is assured.

Why do we need a global certification for batteries?

The GBA envisages a Battery Passport that, by 2030, will be widely adopted by industry, with associated certifications regularly seen on physical batteries in everyday applications. Consumers are already familiar with sustainability-branded products, like timber certified by the Forest Stewardship Council (FSC), sustainable cotton assured by Better Cotton, and Fairtrade food products. With the growing role of batteries in powering our economy, it is time for batteries to be underpinned by the same trust in sustainable production.

In this future, battery, automotive, and energy companies use GBA certification to demonstrate their commitment to sustainability, build trust in the transparency and reliability of their supply chains, differentiate their products, and comply with regulatory reporting requirements, e.g. the EU Batteries Regulation. Production facilities leverage the GBA Battery Passport to distinguish materials and products based on assured sustainability performance and to build resilience against supply disruptions. Mineral-rich countries leverage the

FIGURE 1: The Battery Passport At A Glance



Battery Passport to prepare for global regulations and develop national regulatory frameworks. Consumers, buyers, and investors compare battery products for their sustainability performance before purchasing, enabling more informed choices. Civil society actors have a powerful new tool to advocate for continuous improvement.

Beta Release of the Battery Passport Sustainability Benchmarking Framework: A Major Milestone

The GBA is working toward a fully operational Battery Passport certification by 2027. The Beta Release of the GBA Battery Passport Sustainability Benchmarking Framework – "The GBA Battery Benchmarks" - is a major milestone towards this goal.

Within the Beta Release, the GBA presents:

- Part I: The Battery Benchmarks
  - Section A: Introduction to the GBA's Sustainability Benchmarking Framework
  - Section B: Data Assurance Rulebook
  - Section C: Overview of Scoring Principles
- Part II: Benchmarks for facility-level sustainability performance
- The GBA Greenhouse Gas Rulebook (v2.1)

In addition, supporting guidance materials will be provided for reporting companies ahead of the Operational Trials, including a note on the GBA Battery Passport and the EU Batteries Regulation and detailed guidance on how to report against the GBA Battery Benchmarks.

Scope of the Battery Passport

The **mineral scope** of the Battery Passport certification scheme will build on the four minerals specified in the EU Batteries Regulation —lithium, cobalt, nickel and natural graphite —with the possibility to extend or amend this scope as regulatory requirements, battery chemistries, and GBA member priorities evolve.

The **lifecycle scope** of the Battery Passport focuses on the cradle-to-gate production chain, and recycling. The Battery Passport aggregates facility-level sustainability benchmarks into a product-level score. These can be combined with performance and circularity metrics required by regulations, e.g. recycled content and durability, within a Digital Product Passport infrastructure. Looking ahead in the GBA's roadmap, as battery use matures and battery circularity rises in prominence, the GBA envisions a potential role in convening global stakeholders to set performance benchmarks for products in their use phase and at end-of-life.

About the GBA Greenhouse Gas Rulebook

Reducing GHG emissions and advancing ambitious climate action is one of the principal sustainability considerations for batteries – it lies in the heart of the mission to decarbonise the economy and the GBA's vision for the Battery Passport. The GBA's Greenhouse Gas Rulebook sets globally harmonised rules that make "cradle-to-gate plus recycling" battery carbon footprints transparent and reliable. This enables decisions to be driven by accessible and trusted data. The Rulebook provides a robust methodology for generating and collecting process-specific data in a consistent manner, ensuring that battery carbon footprints across facilities in the battery value chain are comparable. Previous versions of the Greenhouse Gas Rulebook were released and piloted in 2022 and 2024.

The current v2.1 of the Greenhouse Gas Rulebook incorporates minor edits to the previously released v2.0. These edits result from learnings of the 2024 GBA Battery Passport pilots and respond to stakeholder requests for greater clarity on methodological aspects, provide editorial consistency, and increase alignment with adjacent GHG frameworks, including those of the Partnership for Carbon Transparency, Together for Sustainability, and Catena-X. This Rulebook precedes the anticipated release of an EU Delegated Regulation establishing the methodology for the calculation and verification of the carbon footprint of electric vehicle batteries. The GBA intends to produce a v3.0 of the Greenhouse Gas Rulebook, aligned with the EU Delegated Regulation, once the legislation has been finalised. The Rulebook can be accessed here.

GBA's Strategic Roadmap to 2027: Towards a fully-fledged battery sustainability certification

The GBA Battery Passport certification, to be launched in 2027, will build stakeholders' confidence that batteries meet robust sustainability criteria across the supply chain. The certification will be anchored in internationally recognised frameworks and will set clear, ambitious performance thresholds in support of the global push for responsible and traceable supply chains. This will drive more sustainable and resilient battery value chains by rewarding continuous improvement in the market, enabling consumer choice, and supporting sustainable finance. The detailed certification requirements — based on achievement of benchmarks, levels of assurance attained, and coverage of the supply chain — will be developed jointly within the GBA's multistakeholder platform for the full launch of the Battery Passport in 2027.

Figure 2 provides an overview of the major components of the GBA Battery Passport, highlighting the elements featured in the Beta Release, which will be piloted during the Operational Trials in 2026. The remaining components will be developed and tested ahead of the 2027 launch.

The GBA has facilitated two piloting rounds, in 2023 and 2024, which trialled key aspects of the Battery Passport and informed its development. The 2024 piloting round included cell manufacturers representing 80% of global cell production capacity and marked the largest global pre-competitive effort to date trial Battery Passport infrastructure. Real sustainability data was gathered from facilities throughout the supply chain, from mine sites to battery manufacturers, across all five major continents.

Building on those successful piloting rounds, Operational Trials will take place in 2025–2026. Focal areas for the Operational Trials will include:

- Prototype sustainability certification of physical batteries;
- Digital data exchange schemas and tools;
- Trialling third-party assurance mechanisms;
- Automated scoring of sites' existing certifications;
- EU Batteries Regulation compliance.

FIGURE 2: Battery Passport Roadmap - Toward A Sustainability Certification For Batteries

	Component of Beta Release	Used in Operational Trials	Included in 2027 launch of Battery Passport
Benchmarking Framework	✓	✓	✓
Data Assurance Rulebook	✓	✓	✓
GHG Rulebook	✓	✓	✓
Data Exchange Rulebook		✓	✓
Scoring Rulebook		✓	✓
Verifier and Certifier Handbook			✓

PART I: THE BATTERY PASSPORT BENCHMARKING FRAMEWORK

GBA Battery Benchmarks

The Beta Release of the GBA Battery Passport Sustainability Benchmarking Framework represents a major milestone towards establishing globally harmonised benchmarks for sustainability performance, drawing upon normative expectations established in existing regulations and voluntary sustainability standards. Figure 3 illustrates the ESG issues covered in the GBA Battery Benchmarks in the 2025 Beta Release and beyond, and their alignment with the EU Batteries Regulation. The reporting modules corresponding to these issues are presented in Part II of this document.

FIGURE 3: ESG Issues Covered In The Battery Passport Beta Release Benchmarking Framework

*Please refer to the GBA's GHG rulebook v.2.1
**Circular design to be revised for the 2027 edition
***Indigenous Peoples' rights under drafting and multi-stakeholder consensus building

Objectives and design principles of the GBA Battery Benchmarks

Building on the work conducted by the GBA and its members since 2017, and drawing on feedback collected through the development of initial rulebooks for selected ESG issues, as well as two rounds of piloting in 2022 and 2024, the sustainability benchmarking framework for the Beta Release has been designed according to the following principles:

1. Alignment with the risk-based due diligence process, in accordance with the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct six-step framework, focusing reporting efforts on material risks and enabling continuous, iterative deepening of engagement.
2. Grading benchmarks for level of ambition, from A to AAA, to provide a nuanced picture of facilities' sustainability performance and pave the way to progressive improvement (see Figure 4).
3. Inclusivity for diverse companies in the battery industry, allowing sites without existing sustainability certifications to report, while rewarding and incentivising transparency and continuous improvement, and ensuring the trustability of reported data.
4. Succinct, high-level benchmarks that provide clarity in a complex landscape of sustainability expectations, through the mapping and synthesis of existing standards' requirements.

FIGURE 4: Benchmarking Levels: Charting A Path From Toward Continuous Improvement

Level	Definition
A	Practices reflecting: a) due diligence as outlined in the EU Batteries Regulation no. 2023/1542 (EUBR), the underlying OECD Guidance for Responsible Business Conduct, and OECD Due Diligence Guidance for Responsible Supply Chains of Minerals (where applicable); and b) environmental, social, and governance (ESG) requirements of international frameworks referenced in EUBR and OECD guidance, as operationalised in a wide range of benchmarked voluntary sustainability standards (VSS), in particular, their core, critical, or foundational requirements, where applicable.
AA	Practices that reflect additional expectations referenced in some, but not all VSS, and/or that go beyond Level A.
AAA	Practices reflecting additional, emerging, or aspirational expectations in individual VSS, voluntary international guidance, or innovative benchmarks, as agreed by the GBA's membership to advance its vision for sustainable battery value chains, and/or that go beyond Levels A and AA.

Regulatory alignment and EU Batteries Regulation readiness support

The GBA Battery Passport Benchmarking Framework can be used as a powerful tool to support regulatory compliance. Notably, conducting and reporting on due diligence in line with upcoming EU Batteries Regulation requirements. The Beta Release Battery Benchmarks take the EU Batteries Regulation as a baseline - Level A Benchmarks are mapped against relevant articles and sections of the EU Batteries Regulation, in Annex III. The Battery Passport provides reporting tools and performance benchmarks for conducting due diligence according to the EU Batteries Regulation's requirements and its underlying international frameworks.

Selected additional relevant regulations are mapped against the Battery Benchmarks in Annex III for ease of reference. In the future, mapping and alignment against regulations in other jurisdictions, and related guidance, will be issued alongside the framework to support compliance with diverse regulatory requirements and to facilitate global alignment.

A guidance note on using the Battery Passport as a tool for meeting EU Batteries Regulation requirements will be published to support reporting companies, and will be updated regularly as regulatory requirements evolve. The GBA is not officially mandated to implement the Battery Passport as defined in the EU Batteries Regulation or other regulations, nor should any guidance or mapping be interpreted as legal advice.

Benchmarking and recognising Voluntary Sustainability Standards (VSS)

The Battery Benchmarks build on the work of existing voluntary standards to set sustainability norms for facilities in the battery mineral supply chain. By directly recognising facilities' achievement of voluntary standards, the Battery Benchmarks incentivise the adoption of VSS by relevant facilities. The GBA convenes a Standard Setter Working Group, and feedback from this group has been instrumental shaping the Battery Benchmarks.

The following standards have been benchmarked in the Battery Benchmarks Beta version:

- Aluminium Stewardship Initiative (ASI) Performance Standard
- CopperMark Criteria Guide
- CooperMark Joint Due Diligence Standard
- International Council of Mining and Metals Mining Principles
- Initiative for Responsible Mining Assurance (IRMA) Standard Version 1
- Responsible Mining Initiative Facility Standard for Social, Environmental, OHS and Governance Risks
- Responsible Minerals Initiative Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals
- Responsible Minerals Initiative Supply Chain Due Diligence Plus
- Toward Sustainable Mining Protocols

A mapping of the GBA Battery Benchmarks against each standard is provided in *Annex III – Summary Standard Mapping*. Feedback received from standard setters on the mapping of their respective standards, against all or some Battery Benchmark modules, has improved the accuracy of the mapping.

How does the GBA interact with existing Voluntary Sustainability Standards?

The complex and rapidly evolving landscape of Voluntary Sustainability Standards for battery minerals, and other parts of the battery value chain, is one of the challenges supply chain companies and stakeholders face when assessing sustainability claims. Since 2024, the GBA has built a strong partnership with voluntary sustainability standards (VSS), formalised under the Battery Passport Standard Setter Working Group.

The GBA's product-level scoring and certification, together with the facility-level assurance provided by VSS, bring value and clarity by:

- **Promoting uptake of assurance and certification** against these standards as a means of increasing independent auditing, assurance, and credibility of sustainability claims, whilst allowing the coexistence and use of multiple standards. This helps to promote continuous improvement by rewarding progressive achievement across standards' requirements.
- **Encouraging the development of strong standards** by determining Level AAA benchmarks as potential future requirements and discussing them with standard setters for potential inclusion in future editions of their standards; and by promoting the strengthening of assurance, governance, and other recognition criteria in line with those benchmarked in the GBA framework.
- **Supporting the use of voluntary standards** across the value chain: for upstream companies, it reduces reporting burden; for downstream companies, it enables efficient collection and analysis of data across supply chains; and for stakeholders, it delivers comparable, trustworthy information without mandating or favouring one standard over another. This value proposition will be tested during the Operational Trials, where the GBA will work with standard setters on the digital exchange of certifications, verification of audit and assurance reports, and validation of results, ensuring viability and efficiency in practical application.

Testimonials from benchmarked standards:

asi Aluminium Stewardship Initiative

"Aluminium Stewardship Initiative (ASI) is pleased to contribute to the GBA Battery Passport framework through participation in the GBA Standard Setter Working Group and by including ASI's Performance Standard in the benchmarking process. Harmonisation with relevant external standards and schemes is an important part of ASI's collaboration activities, helping to reduce unnecessary duplication and inform our learning and continual improvement. We look forward to continuing to work with the GBA on these areas as our standards evolve over time."

THE COPPER MARK | RESPONSIBLY PRODUCED COPPER

"The Copper Mark is pleased to have participated in the working group and contributed to the development of the Global Battery Alliance (GBA) benchmarking initiative through feedback. This collaboration underscores our ongoing commitment to advancing responsible practices across the mining and metals value chain specifically for copper, nickel, molybdenum, and zinc, and our support for a more aligned and harmonised standards landscape in the future. Adoption of robust and practical standards by producers, processors and users of minerals and metals forms an integral part of building responsible battery value chains. As we transition to the Consolidated Mining Standard Initiative (CMSI), the Copper Mark remains committed to continued collaboration with the GBA toward our shared goal of promoting responsible practices along metal value chains."

ICMM

"ICMM values the partnership with the GBA to develop the Battery Passport Benchmarking framework. ICMM is currently in the process of transitioning to the Consolidated Mining Standard Initiative (CMSI) which will replace the Mining Principles to form the core of their membership commitments. We look forward to future cooperation towards recognition and benchmarking of the CMSI Standard."

IRMA
Initiative for Responsible Mining Assurance

"As a Voluntary Sustainability Standard crafted by and for diverse stakeholders, IRMA has welcomed the opportunity to contribute to the GBA's efforts to streamline reporting in line with the EUBR. Effective due diligence allows all stakeholders to work together towards a common aim: advancing responsible practices along the value chain, particularly at the point of extraction. We hope the framework will support and recognise the efforts of mine operators who are moving beyond the status quo, adopting high-bar standards, and sharing their journey of continuous improvement with transparency."

"The Responsible Minerals Initiative (RMI) is pleased to contribute to the GBA's Battery Passport initiative through participation on the GBA's Board of Directors, and by supporting the inclusion of the RMI's Responsible Minerals Assurance Process (RMAP) All Minerals Standard, Supply Chain Due Diligence Module, and Facility Standard for Social, Environmental, Occupational Health and Safety, and Governance Risks in the Battery Passport benchmarking. This collaboration reflects our commitment to responsible sourcing, transparency, and the advancement of globally aligned due diligence practices. The RMI looks forward to continuing to work with its more than 500 member companies, over 300 mineral processors in the RMI assessment programme, and multistakeholder partners such as the GBA, to provide practical solutions for responsible critical mineral and battery supply chains."

TSM

"Toward Sustainable Mining has actively contributed to the Global Battery Alliance benchmarking initiative, providing input and expertise to help shape the draft framework. This reflects our dedication to responsible mining operations and our support for industry efforts to enhance transparency and standardization in sustainability reporting. We recognize the value of multi-stakeholder collaboration in developing workable solutions for the responsible sourcing challenges facing battery supply chains. TSM will remain engaged with the Global Battery Alliance and other stakeholders as this framework evolves."

These standards have also been assessed against baseline criteria for recognition, established through the GBA's multi-stakeholder governance process and informed by other standard benchmarking exercises. These criteria, and the assessment of each standard, are provided in *Annex II – Standard Recognition Framework*. The scoring and further development of the criteria as well as the assessment will continue as the GBA evolves the Battery Passport certification programme.

1. Assurance and oversight, independence of auditors
2. Quality and intensity of audits
3. Multi-stakeholder governance
4. Transparency of audit results
5. ISEAL membership/alignment[1]
6. Impact and continuous improvement
7. Involvement of affected populations
8. Complaints/grievance mechanism
9. OECD alignment assessment
10. Coherence, cooperation, and openness

In addition to the benchmarked standards, the following organisations have participated in the GBA's Standard Setter Working Group: Extractive Industries Transparency Initiative (EITI), China Chamber of Commerce of Metals, Minerals and Chemicals (CCCMC), Drive Sustainability, Global Reporting Initiative (GRI), London Metals Exchange (LME), Organisation for Economic Cooperation and Development (OECD) Responsible Business Centre, and the United Nations Environment Programme (UNEP).

The standard setters will be invited to provide a further review of the detailed mapping of the Beta Release during the public consultation, and a full review of the revised framework in 2026 before the final publication which is planned for 2027. Standard setters will also be consulted at each major revision of the framework thereafter. Moving forward, the GBA will strive to benchmark additional standards covering the full value chain. Engagement from standard-setting organisations is welcomed as the framework continues to evolve.

How to report against the Battery Passport benchmarks?

The roles and responsibilities of supply chain companies, the process for scoping which modules to report against based on regulatory relevance and a materiality assessment of risks, and the methods for submitting Battery Passport reports are outlined below. Detailed guidance will be provided to companies participating in the Operational Trials of the Battery Passport programme.

Who should collect the reports from a battery's supply chain?
The entity assembling the battery pack or cell should map and engage its upstream supply chain to collect data, using in-house supply chain mapping tools, or third-party solution providers. They should then follow the GBA's aggregation and scoring rules to translate facility-level reports into product-level scores. For further details please refer to the *Data Assurance Rulebook* and *Scoring Principles* sections of the document. Additional clarity will be provided in an upcoming *Data Exchange Rulebook*.

Individual facilities along the supply chain can report for their own facility and make these reports available to clients and the public.

On which modules should facilities select for reporting?
Facilities along the supply chain should begin by reporting on the three core modules of Supply Chain Due Diligence, Risk and Sustainability Management, and Stakeholder Engagement. Facilities seeking to meet specific regulatory requirements with Battery Passport data should focus on the following scope:

- **EU Batteries Regulation:** Facilities involved in raw materials extraction, refining, processing, and active materials production should report on level A of all modules of the Beta Release version of the Battery Benchmarks, which are aligned with EUBR requirements and underlying frameworks.
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, EU Conflict Minerals Regulation, or US Dodd-Frank Act:** Facilities operating in, sourcing from, or trading with CAHRAs and in 3TGs, should report at least on level A of the Annex II risk–corresponding modules (see Figure 3).
- **Uyghur Forced Labour Protection Act and EU Ban on Forced Labour:** Facilities along the supply chain should report on the Forced Labour and Child Labour module.

All facilities can report on modules beyond their most material and prioritised risks to conduct enhanced due diligence, demonstrate sustainability performance, or benchmark against higher performance. The exception is modules that apply only to material extraction and co-located processors/refiners (e.g, Mine Waste Management), or to the battery OEMs (e.g., Circular Design – in future). Value chain applicability is indicated in the table above each module.

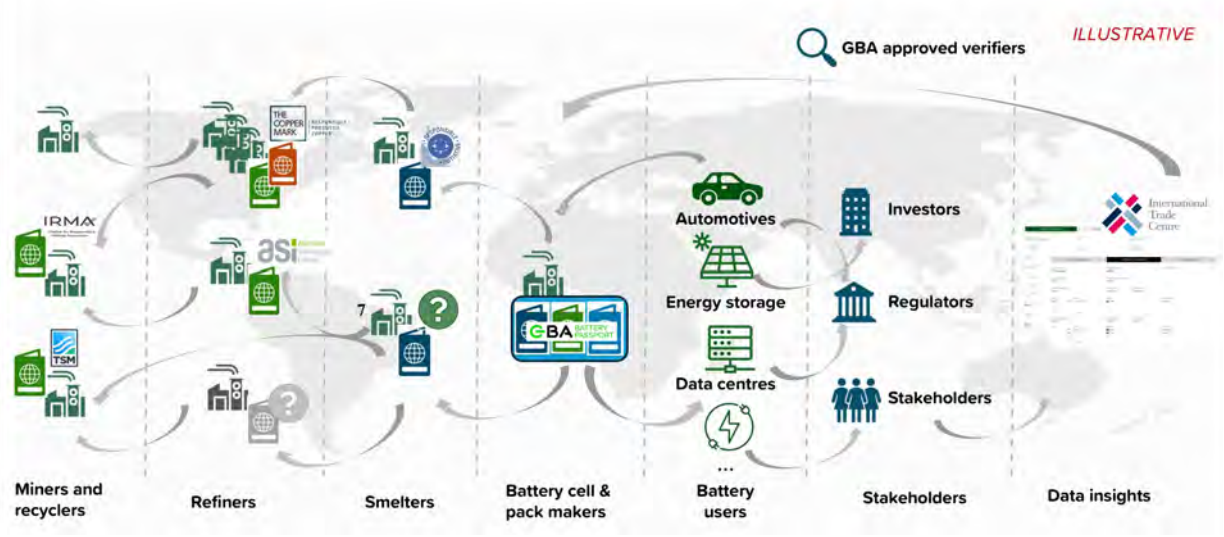
How is the risk materiality assessment verified?
A verification mechanism for assessing the accuracy and trustworthiness of a facility's materiality assessment, for determining which modules to report against, will be developed. This will likely build on materiality assessments assured through audits against Voluntary Sustainability Standards recognised by the GBA, or the GBA's own verification process.

What information is needed for reporting?
The facility should respond with a Yes or No to whether they meet a GBA benchmark and provide links to supporting documents such as policies, procedures, manuals, and reports. Where available, facilities should provide any internal or external assurance (e.g., audit reports) for these documents. If the facility has been assessed against one of the recognised standards, it may provide an independent third-party audit-validated report against that standard. This will automatically populate the benchmarks corresponding to that standard according to the standard mapping, provided in *Annex III*. Digital data exchange rules and associated digital infrastructure are under development, to ensure that facilities' supporting documents can be securely shared with third-party verification bodies, without these documents becoming visible to other entities.

How can data be submitted?
Data can be collected and shared with supply chain actors in Excel or CSV file formats, through the company's own systems or through a 3rd party provider integrating the GBA reporting framework, or via the upcoming GBA Gateway, an open-access reporting, digital data exchange and insights platform the GBA will develop in partnership with the International Trade Centre (ITC), with funding from the European Union.

Funded by the European Union

FIGURE 5: Illustrative reporting, data collection and use of the Battery Benchmarks by supply chain companies and stakeholders



Benchmarks beyond the Beta Release

The GBA will continue developing the Benchmarking Framework in 2026 –2027, based on feedback from the public consultation and Operational Trials, with a focus on:

- Building consensus on any benchmarks not covered in the Beta Release.
- Expanding standard equivalency, referencing, and mapping, particularly to include standards used by mid- and downstream companies.
- Developing additional modules, as shown in Figure 3.

Subsequently, the benchmarking framework will be revised periodically through the GBA's multi-stakeholder processes. Interim updates, in response to changes in the regulatory or standards landscape, may be reflected as notes, but will not form part of the scoring or benchmarking until they have undergone the GBA's multi-stakeholder review.

Data Assurance Rulebook for the GBA Battery Passport

The Global Battery Alliance (GBA) Battery Passport will establish a cohesive and comprehensive framework for the collection and aggregation of data across the battery supply chain. Its scope covers the initial extraction of raw materials at mines, through refining and battery manufacturing, to end-of-life recycling facilities.

In future, a product-level certification will be issued for batteries to attest that they meet core GBA sustainability performance expectations. This certification will accompany the battery in digital form throughout its service life, including reuse and repurposing.

It is essential that data, indicators and certificates attached to batteries through the Battery Passport programme, are trustworthy. Stakeholders must have confidence that reported data reflects a company's sustainability management systems and performance, and that it is aggregated and translated into indicators correctly and consistently.

As the need for robust sustainability claims is increasingly being formalised through legislation e.g. the EU Green Claims Directive, the EU Directive on Empowering Consumers for the Green Transition, and the Canadian Environmental Claims and Competition Act, trustworthy sustainability data and indicators are essential for companies to fulfil their supply chain due diligence obligations. Data assurance in the Battery Passport programme will rely on third-party verifier organisations formally recognised by the GBA. These organisations will conduct checks to establish the credibility of data, indicators, and certificates attached to batteries.

This Beta Release of the Data Assurance Rulebook sets out a structure for data assurance for the GBA Battery Passport. It provides general principles that will be refined during the remainder of the development phase of the Battery Passport up to the launch in 2027. The purpose of the Rulebook is to ensure that data, indicators and certification in the Battery Passport programme are trustworthy, and that the requirements of the programme, for companies that participate, are practically feasible to implement.

Data verification requirements

Data verification mechanisms are required for three aspects of the Battery Passport:

1. **Veracity of the data contained in reports.** Facilities participating in the Battery Passport programme must complete reports on sustainability performance using the Battery Passport Benchmarking Framework and Greenhouse Gas Rulebook. Reporting requirements include data on facilities' sustainability management systems, their attainment of voluntary sustainability standards, and Product Carbon Footprint calculations. Reported facility data will require confirmation by a third-party verification body to ensure it is accurately compiled and consistent with the supporting documentary evidence.
2. **Adherence to data exchange rules and a recognised Implementation Profile.** As set out in the Battery Passport Data Exchange Rulebook (under development), data will be exchanged according to defined exchange rules and a technical Implementation Profile for secure transmission. Data exchanged between companies will require confirmation by a third-party verification body to ensure compliance with this Rulebook.
3. **Adherence to Battery Passport rules for data aggregation and scoring.** As described in the Battery Passport Scoring Rulebook (under development), facilities in the supply chain must aggregate data from their suppliers' reports, and scores for sustainability indicators contained in suppliers' reports must be combined and averaged. Facilities in the supply chain must have their application of the Battery Passport aggregation and scoring rules validated by a third-party verification body.

Verification of Product Carbon Footprint reporting

Data contained in reports, as described in point 1), will include Product Carbon Footprint (PCF) figures calculated in accordance with the Battery Passport Greenhouse Gas Rulebook.[2] This data is expected to be relatively complex to verify compared with data reported against the Benchmarking Framework. In the case of the Benchmarking Framework, the provided documentary evidence will either demonstrate the veracity of the data being reported or it will not. For PCF reporting, figures will result from a complex carbon accounting exercise, and differences in the interpretation of the Greenhouse Gas Rulebook could lead to materially different PCF calculations. Specialist qualifications will therefore be required for Third-Party Assessors to verify PCF reporting (see section Requirements for 3rd Party Assessors).

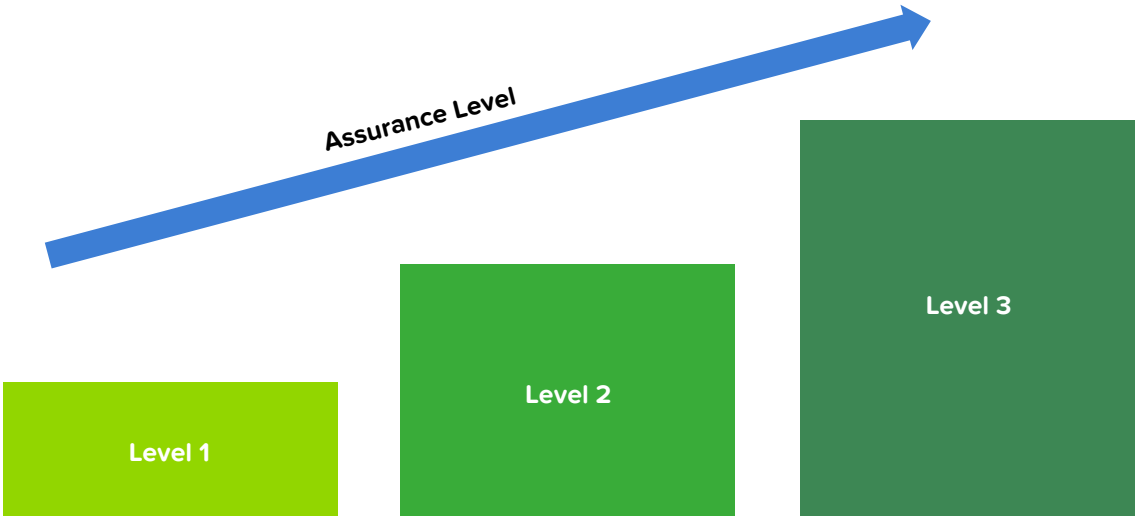
Data verification and the Assurance Escalator

As noted in the section Data Verification Requirements, one of the key verification mechanisms to be implemented in the Battery Passport is to ensure the veracity of the data contained in facility-level Reports.

The Battery Passport sustainability benchmarking framework requires facilities to report on their sustainability management systems. For each individual benchmark, three levels of assurance are attainable: verification of the existence of relevant policy documents and management systems; verification through first-party assessment (e.g. from a head office inspection) or second-party assessment (e.g. from a customer audit) that management systems are being implemented; and verification through a third-party assessment against a voluntary sustainability standard, providing confidence that management systems are being implemented effectively. The three levels are illustrated in Figure 5 below.

Higher levels of attainment in the Assurance Escalator will equate to higher scoring in the Battery Passport. A full scoring mechanism will be detailed in the Scoring Rulebook (under development).

FIGURE 6: The Battery Passport Assurance Escalator



Verified documents

Documents provided to evidence existence of site-level policies and management systems that fulfill BP benchmarks.

Verified implementation

1st or 2nd party assessment documents provided, demonstrating implementation of site-level policies and management systems that fulfill BP benchmarks.

Verified effectiveness

3rd party assessment against a voluntary sustainability standard is evidenced, assuring the effective implementation of site-level policies and management systems that fulfill PB benchmarks.

Frequency of data assurance checks

A preliminary assessment indicates that facility-level verification should take place on a sampling basis. The GBA should not require full verification at every facility each year, as it would not be practically achievable to conduct all verification checks described in the section Data Verification Requirements annually without placing an unrealistically high administrative burden on supply chain companies.

The full parameters of a sampling methodology for data verification will be developed by the GBA in 2026. The development process will be informed by lessons learned from the Battery Passport Operational Trials which will generate valuable data on the resource cost of each verification process for participating facilities. The design principles that the GBA will follow in developing a sampling methodology include the following:

1. A subset of supply chain facilities should be subject to verification processes annually, using a sampling methodology that prioritises risk (i.e., risk of failing verification checks, risk of negative ESG impacts at the facility, contextual risk factors, etc.), while ensuring that each facility has a non-negligible chance of being verified each year.
2. Facilities not selected for verification in a given year will not incur scoring penalties or other disadvantages. This principle is analogous to a tax authority auditing a selection of taxpayers each year. It is assumed that non-audited taxpayers are declaring their tax liabilities correctly in the absence of evidence to the contrary. The possibility of being selected for checks is sufficient to ensure that the vast majority of entities report honestly.
3. Facilities should receive a verification statement if checks are passed or be given remedial actions to undertake if verification checks are not passed. Penalties should be applied in the case of repeated failures to pass verification checks, up to and including the zero-rating of sustainability scores associated with the facility in the Battery Passport ecosystem (see Part D Scoring principles).

For downstream companies conducting supply chain due diligence, this approach should provide sufficient assurance that Battery Passport data can be trusted. Due diligence performed in accordance with **OECD Guidelines** is ongoing and risk-based. It does not require 100% assurance at any given point in time.

The sampling approach will constitute a minimum level of verification. Companies in the supply chain may, in practice, face requirements for more frequent verification from clients or other stakeholders or, in some cases, client requirements to use designated service providers for verification. Such requirements would be outside the GBA's control and would be negotiated bilaterally between companies.

Requirements for Third-Party Assessment Bodies

The GBA will develop a full framework for the approval of third-party Conformity Assessment Bodies (CABs), along with guidance materials for CABs, in 2026. This section provides an overview of the design principles that will underpin this framework, as well as interim measures for CAB approval for the Battery Passport Operational Trials in 2025–2026.

The GBA intends to draw from the ISO 17000 series of standards to develop Conformity Assessment Scheme requirements for the Battery Passport. The GBA will act as a Conformity Assessment Scheme Owner, as described in ISO 17067, and intends to issue a mark of conformity on physical batteries in accordance with ISO 17030. CABs in the Battery Passport ecosystem will have two distinct roles:

1) Verification Bodies – As outlined in the section Data Verification Requirements, Verification Bodies must provide three distinct verification mechanisms:
   - Verification of data reported against GBA reporting templates.
   - Verification of the correct implementation of data exchange rules.
   - Verification of the correct application of data aggregation and scoring rules.

   These verification mechanisms establish the truthfulness of companies' claims that they have followed GBA rules and are therefore underpinned by ISO 17029.

2) Certification Bodies –These attest that batteries meet GBA specifications (currently under development) for supply chain sustainability performance. This, in turn, allows a relevant conformity mark to be associated with the physical product. This process is underpinned by ISO 17065.

Various implementation models are under review, in particular, the approach of the Initiative for Responsible Mining Assurance (IRMA) for conformity assessment in the context of mineral supply chain sustainability. This involves the adoption of baseline expectations for CABs from relevant ISO standards, augmentation as necessary for the specific operating context and verification or certification role, and GBA approval of CABs and individual assessors to provide services within the Battery Passport ecosystem. The latter two steps are likely to require partnership with a CAB approval entity external to the GBA Secretariat, due to the resource costs involved and specialist expertise required. For the purpose of the Battery Passport Operational Trials, Verification Bodies and Certification Bodies will be required to demonstrate accreditation to ISO 17029 and ISO 17065, respectively, with accreditation provided by an Accreditation Body that is a member of the International Accreditation Form (IAF).

High-level guidance will be provided to CABs for the conduct of their activities during the Operational Trials, and this guidance will form the basis for the complete set of guidance materials for CABs to be developed in 2026.

Scoring principles

The GBA Battery Passport certification is derived by aggregating facility-level sustainability performance against the benchmarking framework across the full battery supply chain, into a product-level score. This approach enables the generation of harmonised, globally comparable product-level scores. A robust scoring methodology will underpin the certification. The high-level principles of scoring are presented here for reference.

Objectives and guiding principles of scoring

The principles of scoring were developed in the GBA working groups following a multi-stakeholder development process, in parallel with the development of the Data Assurance Rulebook and the Benchmarking Framework. High-level principles of the scoring system are listed below:

- **Flat allocation of points:** Each benchmark at every attainment tier — Level A, Level AA, and Level AAA — is awarded one point.
- **Sequential attainment:** Scores for Level AA and Level AAA benchmarks are awarded only once the corresponding Level A benchmark has been met. However, reporting against all levels is encouraged, even if attainment at Level A has not yet been achieved.
- **Treatment of incomplete data:** Missing data is generally treated as a zero score. For example:
  - If a facility does not report against a performance expectation, the associated score for that benchmark is zero.
  - If a facility fails to report, then the associated score for that part of the supply chain is zero.
  - If a facility does not report against an ESG module, the score for that module is zero unless the module is deemed non-applicable through materiality assessment of risks.
- **Multipliers for assurance:** Higher levels of assurance equate to higher scoring in the Battery Passport, in line with the *Assurance Escalator* presented in *Section B*. Following the Beta Release, the numerical values of multipliers for *verified implementation* and *verified effectiveness* will be determined. The multipliers for verified effectiveness are tied to the recognition criteria of Voluntary Sustainability Standards described in Part A. Numerical values for these multipliers will be determined and trialled during the Operational Trials.

Display of scores

The ESG performance of the supply chain will be presented at the product level and in disaggregated formats that are subject to finalisation. Indicators will provide insight into the sustainability performance of the supply chain while preserving the anonymity of individual facility-level data.

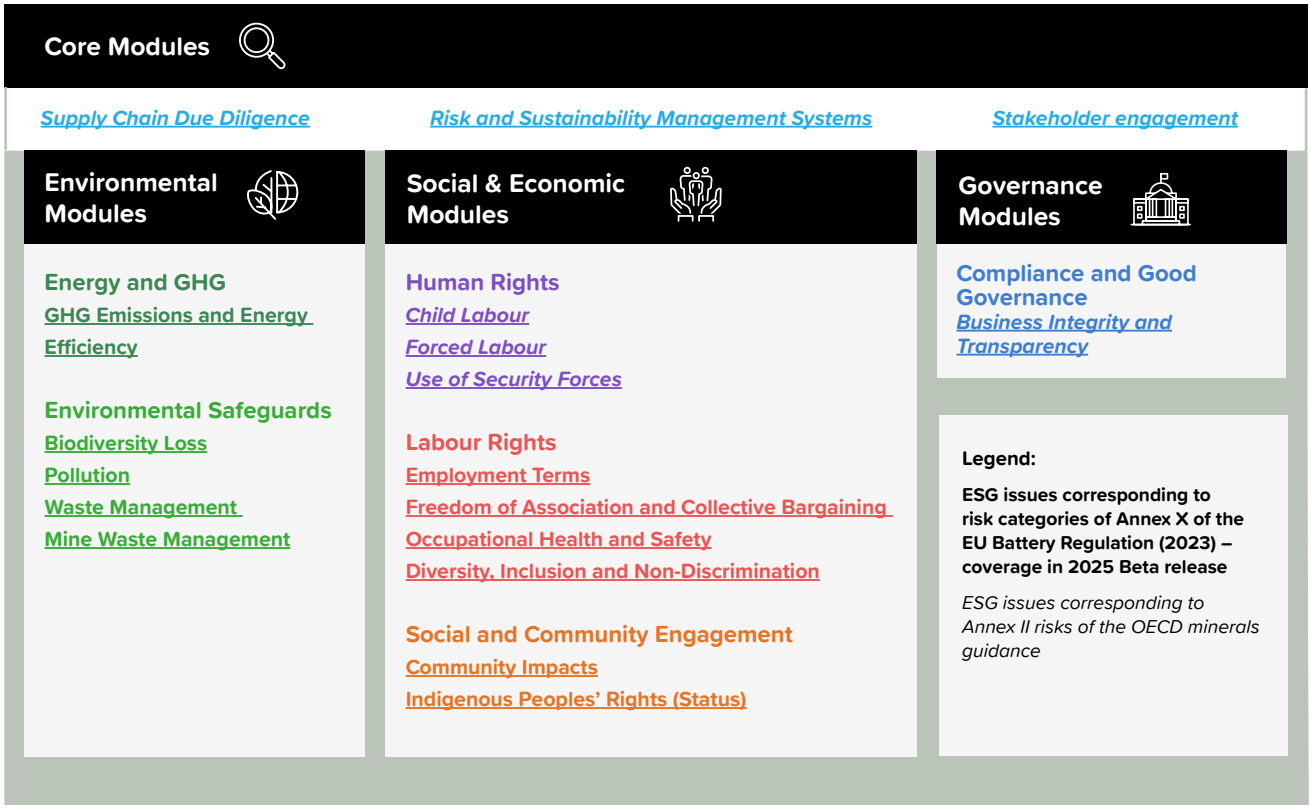
Whether the scores will be displayed as absolute values, or relative performance within the participating pool (using fixed thresholds, quartiles, or other percentile gradations), will be determined ahead of the Operational Trials and refined thereafter.

GHG carbon footprint of the battery will be presented separately as an independent performance indicator, aggregated using an analogous, but not identical, methodology that is defined in the GHG Rulebook, as applied in the 2024 Pilots.

PART II: BATTERY BENCHMARKS: REPORTING MODULES

This section presents 18 ESG issue-specific modules containing the Beta Release version of the GBA Battery Benchmarks. Collecting data from along the battery supply chain on the Battery Passport Benchmarks will require mapping of the relevant supply chains as a pre-step. Detailed guidance for mapping supply chains, collecting data and reporting against the Benchmarks is provided in the Data assurance rulebook and will be provided for GBA members wishing to participate in the Operational Trials. The Box below presents high-level guidance on how to use the benchmarking framework.

FIGURE 7: Click the module name to navigate to the Battery Benchmarks



Guidance for reading and interpreting the benchmarks

- The table preceding each module
  - Describes the intent of the benchmark to improve the sustainability performance of a facility and thus, the entire value chains' impact on people and the planet.
  - Provides an overview of the applicable international frameworks and voluntary guidance used to develop the module. The frameworks and guidance documents mentioned in the three core modules are generally applicable across all modules.
  - Indicates if the module is not applicable to a particular phase of the value chain.
- The levels are to be interpreted as additive: Level AA is in addition to A, and AAA in addition to AA.
- Where the benchmarks consist of multiple expectations, they are to be met in their entirety in order for the benchmark in question to be met.
- Terms in **bold** are found in *Annex II Glossary of terms*.

CORE MODULE

Supply Chain Due Diligence

Intent: Have the policies and management systems in place to identify, prevent, mitigate and account for how a company addresses actual and potential risks and adverse impacts in its supply chain, excluding its own operations.

Applicability: Full value chain, excluding mining facilities

International frameworks: The internationally recognized due diligence instruments applicable to the due diligence requirements laid down in Chapter VII of the EU Batteries Regulation:

(a) the International Bill of Human Rights, including the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;

(b) the UN Guiding Principles on Business and Human Rights;

(c) the OECD Guidelines for Multinational Enterprises;

(d) the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy;

(e) the OECD Due Diligence Guidance for Responsible Business Conduct (OECD RBC);

(f) the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG).

Additional guidance: European Partnership Responsible Minerals Due Diligence Hub; Doing Business with Respect for Human Rights: A guidance tool for companies; Drive Sustainability Battery Supplier Assessment Questionnaire; Draft Due diligence implementation guidelines for the EU Batteries Regulation.

Due diligence step	Benchmark level	The facility...
1. Embed supply chain due diligence into policies and management systems	Level A	[3]Adopts and makes publicly available a board-approved **due diligence** policy for he **facility's** supply chain committing to address ESG risks covered under EU BR **Annex X,** in alignment with the UN Guiding Principles (UNGP) and OECD Due Diligence Guidance for Responsible Business Conduct. Reviews the policy on an annual basis and updates it as risks in the company's supply chain emerge and evolve, in alignment with applicable regulatory requirements. Establishes a traceability or chain-of-custody system along the value chain, taking into account business confidentially and competitive concerns (EU BR Art.52(4)). Establishes **management systems** for assessing and mitigating adverse ESG risks and impacts in the supply chain and implements risk-based **due diligence** measures. Allocates resources to management systems commensurate with the scale of organisation, including senior management staff responsible for overseeing **due diligence** processes. Clearly communicates **due diligence** policies to suppliers and integrates adherence to these policies, as well as risk management measures, into supplier contracts and agreements.
	Level AA	Incentivises the implementation of **due diligence,** e.g. by linking it to employee recognition, remuneration and corporate targets. Engages with suppliers to encourage progressive improvement of their **due diligence** performance over time. Makes the **due diligence** policy available in local languages where appropriate.
	Level AAA	[4]Incentivises suppliers' adherence to **due diligence** policies and ESG risk management performance, e.g. through beneficial financial or non-financial contractual terms or bidding criteria related to ESG performance.

Due diligence step	Benchmark level	The facility...
2. Identify and assess risks and actual and potential adverse impacts to responsible business conduct and human rights in battery supply chains	Level A	[5]Identifies and assesses risks in the supply chain on an annual basis. Utilises a system of controls and transparency regarding the supply chain, including a chain-of-custody or traceability system that identifies upstream actors in the supply chain, including providers of recycled materials, while respecting business confidentiality and competitive concerns (EU BR Art.52(4)). Adopts a **risk-based approach** to identifying and assessing potential and actual risks and adverse ESG impacts in the supply chain, prioritising the most severe and likely risks first, with severity taking precedence over likelihood, making **due diligence** efforts proportionate to the scale of the company. Establishes prioritisation criteria based on minerals, value chains, geographies, and types of suppliers, including artisanal and small-scale miners (ASM), for priority risks that require enhanced **due diligence.** Bases risk assessment on credible external sources and on data collected from suppliers, at a minimum covering the areas set out in the **EU Batteries Regulation Annex X.** Incorporates requirements to provide data supporting a **facility's** risk assessment into supplier contracts (EU BR Art 50(2)), collecting data, e.g. by using the **Battery Passport** rulebooks. Requires suppliers to consult their stakeholders and **rights holders** when conducting risk assessment and responding to **due diligence** queries.
	Level AA	[6]Consults with other industry operators, credible international resources, civil society organisations, unions, experts, or initiatives, where data gaps exist for high-priority risks. Where appropriate, consults supply chain stakeholders, including workers, their representatives and/or trade unions and rights holders, regarding human rights and environmental impacts, paying special attention to marginalised or vulnerable groups, in a sensitive and risk-based manner. Explores fair and feasible assessment cost-sharing plans with supply chain partners, including the provision of capacity building for partners yet to be assessed. Based on ESG risk prioritisation, conduct on-the-ground assessments in Conflict-Affected and High-Risk Areas, as well as in supply chains where critical ESG risks have been identified, or provide evidence that company suppliers at the pinch point conducted such on-the-ground assessments.
	Level AAA	[7]Cooperates with industry associations, collective action platforms, and other coordination mechanisms on risk assessment and data collection. Consults key stakeholders when determining risk priority rankings.

<table>
<tr><th>Due diligence step</th><th>Benchmark level</th><th>The facility...</th></tr>
<tr><td>Outcome:</td><td></td><td>Notes the material risks and impacts identified in its supply chain and conducts enhanced due diligence to prevent, mitigate and remediate those risks in accordance with Steps 3–6 of this module and with thematic ESG modules based on a risk and materiality assessment as outlined below.

Using the Battery Passport as a tool for due diligence:
• All suppliers should complete Risk & Sustainability Management Systems and Stakeholder Engagement modules, and Steps 1–2 of any other modules relevant to risk areas under EUBR Annex X, where risks have been identified in their operations, and ask should require their respective suppliers to do the same on a risk basis.
• Any operators purchasing 3TGs, or operating in, purchasing from, or trading with Conflict-Affected and High-Risk Areas (CAHRAs), must additionally complete the Child Labour, Forced Labour and Business Integrity and Transparency, modules covering OECD Annex II risks.

Complete checklist of risks as applicable:[8]
<table>
<tr><td>Stakeholder Engagement</td><td></td><td>Employment Terms</td><td></td></tr>
<tr><td>Energy and GHG</td><td></td><td>Freedom of Association and Collective Bargaining</td><td></td></tr>
<tr><td>Biodiversity Loss</td><td></td><td>Occupational Health and Safety</td><td></td></tr>
<tr><td>Pollution</td><td></td><td>Diversity and Non-discrimination</td><td></td></tr>
<tr><td>Waste Management</td><td></td><td>Community Impacts</td><td></td></tr>
<tr><td>Mine Waste Management</td><td></td><td>Indigenous Peoples' Rights</td><td></td></tr>
<tr><td>Natural Resource Stewardship</td><td></td><td>Local Economic Development</td><td></td></tr>
<tr><td>Product Circular Design</td><td></td><td>Sourcing from Artisanal and Small-scale Mining</td><td></td></tr>
<tr><td>Resource and Material Efficiency</td><td></td><td>Total Cost of Ownership</td><td></td></tr>
<tr><td>Child Labour</td><td></td><td>Business Integrity and Transparency</td><td></td></tr>
<tr><td>Forced Labour</td><td></td><td>Product Quality and Safety</td><td></td></tr>
<tr><td>Use of Security Forces</td><td></td><td></td><td></td></tr>
</table>
</td></tr>
<tr><td colspan="3">Please respond at a minimum to the Level A on the subsequent requirements in steps 3–6 to cease, mitigate or prevent supply chain risks.</td></tr>
</table>

Due diligence step	Benchmark level	The facility...
3. Cease, prevent and mitigate adverse impacts in supply chains	Level A	[9]Designs and implements a supply chain risk management plan commensurate with the severity and likelihood of risks, and with the **facility's** capacity to respond to those risks, including corrective actions. Exercises leverage over suppliers to manage risk, e.g. by continuing or temporarily suspending trade with a supplier while pursuing risk mitigation efforts, or by discontinuing engagement with suppliers after failed attempts at risk mitigation. Develops prevention and mitigation strategies in consultation with suppliers and stakeholders. Consults with the supply chain's stakeholders when suppliers fail to do so, or in high-risk situations.
	Level AA	[10]Actively engages with suppliers to support mitigation activities. Provides new suppliers with needs-based training on compliance with **due diligence** expectations and supports existing suppliers in improving their own **due diligence** management systems. Incorporates into written agreements the right to conduct unannounced spot checks on immediate suppliers and to access their documentation, as relevant to the exercise of **due diligence.** Cooperates, where appropriate, with potentially **affected stakeholders** of suppliers, local governments, civil society organisations, or international organisations on the **facility**'s risk prevention and mitigation.
	Level AAA	[11]Participates in and contributes to collective action platforms and industry organisations on coordinated risk prevention and mitigation, in cooperation with relevant international organisations, civil society, stakeholders, or other experts.
4. Track supply chain due diligence implementation and results	Level A	[12]Regularly monitors the performance of the **due diligence** system, supply chain risk prevention and mitigation measures. Has its **due diligence** system including risk assessment results audited by the national notified body as required by the **EU Batteries Regulation,** where applicable. Reviews appropriateness of measures in response to significant changes in supply chain operations or circumstances. Regularly reviews and updates the **due diligence** system, the risk prevention and the mitigation strategy, to align with best practices. Reports risk assessment results to senior management, with at least one member of staff responsible for maintaining records demonstrate regulatory compliance, in accordance with applicable regulatory requirements.
	Level AA	Periodically engages, where appropriate, with potentially **affected stakeholders,** as well as with civil society, experts, and other stakeholders, as part of monitoring the effectiveness of risk mitigation measures, including when continuing or suspending trade.
	Level AAA	Involves civil society and other independent actors in the scrutiny of the company's **due diligence,** risk management and prevention system. Periodically reviews **multi-stakeholder** and industry initiatives of which it is a member, and their value in preventing or mitigating **adverse impacts** in its supply chain.

Due diligence step	Benchmark level	The facility...
5. Communicate how externally relevant information on due diligence processes, activities conducted and findings resulting from them to external stakeholders	Level A	Publicly discloses annual **due diligence** reports (EU BR Art. 77). Makes independent third-party **due diligence** system audit reports available to relevant authorities and downstream clients as required by regulations. Reviews annually and makes publicly available, including online, a report on its battery **due diligence** policy and management system, including the risk assessment. Communicates results obtained from the **due diligence** system to immediate suppliers. Communicates the above information in a systematic, comparable manner, e.g. through the **Battery Passport** reports. Where the raw material originates from a **CAHRA,** includes additional information in accordance with the specific recommendations for upstream economic operators, as set out in the **OECD Due Diligence for Responsible Supply Chains of Minerals,** where relevant. This may include the mine of origin, locations where the raw material is consolidated, traded and processed, and details of taxes, fees and royalties paid (EU BR Art 49).
	Level AA	Publicly discloses information on continuous improvement efforts and reports the detailed methodology of risk assessments. Communicates identified risks and impacts in the supply chain to potentially **affected stakeholders** in a timely, culturally sensitive, and responsible manner. In addition to public disclosure, utilises other methods of communication, e.g. face-to-face meetings, training, online dialogue, seeking comments from potentially affected parties, disclosure to **workers, their representatives and/or trade unions** or other appropriate media.
	Level AAA	
6. Provide for and cooperate in remediation of ESG impacts in the value chain	Level A	[13]Establishes **grievance mechanisms** available to internal and external stakeholders, including employees, their representatives and/or trade unions, **affected communities** and other third parties, to lodge complaints related to supply chain circumstances and due diligence violations, in line with the UN Guiding Principles on Business and Human Rights. Establishes accessible channels for whistleblower and community complaints (EU BR Art. 50(5)), with the option of confidential submissions, and puts it place whistleblower protections. Ensures **grievance mechanisms** include a process to investigate and effectively remedy grievances, an early-warning risk awareness system, and facilitate recourse to an external body, providing remedies proportionate to the scale and severity of **adverse impacts.** Remediates harms, seeking to return stakeholders affected by **adverse impacts** caused by the **facility**'s supply chain to the situation they were in prior to the occurrence.
	Level AA	[14]Facilitates participation of **affected stakeholders** in the design and implementation of **remediation** processes, ensuring that remedy mechanisms are accessible, transparent, accountable, and available to all stakeholders. Ensures that supply chain partners have **grievance mechanisms** in place or utilise grievance mechanism provided by the company and/or an international institutionalised mechanism. Cooperates in good faith with judicial and non-judicial external grievance mechanisms. Works with business partners to ensure that timely remedies are provided for reported grievances. Engages in collective action and work with communities on **remediation.**
	Level AAA	

CORE MODULE

Risk and Sustainability Management

Intent: Have the policies and management systems in place to identify, prevent, mitigate and account for how a company addresses actual and potential adverse impacts in its supply chain, excluding its own operations.

Applicability: Full value chain

International frameworks: OECD Due Diligence Guidance for Responsible Business Conduct; OECD Guidelines for Multinational Enterprises; UN Guiding Principles on Business and Human Rights; ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy. The international instruments covering the risks referred to in point 2 include:

(a) the Ten Principles of the United Nations Global Compact;
(b) the UNEP Guidelines for Social Life Cycle Assessment of Products;
(c) the Convention on Biological Diversity, in particular Decision COP VIII/28 – Voluntary guidelines on Biodiversity-Inclusive impact assessment;
(d) the UN Paris Agreement;
(e) the eight fundamental ILO Conventions as defined under the ILO Declaration on Fundamental Principles and Rights at Work;
(f) any other international environmental conventions that are binding upon the Union or its Member States;
(g) the ILO Declaration on Fundamental Principles and Rights at Work;
(h) the International Bill of Human Rights, including the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

Additional guidance: European Sustainability Reporting Standards; Global Reporting Initiative; Taskforce for Nature-related Financial Disclosures; IFC Assessment and Management of Environmental, Social Risks and Impacts; International Association of Impact Assessment.

Due diligence step	Benchmark level	The facility...
1. Embed environmental, social and governance risk management and impact assessment into policies and management systems	Level A	Identifies, documents, and complies with applicable laws, permits, and licenses in the country or countries of operation. Adopts and makes publicly available policy and **management systems** committing to responsible business conduct, respecting human rights and the environment, in line with the UN Guiding Principles, OECD Guidance and other internationally recognised frameworks. Publicly discloses ESG risk management policies, actively disseminates them to employees and stakeholders, and makes senior management staff accountable. Reviews the policy annually, and updates it as risks in the company operations emerge and evolve, in alignment with the applicable regulatory requirements. Where there is a gap between national law and internationally recognised frameworks (see glossary), commits to adhering to whichever is more stringent, unless explicitly prohibited by the host country's law. In such cases, the company shall aim to meet the intent of the international framework requirement, as expressed in the GBA benchmarks, to the extent feasible without violating the law.
	Level AA	Has an emergency response plan and a business resilience plan to address situations where significant adverse ESG impacts suspend or materially alter operations. Integrates ESG performance metrics into corporate strategy, investment decision-making, and into senior management compensation.
	Level AAA	Identifies opportunities for continual improvement in **facility**'s ESG risk management approach. Adopts, publicly discloses, and embeds into management systems a data privacy policy. Involves stakeholders in advisory committees and/or boards or governance structures, where appropriate.

Due diligence step	Benchmark level	The facility...
2. Identify and assess actual and potential adverse ESG impacts associated with the enterprise's operations, products or services	Level A	Conducts environmental and social impact assessments (ESIAs) for existing and planned projects to determine material risks and impacts to be prevented, mitigated, and remediated, and create baseline ESG performance metrics. Uses **competent professionals** and a credible methodology in the ESIA and ESG risk assessment process. Considers cumulative impacts to workforce, communities, or the environment resulting from multiple risks or impacts.
	Level AA	Includes governance impacts in the scope of impact assessments. Considers **double materiality** as a criterion when identifying risks and impacts to be prevented, mitigated, and remediated.
	Level AAA	
Outcome:		Notes the material risks to the **facility**'s operations identified in the risk assessment process. Using the Battery Passport as a tool for risk assessment: • All facilities should complete **Supply Chain Due Diligence, Risk & Sustainability Management Systems and Stakeholder Engagement** modules, as well as Steps 1 –2 of any other modules relevant to risk areas of EUBR **Annex X,** where risks have been identified in their operations, and should require their respective suppliers to do the same on a risk basis. • Any operators purchasing 3TGs, or operating in, purchasing from, or trading with **Conflict-Affected and High-Risk Areas (CAHRAs)** must additionally complete the ***Child Labour, Forced Labour*** *and Business Integrity and Transparency* modules covering **OECD Annex II risks,** and fill out the specific issues covered by the thematic **Battery Passport** modules. Complete checklist as applicable:[15]

Stakeholder Engagement		Employment Terms	
Energy and GHG		Freedom of Association and Collective Bargaining	
Biodiversity Loss		Occupational Health and Safety	
Pollution		Diversity and Non-discrimination	
Waste Management		Community Impacts	
Mine Waste Management		Indigenous Peoples' Rights	
Natural Resource Stewardship		Local Economic Development	
Product Circular Design		Sourcing from Artisanal and Small-scale Mining	
Resource and Material Efficiency		Total Cost of Ownership	
Child Labour		Business Integrity and Transparency	
Forced Labour		Product Quality and Safety	
Use of Security Forces			

Please respond at a minimum to the Level A on the subsequent requirements in steps 3–6 to cease, mitigate or prevent facility-level ESG risks.

Due diligence step	Benchmark level	The facility...
3. Cease, prevent and mitigate adverse ESG impacts	Level A	Makes resources available for the identification, assessment, mitigation, and monitoring of severe risks and identified adverse ESG impacts, including relevant training for staff. Provides training to employees and stakeholders on responsible business conduct.
	Level AA	Responds to the identified ESG risks by preventing, mitigating, and otherwise addressing **adverse impacts,** applying the **mitigation hierarchy.** Involves elected employee representatives in the implementation of risk responses and engages with stakeholders in the process. Utilises independent subject-matter experts as needed. Continuously builds internal capacity to respond to risks and impacts, rather than relying on external support.
	Level AAA	Engages in industry-wide collaboration and collective action to prevent, manage, and mitigate risks. Establishes procedures to address misuse and security of confidential data, including measures for privacy protection.
4. Track implementation and results of responses to risks and impacts	Level A	Monitors the performance of ESG risk **management systems** by maintaining and annually updating a register of prioritised risks. Reports on the effectiveness of the risk management plan to accountable senior management. Pursues continuous improvement in ESG risk management, reviewing policies annually.
	Level AA	Facilitates independent monitoring of key environmental and social impact indicators by **competent professionals.** Reviews emergency response and business resilience plans annually, revising them as needed, and conducts independent assurance of ESG performance.
	Level AAA	
5. Communicate how identified adverse ESG impacts are addressed	Level A	At least annually, publicly discloses ESG risks and management approaches, either through annual report and/or environmental and social impact assessments, alongside the most recent risk management plan and ESG performance. Assigns senior management to oversee communication of ESG policies, including both internal and external communication.
	Level AA	Has a system in place for tracking engagement with the public and **affected stakeholders** regarding actions taken to prevent, mitigate, and remediate adverse ESG impacts. Discloses information with due regard to business confidentiality, competitive concerns, and any risks to affected people that could result from its communications.
	Level AAA	
6. Provide for and cooperate in remediation of adverse ESG impacts caused or contributed to	Level A	Provides employees and their representatives, **rights holders,** and other internal and external stakeholders with access to appropriate, anonymous, and effective **grievance mechanisms,** with the option for anonymous submissions, and puts in place whistleblower protections, in line with the UN Guiding Principles. Implements a **remediation** strategy to provide for, or participate in, adequate remedy in response to any **adverse impacts** caused or contributed to, in line with the UN Guiding Principles. Ensures that using the **grievance mechanism** does not preclude seeking redress through administrative, judicial, or non-judicial remedies.
	Level AA	If remedies are not satisfactory, offers opportunities for stakeholders to provide input on how to make them more effective and trustworthy, and provides and communicates alternative options for recourse. Analyses patterns of grievances to develop prevention strategies. Publishes summaries and analysis of grievances and remedies externally. Develops emergency response plans, in collaboration with external stakeholders when risks to them are significant.
	Level AAA	Provides funding to affected people to hire independent legal and/or technical advisers following an emergency.

CORE MODULE

Stakeholder Engagement

Intent: Facilitate engagement with local communities and other affected stakeholders to prevent or mitigate adverse impacts or risks to community health, safety and cultural heritage. Avoid the involuntary displacement of local communities as a result of land acquisition where possible, or compensate the displaced when unavoidable.

Applicability: Full value chain

International frameworks: OECD Due Diligence Guidance for Responsible Business Conduct; OECD Guidelines for Multinational Enterprises; UN Guiding Principles on Business and Human Rights; ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

Additional guidance: OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector

Due diligence step	Benchmark level	The facility...
1. Embed stakeholder engagement into policies and management systems	Level A	Identifies and maps potentially affected **internal and external stakeholders** and their legitimate representatives. Adopts and makes publicly available a policy and **management systems** committing to meaningful **stakeholder** engagement and consults with stakeholders to ensure the process is accessible, **inclusive**, and culturally appropriate. Establish a **grievance mechanism** (or participate in an industry mechanism) as part of the **management system,** embedding it into policy design and governance.
	Level AA	Involves stakeholders in policy design and development of **management systems** in an **inclusive** and culturally appropriate manner. Seeks and considers stakeholders' input when conducting periodic policy revisions.
	Level AAA	Includes stakeholders in advisory committees and/or boards or governance structures, where appropriate.
2. Identify and assess actual and potential adverse impacts to local communities associated with the enterprise's operations, products or services	Level A	[16]Considers **stakeholder** and expert input in mapping different **stakeholder** groups, ensuring representation of diverse groups and minorities, and identifying and assessing whether, and how, different **stakeholder** groups are at greater risk of **adverse impacts** or physical displacement. Meaningfully engages stakeholders in the ESIA and ESG risk assessment process and conducts **stakeholder** consultations to identify most **material risks.** Utilises information from **grievance mechanisms** to inform risk assessments and track grievances to identify patterns or systemic risks. Consults stakeholders, and incorporates feedback on risk assessment and prevention/mitigation/**remediation** measures, and communicates outcomes back to stakeholders.
	Level AA	[17]Strengthens **stakeholder** engagement during the ESIA and risk assessment process by providing access to consultation and documents in an understandable format, ensuring representation of different groups, and applying gender lens, and conducting targeted **stakeholder** outreach.
	Level AAA	
Outcome:		Has identified stakeholders potentially or actually impacted by the **facility**'s operations.
Please respond at a minimum to the Level A on the subsequent requirements in steps 3–6 to engage with stakeholders in ceasing, mitigating or preventing facility-level ESG risks.		

Due diligence step	Benchmark level	The facility...
3. Engage stakeholders in ceasing, preventing and mitigating adverse impacts	Level A	Implements an **action plan** for meaningful **stakeholder** engagement and mitigation of **adverse impacts** on stakeholders, that is accessible, inclusive, culturally appropriate, and in language(s) understood by stakeholders. Meaningfully engages employees and stakeholders throughout the application of the **mitigation hierarchy.**
	Level AA	Supports capacity of stakeholders to participate in engagement processes and holds separate sessions with underrepresented or **vulnerable groups** where appropriate.
	Level AAA	Collaborates with **affected stakeholders** in investment decision-making processes to mitigate **adverse impacts.**
4. Track implementation and results of stakeholder engagement	Level A	Conducts a review on effectiveness of **stakeholder** engagement processes in consultation with **affected stakeholders.**
	Level AA	Conducts joint monitoring of the effectiveness of **stakeholder** engagement processes.
	Level AAA	
5. Communicate on how stakeholders are engaged, including how adverse are addressed	Level A	Publicly discloses and makes available to stakeholders a summary of **stakeholder** engagement activities, feedback, and subsequent measures to prevent or mitigate any **adverse impacts,** in a way that is accessible, **inclusive,** culturally appropriate, and in appropriate language(s). Makes any additional information available to stakeholders upon request. Provides opportunities for stakeholders to give feedback on the reporting of **stakeholder** engagement activities and measures to prevent or mitigate **adverse impacts.**
	Level AA	
	Level AAA	
6. Engage stakeholders in providing for and cooperating in remediation of adverse stakeholder impacts caused or contributed to when appropriate	Level A	Establishes effective **grievance mechanisms** for workers, their representatives and/or trade unions, **affected communities,** and other third parties to lodge complaints related to violations impacting stakeholders, with an option of confidential submissions, and puts it place whistleblower protections. Makes **affected stakeholders** aware of mechanisms for requests for information, grievances, and remedies where the mitigation hierarchy has been exhausted, for which recourse to alternative grievance and remedy mechanisms through external bodies is also provided.
	Level AA	Co-designs and conducts a review of the **grievance mechanism** in collaboration with stakeholders and includes a post-process follow-up mechanism for those filing grievances. Reviews grievances for patterns, assesses underlying causes, and develops preventative actions in consultation with **affected stakeholders,** ensuring representation of diverse groups and minorities.
	Level AAA	

ISSUE MODULE

Greenhouse Gas Emissions and Energy Efficiency

Intent: Improve operational energy efficiency and reduce greenhouse gas emissions in line with the Paris Agreement on Climate Change

International frameworks: Paris Agreement on Climate Change

Additional guidance documents: Carbon Disclosure Project; World Resources Institute Guidance for Estimating and Reporting the Comparative Emissions Impacts of Products; Science-Based Targets Initiative; Taskforce for Nature-Based Disclosure's Accounting for Natural Climate Solutions

Due diligence step	Benchmark level	The facility…
1. Embed GHG emissions and energy use into policies and management systems	Level A	[18]Adopts and makes publicly available a policy and **management systems** committing to reducing **Scope 1** and **Scope 2** greenhouse gas emissions (GHGs) in line with the Paris Agreement, including those resulting from land use changes, and prioritises the avoidance and reduction of emissions above compensation with carbon offsets. Publicly commits to monitoring of energy use and efficiency, and identifying opportunities for reduction.
	Level AA	Publicly commits to reducing **Scope 3** GHG emissions in line with the Paris Agreement, including through the procurement of energy-efficient products and services that impact energy efficiency. Publicly commits to reducing operational energy consumption and losses against clearly defined, time-bound indicators at either the facility level or as part of a broader, corporate-level commitment. Protects affected stakeholders from potential and actual adverse impacts of GHG emissions that could be attributed to **facility**'s operations.
	Level AAA	[19]Sets climate and carbon reduction targets in line with the Science Based Targets Initiative (SBTi). Publicly commits to the continual improvement of operational energy efficiency and to supporting the procurement of energy-efficient products and services that impact energy efficiency.
2. Identify and assess GHG emissions and energy use of the enterprise's operations	Level A	[20]Identifies disaggregated, site-level sources of Scope 1 and Scope 2 GHG emissions and quantifies their absolute baseline emissions and emission intensity in the absence of reduction efforts. Follows credible methodologies that define comparable performance indicators, as described in internationally recognised standards.
	Level AA	[21]Identifies disaggregated, site-level sources of Scope 3 GHG emissions and quantifies their absolute baseline emissions and emission intensity in the absence of reduction efforts. Identifies and disaggregates the facilities, equipment, systems, processes and personnel that significantly affect energy consumption and losses, quantifying both their absolute energy use and energy intensity.
	Level AAA	Quantifies the energy consumption and losses of procured products and equipment over their expected operating lifetimes. All calculations are verified by a competent, independent third party.
Outcome:		Has identified GHG emissions and opportunities for reducing energy use and/or improving energy efficiency.
If any GHG emissions or energy use reduction needs or opportunities are identified, reports at a minimum on Level A of Steps 3–6 below.		

Due diligence step	Benchmark level	The facility...
3. Implement GHG emissions and energy use reduction plan	Level A	[22]Implements facility-level action plans to achieve **Scope 1** and **Scope 2** GHG emission reduction targets according to the mitigation hierarchy, against a clearly defined schedule, prioritising emission sources that have the highest reduction potential, those that are most cost-efficient, and using the best available technologies and practices
	Level AA	[23]Implements facility-level action plans to achieve **Scope 3** GHG emission reduction targets according to the mitigation hierarchy, against a clearly defined schedule, prioritising emission sources that have the highest reduction potential and energy efficiency improvement targets, using the best available technologies and practices.
	Level AAA	Implements facility-level action plans that support procurement of energy-efficient products and services that impact energy performance, and applies cost-effective measures for the recovery and re-use of energy.
4. Track GHG emissions and energy use reduction implementation and results	Level A	[24]At least annually, evaluates the effectiveness of actions implemented to reduce **Scope 1** and **Scope 2** GHG emissions by monitoring performance against the established baseline.
	Level AA	[25]At least annually, evaluates the effectiveness of actions implemented to reduce energy consumption, energy losses and Scope 3 GHG emissions by monitoring performance against the established baseline.
	Level AAA	
5. Communicate GHG emissions and energy use reduction performance	Level A	[26]Publicly discloses GHG emissions and energy use by source on an annual basis, including facility- or corporate-level energy efficiency, **Scope 1** and **Scope 2** GHG indicators (covering both absolute and intensity values), the methodologies used to calculate them, and progress towards reduction targets.
	Level AA	[27]Publicly discloses disaggregated, facility-level **Scope 1, Scope 2** and **Scope 3** GHG absolute emissions and emission intensities, methodologies used to calculate them, and progress towards reduction targets. Publicly discloses the rationale for the selection of any technologies, equipment, or infrastructure design used to meet energy efficiency performance targets. Publicly discloses the percentage of reductions attributed to carbon offsets. Ensures that all performance indicators are independently verified prior to publication, and engages with key stakeholders for feedback on action plans and reporting.
	Level AAA	
6. Remediates adverse impacts of GHG and energy efficiency improvements	Level A	*Remediation (Step 6) is currently not included in the GHG Emissions & Energy Efficiency rulebook as it may not be applicable for the nature of GHG emissions and energy efficiency improvements.*
	Level AA	
	Level AAA	

ISSUE MODULE

Biodiversity Loss

Intent: Prevent loss of biodiversity and ecosystem services within the facility's area of influence, with the ambition to contribute to a net gain in biodiversity and ecosystem services.

Applicability: Full value chain

International frameworks: Convention Concerning the Protection of the World Cultural and Natural Heritage of 16 November 1972 (the World Heritage Convention), IUCN Global Standard for Nature-based Solutions

Additional guidance: Taskforce for Nature Related Financial Disclosures, Science Based Targets Network, Key Biodiversity Areas

Due diligence step	Benchmark level	The facility…
1. Embed preservation of biodiversity and ecosystem services into policies and management systems	Level A	[28]Adopts and makes publicly available a policy and **management systems** committing to achieving no net loss of **biodiversity** and **ecosystem services** as a result of its operations; not to establish new operations in protected areas (**IUCN** category I–IV protected areas, **Ramsar sites,** UNESCO **biosphere reserves, World Heritage Sites** or national parks) of high **biodiversity** value or their **buffer zones;** and to ensure that existing operations in protected areas or their **buffer zones** (under the UN Habitat protected natural and cultural areas) do not permanently or materially damage the values for which they were designated as protected areas.
	Level AA	[29]Publicly commits to achieving a net gain in **biodiversity** and **ecosystem services** as a result of its operations; and not to establish new operations in **Key Biodiversity Areas;** and to minimise the impact of existing operations.
	Level AAA	Publicly commits to enhancing understanding of, and contributing to, **biodiversity** and **ecosystem services** conservation through the preservation of protected sites and **Key Biodiversity Areas,** as well as through industry- or region-specific research.
2. Identify and assess actual and potential adverse impacts to biodiversity and ecosystem services associated with the enterprise's operations, products or services	Level A	Identifies significant **biodiversity** conservation status and protected areas within the **facility**'s **area of influence.** Identifies **affected stakeholders, rights holders,** and communities dependent on **ecosystem services,** in consultation with these and other relevant stakeholders. Identifies and assesses potential and actual **adverse impacts** that the **facility's** operations have on **biodiversity** conservation and the loss of natural capital, e.g. **ecosystem services.** Follows **credible methodologies** to monitor **biodiversity** and ecosystem health that define comparable performance indicators.
	Level AA	[30]Identifies a baseline of the biological environment, including locations of critical habitat; the **biodiversity** and conservation status of flora and fauna; land conservation status; historical information on deforestation, where available; soil, health; and the productive value of the land in scope.
	Level AAA	[31]Identifies and assesses any synergies and trade-offs between the mitigation of **biodiversity** loss and **greenhouse gas emissions.** Identifies impacts and risks to **biodiversity, ecosystem services,** or protected areas from past and present projects and assess the impacts.
Outcome:		Has identified **biodiversity, ecosystem services** or protected areas of high **biodiversity** value affected by proposed or ongoing projects.
If potential or actual adverse impacts to biodiversity conservation, ecosystem services, or protected areas have been identified, responds at a minimum to Level A benchmarks on Steps 3–6 below.		

Due diligence step	Benchmark level	The facility...
3. Cease, prevent, rehabilitate, restore, and offset adverse impacts to biodiversity and ecosystem services	Level A	[32]Implements **action plans,** consistent with the **mitigation hierarchy,** to ensure no net loss to habitats, species, or **ecosystem services.** Develops **action plans** in consultation with, and where possible with the participation of, **affected stakeholders, rights holders,** and **affected communities.** Allows affected populations access to any ecosystem services on which they depend, where the **facility** has direct management control over those **ecosystem services.**
	Level AA	[33]Implements **action plans,** consistent with the **mitigation hierarchy,** to ensure a net gain to habitats, species, or **ecosystem services.** Partners with **affected communities, rights holders,** and stakeholders to directly implement nature-based solutions as part of broader **biodiversity action plans.**
	Level AAA	Partners with **affected communities, rights holders,** stakeholders, relevant government authorities, and/or conservation organisations or academic institutions to invest in nature based solutions, increase local or regional **biodiversity,** or support research and development toward industry- or regional-level **biodiversity** improvement.
4. Track implementation and results of biodiversity and ecosystem services conservation	Level A	Establishes procedures to monitor the conservation of **biodiversity, ecosystem services,** and protected areas, including consultations with **affected communities** and **stakeholders,** where relevant, and reports results to facility-level senior management at least annually. Updates **biodiversity** plan at least every five years.
	Level AA	[34]Sets and tracks quantifiable targets and builds a long-term monitoring framework, drawing from the procedures developed to identify the baseline. Conducts an independent review of **biodiversity, ecosystem services,** and protected areas monitoring programmes at least every five years.
	Level AAA	Invests in and tracks investment in **biodiversity** solutions.
5. Communicate how biodiversity and ecosystem services impacts are addressed	Level A	[35]Publicly discloses **biodiversity** conservation and **ecosystem services** impact assessments, mitigation plans, and monitoring data in ways that are physically accessible and understandable for **affected communities, rights holders,** and stakeholders. Publicly discloses the source and nature of any offset accreditation used to mitigate residual adverse **biodiversity** impacts. Demonstrates that any proposed development in protected areas is legally permitted and have undergone meaningful consultation with affected populations, relevant government authorities, and reputable conservation organisation or academic institution.
	Level AA	[36]Publicly discloses mitigation plans and monitoring data demonstrating improvements in **biodiversity** and **ecosystem services,** including independent verification of any **biodiversity** offsets. Publicly discloses synergies and trade-offs between actions taken to manage **biodiversity** and **greenhouse gas emissions.**
	Level AAA	[37]Publicly discloses numerical targets for **biodiversity** and reports on progress on towards those targets. Shows short- and long-term expected investment and benchmarks the results.

Due diligence step	Benchmark level	The facility…
6. Provide for and cooperate in remediation of adverse biodiversity impacts caused or contributed to.	Level A	[38]Establishes a **grievance mechanism** for reporting instances of **biodiversity** loss, including habitat destruction, water **pollution** from mining affecting aquatic **biodiversity,** and project encroachment on protected and **Key Biodiversity Areas (KBAs).** Implements timely and effective corrective action and **remediation** if monitoring reveals that the operating company's protected areas and or **biodiversity** and **ecosystem services** objectives are not being achieved as expected, delivering measurable outcomes against baseline. Engages with **affected communities, rights holders** and stakeholders adversely affected by impacts on **biodiversity** and **ecosystem services** associated with the **facility**'s operational activities, to agree on compensation measures that ensure they are at least as well off as they were prior to the impacts. Provides for, or cooperates in, compensating for destroyed **biodiversity** areas that cannot be restored.
	Level AA	[39]Engages with communities, **rights holders,** and stakeholders adversely affected by impacts on **biodiversity** and **ecosystem services** associated with the company's operational activities on mitigation measures, ensuring that **biodiversity** and **ecosystem services,** including wildlife populations and habitats, are better off than they were prior to the impacts.
	Level AAA	Links remediated areas with other existing KBAs or Protected Areas to form wildlife corridors. Systematically engages with **affected communities, rights** holders, stakeholders, industry, and **multi-stakeholder** collective action initiatives to design **biodiversity remediation** actions.

ISSUE MODULE

Pollution

Intent: Facilities along the battery supply chain prevent, reduce and mitigate negative environmental impacts due to air, soil and/or water pollutants produced at operational facilities into the environment. Forms of pollution include: hazardous substances, light pollution, noise pollution, odour pollution, particulate matter, soil erosion or wastewater discharges. (Greenhouse gas emissions are covered in the GHG and energy efficiency module.

Applicability: Full value chain

International frameworks: EU Air Quality Standards; Stockholm Convention on POPs

Additional guidance: European Sustainability Reporting Standards (ESRS), Institute for Air Quality Management Guidance on the Assessment of Odour for Planning; IFC Environmental Health and Safety Guidelines; EU Industrial Emissions Directive /BAT, World Health Organisation Air Quality Guidelines

Due diligence step	Benchmark level	The facility…
1. Embed pollution prevention and reduction into policies and management systems	Level A	Adopts and makes publicly available a policy and **management systems** committing to, and implements policies to prevent, reduce, and mitigate air, land and soil, noise, vibration, and water **pollution** produced at operational facilities, including transboundary **pollution.**
	Level AA	Publicly commits to and implements policies to prevent, reduce, and mitigate air, land and soil, noise, vibration, and water **pollution** produced during transport. The policy includes **pollution** reduction targets.
	Level AAA	[40]Publicly commits to, and implements policies to prevent, reduce, and mitigate heat, light, radiation, and odour **pollution.**
2. Identify and assess actual and potential adverse impacts of pollution from the enterprise's operations	Level A	[41]Identifies potential and actual impacts and risks of **pollution,** including a **pollution** baseline and an inventory of the sources and types of air, land and soil, noise and vibration, and water **pollution.** Consults with stakeholders e.g. workers, their representatives and/or trade unions, and **affected communities,** including on their access to land and water, within the scope of the assessment. Applies a materiality threshold to the **waste** streams and their impacts to determine appropriate risk-response actions.
	Level AA	Identifies emergency scenarios arising from the potential and actual **adverse impacts** of significant **pollution** events (e.g., spills or leakages).
	Level AAA	Assesses risks associated with the human rights of **affected stakeholders** due to the **adverse impact** of **pollution.** Identifies potential and actual impacts and risks of light, radiation and odour **pollution,** including a **pollution** baseline and an inventory of the sources of such **pollution.**
Outcome:		Has identified sources of **pollution** or negative environmental impacts, or risks to employees or **affected stakeholders,** from proposed or ongoing projects.
If potential or actual adverse environmental impacts due to pollution have been identified, responds at a minimum to Level A benchmarks on Steps 3–6 below.		

Due diligence step	Benchmark level	The facility...
3. Cease, prevent and mitigate adverse impacts of pollution	Level A	Deploys on-site controls to monitor and address potential and actual negative impacts from air, land and soil, noise, vibration and water **pollution** on people and the environment, using a **risk-based approach** and following a materiality assessment. Has an emergency spill/leakage response plan.
	Level AA	Implements the **mitigation hierarchy** to address actual and potential impacts of **pollution** in line with set reduction targets.
	Level AAA	[42]Reduces light, radiation and odour **pollution** levels below baselines defined using credible frameworks.
4. Track implementation of pollution prevention and reduction and results	Level A	Establishes monitoring procedures and protocols to track the implementation of **action plans** to prevent, reduce, and mitigate **adverse impacts** from air, land and soil, noise, vibration and water **pollution,** measured against baseline levels. Documents and monitors negative impacts of **pollution** on **affected stakeholders** and **affected communities.**
	Level AA	Engages affected stakeholders and community representatives, alongside qualified managers and workers and their representatives and/or trade unions, to track monitoring implementation and review results.
	Level AAA	Monitors **pollution** levels and impacts to stakeholders, including light, radiation and odour **pollution,** to ensure they remain below the baseline levels.
5. Communicate and report on pollution impacts, risks and improvement actions	Level A	Publicly discloses potential and actual impacts from land and soil, noise, vibration and water **pollution** originating at the **facility,** along with planned actions, progress, and results related to **pollution.**
	Level AA	Publicly discloses spill/leakage impact assessments and any subsequent legal actions or financial penalties. Engages stakeholders in participatory monitoring and consults **affected stakeholders** during any post-incident internal reviews.
	Level AAA	Makes light, radiation and odour **pollution** data available to **affected stakeholders.**
6. Provide for and cooperate in remediation of adverse pollution impacts caused or contributed to	Level A	[43]Establishes a **grievance mechanism** available to internal and external stakeholders to lodge complaints related to **pollution.** Remediates negative impacts from air, land and soil, noise, vibration, and water **pollution** and spills/leakages in consultation with **affected stakeholders.**
	Level AA	For residual significant impacts from pollutants arising from operational activities, when all other measures have been taken to prevent, minimise, and rectify such impacts, implements remedial steps in consultation with **affected stakeholders.**
	Level AAA	Remediates negative impacts from light, radiation and odour **pollution** in consultation with **affected stakeholders.**

ISSUE MODULE

Waste Management

Intent: Facilities along the battery supply chain reduce the amount of waste produced and increase the amount recycled by correctly collecting, handing, storing, transporting, disposing of and recycling discarded waste produced on-site.

Applicability: Full value chain

International frameworks: Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal; ISO 14001 Environmental Management Systems; UN Globally Harmonized System of Classification and Labelling of Chemicals (GHS)

Additional guidance documents: IFC Environmental, Health and Safety Guidelines

Due diligence step	Benchmark level	The facility...
1. Embed waste management into policies and management systems	Level A	Adopts and makes publicly available a policy and **management systems** committing to effectively collect, handle, store, reduce, transport and dispose of all **waste** produced on site, particularly **hazardous materials,** applying a **risk-based approach.** For **hazardous materials,** commits to the **Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.**
	Level AA	Publicly discloses and implements policies to improve recycling targets for all site-based **waste.**
	Level AAA	Publicly commits to identifying opportunities for material substitution for **hazardous materials,** as well as circular economy, nature-based solutions and climate adaptation measures for both **hazardous and non-hazardous materials.**
2. Identify and assess opportunities for waste reduction and recycling increase from the enterprise's operations	Level A	Identifies and documents the sources and types of all site-based **waste** and assess opportunities to avoid or reduce the amount of **waste** produced, and minimise the amount of **waste** disposed of, adopting a **risk-based approach.** Identifies locations where hazardous **waste** streams are disposed of.
	Level AA	Identifies opportunities to increase recycled fraction of **waste** generated, commensurate with the scale and capabilities of the **facility.**
	Level AAA	Investigates opportunities for circularity and measures to substitute hazardous materials with materials that pose lower health and/or environmental risks, if elimination is not possible.
Outcome:		Has identified hazardous and non-hazardous **waste** streams, measures for **waste** reduction, improved **waste** disposal, or increased recycling in **waste** streams from proposed or ongoing projects.
If waste streams and related disposal, waste reduction improvements, or recycling-increase opportunities have been identified within the facility's waste management, responds at a minimum to Level A benchmarks of Steps 3–6 below.		

Due diligence step	Benchmark level	The facility...
3. Cease, prevent and mitigate adverse impacts of hazardous waste. Avoid / reduce waste produced and increase fraction of waste recycled	Level A	Puts in place a process to cease, prevent, and mitigate **adverse impacts** of hazardous **waste.** Adopts and implements a risk-based plan to safely collect, handle, store, transport and dispose of all site-based **waste,** prioritising hazardous materials, in consultation with stakeholders, **affected communities, and rights holders.**
	Level AA	[44]Applies the **waste mitigation hierarchy** to avoid, minimise and recover on-site **waste** to meet credible recycling targets.
	Level AAA	Assesses opportunities for circular economy and for reducing **waste** through process redesign and material substitution. Substitutes more **hazardous materials** and less recyclable materials by aligning with **pollution** prevention hierarchies. Effectively substitutes materials for which substitutes have been identified with those posing lower risks to the environment and human health.
4. Track implementation of waste management system and results	Level A	Maintains an inventory of the sources and types of all site-based **waste** to establish baselines for **waste** reduction levels. Maintains an inventory of all hazardous **waste** disposal locations.
	Level AA	Sets measurable, credible targets and establish monitoring procedures for **waste** management and reduction plans. Determines and records the fraction of **waste** recycled using industry guidelines.
	Level AAA	Tracks measures to substitute **hazardous materials,** as well as initiatives for circularity, **nature-based solutions,** and climate adaptation for both hazardous and non-**hazardous materials.**
5. Communicate and report on waste management improvements	Level A	Publicly discloses quantities and risks of hazardous and non-hazardous site-based **waste** produced; **waste** management procedures; and the location of **waste** disposal sites, at least annually
	Level AA	Publicly discloses progress towards meeting recycling targets and a rationale for cases where the **waste mitigation hierarchy** is not followed.
	Level AAA	Publicly discloses regulatory authorisation for any **waste** management service providers engaged by the company for transport, and off-site treatment or disposal. Publicly discloses opportunities and measures for material substitution, circular economy, and **nature-based solutions** applied.
6. Provide for and cooperate in remediation of adverse waste management impacts caused or contributed to	Level A	[45]Establishes **grievance mechanisms** to lodge complaints related to **waste** management violations. Takes immediate remedial steps where **waste** management procedures are ineffective, and if necessary, halts work in the affected area until issues are addressed. Implements procedures to evaluate effective **remediation** steps in consultation with **affected stakeholders.**
	Level AA	Provides **affected stakeholders** with access to a legitimate escalation channel (e.g., to a state-based judicial or non-judicial **grievance mechanism**) if **waste** management processes are ineffective.
	Level AAA	

ISSUE MODULE

Mine Waste Management

Intent: Mining and mineral processing facilities avoid, reduce or mitigate adverse impacts on the environment, community health or employee health caused by mining-specific waste.

Applicability: Mining facilities and co-located mineral processing facilities

International frameworks: UN Globally Harmonised System of Hazard Classification and Labelling; Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal; International Cyanide Management Code; Minamata Convention on Mercury; UNEP Resolution 4/19 on Mineral Resource Governance

Additional guidance: Global Industry Standard on Tailings Management (GISTM); TSM Tailings Management Protocol, Earthworks Guidelines for Responsible Tailings Management and Global Tailings Review; World Bank Safety of Dams And Downstream Communities Technical Note 7; Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF) Mining Policy Framework, Tailings Storage Facilities; EU Extractive Waste Directive (2006).

Due diligence step	Benchmark level	The facility...
1. Embed mine waste and tailings management into responsible business conduct policies and management systems	Level A	[46]Adopts and makes publicly available a policy and **management systems** committing to safely store, handle, transport, and dispose of mining and mineral processing **waste** (including the management of **tailings** facilities and **tailings** disposal systems, as well as hazardous substances),using a **risk-based approach** to prevent and minimise any adverse environmental, health and community impacts. Complies with material-specific, internationally recognised mining and hazardous **waste** frameworks, e.g. the **International Cyanide Management Code, the Minamata Convention or Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF) Mining Policy Framework.** Appoints an executive-level staff member to be accountable for minimising adverse social and environmental impacts of mine waste management systems.
	Level AA	[47]Publicly discloses and implements policy to prevent and minimise the adverse environmental and human health impacts of mining and mineral processing **waste** according to the waste mitigation hierarchy, in line with the **Global Industry Standard on Tailings Management (GISTM), TSM Tailings Management Protocol** or equivalent. Commits to no new tailings facilities where inhabited areas are in the path of a **tailings** dam failure, and no new upstream dams.
	Level AAA	Implements employee incentives to encourage **workers** provide input that leads to improvements in **mine waste** and **tailings** management. Commits to emphasising the adoption of **Best Available Technologies (BAT) and Best Available Practices (BAP),** as relevant to specific **tailings** and mine sites.
2. Identify and assess actual and potential adverse impacts associated with mining and mineral processing waste	Level A	Assesses the risks and adverse environmental and human health impacts on mine **waste, including tailings,** produced at mining and mineral processing facilities via a **risk-based approach.** Identifies all existing and/or proposed **mine waste** facilities that have the potential to be associated with **waste** discharges or incidents, including catastrophic failures, that could impact human health, safety, the environment, or communities, including physical risks related to **tailings** and other **mine waste** facilities. Documents an inventory of all mining- and mineral-processing-specific wastes and identify procedures for safe handling, storage, transport, and disposal of **waste** materials. Puts a monitoring system in place to identify and disclose risks, through ongoing surveillance, with regular independent inspections.
	Level AA	[48]Assesses potential adverse environmental or health impacts of emergency **waste** storage breach scenarios. Assesses mining and mineral processing **waste** streams for which recovery and reprocessing levels could be increased. Engages with community representatives in assessing risks and **adverse impacts,** and drafting the impact assessment.
	Level AAA	Adopts a regional or geographic-based risk management approach to assessing **tailings** risk.
Outcome:		Has identified potential or actual **adverse impacts** caused by mining or mineral processing, mine closure **waste,** or **tailings** of the **facility.**
If potential or actual adverse impacts caused by mining or mineral processing, mine closure waste or tailings have been identified, including mine closure, responds at a minimum to Level A benchmarks in Steps 3–6 below.		

Due diligence step	Benchmark level	The facility...
3. Cease, prevent and mitigate adverse environmental or human health impacts from mining and mineral processing waste, and reducing amount of mineral waste produced	Level A	Prevents or reduce, as far as possible, any adverse effects on the environment and human health as a result of **mine waste,** including **tailings** management in accordance with **GISTM, TSM** or equivalent. Implements procedures for the safe storage, transport, and disposal of mining and mineral processing wastes, to prevent and minimise impacts on natural environment and human health, using a **risk-based approach.** For hazardous **mine waste** management, adheres to material-specific, internationally recognised frameworks for **mine waste** management, e.g. for cyanide or mercury, in alignment with the **Minamata Convention and the International Cyanide Management Code.**
	Level AA	Implements a mining and mineral processing **waste** management plan that aligns with the **waste mitigation hierarchy,** where possible, implements cost-effective measures for the recovery and re-processing of mined material. Uses authorised **mine waste** management service providers for **waste** transportation, treatment, and disposal of waste, ensuring the prevention unauthorised disposal of wastes.
	Level AAA	[49]Implements **tailings** reduction and elimination approaches, as appropriate for the nature of the site. Puts in place measures to optimise the recovery, elimination, or substitution of hazardous mining and mineral processing wastes.
4. Track implementation, results and effectiveness of mining and mineral processing waste management systems	Level A	Implements a system for documenting information and mitigating actions relating to the generation, handling, storage, treatment, transportation, and disposal of mining and mineral processing **waste.** Conducts an external review of the causes of, and mitigation actions for **waste** storage **facility** failures. Conducts an independent technical review of **mine waste facility,** including **tailings,** covering siting, design, construction, operation, and closure plans. Tracks and reviews results of the ongoing monitoring systems in place to identify, disclose and mitigate **waste** management plans and **facility-**related risks, with regular independent inspections. Ensures that surveillance plans are site-specific.
	Level AA	Maintains documentation of all off-site **waste** management activities, if such facilities are part of mining operation. Ensures that surveillance plans are site-specific. Assesses effectiveness of measures to prevent and manage harm from **waste** handling failures.
	Level AAA	
5. Communicate how adverse impacts due to mining and mineral processing waste are addressed and the outcomes of the actions taken	Level A	Publicly discloses potential **waste**-related hazards to relevant authorities where they may pose a risk to local community health or the environment in the event of **waste** storage breaches or other **adverse impacts** of **mine waste.** At least annually, publicly disclose of post- **tailings** failure outcomes.
	Level AA	Annually reports to **affected communities** on mining and mineral processing **waste** management plan, including responses to requests from **affected stakeholders** for further information on the introduction of **waste** into the local environment.
	Level AAA	[50]Cooperates in global transparency initiatives to create publicly accessible information repositories about the safety and integrity of **tailings** facilities.

Due diligence step	Benchmark level	The facility...
6. Provide for and cooperate in remediation of adverse mine closure and reclamation impacts caused or contributed to when appropriate	Level A	Establishes **grievance mechanisms** for employees, **affected communities,** and other third parties to lodge complaints related to **mine waste** management violations. Has a system in place to assess complaints and remediate **adverse impacts** related to mining **waste** storage areas which cannot be prevented or mitigated, including the implementation of site closure and reclamation plans, e.g. those for acid rock drainage or metals leaching. In the event of a mining storage **facility** failure, works with public sector agencies and other stakeholders to implement reconstruction, restoration, and recovery plans. Conducts emergency response simulations with local community and public sector to establish a shared state of readiness to address potential mining storage **facility** failures.
	Level AA	Offsets adverse environmental impacts of mining or mineral processing **waste.** Reduces, recovers, and repurposes mineral wastes, where possible. Develops sudden closure measures to include maintenance, surveillance and emergency preparedness programmes for the protection of the environment and the health of **affected stakeholders.**
	Level AAA	

ISSUE MODULE

Child Labour

Intent: Prevent the worst forms of child labour and the employment of children under the age of 15, unless ILO Convention C138 exceptions apply. Protect the health, safety & morals of young workers, as well as ensuring that their work does not interfere with their education and that they receive fair remuneration.

Applicability: Full value chain

International frameworks: UNGP, United Nation's Convention on the Rights of the Child, ILO Declaration on Fundamental Principles and Rights at Work, ILO Minimum Age Convention C138 (1973), ILO Worst Forms of Child Labour Convention C182 (1999)

Guidance documents: ILO, Checkpoints for Companies – Eliminating and Preventing Child Labour, ILO, International Organization for Employers (IOE) – Child Labor Guidance Tool for Business, OECD, Practical Actions for Companies to Identify and Address the Worst Forms of Child Labor in Mineral Supply Chains, Optional Protocol to the Convention on the Rights of the Child on the involvement of children in armed conflict.

Due diligence step	Benchmark Level	The facility...
1. Embed prohibition of unacceptable forms of child labour into policies and management systems	Level A	[51]Adopts and makes publicly available a policy and **management systems** committing to the prohibition of the **worst forms of child labour (WFCL)** in line with **ILO Convention C182,** Article 3, and the **OECD Due Diligence Guidance** for minerals, within its operations. Publicly commits to preventing the direct or indirect employment, within its operations, of children younger than 15 years of age, unless under the **ILO Convention C138** light work exception; or to engaging children younger than 18 years of age in **hazardous work** or work that interferes with their education, unless exceptions recognised by **ILO Convention C138** apply. Publicly commits to remunerating young **workers** with wages equal to those of their adult counterparts.
	Level AA	[52]Publicly commits to preventing the direct or indirect employment of children younger than 15 years of age within its operations, irrespective of exemptions recognised by **ILO Convention C138.**
	Level AAA	[53]Commits to providing safe and decent working conditions for young **workers** and to having procedures in place to support the continued education of young **workers,** if such work exists within the company's own operations.
2. Identify and assess actual and potential adverse impacts of child labour with the enterprise's operations, products or services	Level A	[54]Establishes robust and documented age verification mechanisms to assess ages of direct and indirect employees and identify risks of **worst forms of child labour** and other unacceptable forms of **child labour.** Assesses, in consultation with young **workers** or their representatives, the risk that any young **workers** are performing **hazardous work,** being prevented from completing their education, or being inadequately remunerated, if young **workers** are part of the **facility** workforce.
	Level AA	Identifies and assesses risks of other forms of **child labour** within its operations. Consults **workers,** their representatives and/or trade unions, **affected communities,** and experts as part of the risk assessment, and ensures that the assessment takes into account differentiated risks for young **workers** based on gender and vulnerability. Ensures that **contractors** adhere to same rigorous policies and proactively assess for such risks. Requires **contractors** to establish documented age verification mechanisms through contractual obligations.
	Level AAA	
Outcome:		Has identified any of its direct or indirect employees to be under the age of 18 years, or any young workers within its supply chain.
If potential or actual adverse impacts to young workers employed at the facility's operations or within their supply chains have been identified, please respond at a minimum to Level A benchmarks in Steps 3–6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate adverse impacts of child labour	Level A	[55]Implements an **action plan** to prevent and mitigate risks of child labour. Immediately removes any children found to be engaged in **worst forms of child labour** and/or **hazardous work,** and restricts their working hours where they are interfering with their education. Provides specialised occupational **health and safety** training to young **workers.** Engage with stakeholders and **contractors** to avoid and mitigate risks of unacceptable **child labour** and report cases to relevant authorities if **facility** is unable to prevent their continuation.
	Level AA	[56]Ensures that removed child **workers** have access to education and livelihood opportunities. Provides health programmes to support the wellbeing of young **workers,** if young **workers** are part of the **facility**'s workforce.
	Level AAA	Directly engages in, or supports, **community development** initiatives to benefit the educational and social outcomes of young **workers'** host communities in collaboration with young **workers** and/or their representatives, in cooperation with other stakeholders, and as part of collective action where possible. Follows expert guidance when designing or conducting any engagement with potentially affected children or their families.
4. Track implementation and results of how child labour risks and impacts are addressed	Level A	Monitors prevention of **worst forms of child labour,** other unacceptable forms of **child labour,** and ensures that young **workers,** where they are part of **facility** operations, from engaging in **hazardous work** and to protecting their **health and safety.** Monitors and documents ages, wages paid, working hours and educational attendance of young **workers.** Monitors the health, working conditions and hours of young **workers** in its operations if present.
	Level AA	Monitors the effectiveness of removing the **worst** and other unacceptable **forms of child labour,** as well as mitigation and **remediation,** progress, ensuring that removed child **workers** have access to education and livelihood.
	Level AAA	
5. Communicate how child labour risks and impacts are addressed	Level A	[57]Publicly discloses **adverse impacts** on children and young **workers,** the measures taken and progress made to prevent and mitigate **child labour** within its operations, whilst protecting the privacy and safety of young **workers.**
	Level AA	Communicates to communities, and to affected children and their families, the activities and progress made in managing **adverse impacts;** the measures taken to prevent and mitigate unacceptable forms of **child labour;** and the support provided for the education of young **workers,** whilst protecting the privacy and safety of young **workers.**
	Level AAA	Publicly reports number of **worst forms of child labour** incidents, **remediation** actions taken and planned, progress made, and results obtained, in aggregated anonymised format.
6. Provide for and cooperate in remediation of adverse child labour impacts caused or contributed to	Level A	Establishes **grievance mechanisms** to lodge complaints related to **child labour** violations. Develops the **grievance mechanism** and **remediation** actions in consultation with stakeholders, including young **workers** and their representatives, to remediate unacceptable forms of **child labour** and **adverse impacts** on young workers in its operations, if any. Trains young **workers** on how to use **grievance mechanism.** Engages with stakeholders to remediate cases of **worst forms of child labour** and report cases to relevant authorities if the **facility** is unable to prevent their continuation.
	Level AA	Allocates adequate financial and other resources to rehabilitate young **workers** found to be engaged in unacceptable forms of **child labour,** including their return to education, where applicable. Collaborates with young **workers** and/or their representatives to monitor the grievance and **remediation** mechanism.
	Level AAA	Collaborates with, and contribute to, child rights organisations, collective action programmes, and governments on **remediation** programmes, to ensure that the implementation of the procedure protects the rights of the impacted children and stakeholders.

ISSUE MODULE

Forced Labour

Intent: Elimination and remediation of all forms of forced labour in operations and in supply chains, including the application of responsible recruitment practices.

Applicability: Full value chain

International frameworks: ILO Forced Labour Convention C029 (1930), ILO Abolition of Forced Labour Convention C105 (1957), ILO General Principles and Operational Guidelines on Fair Recruitment and the Definition of Recruitment Fees and Related Costs, ILO C097- Migration for Employment Convention, ILO C143-Migrant Workers Convention and ILO C181-Private Employment

Additional guidance: IOM Migrant Worker Guidelines for Employers: Promoting Respect for the Human and Labour Rights of Migrant Workers through Ethical Recruitment and Deployment, Responsible Employment and Safe Return

Due diligence step	Benchmark Level	The facility...
1. Embed prohibition of forced labour and application of responsible recruitment into policies and management systems	Level A	[58]Adopts and makes publicly available a policy and **management systems** committing to the elimination and **remediation** of all forms of **forced labour** and exploitative recruitment practices for all **workers,** including direct or indirect employees in compliance with **ILO Conventions C029 and C105** and implements a policy and **management systems** reflecting this commitment. Identifies applicable **forced labour** laws and regulations in country of operation, alongside international instruments addressing all forms of **forced labour.**
	Level AA	[59]Identifies industry standard requirements for addressing all forms of **forced labour.** Publicly commits to recruitment fee repayment for all **workers,** including the direct and indirect employees.
	Level AAA	[60]Participates in industry initiatives and/or joint funds and action groups to eliminate and remediate all forms of forced labour and exploitative recruitment practices, and works to advance responsible recruitment practices.
2. Identify and assess actual and potential adverse impacts of forced labour with the enterprise's operations, products or services	Level A	[61]Identifies and assesses any potential or actual **adverse impacts** of any forms of **forced labour** or exploitative recruitment practices in consultation with direct and **indirect workers** and their representatives. Conducts risk assessment to identify and assess any potential or actual **adverse impacts** of **forced labour,** by screening the practices of recruitment agencies.
	Level AA	[62]Proactively identifies **vulnerable groups** within the direct and indirect employee pool who are at risk of forced labour and exploitation. Establishes and implements an internal audit programme to further assess **forced labour** risks.
	Level AAA	Identifies and participates in industry-wide or regional initiatives to effectively identify risks and eliminate all forms of **forced labour.**
Outcome:		Has identified actual or potential risks or incidents of any of its direct or indirect employees, or **contractors'** employees, being subjected to any form of **forced labour,** or victimised by exploitative recruitment practices.
If potential or actual adverse impacts of forced labour or exploitative recruitment practices for direct or indirect facility employees, or those of its suppliers, have been identified, responds at a minimum to Level A of Steps 3–6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate risks and adverse impacts of forced labour	Level A	[63]Immediately ceases identified instances all forms of **forced labour** involving direct or indirect employees, as well as any exploitative recruitment practices. Provides training on identifying any form of **forced labour** or exploitative recruitment practices to relevant staff and **contractors.** Monitors **contractors** and recruitment agencies found to be at heightened risk of **forced labour** and engages with them to cease any identified instances.
	Level AA	[64]Facilitates rehabilitation support for victims of forced labour, repayment of **recruitment fees** and return of identity documents. Facilitates the transfer of indirect employees subject to **forced labour** or exploitative recruitment practices to alternative **contractors** or recruitment agencies.
	Level AAA	Directly or indirectly supports industry-wide or regional initiatives to eliminate all forms of **forced labour.** Encourages contracted recruitment agencies to obtain certification in responsible recruitment practices.
4. Track implementation and results of how forced labour risks and impacts are addressed	Level A	Monitors the effectiveness of measures taken to address instances **forced labour** or exploitative recruitment practices, in consultation with the affected employees. Monitors the implementation of corrective **action plans** adopted to mitigate forced labour issues identified at the **facility's** own production sites and **contractors'** operations.
	Level AA	Conducts impact assessment to confirm the effectiveness of programmes adopted to address **forced labour** and responsible recruitment risks.
	Level AAA	Uses the learnings from the conducted impact assessment to redefine current mitigation approaches to address forced labour risks and improve responsible recruitment practices.
5. Communicate how forced labour risks and impacts are addressed	Level A	[65]Publicly discloses risk assessment findings on **adverse impacts** from all forms of **forced labour** or exploitative recruitment practices in its own operations, as well as the measures taken to prevent and mitigate them.
	Level AA	Publicly reports on identified and remediated instances of **forced labour,** and **remediation** offered, in aggregated anonymised format.
	Level AAA	
6. Provide for and cooperate in remediation of adverse forced labour impacts caused or contributed to when appropriate	Level A	Establishes **grievance mechanisms** for lodging complaints related to all forms of forced labour violations. Ensures that the **grievance mechanism** is available to contracted and **indirect workers** and alerts them of risks or incidents of **forced labour.** Remediates any instances of **forced labour** by returning affected employees to their situation prior to **adverse impacts,** by facilitating access to qualified, independent third-party advisers and, if necessary, a state-based judicial mechanism. Reports instances of **forced labour** that the **facility** has no ability to address to relevant authorities and cooperates with any subsequent investigations.
	Level AA	Collaborates with relevant stakeholders to monitor the **forced labour remediation** mechanism and conducts an internal review of its effectiveness.
	Level AAA	[66]Takes proactive measures on products tainted by any forms of forced labour. As a measure of last resort, engages in responsible disengagement, including ceasing business with **contractors** who have engaged in forced labour practices or have not taken swift mitigation and **remediation** actions to address forced labour.

ISSUE MODULE

Use of Security Forces

Intent: The use and conduct of private and public security providers is carefully managed to prevent contributing to armed conflict and prevent undue harm to or the violation of human rights of employees, visitors or local communities, by security forces.

Applicability: Full value chain

International frameworks: UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials; Voluntary Principles on Security and Human Rights (VPSHR)

Due diligence step	Benchmark Level	The facility...
1. Embed responsible use of security forces into policies and management systems	Level A	[67]Adopts and makes publicly available a policy and **management systems** committing to ensuring that private or public security providers do not use excessive force or infringe on human rights or international humanitarian law, in line with the **UN Basic Principles on the Use of Force and Firearms and Voluntary Principles on Security and Human Rights (VPSHR),** or other internationally recognised framework. Requires private security providers to implement the **International Code of Conduct for Private Security Service Providers.**
	Level AA	Deters security policy violations through contracts with private security providers or memorandums of understanding with public security providers, stipulating termination of the relationship where there is credible evidence of the use of excessive force or other human rights violations.
	Level AAA	Supports collective action platforms or initiatives to raise awareness of, and eliminate security-related incidents.
2. Identify and assess actual and potential adverse impacts associated with the use of security forces	Level A	Identifies and assesses risks of contributing to armed conflict or human rights violations associated with security provision, and screens security providers and personnel for previous excessive use of force, human rights violations, or breaches of international humanitarian law. Consults workers, their representatives and/or trade unions and stakeholders as part of the security risk assessment.
	Level AA	Considers differentiated impacts of security risks, including psychological safety, on employees and stakeholders by gender and other characteristics, as part of the security risk assessment.
	Level AAA	
Outcome:		Has identified the use of private or public security forces using in its operations, or risks or incidents of excessive force or perpetrating human rights violations.
If potential or actual adverse impacts related to the use of public or private security forces have been identified, responds at a minimum to the Level A benchmarks in Steps 3 – 6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate adverse impacts of use of security forces	Level A	Trains security providers and personnel on the proportionate and restrained use of force, using firearms only to prevent serious injury or death of any employees or community members. Takes disciplinary action against any security personnel credibly found to have unnecessarily caused or contribute to harm to people.
	Level AA	Only uses registered recruitment agencies or security providers to recruit private security personnel and provides refresher training courses on the restrained use of force and firearms. Collaborates with employees and their representatives and **affected communities** to develop mitigation strategies where risk assessments reveal potential conflicts between them and security providers. Includes, in risk mitigation implementation plans, the results from security risk assessments with regard to gender and **vulnerable groups.**
	Level AAA	[68]Participates in the **Voluntary Principles on Security and Human Rights (VPSHR) Initiative.**
4. Track implementation and results of use of security forces	Level A	Conducts regular internal reviews on the ability of security providers to comply with the **Voluntary Principles on Security and Human Rights,** investigating and documenting any security incidents.
	Level AA	Conducts regular independent third-party reviews on the ability of security providers to comply with the **Voluntary Principles on Security and Human Rights.**
	Level AAA	
5. Communicate how impacts are addressed of use of security forces	Level A	Publicly discloses actions taken to prevent or mitigate any security-related human rights impacts, including reporting of security-related incidents to appropriate governmental authorities.
	Level AA	Publicly discloses the number and nature of substantiated grievances raised, while protecting complainant confidentiality.
	Level AAA	
6. Provide for and cooperate in remediation of adverse impacts security forces caused or contributed to when appropriate	Level A	Establishes a **grievance mechanism** to lodge complaints of security-related impacts. Investigates and records credible allegations of injury, fatalities, or human rights violations caused by security personnel, and takes appropriate remedial action. Consults **affected stakeholders** to develop strategies to remediate incidents and prevent the recurrence of similar incidents, where necessary.
	Level AA	
	Level AAA	

ISSUE MODULE

Employment Terms

Intent: Ensure the provision of fair and decent employment terms for all workers.

Applicability: Full value chain

International frameworks: ILO Conventions C001 (Hours of Work), C014 (Weekly Rest), C095 (Protection of Wages), C131 (Minimum Wage Fixing), C132 (Holidays with Pay); ILO Recommendation R115 (Workers' Housing), ILO Convention 135 on Employee Representatives.

Additional guidance: RBA Responsible Recruitment Due Diligence Toolkit

Due diligence step	Benchmark Level	The facility...
1. Embed respect for fair employment terms and fundamental rights at work into policies and management systems	Level A	[69]Adopts and makes publicly available a policy and **management systems**, and informs **workers** of, their rights under national labour and employment law, committing to fair and decent employment terms, including leave, remuneration, rest, working hours, and, where applicable, employer-provided accommodation and right to collective bargaining, where not in conflict with national law. Aligns these policies with the **ILO Declaration on Fundamental Principles and Rights at Work and relevant ILO Conventions and Recommendations.**
	Level AA	[70]Provides **workers** social security and welfare benefits beyond the legal minimum. Commits to responsible recruitment principles. Ensures that terms and conditions are negotiated between employers and employees and their representatives, leading to a collective bargaining agreement, where not in conflict with national laws. Ensures that employment agreement clauses are not constructed in a manner contrary to a valid collective bargaining agreement.
	Level AAA	Publicly commits to paying **workers a living wage.**
2. Identify and assess actual and potential risks and adverse impacts from violation of employment terms, associated with the enterprise's operations, products or services	Level A	Identifies risks of violations of employment terms. Maintains records of regular and overtime working hours, all forms of leave, and the timely payment of wages.
	Level AA	Identifies alternatives to retrenchment in consultations with **workers,** their representatives, and/or trade unions and, where appropriate, the government or community leaders.
	Level AAA	Maintains documentation of **living wage** calculations and payments.
Outcome:		Has identified risks or shortcomings in meeting fundamental rights at work, related to compensation, leave, working hours or other employment terms?
If risks or shortcomings in meeting fundamental rights at work related to compensation, leave, working hours, or other employment terms are identified, responds at a minimum to Level A on Steps 3-6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate adverse impacts of violations of employment terms	Level A	Communicates employment terms to **workers** prior to the start of employment and provides subsequent pay slips in a language and format they understand.
	Level AA	Provides training on employment terms to relevant personnel in language and format that they understand. In cases of lay-off without notice and compensation for retrenchment due to economic bankruptcy, arranges alternative employment of equivalent renumeration, terms, and conditions.
	Level AAA	Remunerates **workers** with a **living wage** and industry competitive benefits.
4. Track implementation and results of respecting fair employment terms	Level A	Conducts an internal review of fair and decent employment terms at defined intervals, in consultation with **workers** and their representatives, and/or trade unions. Reviews any patterns of violations and inequities in **worker** compensation or benefits.
	Level AA	Monitors recruitment agencies on adherence to employment terms.
	Level AAA	
5. Communicate how risks and impacts of violations to employment terms are addressed	Level A	Publicly discloses risk assessment and impacts of planned actions, progress, and results related to upholding employment terms. Communicates any **adverse impacts** and subsequent actions to affected **workers** in ways that are physically accessible and understandable.
	Level AA	Publicly discloses wage scales and salary ranges, as permittable by national law.
	Level AAA	
6. Provide for or cooperate in remediation of violations of employment terms	Level A	[71]Establishes **grievance mechanisms** to receive, track, and respond to grievances related to employment terms, ensuring that the mechanism is accessible to direct and indirect employees. Cooperates in **remediation,** ensuring that **workers** face no reprisals for filing such grievances.
	Level AA	Provides access to legitimate escalation channels to which **workers,** their representatives, and/or trade unions can resort if **facility** is unable to provide effective remedy, e.g. state-based judicial or non-judicial, or other mechanisms.
	Level AAA	Collaborates with industry associations, unions, and other stakeholders on providing access to grievance and **remediation** processes when employment terms are violated, including improvements in compensation and **living wage.**

ISSUE MODULE

Freedom of Association and Collective Bargaining

Intent: Protect workers' rights to freedom of association and collective bargaining, and ensure the provision of fair and decent employment terms for all workers.

Applicability: Full value chain

International frameworks: ILO Conventions C087 (Freedom of Association and Protection of the Right to Organise), C098 (Right to Organise and Collective Bargaining Convention), ILO Convention 135 (Employee Representatives), ILO Convention 144 (Tripartite Consultation) the ILO Convention 87 on Freedom of Association and Protection of the Right to Organise, ILO Convention 135 on Employee Representatives and ILO Convention 98 Right to Organise and Collective Bargaining Convention

Additional guidance: OECD COLLECTIVE BARGAINING IN A CHANGING WORLD OF WORK (2019) ILO Social Dialogue Report (2023)

Due diligence step	Benchmark Level	The facility...
1. Embed freedom of association, collective bargaining into policies and management systems	Level A	[72]Adopts and makes publicly available a policy and **management systems** committing to strict neutrality toward, and informs **workers** of their rights to, freedom of association and collective bargaining. Does not prohibit or discourage joining of forming trade unions and bargaining collectively. Aligns these policies with applicable ILO conventions. Informs **workers** of any existing trade unions and collective bargaining agreements during their induction and participates in collective bargaining processes in good faith. Where these rights are restricted by national law, promotes legally permissible alternative means of association, organisation, and employee representation.
	Level AA	[73]Negotiates a neutrality agreement with the trade union in preparation for elections. Promotes company-wide bargaining in case a company has several subsidiaries in one country. Allows the establishment of **worker** committees with freely elected representatives, to discuss workplace issues in the absence of **Collective Bargaining** Agreement(s) when operating in countries where **Freedom of Association** is restricted by law.
	Level AAA	Participates in industry initiatives on approaches to sector-wide bargaining.
2. Identify and assess actual and potential adverse impacts associated with the enterprise's operations, products or services related to violations of collective bargaining and freedom of association	Level A	Identifies risks of violations of freedom of association and collective bargaining rights for direct and indirect employees (including those hired by employment agencies and **subcontractors**) in consultation with **workers,** their representatives and/or trade unions. Maintains records of collective bargaining agreements.
	Level AA	Conducts risk analyses in consultation with **ILO, ITUC, Global Trade Union Confederations, workers** and their representatives and/or national unions.
	Level AAA	
Outcome:		Has identified risks or shortcomings in meeting fundamental rights at work, including right to collective bargaining and freedom of association.
If risks or shortcomings in respecting the right to collective bargaining and freedom of association have been identified, responds at a minimum to Level A on the Steps 3–6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate adverse impacts of violations to of collective bargaining and freedom of association	Level A	Mitigates any risks of violations of freedom of association and collective bargaining rights for direct and indirect employees (including those hired by employment agencies and **subcontractors**) in consultation with **workers,** their representatives and/or trade unions.
	Level AA	Tracks effectiveness of actions to prevent/mitigate risks to freedom of association and collective bargaining.
	Level AAA	Engages with **multi-stakeholder** initiatives to resolve issues in countries with systemic violations of **Freedom of Association** and **Collective Bargaining** rights.
4. Track implementation and results of how collective bargaining and freedom of association violations are addressed	Level A	Conducts an internal review of effectiveness of actions to prevent risks to **Freedom of Association** and **Collective Bargaining** rights at defined intervals, in consultation with **workers**, their representatives and/or trade unions.
	Level AA	
	Level AAA	
5. Communicate how collective bargaining and freedom of association impacts are addressed	Level A	Publicly discloses impacts, planned actions, progress, and results related to safeguarding freedom of association and collective bargaining, communicating any **adverse impacts** and subsequent actions to affected **workers,** their representatives and/or trade unions in ways that are physically accessible and understandable.
	Level AA	Actively disseminates information about upholding rights to **Freedom of Association** and **Collective Bargaining,** and any violations of these rights and measures to address them, to key stakeholders, including **workers,** their representatives, and/or trade unions, to promote a joint follow-up process.
	Level AAA	
6. Provide for or cooperate in remediation to collective bargaining and freedom of association when appropriate	Level A	[74]Establishes a **grievance mechanism** to receive, track, and respond to grievances related to **Freedom of Association** and **Collective Bargaining,** and other trade union freedoms, and cooperates in **remediation,** ensuring that **workers** face no reprisals for filing such grievances, and facilitating **worker** anonymity where appropriate. Immediately terminates any practices that limit **workers'** rights to **Freedom of Association** and **Collective Bargaining,** unless this is in violation of national laws.
	Level AA	Provides access to legitimate escalation channels to which **workers,** their representatives, and/or trade unions can recur if **facility** is unable to provide effective remedy, e.g. state-based judicial or non-judicial, or other appropriate mechanisms.
	Level AAA	Collaborates with industry associations, unions, and other stakeholders on providing access to **grievance mechanisms** and remediation when their rights **Freedom of Association** and **Collective Bargaining** have been violated, at an industry level.

ISSUE MODULE

Occupational Health and Safety

Intent: Eliminate physical harm to employees, contractors or visitors taking place at the facility.

Applicability: Full value chain

International frameworks: ILO Convention C155 on Occupational Safety and Health, ILO Convention C161 on Occupational Health Services, ILO Convention C148 on Working Environment, ILO Convention C176 on Safety and Health in Mines

Additional guidance: Promotional Framework for Occupational Safety and Health Convention, 187

Due diligence step	Benchmark Level	The facility...
1. Embed occupational health and safety (OHS) into policies and management systems	Level A	Adopts and makes publicly available a policy and **management systems** committing to and internally communicates **occupational health and safety (OHS)** policy to eliminate serious workplace injuries and fatalities, and to reduce work-related illnesses. Assigns senior management to be accountable for setting and achieving OHS outcomes, and reviews OHS management plan annually, updating it at least every five years.
	Level AA	[75]Has a policy for continual performance improvement. Introduces **occupational health and safety (OHS)** performance indicators to reduce the number of **OHS** incidents and internally incentivises management and staff to meet targets. Enables the participation of **workers,** their representatives, and/or unions in **OHS** management decisions and in setting performance targets.
	Level AAA	
2. Identify and assess actual and potential occupational health and safety (OHS) related risks and adverse impacts associated with the enterprise's operations, products or services	Level A	[76]Maintains and updates a register of **occupational health and safety (OHS)** hazards and risks at least annually, and prior to any new or changed operational activities or to new OHS regulations. Establishes metrics to define **OHS** risk assessment baseline. Bases **OHS** risk assessments on credible, reliable and valid data. Establishes mechanisms for **workers** to report unsafe working conditions, near misses, and actual incidents, and integrates **worker** feedback into risk assessments.
	Level AA	[77]Considers differences by gender and other characteristics in **occupational health and safety (OHS)** risk assessments, including psychological safety.
	Level AAA	[78]**For mining and mineral processing facilities:** Identifies potential physical stability risks and evaluates the potential severity of failure.
Outcome:		Has identified occupational health and safety risks or shortcomings in the **management system.**
If occupational health and safety risks or shortcomings in the management system have been identified, responds at a minimum to Level A of Steps 3–6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate occupational health and safety (OHS) related risks and adverse impacts	Level A	[79]Adopts risk controls for identified **occupational health and safety (OHS)** hazards and risks in line with the Health and Safety Controls Hierarchy. Provides training on near-miss incidents, injuries, illnesses, or fatalities. Internally communicates identified OHS hazards and risks, and provides **OHS** training and personal protective equipment (PPE) to **workers, contractors,** and visitors.
	Level AA	[80]Implements processes for consultation and participation of non-managerial employees in the implementation of **occupational health and safety (OHS) management system.** Provides specialised OHS training to young **workers** under 18, if they are part of the **facility** workforce, to ensure they are adequately informed of, and protected from OHS hazards. Provides employees with gender-appropriate PPE, and considers gender differences when determining the physical positioning and limitations of tasks and equipment.
	Level AAA	Collaborates with **worker** health and safety representatives to develop and implement programmes to encourage overall health and wellness in the workplace. **For mining and mineral processing facilities:** Designs facilities and establishes critical controls to minimise the possibility of physical stability failures as much as reasonably practicable, and sets action triggers if potential failure thresholds are exceeded.
4. Track implementation and results related to occupational health and safety (OHS) risks and impacts	Level A	Regularly monitors and documents the effectiveness of OHS hazard and risk **management system** against baseline performance metrics, reporting findings to senior management. Regularly inspects and maintains risk controls for OHS hazards and evaluates OHS training programmes.
	Level AA	Allows **workers,** or their representatives and/or unions to evaluate the effectiveness of OHS hazard and risk controls, including benchmarking the **facility**'s performance against industry peers. Assesses the competency of OHS trainers and facilitates coaching to verify that OHS training is implemented into daily operations.
	Level AAA	Monitors the effectiveness of programmes to encourage overall health and wellness in the workplace. **For mining and mineral processing facilities:** Annually reviews the effectiveness of physical stability surveillance and maintenance plan, updating risk controls as necessary.
5. Communicate how occupational health and safety (OHS) risks and impacts are addressed	Level A	Publicly discloses OHS performance, impacts and planned actions at least annually.
	Level AA	Publicly discloses OHS performance against baselines and targets at least annually.
	Level AAA	**For mining and mineral processing facilities:** Makes physical stability risk assessments and any corrective **action plans** publicly available, allowing **affected stakeholders** to provide input on their findings.
6. Provide for or cooperate in remediation of adverse occupational health and safety (OHS) impacts when appropriate	Level A	Establishes **grievance mechanisms** to lodge complaints related to **occupational health and safety (OHS)** violations. Makes affected **workers, contractors,** or visitors aware of **remediation** mechanisms in the event of serious illness, injury, or fatality caused by operational activities, and ensures their protection from reprisals for reporting such events. Conducts investigations where serious injuries or fatalities occur, to identify root causes and remediate impacts where possible, including immediate cessation of contributing practices.
	Level AA	Implements processes to consult with impacted **workers** or their representatives in conducting root-cause analyses and evaluating the effectiveness of any remedial actions. Establishes return-to-work programmes for injured or sick **workers,** including restricted duty until recovery is complete and mandatory medical clearance prior to full return to work.
	Level AAA	**For mining and mineral processing facilities:** Incorporates remedial measures for deviations from expected physical stability performance into the OHS management plan.

ISSUE MODULE

Diversity, Inclusion and Non-discrimination

Intent: Prevent any form of discrimination, harassment, violence or psychological harm in the workplace, and ensure diverse, equitable and inclusive outcomes for all workers.

Applicability: Full value chain

International frameworks: ILO Convention 100 (Equal Remuneration); ILO Convention C111 (Discrimination (Employment and Occupation))

Additional guidance:

Due diligence step	Benchmark Level	The facility...
1. Embed responsible business conduct related to diversity, inclusion and non-discrimination into policies and management systems	Level A	[81]Adopts and makes publicly available a policy and **management systems** committing to providing a respectful, healthy, and safe workplace in line with the **Occupational Safety and Health Convention, 1981 (No. 155)** and the **Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187),** free from psychological harm, and eliminating any forms of **discrimination, harassment,** violence, or unfair disciplinary action based on personal characteristics. Publicly discloses and internally communicates commitments regarding **diversity, equity,** and **inclusion** in the workplace.
	Level AA	[82]Commits to recognising differences in risks and sets objectives to promote **diversity, inclusion** and **equity** by gender and other dimensions, regarding recruitment, remuneration, representation, retention, and development and advancement opportunities.
	Level AAA	Prioritises business partners with commitments to **diversity, equity,** and **inclusion.** Includes women's rights, **diversity** and **non-discrimination** in partner engagements by setting gender-responsive expectations in contracts, codes of conduct, and assessments.
2. Identify and assess actual and potential risks and adverse impacts related to diversity, inclusion and non-discrimination associated with the enterprise's operations, products or services	Level A	[83]Identifies and assesses a gender responsive and intersectional approach to workplace risks of **discrimination.** Establishes baseline self-identified **diversity** metrics, unless prohibited by operational jurisdiction. Identifies barriers to **diversity, equity,** and **inclusion.** Compiles existing evidence of risks of sexual **harassment.**
	Level AA	Identifies candidates for priority employment or business opportunities in collaboration with local community representatives. Reviews physical infrastructure to identify psychological hazards and barriers to **inclusion** and accessibility. Consults with all **workers,** their representatives and/or trade unions including women, collects gender-disaggregated data, and takes into account other factors of vulnerability.
	Level AAA	Collaborates with industry peers and/or relevant associations, organisations, and multistakeholder initiatives to identify and assess systematic barriers to **diversity, equity,** and **inclusion** across the industry.
Outcome:		Has identified risks or impacts of psychological harm, **discrimination, harassment** or violence identified.
If potential or actual adverse impacts related to discrimination, harassment, violence, or psychological harm have been identified, responds at a minimum to Level A of Steps 3–6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate risks and adverse impacts related to diversity, inclusion and non-discrimination	Level A	[84]Develops and implements prevention plans, aligned with the **ILO C190** to cease, prevent or mitigate the identified risks, in consultation with **workers,** their representatives, and/or trade unions. Provides training on respectful behaviour, psychological support, and disciplinary procedures; prohibits unacceptable disciplinary practices and establishes escalating steps for disciplinary practices. Provides training on company's **diversity** strategy and implement steps to address barriers.
	Level AA	[85]Implements programmes to promote and encourage **psychological health.** Provides leave to **workers** to exercise their political rights, including the right to vote. Sets up **diversity** committees in the development and implementation of the prevention plan. Ensures companies identify actions that are relevant to, and effective for, all genders and other diverse groups.
	Level AAA	Collaborates with industry peers and/or relevant associations, organisations, and multistakeholder initiatives to prevent or mitigate systemic barriers to **diversity** and **inclusion** across the industry. Launches transformative programmes and measures addressing the root causes of **discrimination,** violence and **harassment.**
4. Track implementation and results related to diversity, inclusion and non-discrimination risks and impacts	Level A	[86]Continually monitors, using a gender responsive and intersectional approach, effectiveness of steps taken to prevent and mitigate risks of **discrimination** and **harassment,** including maintaining records of disciplinary actions. Conducts ongoing monitoring of **diversity** metrics, equitable remuneration, and effectiveness of **diversity** and **inclusion** policies.
	Level AA	Conducts an independent, third-party participatory review, involving all **workers, their representatives and/or trade unions,** including women, of effectiveness of programmes to promote psychological safety, eliminate **discrimination** and **harassment,** and advance the corporate **diversity** and **inclusion** strategy.
	Level AAA	
5. Communicate how risks and impacts related to diversity, inclusion and non-discrimination are addressed	Level A	Publicly discloses **psychological health and safety** performance at least annually. Publicly discloses assessments, actions, and progress towards **diversity** and **inclusion** objectives at least annually, with due regard for jurisdictional restrictions on publication of demographic indicators.
	Level AA	Communicates assessments, actions, and progress towards **diversity** and **inclusion** objectives at least annually to immediate **contractors** and, where applicable, employment agencies.
	Level AAA	
6. Provide for and cooperate in remediation of adverse impacts related to discrimination, harassment, violence or disrespectful behaviour caused or contributed to when appropriate	Level A	Establishes a **grievance mechanism** to lodge complaints related to **discrimination,** violence, and **harassment,** involving disciplinary procedures. Provides access to and training on submitting and remediating grievances; ensures **worker** confidentiality to prevent reprisals; and ensures presence of **worker** representatives during proceedings, where requested. Facilitates recourse through alternative legitimate grievance and whistleblowing mechanisms for issues not resolved by **facility's grievance mechanism.**
	Level AA	Reports internally on the number and types of grievances related to **discrimination, harassment,** violence, or disrespectful behaviour.
	Level AAA	

ISSUE MODULE

Community Impacts

Intent: Facilitate engagement with local communities and other affected stakeholders to prevent or mitigate adverse impacts or risks to community health, safety and cultural heritage. Avoid the involuntary displacement of local communities as a result of land acquisition where possible, or compensate the displaced when unavoidable.

Applicability: Full value chain

International frameworks: OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector

Additional guidance:

Due diligence step	Benchmark Level	The facility...
1. Embed impacts to local and affected communities into policies and management systems	Level A	[87]Adopts and makes publicly available a policy and **management systems** committing to protecting community health, safety, and **cultural heritage,** and minimising **adverse impacts** to communities. Seeks and considers stakeholders' input when developing the policy or conducting major revisions.
	Level AA	[88]Publicly commits not to develop new projects or expand existing projects into **buffer zones** of **World Heritage Sites** or other designated protected **cultural heritage** areas, and to negotiate in good faith regarding agreements related to resettlement. Publicly commits to prohibiting forced evictions and avoiding the unnecessary physical or economic displacement of communities. Publicly commits to providing, or cooperating with governments on, fair compensation where resettlement is the responsibility of the government.
	Level AAA	Where it cannot be avoided, takes a holistic approach to resettlement, including economic and physical community restoration, aiming to leave the community better off.
2. Identify and assess actual and potential adverse impacts to local communities associated with the enterprise's operations, products or services	Level A	[89]Identifies and maps **communities** that are directly, indirectly, or potentially **affected** by the **facility**'s activities, and their legitimate representatives. Identifies and assess potential or actual **adverse impacts** to communities' health, **cultural heritage,** or legal and/or customary land rights, in collaboration with relevant stakeholders. Identifies and assesses how different **stakeholder** groups are at greater risk of **adverse impacts** or physical displacement.
	Level AA	[90]Conducts consultations with local and **affected communities** to identify the most salient and material risks to them.
	Level AAA	Engages in industry-wide collaboration and collective action focused on addressing community impacts, from past, present, and future operations.
Outcome:		Has identified risks of **adverse impacts** to community health, **cultural heritage,** or displacement.
If potential or actual adverse impacts related to community health, cultural heritage or physical displacement have been identified, responds at a minimum to Level A of Steps 3–6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate adverse impacts to local communities	Level A	[91]Implements measures to cease, prevent or mitigate **adverse impacts** to local communities, including on community health or **cultural heritage**, incorporating input from potentially **affected stakeholders**, and considering gender and other dimensions of **diversity** and representation. Implements resettlement **action plans** in consultation with **affected stakeholders** where land acquisition and displacement are unavoidable, creating conditions that are equal to or better than those the community was previously in. Provides relevant staff training on community engagement, cultural awareness, and **cultural heritage.**
	Level AA	Co-designs measures to prevent or mitigate **adverse impacts** on community health or **cultural heritage** in consultation with potentially **affected stakeholders**. Develops a livelihood restoration plan where displacement is unavoidable.
	Level AAA	Collaborates with affected community leaders and/or representatives in decision-making and investments to mitigate adverse community health impacts beyond the productive life of the **facility.**
4. Track implementation and results of community impacts	Level A	Conducts a review of steps to prevent or mitigate **adverse impacts** on community health, **cultural heritage,** and any resettlement **action plans**, in consultation with **affected stakeholders.**
	Level AA	Conducts joint monitoring of steps to prevent or mitigate **adverse impacts** on community health, **cultural heritage,** and any resettlement action plans.
	Level AAA	Facilitates access for **affected communities** to independent legal or other expert advice to participate in resettlement planning and monitoring.
5. Communicate on stakeholder engagement and how adverse community impacts are addressed	Level A	Publicly discloses and makes available to affected communities a summary of measures to prevent or mitigate any **adverse impacts** to community health, **cultural heritage** or physical economic displacement available, in a way that is accessible, **inclusive,** culturally appropriate, and in appropriate language(s). Provides opportunities for stakeholders to provide feedback on reporting of **stakeholder** engagement activities and measures to prevent or mitigate **adverse impacts.**
	Level AA	Communicates progress on mitigation actions to **affected communities.**
	Level AAA	
6. Provide for or cooperate in remediation when appropriate	Level A	[92]Establishes a **grievance mechanism** for **affected communities** and other stakeholders to lodge complaints related to violations impacting communities. Makes **affected community members** aware of mechanisms for requests for information, grievances, and remedies where the mitigation hierarchy has been exhausted, particularly with regard to conflicting claims of land titles or **cultural heritage,** for which recourse to alternative grievance and remedy mechanisms through external bodies should additionally be provided.
	Level AA	[93]Co-designs and conducts a review of the **grievance mechanism** in collaboration with **affected communities,** and includes a post-process follow-up mechanism for those filing grievances related to **cultural heritage,** land acquisition, displacement, or resettlement. Reviews grievances for patterns, assesses underlying causes and develops preventative actions in consultation with **affected stakeholders,** considering representation of diverse groups and minorities.
	Level AAA	Facilitates the process of establishing legal title for those resettled under national law, if possible, and implements programmes to improve the standard of living of people displaced by land acquisitions.

ISSUE MODULE

Indigenous Peoples' Rights

Status: This module has not been included in the Beta Release of September 2025.

Respect for the rights of Indigenous Peoples is essential to a just and credible battery value chain. In line with the GBA's multi-stakeholder approach, the GBA Working Group has convened since 2024 to develop consensus-based benchmarks regarding Indigenous Peoples' rights, drawing on existing frameworks and standards:

- March–May 2024 – the Pilot Rulebook on Indigenous Peoples' rights was developed. The pilots gathered detailed expectations for piloting and future improvement of the module.
- October 2024 – This version was consulted upon with organisations representing Indigenous Peoples across the seven socio-cultural regions, yielding additional important perspectives.
- May–July 2025 – the GBA Working Group has reviewed drafts of the module, building on the EU Batteries Regulation, its underlying frameworks, and the benchmarked standards, making good progress towards a consensus position on the benchmarks.

However, the Working Group has not yet reached multi-stakeholder consensus at a level of maturity comparable to the other modules and required for publication. Given the topic's complexity and importance—and the diversity of expectations and interpretations across jurisdictions and stakeholder groups—this module is not included in the 2025 **Battery Passport Beta Release.** The GBA members agreed that more time is needed to reach durable, widely supported benchmarks. The GBA will continue to work with members and partners, including organisations representing Indigenous Peoples, to broaden engagement, resolve open questions, and trial implementation, with a view to including this module in the full 2027 **Battery Passport Sustainability Benchmarking Framework.**

We invite reviewers of this public consultation draft to provide free-form comments on key considerations to be included in future drafting of the module, and welcome interested organisations and partners to join the GBA to contribute to this work.

ISSUE MODULE

Business Integrity and Transparency

Intent: Facilities conform to business integrity standards to prevent the undue gain of advantage in conducting business, particularly with regard to bribery, corruption and money laundering.

Applicability: Full value chain

International frameworks: OECD Guidance on Responsible Business Conduct; International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation

Additional guidance: Extractive Industries Transparency Initiative (EITI standard 2023); OECD Corruption in the Extractive Value Chain: Typology of Risks, Mitigation Measures and Incentives

Due diligence step	Benchmark Level	The facility...
1. Embed business integrity and transparency into policies and management systems	Level A	[94]Adopts and makes publicly available a code of conduct covering all business integrity risks and a zero-tolerance policy for violations of **OECD Annex II risks** in scope of this module, committed by direct employees, indirect employees, **subcontractors,** or business partners, including through the establishment of a code of conduct. Incentivises and requires compliance with the **facility**'s business integrity policy and code of conduct through management incentives. Publicly declares support for **beneficial ownership** transparency, including the public disclosure of the identities and level of control of its beneficial owners. **Upstream operators (mining companies):** Adheres to EITI requirements in implementing countries. Publicly commits to supporting the EITI in non-EITI-implementing countries.
	Level AA	[95]Publicly discloses its zero-tolerance policy for all business integrity risks, and declares how it collects and takes risk-based steps to use **beneficial ownership** data. **Upstream operators:** Publicly commits to disclosing information in line with the EITI Standard in non-EITI implementing countries.
	Level AAA	**Upstream & midstream operators:** Contributes to the advancement of transparency and integrity by becoming an EITI-supporting company.
2. Identify and assess actual and potential risks and adverse impacts related to transparency and business integrity violations associated with the enterprise's operations, products or services	Level A	[96]Identifies and assesses risks of business integrity violations by direct or indirect employees or any other third parties, and investigates any suspected violations. Establishes the identity of its beneficial owners, their level of ownership, how they exert ownership or control, and stock exchange filings for the **facility**, including any joint venture partners. **Upstream operators:** Compiles register of all **material payments** made to governments and identifies regulatory or legal obligations regarding financial transactions and transparency.
	Level AA	Establish the identity of its direct suppliers and direct customers' beneficial owners and their level of ownership. Conducts enhanced **"Know your counterparty" (KYC)** risk assessments on **subcontractors** and business partners, and on payments to them, based on risk typologies to detect **bribery,** corruption, fraud, and **money laundering.**
	Level AAA	
Outcome:		Has identified business integrity related actual or potential risks.
If risks or adverse impacts related to business integrity and transparency have been identified, responds at a minimum to Level A on Steps 3–6 below.		

Due diligence step	Benchmark Level	The facility...
3. Cease, prevent and mitigate adverse impacts related to business integrity and transparency	Level A	Establishes guidelines, procedures and internal staff training programmes for **anti-money laundering,** charitable contributions, donations to political parties, offers of employment, payments to governments or receiving or donating gifts, and maintains a register of all payments or gifts. Terminates employment contracts with any direct or indirect employees credibly found to have committed severe violations related to **OECD Annex II risks** in scope of this module.
	Level AA	Terminates employment or business contracts with any **subcontractors** or business partners credibly found to have committed severe business integrity violations. Applies warnings, training, and other disciplinary action to less severe incidents.
	Level AAA	
4. Track implementation and results of business integrity and transparency policies	Level A	Conducts annual reviews of the effectiveness of the business integrity risk **management system** and internal code of conduct, investigating and documenting any incidents of business integrity violations. Reports results of monitoring to senior management and designs continuous improvement actions based on results. Consults employees and stakeholders in the design of continuous improvement.
	Level AA	Reports results of monitoring to senior management and design continuous improvement actions based on results. Consults employees and stakeholders in the design of continuous improvement.
	Level AAA	
5. Communicate how business integrity and transparency impacts are addressed	Level A	[97]Publicly discloses the **beneficial ownership** of the company operating the **facility,** and the recipients of any financial or in-kind contributions, including joint venture partners. Reports actions taken to prevent or mitigate any business integrity violations. **Upstream operators:** In EITI implementing countries, publicly discloses all information as required by the EITI Standard, such as all material payments to governments, including taxes, royalties, and all other forms of payment of benefits, at a project level, beneficial ownership information and audited financial statements.
	Level AA	Publicly discloses audited financial statements, and where these are not available, financial items such as balance sheets, cash flows, and profit/loss statements. Publicly discloses the **beneficial ownership** of the **facility**'s shareholders, direct suppliers, and direct customers, with due regard for business confidentiality and competitive concerns. **Upstream operators:** In non-EITI implementing countries, publicly discloses all material to governments, including taxes, royalties, and all other forms of payment of benefits, at a project level in line with the EITI Standard.
	Level AAA	**Upstream operators:** In non-EITI implementing countries, publicly discloses all information required by EITI of supporting companies.
6. Provide for and cooperate in remediation related to business integrity and transparency	Level A	[98]Establishes **grievance mechanisms** for employees, **affected communities** and other third parties to lodge complaints related to business integrity and ethics violations. Investigates and records credible allegations of business integrity violations and takes appropriate remedial action. Protects complainants by ensuring they face no retaliation or **discrimination.**
	Level AA	Regularly encourages **workers** to report any concerns regarding the violation of company business integrity policies in performing their duties. Publicly discloses the number and nature of substantiated grievances raised while protecting complainant confidentiality.
	Level AAA	

ANNEXES

ANNEX I: GLOSSARY OF TERMS

Term	Definition
Action Plan	[99]Documented measures to be taken to achieve objectives/ targets and/ or mitigate identified impacts. Actions plans include identification of resources, roles responsible, steps to be taken, and timelines for completion.
Actual and Potential Risks	[100]Actual Risks - Existing, occurring impacts (e.g., ongoing pollution, active child labour). Potential Risks - Future impacts (e.g., planned mine in Indigenous territory).
Adverse Impact	[101]Any adverse effect on human rights or the environment that the Site may cause, contribute to, or to which it is directly linked. Actual adverse impacts indicate adverse effects that have already occurred or are occurring; potential adverse impacts indicate an adverse effect that might occur.
Affected Communities	[102]Affected Community: A community that is subject to potential risks or impacts from a project.
Affected Stakeholders	[103]Individuals or groups or their legitimate representatives, who have rights or interests related to the ESG issues, or who could be affected by adverse impacts associated with the Site's operations. This includes workers, workers representatives, trade unions, neighbouring landowners, land rights holders, municipalities, non-governmental organizations (NGOs), civil society organizations, and communities of interest.
Area of Influence	[104]The area within which a project may potentially directly and indirectly cause impacts. The area of direct impacts caused by mining-related activities includes the physical mine site footprint, areas adjacent to the project site that are affected by emissions and effluents, power transmission corridors, pipelines, borrow and disposal areas, etc., and the area affected by associated facilities that, although not part of the project that is being assessed, would not have been constructed in the absence of the project. Areas indirectly affected by mining-related activities include the physical footprint of non-project activities in the surrounding area that are caused or stimulated by the project plus the area affected by their emissions and effluents. This area of influence encompasses, as appropriate: • The area likely to be affected by: – the project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project; – impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or – indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent. • Associated facilities, which are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable. • Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.
Annual Review vs Policy Revision	[105]Policy revision is guided by any emerging risks in the company operations and any applicable regulatory requirements. Reviewing the policy annually doesn't necessarily mean that the policy has to be revised annually. Annual management systems and policy review is in line with OECD DDG and can be done as part of preparation for an assurance engagement, for example.
Beneficial Ownership	[106]In respect of a company means the natural person(s) who directly or indirectly ultimately owns or controls the corporate entity. The EITI standard requires that information about the identity of the beneficial owner must include: • the name of the beneficial owner; • their nationality; • their country of residence, as well as; • additionally identifying any politically exposed persons.

Term	Definition
Biodiversity	[107]The variability among living organisms from all sources, including terrestrial, marine, and other aquatic ecosystems (e.g. forests, grasslands, coral reefs, etc) and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems.
Biosphere Reserves	[108]Areas comprising terrestrial, marine and coastal ecosystems, which promote solutions reconciling the conservation of biodiversity with its sustainable use. Biosphere reserves allow for testing interdisciplinary approaches to understanding and managing changes and interactions between social and ecological systems, including conflict prevention and management of biodiversity. Biosphere reserves are nominated by national governments and remain under the sovereign jurisdiction of the states where they are located, but their status is designated by UNESCO and internationally recognised. The list can be found at: https://www.unesco.org/en/mab/map?hub=66369
Bribery	[109]Giving or receiving a financial or other advantage in connection with the "improper performance" of a position of trust, or a function that is expected to be performed impartially or in good faith.
Buffer Zone	[110]Buffer zones are clearly delineated area(s) outside a World Heritage property and adjacent to its boundaries which contribute to the protection, conservation, management, integrity, authenticity and sustainability of the Outstanding Universal Value of the property. Although buffer zones are not regarded as part of the inscribed property, their boundaries and relevant management approaches should be evaluated, approved and formally recorded at the time they are proposed by a State Party. Where buffer zones are defined, they should be seen as an integral component of the State Party's commitment to the protection, conservation and management of the World Heritage property. The functions of the buffer zone should reflect the different types and levels of protection, conservation and management needed to protect the attributes that sustain the Outstanding Universal Value of the World Heritage property.
Child Labor	[111]The employment of workers younger than 15 years old (or the legal minimum age defined by the country) directly or through agencies and contractors and/or the employment of workers younger than 18 who are subjected to hazardous work, overtime, or night shifts.
Carbon Offsets	[112]Investment in in environmental projects, such as tree planting, REDD, renewable energy, energy conservation and methane capture, with the goal of reducing the overall carbon dioxide in the atmosphere.
Competent Professionals	[113]In-house staff or external consultants with relevant education, knowledge, proven experience, and necessary skills and training to carry out the required work. Competent professionals would be expected to follow scientifically robust methodologies that would withstand scrutiny by other professionals. Other equivalent terms used may include: competent person, qualified person, qualified professional. Competent professionals are expected to follow scientifically robust methodologies to carry out their work.
Community development	[114]Community development: "a process where community members come together to take collective action and generate solutions to common problems" (Community life risk category from EUBR references UN definitions)
Conflict-Affected or High Risk Areas (CAHRAs)	[115]Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, e.g. a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterised by widespread human rights abuses and violations of national or international law.
Contractors / sub-contractors	[116]ISO defines a contractor as any organization or individual that performs work for an organization. This includes consultants, specialists, and other service providers.
Credible Information	[117]Credible information: Information that, considering its source and the surrounding circumstances, supports a reasonable belief that an event has occurred or will occur.

Term	Definition
Cultural Heritage	[118]Customs, practices, places, objects, artistic expressions and values. Cultural heritage can further be categorised as critical, replicable or tangible: **Critical cultural heritage:** This includes cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual impacts of affected Indigenous Peoples' lives. It includes natural areas with significant cultural and/or spiritual value such as sacred groves, sacred bodies of water and waterways, sacred trees and sacred rocks It is defined as either (i) the internationally recognised heritage of communities that use or have used within living memory the cultural heritage for longstanding cultural purposes; or (ii) legally protected cultural heritage areas, including those proposed by host governments for such designation. Co-identifying these areas of critical cultural heritage on a project-by-project basis and in consultation with affected Indigenous Peoples is an integral step in understanding their spiritual, cultural or historical significance and value. **Tangible cultural heritage:** A unique and often non-renewable resource that possesses cultural, scientific, spiritual, or religious value, and are considered worthy of preservation for the future. Includes moveable or immovable objects, sites, structures, groups of structures, natural features, or landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural value. **Intangible cultural heritage:** Knowledge, innovations and/or practices, including oral expressions of folklore, performing arts, rituals, and festivals that are inherited from past generations, maintained in the present, and bestowed for the benefit of future generations. **Replicable cultural heritage:** Tangible forms of cultural heritage that can themselves be moved to another location or that can be replaced by a similar structure or natural features to which the cultural values can be transferred by appropriate measures. Archaeological or historical sites may be considered replicable where the particular eras and cultural values they represent are well represented by other sites and/or structures.
Debt Bondage	[119]Work undertaken by a worker who mortgages his or her services or those of family members to someone providing credit to repay a loan or advance. [CopperMark RRA; page 218]
Discrimination	[120]Discrimination occurs when a person is treated less favorably than others because of characteristics that are not related to the person's competencies or the inherent requirements of the job. All workers and job seekers have the right to be treated equally, regardless of any attributes other than their ability to do the job. Prohibited bases of discrimination can include age, caste, disability, ethnic, and/or national origin, gender, membership in free and independent workers' organizations including free and independent unions, political affiliation, race, religion, sexual orientation, marital status, family responsibilities, social background, and other personal characteristics.
Diversity	[121]Diversity, equity and inclusion are three interconnected values that organizations strive to integrate into their practices and cultures to promote a more inclusive and fair environment.
Double Materiality: Salient and Material Risks	[122]Material risks - Risks with significant financial/reputational impact on the company or severe environmental/social consequences. Salient risks - Risks most critical to stakeholders (workers, communities, investors) based on severity, scale, and irremediability.
Due Diligence	[123]Due diligence is the process enterprises should carry out to identify, prevent, mitigate and account for how they address these actual and potential adverse impacts in their own operations, their supply chain and other business relationships, as recommended in the OECD Guidelines for MNEs.
Ecosystem Services	[124]The benefits people obtain from ecosystems. These include provisioning services such as food, water, timber, and fibre; regulating services that affect climate, floods, disease, wastes, and water quality; cultural services that provide recreational, aesthetic, and spiritual benefits; and supporting services such as soil formation, photosynthesis, and nutrient cycling.
Energy Efficiency	[125]Energy Efficiency means the ratio of output of performance, service, goods or energy to input of energy, in other words the practice of using less energy to provide the same amount of useful output from a service.

Term	Definition
Equity	[126]The process of being fair to all individuals and groups, by addressing present and historical inequality in order to work towards equality in outcomes. Equity may involve the use of temporary special measures to compensate for the historical and systemic bias and discrimination faced by marginalized groups. Systems, institutions, policies and programming may be described as equitable or inequitable depending on their approach to addressing inequality. Generally speaking, equity is a means to the goal of equality.
EU Batteries Regulation Annex X Risks	[127]The risk categories identified in Annex X of the EU Batteries Regulation are: a) Environment, Climate and Human Health, Considering Direct, Induced, Indirect and Cumulative Effects, including: i) air, including air pollution such as greenhouse gas emissions, (ii) water, including seabed and marine environment, and including water pollution, water use, water quantities (flooding or droughts) and access to water, (iii) soil, including soil pollution, soil erosion, land use and land degradation, (iv) biodiversity, including damage to habitats, wildlife, flora and ecosystems, including ecosystem services, (v) hazardous substances, (vi) noise and vibration, (vii) plant safety, (viii) energy use, (ix) waste and residues; b) Human Rights, Labour Rights and Industrial Relations, including: (i) occupational health and safety, (ii) child labour, (iii) forced labour, (iv) discrimination, (v) trade union freedoms; c) Community Life, including that of Indigenous Peoples
Facility	[128]Facility: A singular location of a company
Forced Labour	[129]Any work or service not voluntarily performed that is exacted or coerced from an individual under threat of force or penalty including: • bonded labor (debt bondage) or similar labour-contracting arrangements required to pay off a debt • exploitative or involuntary prison labour • indentured labour • isolation • restriction of movement • slavery or slavery-like practices. Forced labour also includes exploitative recruitment practices, such as: • abuse of vulnerability • abusive working and living conditions • deception • excessive monetary deposits • excessive notice periods • excessive overtime • loss or delay of wages that prevent workers from voluntarily ending employment within their legal rights • recruitment fees • retention of documents • substantial or inappropriate fines.
Free, Prior and Informed Consent	[130]Comprises a process, and an outcome (for a point in time); through this process Indigenous Peoples are: (i) able to freely make decisions without coercion, intimidation or manipulation; (ii) given sufficient time to be involved in decision-making before key decisions are made and impacts occur; and (iii) fully informed about proposed activities and their potential impacts and benefits. The outcome is that Indigenous Peoples can collectively grant or withhold their consent (demonstrated in an agreement) for a specified activity as part of a given decision-making process. These decision-making processes for proposed activities should be based on good faith negotiation, while striving to be consistent with Indigenous Peoples' traditional decision-making processes and respecting internationally recognised human rights.

Term	Definition
Greenhouse Gas Emissions	[131]Emissions of any of the 7 greenhouse gases (GHG) as defined by the Kyoto Protocol: carbon dioxide (CO_2), hydrofluorocarbons (HFCs), methane (CH_4), nitrous oxide (N_2O), nitrogen trifluoride (NF_3), perfluorocarbons (PCFs) and sulphur hexafluoride (SF_6), expressed in units of CO_2 equivalent (CO_2-eq). GHG emissions can be categorised as scope 1, 2, 3 or 4. Scope 1 (direct GHG emissions): GHG emissions occur from sources that are owned or controlled by the company. Examples include emissions from combustion in owned or controlled boilers, furnaces, vehicles, etc; emissions from chemical production in owned or controlled process equipment. Scope 1 emissions do not include emissions resulting from the combustion of biomass. Scope 2 (indirect GHG emissions): GHG emissions from the generation of electricity consumed by the company that physically occur at the facility where electricity is generated. Scope 3 (other indirect GHG emissions): emissions that are a consequence of the activities of the company, but occur from sources not owned or controlled by the company. For example, the extraction and production of purchased materials, transportation of purchased fuels, or the use of sold products and services.
Grievance Mechanism	[132]State-based or non-state-based processes through which grievances concerning business-related human rights impacts can be raised and remedy can be sought. UNGP core requirements for grievance mechanisms: Legitimate, Accessible, Predictable, Equitable, Transparent, Rights-Compatible, Source of Continuous Learning.
Harassment	[133]A range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, including bullying, gender-based or sexual violence, and racism.
Hazardous Materials	[134]Substances and mixtures posing physical, health, and environmental hazards, including hasardous waste.
Hazardous Work (for Children)	[135]Work that can be hazardous for children can include, but not be limited to: • exposure to physical, psychological or sexual abuse; • work underground, under water, at dangerous heights or in confined spaces; • work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; • work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations damaging to their health; • work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer.
Health and Safety Control Hierarchy	[136]A method for controlling health and safety risks: • Eliminate the hazard by removing or modifying the activity causing it • Control the hazard at the point where it starts; and Minimize the hazard by designing safe work systems and/or taking administrative or institutional measures (for example, by providing training or communication materials on safe work procedures, monitoring the workplace, limiting exposure or working hours, or promoting job rotation).
Human Trafficking	[137]The recruitment, transportation, transfer, harbouring or receipt of a person by means of the threat or use of force or other means of coercion, or by abduction, fraud, deception, abuse of power or of a position of vulnerability, or by the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation includ es, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. Women and children are particularly vulnerable to trafficking practices. (IRMA Standard 2018, page 201]
Inclusive / Inclusion	[138]This term refers to processes that include all types of stakeholders, such as men, women, the elderly, youth, displaced persons, Indigenous Peoples, vulnerable and disadvantaged persons or groups, without discrimination.

Term	Definition
Indigenous Peoples	[139]An official definition of "indigenous" has not been adopted by the UN system due to the diversity of the world's indigenous peoples. Instead, a modern and inclusive understanding of "indigenous" includes peoples who: identify themselves and are recognized and accepted by their community as indigenous; demonstrate historical continuity with pre-colonial and/or pre-settler societies; have strong links to territories and surrounding natural resources; have distinct social, economic or political systems; maintain distinct languages, cultures and beliefs; form non-dominant groups of society; and resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities. In some regions, there may be a preference to use other terms such as: tribes, first peoples/nations, aboriginals, ethnic groups, Adivasi and Janajati. All such terms fall within this modern understanding of "indigenous." Various similar terms are used interoperably in contexts concerning Indigenous Peoples, including aboriginal, ethnic minorities, First Nations etc, some of which may not be explicitly recognised in national law. The United Nations Permanent Forum on Indigenous Issues highlights that the fundamental criterion of self-identification of Indigenous Peoples is more important than the issue of defining Indigenous Peoples when engaging with supply chain stakeholders.
Indirect Workers	[140]Employees of third-party providers (e.g., temp agencies, service firms) embedded in company operations.
IUCN Protected Categories	[141]The International Union for Conservation of Nature (IUCN) defines a protected area as, "a clearly defined geographical space, recognised, dedicated and managed, through legal or other effective means, to achieve the long-term conservation of nature with associated ecosystem services and cultural values." The IUCN distinguishes 6 categories of protected areas as follows, with categories I-IV representing protected areas with a strong focus on biodiversity conservation and the restriction of human activities to protect natural ecosystems: • Ia - Strict Nature Reserve: strictly protected for biodiversity and also possibly geological/ geomorphological features, where human visitation, use and impacts are controlled and limited to ensure protection of the conservation values. • Ib - Wilderness Area: Usually large unmodified or slightly modified areas, retaining their natural character and influence, without permanent or significant human habitation, protected and managed to preserve their natural condition. • II - National Park: Large natural or near-natural areas protecting large-scale ecological processes with characteristic species and ecosystems, which also have environmentally and culturally compatible spiritual, scientific, educational, recreational and visitor opportunities. • III - Natural Monument or Feature: Areas set aside to protect a specific natural monument, which can be a landform, sea mount, marine cavern, geological feature such as a cave, or a living feature such as an ancient grove. • IV - Habitat/species Management Area: Areas to protect particular species or habitats, where management reflects this priority. Many will need regular, active interventions to meet the needs of particular species or habitats, but this is not a requirement of the category. • V - Protected Landscape or Seascape: Where the interaction of people and nature over time has produced a distinct character with significant ecological, biological, cultural and scenic value: and where safeguarding the integrity of this interaction is vital to protecting and sustaining the area and its associated nature conservation and other values. • VI - Protected Areas with Sustainable Use of Natural Resources: Areas which conserve ecosystems, together with associated cultural values and traditional natural resource management systems. Generally large, mainly in a natural condition, with a proportion under sustainable natural resource management and where low-level non-industrial natural resource use compatible with nature conservation is seen as one of the main aims.
Living Wage	[142]Living wage is defined as the remuneration received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs, including provision for unexpected events. According to the Anker methodology, a living wage can be calculated as: Cost of basic but decent life for reference size family (food, housing, essential needs, small margin for unforeseen events) divided by the number of full-time workers per family.

Term	Definition
Management System	[143]A set of documented policies, processes and procedures that set out the tasks required by a company to achieve its objectives and improve performance over time by carrying out repeatable steps to be implemented by management and staff.
Material Payments	[144]Important or relevant revenue streams that are of material benefit to a company, according to the EITI, material benefit streams are whose omission, or misstatement could materially affect an EITI report. It is typically the responsibility of the national multi-stakeholder group to decide how to define material in quantitative or qualitative terms.
Meaningful Engagement	[145]Entering consultation and providing resources for stakeholder group(s) to reach consensus with supply chain operators as to how shared resources should be managed. Within the context of Indigenous Peoples, meaningful engagement should take place within existing Indigenous Peoples' governance structures.
Mine Waste	[146]2 types of mining waste: i) waste from processing ore into a concentrate; ii) soil & rock removed during mining that will not be processed for minerals e.g. sub-economic ore, waste rock etc. Waste from mining include: • Air pollutants (particulate matter e.g. fugitive dust from mineral processing, transport) • Acid rock drainage (ARD) • Diesel particulate matter (DPM) in underground mining operations • Leachates (e.g. cyanide, mercury) • Mining wastes (e.g. overburden, waste rock) • Mineral processing wastes (e.g. slag) • Tailings
Mitigation Hierarchy	[147]Framework used in environmental and social impact management in which adverse impacts are prioritised and addressed in the following hierarchical order: i) Prevention ii) Minimisation iii) Restoration / rehabilitation iv) Compensation
Money Laundering	[148]The process by which proceeds from a criminal activity are disguised to conceal their illicit origins.
Nature-based solutions	[149]Nature-based Solutions leverage nature and the power of healthy ecosystems to protect people, optimise infrastructure and safeguard a stable and biodiverse future. They address societal challenges through actions to protect, sustainably manage, and restore natural and modified ecosystems, benefiting people and nature at the same time. They target major challenges like climate change, disaster risk reduction, food and water security, biodiversity loss and human health, and are critical to sustainable development.
OECD Annex II Risks	[150]Annex II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas identified the following categories as the most serious supply chain risks to be addressed: • Serious human rights abuses, including: i) Any forms of torture, cruel, inhuman and degrading treatment; ii) Any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered himself voluntarily; iii) The worst forms of child labour; iv) Other gross human rights violations and abuses such as widespread sexual violence; v) War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide • Direct or indirect support to non-state armed groups, public or private security forces who: i) Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain; ii) Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; and / or iii) Illegally tax or extort intermediaries, export companies or international traders. • Bribery and fraudulent misrepresentation of the origin of minerals; • Money laundering; • Payment of taxes, fees and royalties due to governments

Term	Definition
Pollution (incomplete, working definition)	[151]Introduction of harmful contaminants into the environment. Different forms of pollution include: • Air: pollutants that may be released into the air with potential to cause adverse impacts on the environment. This includes odour pollution, particulate matter (PM), sulphur oxides (SOx), nitrogen oxides (NOx), persistent organics pollutants (POPs) volatile organic compounds (VOCs), and ozone depleting substances (ODS).; • Land and soil heavy metals like lead and mercury, pesticides, herbicides, chemical fertilizers, industrial waste, plastic waste, petroleum products, mining waste, garbage, sewage, and certain types of bacteria and pathogens, all of which can contaminate the soil when present in excessive amounts, impacting plant growth and potentially harming human health when ingested by animals or humans through the food chain; • Light / visual (intermittent lighting from buildings, visibility reduction due to built features); • Noise and vibration (controlled explosions or heavy machinery); • Radioactive/radiological pollution occurs when living organisms and their environment are exposed to unintended or undesirable radiation from radioactive elements, for example low grade radioactive waste from mineral production and processing - NARM (Naturally Occurring Radioactive Materials) or TENORM (Technologically Enhanced Naturally Occurring Radioactive Materials); • Water: harmful substances—often chemicals or microorganisms—contaminate a stream, river, lake, ocean, aquifer, or other body of water, degrading water quality and rendering it toxic to humans or the environment. This includes POPs, sediment, sludge, sewage, industrial wastewater, stormwater runoff, and uncontrolled releases
Psychological Health	[152]Psychological health in the workplace is defined in international literature as the ability to think, feel and behave in a manner that enables workers to perform effectively. Psychological safety in the workplace is defined as the risk of injury to the psychological wellbeing of a worker.
Ramsar Site	[153]Wetlands that either contain a representative, rare or unique wetland type, or are of international importance for conserving biological diversity. These sites are included in the Ramsar List of Wetlands of International Importance due to their international significance in terms of botany, ecology, hydrology, limnology or zoology.
Recruitment Fees	[154]Any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.
Recycled Metal	[155]Reclaimed end-user or post-consumer products, or scrap processed metals created during product manufacturing. Recycled metal includes excess, obsolete, defective, and scrap metal materials which contain refined or processed metals that are appropriate to recycle in the production of tin, tantalum, tungsten and / or gold. Minerals partially processed, unprocessed or a by-product from another ore are not recycled metals.
Remediation	[156]Processes of restoring an affected person or persons (or the environment) to the situation it or they would be in had the adverse impact not occurred.
Rights Holders	[157]Rightsholders are individuals or social groups that have particular entitlements in relation to specific duty bearers (e.g., state or non-state actors that have a particular obligation or responsibility to respect, promote and realise human rights and abstain from human rights violations). In general terms, all human beings are rights-holders under the Universal Declaration of Human Rights. In particular contexts, there are often specific social groups whose human rights are not fully realised, respected or protected.
Risk-based Approach	[158]Prioritisation of action to manage risk through identifying and prioritising the most severe and likely risks. In determining how to prioritise risks, the severity of the actual or potential adverse impact takes precedence over likelihood.
Scope 1, 2 and 3 emissions	[159]Scope 1: The direct GHG emissions from sources owned or controlled by the Site including stationary combustion, mobile combustion, process emissions and fugitive emissions. Scope 2: The indirect GHG emissions that result from the generation of purchased or acquired electricity, heating, cooling, and steam consumed by the Site. Scope 3: The sub-categories of indirect GHG emissions that occur outside of the facility's control, from sources upstream and downstream within their supply chain owned or controlled by others. This includes emissions from transportation of supplies and end products and emissions produced in the manufacturing of an input to the main production process

Term	Definition
Social Partners	[160]Social partners: representatives of employers and workers, usually employer organisations and trade unions. Social partners are the representatives of labour (trade unions, worker representatives) and capital (individual companies, employer associations) who negotiate binding rules for workplaces including collective bargaining agreements, at the national, regional, industry-specific, or company-level. Their role is designed to balance worker protections with business flexibility.
Stakeholder	[161]Any individual, group of individuals or organisation, or their legitimate representatives, such as interest groups, government agencies or corporate entities who have rights or interests related to a facility's operations that are or could be affected by adverse impacts associated with the Facility's operations. They could include politicians, commercial and industrial enterprises, labour unions, academics, religious groups, national social and environmental groups, public sector agencies, the media and communities. Legitimate representatives include trade unions, as well as civil society organisations and others with experience and expertise related to business impacts on human rights.
Supply Chain Upstream	Includes facilities that carry out mining, beneficiation or processing of minerals or metals up to but not including smelting or refining.
Supply Chain Midstream	Includes facilities that carry out smelting or refining of minerals or metals (also referred to as Pinch Point by the OECD); recycling aggregators, or; the production of input chemicals for manufacturing. Within the context of battery supply chains, this includes the manufacture of anode active material (AAM), cathode active material (CAM) or electrolytes.
Supply Chain Downstream	Includes facilities that carry out (original equipment manufacturer) OEM manufacturing, assembly, and production and sale/distribution of final ready-for-market products. Within the context of battery supply chains this includes the production of anodes / cathodes, battery cell / module manufacturing, assembly of batteries and final product manufacture e.g. electric vehicles.
Tailings	[162]A by-product of mining, consisting of the processed rock or soil left over from the separation of the commodities of value from the rock or soil within which they occur. The waste stream resulting from milling and mineral concentration processes that are applied to ground ore (i.e., washing, concentration, and/or treatment). Tailings are typically sand to clay-sized materials considered too low in mineral values to be treated further. They are usually discharged in slurry form to a final storage area commonly referred to as a tailings storage facility (TSF) or tailings management facility (TMF).
Vulnerable Groups	[163]Groups that are characterized by their higher risk and reduced ability to cope with adverse impacts. Such vulnerability may be based on socio-economic conditions, such as sex, gender, age, disability, ethnicity, religion, or other criteria that influence people's ability to access resources and development opportunities.
Waste	[164]Discarded material at operational facilities for which it is not economically or technically feasible to re-integrate into production processes such as effluents, which must either be disposed of or recycled. Additionally includes on-site wastes such as that from sewage treatment facilities.
Waste Mitigation Hierarchy	[165]Framework applied to waste management systems wherein actions taken to manage waste are taken in the following order: • Prevention • Reduction / reuse • Recycling • (Energy) recovery • Treatment/disposal
Worker	[166]Personnel that are directly employed by the Facility, or organization. This includes employees, workers employed via service providers, labour agencies, or third parties.
World Heritage Site (including Buffer Zones)	[167]A site or property inscribed on the UNESCO World Heritage List, which has outstanding universal value and meets the conditions of authenticity and integrity. The World Heritage property includes within its borders all of the attributes that are recognized as being of outstanding universal value, with the 1972 World Heritage Convention defining the kind of natural or cultural sites which can be considered for inscription on the World Heritage List. The current World Heritage List can be found here: https://whc.unesco.org/en/list/

Term	Definition
Worst Forms of Child Labour	[168]The worst forms of child labour comprises: • all forms of slavery or practices similar to slavery, such as the sale and trafficking of children, debt bondage and serfdom and forced or compulsory labour, including forced or compulsory recruitment of children for use in armed conflict; • the use, procuring or offering of a child for prostitution, for the production of pornography or for pornographic performances; • the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties; • work which, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety, wellbeing or morals of children.

Annex II: Standard Recognition Framework

This framework complements the Assurance escalator and the Scoring principles, by differentiating between Voluntary Sustainability Standards recognised in the Battery Passport framework, based on their governance, management, assurance processes, etc. “credibility criteria”. These criteria are a draft set drawn upon other similar benchmarks[169] as subsequently developed and agreed-upon by the GBA’s Working Group, for the purposes of the Beta version and the Operational Trials. The standard setters have provided their self-assessments against the criteria, which the GBA has subsequently calibrated across the standards and other benchmarkings.

Benchmarking Area	Level	Criteria * Minimum level for recognition in the Battery Passport framework	ASI	ICMM	IRMA	Copper Mark Criteria Guide	Copper Mark JDDS	TSM	RMI Facility Standard	RMI RMAP+ SCDDP	RMI RMAP All Minerals
1. Assurance & oversight, independence of auditors	Level 1	Self-assessment (1st party audit)									
	Level 2	2nd party audit by independent auditor									
	Level 3*	3rd party audit by independent auditor with oversight system in place	X[170]	X[171]	X[172]	X[173]	X[174]	X[175]	X[176]	X[177]	X[178]
2. Quality and intensity of audits	Level 1	Self-assessment, no support to auditors									
	Level 2*	Document analysis, assistance and guidance available to auditors		X[179]							
	Level 3	Site-level inspections, assistance and training available to auditors	X[180]		X[181]	X[182]	X[183]	X[184]	X[185]	X[186]	X[187]
3. Governance	Level 1	Industry governance only		X[188]							
	Level 2*	Multi-stakeholder advisory committee or other structured engagement	X[189]			X[190]	X[191]	X[192]	X[193]	X[194]	X[195]
	Level 3	Full, equal multi-stakeholder governance			X[196]						
4. Transparency of audit results	Level 1	Available to controlling bodies		X[197]							
	Level 2*	Summaries available to the public, details passed down the supply chain for due diligence.							X[198]	X[199]	X[200]
	Level 3	Structure, processes, content and results of audits publicly available	X[201]		X[202]	X[203]	X[204]	X[205]			
5. ISEAL membership / alignment[206]	Level 1*	No		X					X	X	X
	Level 2	ISEAL Community Member			X	X	X	X			
		ISEAL Code compliant	X								
6. Impact and continuous improvement	Level 1	None		X[207]							
	Level 2*	KPIs and continuous improvement	X[208]							X[209]	X[210]
	Level 3	Different performance levels, improvement over time required			X[211]	X[212]	X[213]	X[214]	X[215]		
7. Involvement of affected populations	Level 1	No involvement		X							
	Level 2*	Ad hoc involvement/consultation of affected populations and other stakeholders							X[216]	X[217]	X[218]
	Level 3	Systematic consultation of affected parties within the audit process	X[219]		X[220]	X[221]	X[222]	X[223]			
8. Complaints / grievance mechanism	Level 1	Complaints/dispute resolution mechanism available		X[224]							
	Level 2*	Complaints mechanism with whistleblowing protection available									
	Level 3	Access to complaints mechanism in local language, and proactive engagement of those affected incl. publication of summaries of grievances	X[225]		X[226]	X[227]	X[228]	X[229]	X[230]	X[231]	X[232]
9. OECD alignment assessed (supply chain due diligence standards only)	Level 1*	No		N/A	N/A[233]	N/A		N/A	N/A	X	
	Level 2	Undergoing alignment assessment	X[234]								
	Level 3	Assessed					X[235]				X[236]
10. Coherence, cooperation and openness	Level 1	No active promotion of coherence/openness to share and review documents									
	Level 2*	Cooperation with standard setting bodies, openness for review, open access to documents		X[237]					X[238]	X[239]	
	Level 3	Active promotion of cross-recognition, interoperability and coherence	X[240]		X[241]	X[242]	X[243]	X[244]			X[245]

Annex III: Summary Standard Mapping

This table provides a reference guide of the coverage of the benchmarked and other standards across the reporting modules. A detailed mapping against the provisions of the standards will be made available for GBA members and other companies participating in the Operational Trials.

Please refer to the methodological notes on standard mapping: The GBA has applied an “inclusive” approach to benchmarking, focusing on a broadly similar intent of the standard, rather than a literal approach of “equivalency”, acknowledging that standards differ in level of detail and organisation of requirements. This approach has in most cases allowed avoiding “partial equivalency”. However, in limited instances where standards’ coverage of the underlying international frameworks or substantive GBA expectations differ, partial equivalency has been used to indicate this. Level A focuses but is not strictly limited to core / critical requirements of those standards that have such requirements. In most cases, standards’ feedback has led to revision of the mapping.

Most benchmarked Standard setting organisations have reviewed the benchmarkings in part or in full – please refer to the standard-specific notes. Due to the GBA’s multi-stakeholder Working Group’s role in the benchmarking on a consensus-based process, in limited instances, the GBA has maintained the Working Group’s consensus decision over the standard setters’ review. Vice versa, in some instances where the standard setters’ review has been consistent with the methodology described above, the GBA Secretariat has not taken action on some Working Group members’ recommendations for the sake of consistency.

Legend	X	GBA Benchmark covered by respective standard
	–	GBA Benchmark partially covered by the respective standard: Due diligence standards: Partial scope of ESG risks, e.g. OECD Annex II (CopperMark JDDS, RMI RMAP+ SCDDP, ASI) or Human Rights only (IRMA) Other standards: Partial coverage of GBA benchmark
	AAA	No associated Level AAA GBA benchmark has been developed (for the 2025 Beta Release)

		Regulations and international frameworks					Recognised Voluntary Sustainability Standards								Other Mapped Standards[246]									
Due diligence step	**Benchmark level**	**EU Batteries Regulation (2023)**	**EU Conflict Minerals Regulation (2017)**	**EU Forced Labour Regulation (2024)**	**Canada Supply Chain Forced & Child Labour Act (2023)**	**Uyghur Forced Labor Prevention Act (2022)**	**ASI Performance Standard v3.1 (2023)[247]**	**CopperMark/RMI RRA Criteria Guide (2023)[248]**	**IRMA Standard for Responsible Mining (2018)**	**RMI Facility Standard 2025**	**TSM (2021-2024)**	**Copper Mark JDDS (2022)**	**RMI RMAP All Minerals (2022)**	**RMI Supply Chain Due Diligence Plus (2025)**	**ICMM Mining Principles (2024)[249]**	**EITI Standard (2023)**	**GRI 101 - Biodiversity (2024)**	**CCCMC Due Diligence Guidance v2 (2022)**	**CCCMC Mining Investment Social Guidelines (2017)**	**GISTM (2020)**	**ISO 05100: Energy management systems**	**ISO 14001: 2015 Environmental Management Systems (EMS)**	**ISO 26000 Guideline for Social Responsibility**	**ISO 45001 OHS (2018)**
SUPPLY CHAIN DUE DILIGENCE																								
1. Embed supply chain due diligence into policies and management systems	A	x	x				–	x	–			–	–	x				–						
	AA	x										–	–	x				–						
	AAA							x				–	–	x										
2. Identify and assess risks and actual and potential adverse impacts to responsible business conduct and human rights in battery supply chains	A	x	x				–	x	–			–	–	x				–						
	AA							x	–			–	–	x				–						
	AAA											–	–	x										
3. Cease, prevent and mitigate adverse impacts in supply chains	A	x						x	–			–	–	x				–						
	AA							x	–			–	–	x				–						
	AAA																	–						
4. Track supply chain due diligence implementation and results	A	x						x	–			–	–	x				–						
	AA											–	–	x				–						
	AAA													x										
5. Communicate how externally relevant information on due diligence processes, activities conducted and findings resulting from them to external stakeholders	A	x						x	–			–	–	x				–						
	AA							x				–	–	x				–						
	AAA																							
6. Provide for and cooperate in remediation of risks in the value chain	A	x					–	x	–			–	–	x				–						
	AA							x	–			–		x				–						
	AAA							x	–			–		x										

		Regulations and international frameworks					Recognised Voluntary Sustainability Standards								Other Mapped Standards[246]									
Due diligence step	**Benchmark level**	**EU Batteries Regulation (2023)**	**EU Conflict Minerals Regulation (2017)**	**EU Forced Labour Regulation (2024)**	**Canada Supply Chain Forced & Child Labour Act (2023)**	**Uyghur Forced Labor Prevention Act (2022)**	**ASI Performance Standard v3.1 (2023)[247]**	**CopperMark/RMI RRA Criteria Guide (2023)[248]**	**IRMA Standard for Responsible Mining (2018)**	**RMI Facility Standard 2025**	**TSM (2021-2024)**	**Copper Mark JDDS (2022)**	**RMI RMAP All Minerals (2022)**	**RMI Supply Chain Due Diligence Plus (2025)**	**ICMM Mining Principles (2024)[249]**	**EITI Standard (2023)**	**GRI 101 - Biodiversity (2024)**	**CCCMC Due Diligence Guidance v2 (2022)**	**CCCMC Mining Investment Social Guidelines (2017)**	**GISTM (2020)**	**ISO 05100: Energy management systems**	**ISO 14001: 2015 Environmental Management Systems (EMS)**	**ISO 26000 Guideline for Social Responsibility**	**ISO 45001 OHS (2018)**
RISK AND SUSTAINABILITY MANAGEMENT SYSTEMS																								
1. Embed environmental, social and governance risk management and impact assessment into policies and management systems	A	x					x	x	x	x	–				x							x		
	AA						x	x	x	x												x		
	AAA																							
2. Identify and assess actual and potential adverse ESG impacts associated with the enterprise's operations, products or services	A	x					x	x	x	x	x				x							x		
	AA							x	x	x														
	AAA																							
3. Cease, prevent and mitigate adverse ESG impacts	A	x						x	x	x	–											x		
	AA								x	x					x									
	AAA									x														
4. Track implementation and results of responses to ESG risks and impacts	A	x					x	x	x	x	x				x									
	AA						x			x	–													
	AAA																							
5. Communicate how identified adverse ESG impacts are addressed	A	x					x	x	x	x	–				x									
	AA						x	x	x	x														
	AAA																							
6. Provide for and cooperate in remediation of adverse ESG impacts caused or contributed to when appropriate	A	x					x	x	x	x					x									
	AA								x	x					x									
	AAA									x														

		Regulations and international frameworks					Recognised Voluntary Sustainability Standards								Other Mapped Standards[246]									
Due diligence step	**Benchmark level**	**EU Batteries Regulation (2023)**	**EU Conflict Minerals Regulation (2017)**	**EU Forced Labour Regulation (2024)**	**Canada Supply Chain Forced & Child Labour Act (2023)**	**Uyghur Forced Labor Prevention Act (2022)**	**ASI Performance Standard v3.1 (2023)[247]**	**CopperMark/RMI RRA Criteria Guide (2023)[248]**	**IRMA Standard for Responsible Mining (2018)**	**RMI Facility Standard 2025**	**TSM (2021-2024)**	**Copper Mark JDDS (2022)**	**RMI RMAP All Minerals (2022)**	**RMI Supply Chain Due Diligence Plus (2025)**	**ICMM Mining Principles (2024)[249]**	**EITI Standard (2023)**	**GRI 101 - Biodiversity (2024)**	**CCCMC Due Diligence Guidance v2 (2022)**	**CCCMC Mining Investment Social Guidelines (2017)**	**GISTM (2020)**	**ISO 05100: Energy management systems**	**ISO 14001: 2015 Environmental Management Systems (EMS)**	**ISO 26000 Guideline for Social Responsibility**	**ISO 45001 OHS (2018)**
STAKEHOLDER ENGAGEMENT																								
1. Embed stakeholder engagement into policies and management systems	A	x						x	x	x	x				x									
	AA							x	x		x													
	AAA																							
2. Identify stakeholders and assess actual and potential adverse impacts to stakeholders associated with the enterprise's operations, products or services	A	x					x	x	x	x	x				x									
	AA							x	x		x													
	AAA																							
3. Engage stakeholders in ceasing, preventing and mitigating adverse impacts	A	x					x	x	x	x	x				x									
	AA							x	x	x	x													
	AAA								x		x													
4. Track implementation and results of stakeholder engagement	A	x					x	x	x	x	x													
	AA								x		x				x									
	AAA																							
5. Communicate on how stakeholders are engaged, including how adverse are addressed	A	x					x	x	x	x	x				x									
	AA																							
	AAA																							
6. Engage stakeholders in providing for and cooperating in remediation of adverse stakeholder impacts caused or contributed to when appropriate	A	x					x	x	x	x	x				x									
	AA							x	x	x	x													
	AAA																							

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GHG AND ENERGY EFFICIENCY																								
1. Embed GHG emission and energy use into policies and management systems	A	x						x	x	x	x										x			
	AA							x		x	x				x						x			
	AAA							x		x														
2. Identify and assess GHG emission and energy use of the enterprise's operations	A	x					x	x	x	x	x										x			
	AA						x	x		x	x													
	AAA																							
3. Implement GHG emission and energy use reduction plan	A	x						x	x	x	x				x						x			
	AA							x		x	x													
	AAA									x														
4. Track GHG emission and energy use reduction implementation and results	A	x						x	x	x	x										x			
	AA									x	x													
	AAA																							
5. Communicate GHG emission and energy use reduction performance	A						x	x	x	x	x				x						x			
	AA						x	x	x	x	x										x			
	AAA																							
Step 6 is currently not included in the GHG Emissions & Energy Efficiency rulebook as it may not be applicable for the nature of GHG emissions and energy efficiency improvements.	A																							
	AA																							
	AAA																							

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Due diligence step	**Benchmark level**	**EU Batteries Regulation (2023)**	**EU Conflict Minerals Regulation (2017)**	**EU Forced Labour Regulation (2024)**	**Canada Supply Chain Forced & Child Labour Act (2023)**	**Uyghur Forced Labor Prevention Act (2022)**	**ASI Performance Standard v3.1 (2023)[247]**	**CopperMark/RMI RRA Criteria Guide (2023)[248]**	**IRMA Standard for Responsible Mining (2018)**	**RMI Facility Standard 2025**	**TSM (2021-2024)**	**Copper Mark JDDS (2022)**	**RMI RMAP All Minerals (2022)**	**RMI Supply Chain Due Diligence Plus (2025)**	**ICMM Mining Principles (2024)[249]**	**EITI Standard (2023)**	**GRI 101 - Biodiversity (2024)**	**CCCMC Due Diligence Guidance v2 (2022)**	**CCCMC Mining Investment Social Guidelines (2017)**	**GISTM (2020)**	**ISO 05100: Energy management systems**	**ISO 14001: 2015 Environmental Management Systems (EMS)**	**ISO 26000 Guideline for Social Responsibility**	**ISO 45001 OHS (2018)**
BIODIVERSITY																								
1. Embed preservation of biodiversity and ecosystem services into policies and management systems	A	x					x	x	x	x	x				x		x					x		
	AA							x		x	x						x					x		
	AAA							x			x													
2. Identify and assess actual and potential adverse impacts to biodiversity and ecosystem services associated with the enterprise's operations, products or services	A	x					x	x	x	x	x						x					x		
	AA							x	x	x	x						x					x		
	AAA								x		x				x									
3. Cease, prevent, rehabilitate, restore and offset adverse impacts to biodiversity and ecosystem services	A	x						x	x	x	x				x		x					x		
	AA							x	x	x	x						x							
	AAA										x						x							
4. Track implementation and results of biodiversity and ecosystem services conservation	A	x						x	x	x	x											x		
	AA							x	x	x	x						x					x		
	AAA										x													
5. Communicate how biodiversity and ecosystem services impacts are addressed	A	x						x	x	x	x						x					x		
	AA							x		x	x						x							
	AAA									x	x													
6. Provide for and cooperate in remediation of adverse biodiversity impacts caused or contributed to	A	x							x	x	x						x					x		
	AA									x	x													
	AAA							x																

		Regulations and international frameworks					Recognised Voluntary Sustainability Standards								Other Mapped Standards[246]									
Due diligence step	**Benchmark level**	**EU Batteries Regulation (2023)**	**EU Conflict Minerals Regulation (2017)**	**EU Forced Labour Regulation (2024)**	**Canada Supply Chain Forced & Child Labour Act (2023)**	**Uyghur Forced Labor Prevention Act (2022)**	**ASI Performance Standard v3.1 (2023)[247]**	**CopperMark/RMI RRA Criteria Guide (2023)[248]**	**IRMA Standard for Responsible Mining (2018)**	**RMI Facility Standard 2025**	**TSM (2021-2024)**	**Copper Mark JDDS (2022)**	**RMI RMAP All Minerals (2022)**	**RMI Supply Chain Due Diligence Plus (2025)**	**ICMM Mining Principles (2024)[249]**	**EITI Standard (2023)**	**GRI 101 - Biodiversity (2024)**	**CCCMC Due Diligence Guidance v2 (2022)**	**CCCMC Mining Investment Social Guidelines (2017)**	**GISTM (2020)**	**ISO 05100: Energy management systems**	**ISO 14001: 2015 Environmental Management Systems (EMS)**	**ISO 26000 Guideline for Social Responsibility**	**ISO 45001 OHS (2018)**
POLLUTION																								
1. Embed pollution prevention and reduction into policies and management systems	A	x						x	x	x	x							x				x		
	AA								x	x												x		
	AAA																							
2. Identify and assess actual and potential adverse impacts of pollution from the enterprise's operations	A	x					x	x	x	x	x							x				x		
	AA							x	x	x	_											x		
	AAA							x			_													
3. Cease, prevent and mitigate adverse impacts of pollution	A	x					x	x	x	x	x											x		
	AA						x	x	x	x												x		
	AAA																							
4. Track implementation of pollution prevention and reduction and results	A	x					x	x	x	x	x											x		
	AA							x	x	x														
	AAA																							
5. Communicate and report on pollution impacts, risks and improvement actions	A	x					x	x	x	x												x		
	AA						x		x															
	AAA								x															
6. Provide for and cooperate in remediation of adverse pollution impacts caused or contributed to	A	x					x	x	x	x												x		
	AA							x	x	x														
	AAA																							

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Due diligence step	Benchmark level	EU Batteries Regulation (2023)	EU Conflict Minerals Regulation (2017)	EU Forced Labour Regulation (2024)	Canada Supply Chain Forced & Child Labour Act (2023)	Uyghur Forced Labor Prevention Act (2022)	ASI Performance Standard v3.1 (2023)[247]	CopperMark/RMI RRA Criteria Guide (2023)[248]	IRMA Standard for Responsible Mining (2018)	RMI Facility Standard 2025	TSM (2021-2024)	Copper Mark JDDS (2022)	RMI RMAP All Minerals (2022)	RMI Supply Chain Due Diligence Plus (2025)	ICMM Mining Principles (2024)[249]	EITI Standard (2023)	GRI 101 - Biodiversity (2024)	CCCMC Due Diligence Guidance v2 (2022)	CCCMC Mining Investment Social Guidelines (2017)	GISTM (2020)	ISO 05100: Energy management systems	ISO 14001: 2015 Environmental Management Systems (EMS)	ISO 26000 Guideline for Social Responsibility	ISO 45001 OHS (2018)
WASTE MANAGEMENT																								
1. Embed waste management into policies and management systems	A	x						x	x	x								x				x		
	AA							x		x												x		
	AAA									x														
2. Identify and assess opportunities for waste reduction and recycling increase from the enterprise's operations	A	x					x	x	x	x												x		
	AA							x		x												x		
	AAA									x														
3. Cease, prevent and mitigate adverse impacts of hazardous waste. Avoid / reduce waste produced and increase fraction of waste recycled.	A	x						x	x	x												x		
	AA						x	x		x												x		
	AAA																							
4. Track implementation of waste management systems and results	A	x							x	x												x		
	AA							x		x												x		
	AAA																							
5. Communicate and report on waste management improvements	A	x					x	x		x												x		
	AA									x												x		
	AAA																							
6. Provide for and cooperate in remediation of adverse waste management impacts caused or contributed to	A	x						x		x												x		
	AA							x	x	x												x		
	AAA																							

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MINE WASTE MANAGEMENT																								
1. Embed mine waste and tailings management into responsible business conduct policies and management systems	A	x						x	x		x									x				
	AA						x	x	x		x									x				
	AAA								x											x				
2. Identify and assess actual and potential adverse impacts associated with mining and mineral processing waste	A	x					x	x	x		x				x					x				
	AA						x		x											x				
	AAA								x															
3. Cease, prevent and mitigate adverse environmental or human health impacts from mining and mineral processing waste, and reducing amount of mineral waste produced	A	x					x	x	x		x				x			x		x				
	AA						x	x	x						x			x		x				
	AAA						x		x									x						
4. Track implementation, results and effectiveness of mining and mineral processing waste management systems	A	x							x		x									x				
	AA						x		x		x									x				
	AAA																							
5. Communicate how adverse impacts due to mining and mineral processing waste are addressed and the outcomes of the actions taken	A	x							x		x									x				
	AA														x					x				
	AAA																			x				
6. Provide for and cooperate in remediation of adverse mine closure and reclamation impacts caused or contributed to when appropriate.	A	x					x	x	x		x				x			x		x				
	AA								x									x						
	AAA																							

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Due diligence step	Benchmark level	EU Batteries Regulation (2023)	EU Conflict Minerals Regulation (2017)	EU Forced Labour Regulation (2024)	Canada Supply Chain Forced & Child Labour Act (2023)	Uyghur Forced Labor Prevention Act (2022)	ASI Performance Standard v3.1 (2023)[247]	CopperMark/RMI RRA Criteria Guide (2023)[248]	IRMA Standard for Responsible Mining (2018)	RMI Facility Standard 2025	TSM (2021-2024)	Copper Mark JDDS (2022)	RMI RMAP All Minerals (2022)	RMI Supply Chain Due Diligence Plus (2025)	ICMM Mining Principles (2024)[249]	EITI Standard (2023)	GRI 101 - Biodiversity (2024)	CCCMC Due Diligence Guidance v2 (2022)	CCCMC Mining Investment Social Guidelines (2017)	GISTM (2020)	ISO 05100: Energy management systems	ISO 14001: 2015 Environmental Management Systems (EMS)	ISO 26000 Guideline for Social Responsibility	ISO 45001 OHS (2018)
CHILD LABOUR																								
1. Embed prohibition of unacceptable forms of child labour into policies and management systems	A	x	x	x	x	x	x	x	x	x	x				x								x	
	AA					x		x	x	x	x												x	
	AAA								x	x														
2. Identify and assess actual and potential adverse impacts of child labour with the enterprise's operations, products or services	A	x	x	x		x		x	x	x	x												x	
	AA							x	x	x														
	AAA																							
3. Cease, prevent and mitigate risks and adverse impacts of child labour	A	x		x			x	x	x	x	x				x								x	
	AA							x	x	x													x	
	AAA							x	x															
4. Track implementation and results of how child labour risks and impacts are addressed	A	x						x	x	x													x	
	AA							x		x														
	AAA																							
5. Communicate how child labour risks and impacts are addressed	A	x			x	x		x	x	x													x	
	AA							x															x	
	AAA							x																
6. Provide for and cooperate in remediation of adverse child labour impacts caused or contributed to when appropriate	A	x		x				x	x	x					x								x	
	AA							x	x	x													x	
	AAA							x																

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FORCED LABOUR																								
1. Embed prohibition of forced labour and application of responsible recruitment into policies and management systems	A	x	x	x	x	x	x	x	x	x	x				x									
	AA					x				x														
	AAA																							
2. Identify and assess actual and potential adverse impacts of forced labour with the enterprise's operations, products or services	A	x	x	x		x		x	x	x	x													
	AA								x	x														
	AAA																							
3. Cease, prevent and mitigate risks and adverse impacts of forced labour	A	x		x			x	x	x	x	x													
	AA								x	x														
	AAA																							
4. Track implementation and results of how forced labour risks and impacts are addressed	A	x						x	x	x														
	AA									x														
	AAA																							
5. Communicate how forced labour risks and impacts are addressed	A	x			x	x	x	x		x														
	AA																							
	AAA																							
6. Provide for and cooperate in remediation of adverse forced labour impacts caused or contributed to when appropriate	A	x		x				x	x	x					x									
	AA							x	x	x														
	AAA								x															

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USE OF SECURITY FORCES																								
1. Embed responsible use of security forces into policies and management systems	A	x					x	x	x	–					x									
	AA								x	–														
	AAA																							
2. Identify and assess actual and potential adverse impacts associated with the use of security forces	A	x						x	x	–					x									
	AA									–														
	AAA																							
3. Cease, prevent and mitigate adverse impacts of use of security forces	A	x						x	x	–														
	AA								x															
	AAA								x															
4. Track implementation and results of use of security forces	A	x						x	x	–														
	AA								x	–														
	AAA																							
5. Communicate how impacts are addressed of use of security forces	A	x						x	x	–														
	AA								x															
	AAA								x															
6. Provide for and cooperate in remediation of adverse impacts security forces caused or contributed to when appropriate	A	x						x	x	–														
	AA								x	–														
	AAA																							

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EMPLOYMENT TERMS																								
1. Embed respect for fair employment terms and fundamental rights at work into policies and management systems	A	x					x	x	x	x					x									
	AA								x	x														
	AAA								x	x														
2. Identify and assess actual and potential risks and adverse impacts from violation of employment terms, associated with the enterprise's operations, products or services	A	x					x	x	x	x														
	AA							x	x	x														
	AAA								x	x														
3. Cease, prevent and mitigate adverse impacts of violations of employment terms	A	x					x	x	x	x					x									
	AA						x	x	x						x									
	AAA								x															
4. Track implementation and results of respecting fair employment terms	A	x						x	x	x														
	AA									x														
	AAA																							
5. Communicate how risks and impacts of violations to employment terms are addressed	A	x						x	x	x														
	AA																							
	AAA																							
6. Provide for or cooperate in remediation of violations of employment terms	A	x					x	x	x	x					x									
	AA							x	x	x														
	AAA																							

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FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING																								
1. Embed freedom of association, collective bargaining into policies and management systems	A	x					x	x	x	x					x									
	AA								x	x														
	AAA								x															
2. Identify and assess actual and potential adverse impacts associated with the enterprise's operations, products or services related to violations of collective bargaining and freedom of association	A	x					x	x	x	x														
	AA							x	x	x														
	AAA																							
3. Cease, prevent and mitigate adverse impacts of violations to of collective bargaining and freedom of association	A	x					x	x	x	x					x									
	AA						x	x	x						x									
	AAA								x															
4. Track implementation and results of how collective bargaining and freedom of association violations are addressed	A	x						x		x														
	AA																							
	AAA																							
5. Communicate how collective bargaining and freedom of association impacts are addressed	A	x						x		x														
	AA																							
	AAA																							
6. Provide for or cooperate in remediation to collective bargaining and freedom of association when appropriate	A	x					x	x	x	x					x									
	AA							x	x	x														
	AAA																							

		Regulations and international frameworks					Recognised Voluntary Sustainability Standards								Other Mapped Standards[246]									
Due diligence step	**Benchmark level**	**EU Batteries Regulation (2023)**	**EU Conflict Minerals Regulation (2017)**	**EU Forced Labour Regulation (2024)**	**Canada Supply Chain Forced & Child Labour Act (2023)**	**Uyghur Forced Labor Prevention Act (2022)**	**ASI Performance Standard v3.1 (2023)[247]**	**CopperMark/RMI RRA Criteria Guide (2023)[248]**	**IRMA Standard for Responsible Mining (2018)**	**RMI Facility Standard 2025**	**TSM (2021-2024)**	**Copper Mark JDDS (2022)**	**RMI RMAP All Minerals (2022)**	**RMI Supply Chain Due Diligence Plus (2025)**	**ICMM Mining Principles (2024)[249]**	**EITI Standard (2023)**	**GRI 101 - Biodiversity (2024)**	**CCCMC Due Diligence Guidance v2 (2022)**	**CCCMC Mining Investment Social Guidelines (2017)**	**GISTM (2020)**	**ISO 05100: Energy management systems**	**ISO 14001: 2015 Environmental Management Systems (EMS)**	**ISO 26000 Guideline for Social Responsibility**	**ISO 45001 OHS (2018)**
OCCUPATIONAL HEALTH AND SAFETY																								
1. Embed occupational health and safety (OHS) into policies and management systems	A	x					x	x	x	x	x				x									x
	AA							x	x	x	x													x
	AAA																							
2. Identify and assess actual and potential occupational health and safety (OHS) related risks and adverse impacts associated with the enterprise's operations, products or services	A	x						x	x	x	x													x
	AA							x	x	x	x													x
	AAA								x		–													
3. Cease, prevent and mitigate occupational health and safety (OHS) related risks and adverse impacts	A	x						x	x	x	x				x									x
	AA								x	x	x				x									
	AAA								x	x	x													
4. Track implementation and results related to occupational health and safety (OHS) risks and impacts	A	x					x		x	x	x				x									x
	AA							x	x	x	x													x
	AAA										x													
5. Communicate how occupational health and safety (OHS) risks and impacts are addressed	A	x					x	x	x	x	x													x
	AA						x		x															
	AAA								x															
6. Provide for or cooperate in remediation of adverse occupational health and safety (OHS) impacts when appropriate	A	x					x	x	x	x	x													x
	AA							x	x	x														x
	AAA																							

		Regulations and international frameworks					Recognised Voluntary Sustainability Standards								Other Mapped Standards[246]									
Due diligence step	**Benchmark level**	**EU Batteries Regulation (2023)**	**EU Conflict Minerals Regulation (2017)**	**EU Forced Labour Regulation (2024)**	**Canada Supply Chain Forced & Child Labour Act (2023)**	**Uyghur Forced Labor Prevention Act (2022)**	**ASI Performance Standard v3.1 (2023)[247]**	**CopperMark/RMI RRA Criteria Guide (2023)[248]**	**IRMA Standard for Responsible Mining (2018)**	**RMI Facility Standard 2025**	**TSM (2021-2024)**	**Copper Mark JDDS (2022)**	**RMI RMAP All Minerals (2022)**	**RMI Supply Chain Due Diligence Plus (2025)**	**ICMM Mining Principles (2024)[249]**	**EITI Standard (2023)**	**GRI 101 - Biodiversity (2024)**	**CCCMC Due Diligence Guidance v2 (2022)**	**CCCMC Mining Investment Social Guidelines (2017)**	**GISTM (2020)**	**ISO 05100: Energy management systems**	**ISO 14001: 2015 Environmental Management Systems (EMS)**	**ISO 26000 Guideline for Social Responsibility**	**ISO 45001 OHS (2018)**
DIVERSITY, INCLUSION AND NON-DISCRIMINATION																								
1. Embed responsible business conduct related to diversity, inclusion and non-discrimination into policies and management systems	A	x						x	x	x	x				x									
	AA							x	x	x	x													
	AAA								x															
2. Identify and assess actual and potential risks and adverse impacts related to diversity, inclusion and non-discrimination associated with the enterprise's operations, products or services	A	x					x	x	x	x	x				x									
	AA							x	x	x	x													
	AAA																							
3. Cease, prevent and mitigate risks and adverse impacts related to diversity, inclusion and non-discrimination	A	x					x	x	x	x	x				x									
	AA							x	x	x	x													
	AAA								x	x	x													
4. Track implementation and results related to diversity, inclusion and non-discrimination risks and impacts	A	x					x	x	x	x	x													
	AA								x		x				x									
	AAA								x															
5. Communicate how risks and impacts related to diversity, inclusion and non-discrimination are addressed	A	x					x	x	x	x	x				x									
	AA							x	x		x													
	AAA																							
6. Provide for and cooperate in remediation of adverse impacts related to discrimination, harassment, violence or disrespectful behaviour caused or contributed to when appropriate.	A	x					x	x	x	x	x				x									
	AA							x	x	x	x													
	AAA								x															

		Regulations and international frameworks					Recognised Voluntary Sustainability Standards								Other Mapped Standards[246]									
Due diligence step	**Benchmark level**	**EU Batteries Regulation (2023)**	**EU Conflict Minerals Regulation (2017)**	**EU Forced Labour Regulation (2024)**	**Canada Supply Chain Forced & Child Labour Act (2023)**	**Uyghur Forced Labor Prevention Act (2022)**	**ASI Performance Standard v3.1 (2023)[247]**	**CopperMark/RMI RRA Criteria Guide (2023)[248]**	**IRMA Standard for Responsible Mining (2018)**	**RMI Facility Standard 2025**	**TSM (2021-2024)**	**Copper Mark JDDS (2022)**	**RMI RMAP All Minerals (2022)**	**RMI Supply Chain Due Diligence Plus (2025)**	**ICMM Mining Principles (2024)[249]**	**EITI Standard (2023)**	**GRI 101 - Biodiversity (2024)**	**CCCMC Due Diligence Guidance v2 (2022)**	**CCCMC Mining Investment Social Guidelines (2017)**	**GISTM (2020)**	**ISO 05100: Energy management systems**	**ISO 14001: 2015 Environmental Management Systems (EMS)**	**ISO 26000 Guideline for Social Responsibility**	**ISO 45001 OHS (2018)**
COMMUNITY IMPACTS																								
1. Embed community Impacts into policies and management systems	A	x						x	x	x	x				x									
	AA							x	x	x	x													
	AAA								x															
2. Identify and assess actual and potential adverse impacts to local communities associated with the enterprise's operations, products or services	A	x					x	x	x	x	x				x									
	AA							x	x	x	x													
	AAA																							
3. Cease, prevent and mitigate adverse impacts to local communities	A	x					x	x	x	x	x				x									
	AA							x	x	x	x													
	AAA								x	x	x													
4. Track implementation and results of how community impacts are addressed	A	x					x	x	x	x	x													
	AA								x		x				x									
	AAA								x															
5. Communicate on stakeholder engagement and how adverse community impacts are addressed	A	x					x	x	x	x	x				x									
	AA							x	x		x													
	AAA																							
6. Provide for or cooperate in remediation when appropriate	A	x					x	x	x	x	x				x									
	AA							x	x	x	x													
	AAA								x															
INDIGENOUS PEOPLES' RIGHTS																								

This module has not been included in the Beta Release of the Battery Benchmarks of September 2025.

		Regulations and international frameworks					Recognised Voluntary Sustainability Standards								Other Mapped Standards[246]									
Due diligence step	Benchmark level	EU Batteries Regulation (2023)	EU Conflict Minerals Regulation (2017)	EU Forced Labour Regulation (2024)	Canada Supply Chain Forced & Child Labour Act (2023)	Uyghur Forced Labor Prevention Act (2022)	ASI Performance Standard v3.1 (2023)[247]	CopperMark/RMI RRA Criteria Guide (2023)[248]	IRMA Standard for Responsible Mining (2018)	RMI Facility Standard 2025	TSM (2021-2024)	Copper Mark JDDS (2022)	RMI RMAP All Minerals (2022)	RMI Supply Chain Due Diligence Plus (2025)	ICMM Mining Principles (2024)[249]	EITI Standard (2023)	GRI 101 - Biodiversity (2024)	CCCMC Due Diligence Guidance v2 (2022)	CCCMC Mining Investment Social Guidelines (2017)	GISTM (2020)	ISO 05100: Energy management systems	ISO 14001: 2015 Environmental Management Systems (EMS)	ISO 26000 Guideline for Social Responsibility	ISO 45001 OHS (2018)
BUSINESS INTEGRITY																								
1. Embed business integrity and transparency into policies and management systems	A	x					x	x	x	x					x	x			x					
	AA							x	x	x						x			x					
	AAA									x														
2. Identify and assess actual and potential risks and adverse impacts related to transparency and business integrity violations associated with the enterprise's operations, products or services	A	x						x	x	x					x	x			x					
	AA							x	x							x			x					
	AAA																							
3. Cease, prevent and mitigate adverse impacts related to business integrity and transparency	A	x					x	x	x	x									x					
	AA								x															
	AAA																							
4. Track implementation and results of business integrity and transparency policies	A	x							x	x														
	AA									x														
	AAA																							
5. Communicate how business integrity and transparency impacts are addressed	A	x					x	x	x	x					x	x			x					
	AA							x	x	x						x								
	AAA								x	x						X								
6. Provide for and cooperate in remediation related to business integrity and transparency	A	x						x	x	x									x					
	AA								x	x														
	AAA																							

REFERENCES

[1] International Social and Environmental Accreditation and Labelling (2025), Who we are

[2] GBA (2025), Greenhouse Gas Rulebook Generic Rules - Version 2.1

[3] - Refer to upcoming GBA guidance on mineral materiality, at a minimum this will include regulated minerals such as 3TG (EU CMR) and minerals covered by the Battery Regulation and any additional battery minerals based on company materiality assessment. Regulation - 2017/821 - EN - EUR-Lex

- For the purposes of EU Batteries Regulation, ensure the policy covers raw material sourcing (EU BR Art. 50(1)). Regulation - 2023/1542 - EN - EUR-Lex

- For the purposes of overall supply chain due diligence, all stages of the value chain and materials should be covered.

- The foundational benchmarks in this Battery Passport Supply chain due diligence module, the Risk and sustainability management module, and any applicable thematic modules can serve as references for the elements of due diligence and risk management measures to be embedded in supplier contracts.

- Reviewing the policy annually does not necessarily mean it must be revised every year. Revisions should be guided by emerging risks in the company's supply chain and any applicable regulatory requirements. Conducting an annual review of management systems and policies is consistent with the OECD Due Diligence Guidance and can, for example, form part of the preparation for an assurance engagement.

- Draft Due Diligence Implementation Guidelines for the EU Batteries Regulation

The establishment of supply chain controls and transparency is a prerequisite under the Regulation for implementing key due diligence processes, from risk assessment to risk response, including remediation. While risk assessment and risk response apply only from raw material production through to the production of anode and cathode active materials (AAM and CAM, respectively), and the preparation of electrolyte salts, the Regulation requires the establishment of a chain of custody or traceability system across the entire supply chain for the raw materials within its scope (see Section 4: Pathways for Due Diligence). This requirement reflects the fact that, without sufficient knowledge of the physical supply chain, economic operators cannot implement or evaluate the effectiveness of due diligence processes and controls. The chain of custody or traceability system is not risk-based and must be established regardless of the level of risk. Nevertheless, particular emphasis should be placed on systems of control and transparency in high-risk contexts, where it will be necessary to determine whether traceability is required or whether a chain of custody is sufficient.

[4] Including ESG criteria in supplier evaluation criteria within contracts, supplier agreements, T&Cs and tenders (see e.g. Mining Shared Value's case study on Ivanhoe's PGM-nickel Platreef mine, which included ESG criteria in supplier evaluation criteria within its tendering process:)

[5] - External sources may include industry and independent reports, academic research, and other publicly available information.

- Guidance on the identification of CAHRAs is provided in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs. See glossary for list of Annex II risks from the OECD Guidance.

- See glossary for risk areas covered in Annex X of the EU Batteries Regulation. Regulation - 2023/1542 - EN - EUR-Lex

- The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs (Supplement on Gold, Version 3, 2016) identifies recyclable or scrap gold refined in a country through which gold from CAHRAs is known to transit as a red flag, requiring enhanced due diligence.

- Risk-based Due Diligence means that the measures a company takes to conduct Due Diligence are commensurate to the severity and likelihood of potential or actual adverse social or environmental impacts. Where the severity and likelihood of an adverse impact are high, due diligence must be more extensive. If it is not feasible to address all identified impacts simultaneously, companies should prioritise actions based on severity and likelihood, with severity taking precedence over likelihood.

- Companies should be prepared to justify their risk prioritisation decisions to stakeholders and auditors. Where companies rely on due diligence carried out by suppliers, they must ensure that the suppliers' risk prioritisation decisions are reasonable and aligned with their own. Importantly, companies remain accountable for ensuring that adequate risk-based due diligence is undertaken across their supply chains, even where the due diligence is not performed directly by them. (2024 Draft Due Diligence Implementation Guidelines for the EU Batteries Regulation – not published)

- The importance of information from suppliers

In order to fulfil the requirements of the Regulation, economic operators must be able to link information about risks relevant to a specific supplier with the corresponding risk response measures applied to that supplier.

- The economic operator does not necessarily need to know the identity of suppliers beyond their facility type and country of location. However, they must have confidence in the completeness and accuracy of the risk information provided. Supplier identities may be collected in a pseudonymised form, and information may be shared between suppliers in an aggregated manner. This ensures that a supplier does not need to disclose its specific upstream suppliers or raw material flows to its immediate customer. However, measures taken by companies to protect supplier identities for reasons of commercial confidentiality must not obstruct the implementation of risk assessment or risk management measures by the economic operator. Where supplier identities and other documentation verifying chain of custody are withheld, it is essential that an independent auditor, such as a notified body, can audit the supply chain data. This enables verification of the system's integrity and its reliability in assigning risk assessment and risk response data to pseudonymised supplier identities. To address concerns over supply chain data transparency, economic operators and supply chain entities may also consider using neutral third parties.

[6] - *The OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector* provides guidance on identifying stakeholders and interlocutors, as well as on designing effective stakeholder engagement processes.

- Cost-sharing mechanisms may include bilateral agreements, downstream contributions through membership fees and voluntary contributions (e.g. RMI Upstream Due Diligence Fund), and price premiums (e.g. Fairmined Premium). See OECD (2021) Costs and Value of Due Diligence in Mineral Supply Chains.

[7] Prioritise ensuring and supporting suppliers to conduct meaningful engagement with their suppliers and stakeholders, including CSOs and rightsholders on the ground, and intervene only if engagement by suppliers fails.
[8] - Note that the ticked boxes are for demonstration purposes only and must be completed by each Battery Passport user.
See e.g. RMI (2025) Facility Standard for Social, Environmental, OHS and Governance Risks for an example of risk prioritisation:
- Critical ESG Supply Chain Risks
Critical ESG risks are those that require an immediate response from the Facility. They must always be treated as high-priority risks within the Facility's risk prioritisation process. These risks are divided into two categories, each requiring a distinct management response.
- Category 1 critical ESG risks are those that require immediate disengagement. While Facilities are obliged to suspend or disengage from supply chains where there is a reasonable risk of sourcing from, or being linked to, any party committing serious abuses, this does not absolve them of the responsibility to disengage responsibly. In line with the UNGPs, responsible disengagement includes supporting the effective remediation of any impacts. Category 1 critical ESG risks include: serious human rights abuses, direct or indirect support to non-state armed groups, as defined in Annex II of the OECD Due Diligence Guidance (see definitions) and fraudulent misrepresentation of the origin of minerals.
- Category 2 critical ESG risks are those that require the immediate implementation of mitigation (see Section 5.3.3) and/or remediation measures (see Section 5.6). Category 2 ESG risks include but not limited to: direct or indirect support to public or private security forces; money laundering; bribery; non-payment of taxes, fees and royalties to governments; severe harm to human rights and the environment, including child labour; flagrant occupational health and safety risks that pose an immediate and substantial threat to life, limb, or corporal function; and irreversible or long-term damage to the environment and ecosystems.
[9] Suspending or discontinuing engagement with a supplier or its subsidiary or subcontractor after failed attempts at mitigation, based on relevant contracts and agreements.
[10] - Drive Sustainability (2025), Battery Sustainability Assessment Questionnaire
- The company exercises its leverage to seek to address the risk or impact
- Where the company lacks leverage, it should consider suspending or terminating engagement with a supplier, subsidiary, or subcontractor following unsuccessful attempts at prevention and/or mitigation. Such action should be based on the relevant contracts and agreements referred to in Article 49(1) of the EU Batteries Regulation.
[11]Collective action initiatives include for example, but are not limited to PPA, EPRM, GBA's and RMI's upstream projects or any other collective initiative.
[12]- Risk mitigation performance indicators can be found to in Annex II of the OECD DDG for CAHRAs.
While the common expectation for document retention is five years, the EU Batteries Regulation requires a retention period of ten years. Specifically:
3. Economic operators referred to in paragraph 1 of this Article shall keep documentation demonstrating their fulfilment of the obligations laid down in Articles 49, 50 and 52, including the verification report and approval decision referred to in Article 51 and the audit reports referred to in paragraph 2 of this Article, for 10 years after the last battery manufactured under the relevant battery due diligence policy has been placed on the market.
Article 49 (c) "[The economic operator shall] structure its internal management system to support its battery due diligence policy by assigning responsibility to its top management level to oversee its battery due diligence policy as well as maintain records of that system for a minimum of 10 years."
[13] Provide for early-warning risk-awareness system and a remediation mechanism such mechanisms through collaborative agreements with other economic operators or organisations or by facilitating recourse to an external expert or body, an ombudsman.
[14] - The Facility shall establish and require its suppliers to establish a grievance mechanism(s), available and accessible to all stakeholders, that is legitimate, accessible, transparent, predictable, equitable, rights-compatible and a source of continuous learning based on stakeholder engagement, in alignment with the UN Guiding Principles on Business and Human Rights. See e.g. Facility Standard for Social, Environmental, OHS and Governance Risks
- Supplier(s) definition: "All entities from which the company / facility received materials during the assessment period. These include immediate suppliers and other known suppliers further upstream which are identifiable through general business dealings or public reports" () Facility Standard for Social, Environmental, OHS and Governance Risks).
[15] Note that the ticked boxes are for demonstration purposes only and must be completed by each Battery Passport user.
See e.g. RMI (2025) Facility Standard for Social, Environmental, OHS and Governance Risks for an example of risk prioritisation:
- Critical ESG Supply Chain Risks
Critical ESG risks refer to risks that require an immediate response from the Facility. All critical ESG risks must be considered high-priority risks as part of a Facility's risk prioritization process. Critical ESG risks are broken down into two categories of risk, which require different management responses.
- Category 1 critical ESG risks are those that require immediate disengagement. While Facilities are obliged to suspend or disengage from supply chains where there is a reasonable risk of sourcing from, or being linked to, any party committing serious abuses, this does not absolve them of the responsibility to disengage responsibly. In line with the UNGPs, responsible disengagement includes supporting the effective remediation of any impacts. Category 1 critical ESG risks include: serious human rights abuses, direct or indirect support to non-state armed groups, as defined in Annex II of the OECD Due Diligence Guidance (see definitions) and fraudulent misrepresentation of the origin of minerals.
- Category 2 critical ESG risks are those that require the immediate implementation of mitigation (see Section 5.3.3) and/or remediation measures (see Section 5.6). Category 2 ESG risks include but not limited to: direct or indirect support to public or private security forces; money laundering; bribery; non-payment of taxes, fees and royalties to governments; severe harm to human rights and the environment, including child labour; flagrant occupational health and safety risks that pose an immediate and substantial threat to life, limb, or corporal function; and irreversible or long-term damage to the environment and ecosystems.
[16] - Physical displacement scenarios due to land acquisition and resettlement that could cause adverse impacts include but are not limited to:
• Land (use) rights acquired through expropriation or other compulsory procedures.
• Land (use) rights acquired through negotiated settlements with property owners / those with legal land rights, if failure to reach settlement would have resulted in expropriation / other compulsory procedures.
• Customary land tenure rights holders.

• Legacy resettlement impacts from previous site owners.
• Involuntary restrictions on land use / access to natural resources causing communities to lose access to resource usage where they have traditional / recognisable usage rights.
• Situations requiring evictions of people occupying land without formal, traditional or recognisable land usage rights.
• Restriction on land / other resource use access, including communal property such as marine and aquatic resources, timber and non-timber forest products, freshwater, medicinal plants, hunting and gathering grounds, or grazing and cropping areas
• Meaningful stakeholder involvement means for example having translators accompany engagement, ensure documents have been reviewed,

[17] Certain stakeholder groups such as underrepresented or vulnerable groups, may be at greater risk to adverse impacts. Consider the composition of the community engagement team to match the stakeholder group and prioritise internal capacity building for direct engagement over reliance on external consultants.

[18] - Note that carbon offsets are outside of the scope of the Battery Passport Greenhouse Gas Rulebook v2.1.
- The objective of the Paris Agreement on Climate Change is to hold the increase in the global average temperature to well below 2°C above pre-industrial levels and pursue efforts to limit the temperature increase to 1.5°C. This corresponds to reduction targets of 45% by 2030 and net zero emissions by 2050. Each country defines Nationally Determined Contributions (NDCs) that outline their national commitments to these goals.
- Emissions reduction commitments and targets may be corporation-wide or facility specific, as long as they clearly cover the facility in question.

[19] Align with science-based targets consistent with global climate goals, such as the Paris Agreement, to limit temperature increases to 1.5°C above pre-industrial levels. Target setting should be based on frameworks like the Science-Based Targets Initiative (SBTi) to ensure targets are robust and science-driven: Ambitious corporate climate action - Science Based Targets Initiative.

[20] See the Battery Passport Greenhouse Gas Rulebook v2.1, the GHG Protocol Corporate Standard or GRI 305: Emissions for credible methodological approaches for quantifying scope 1 and 2 emissions.

[21] See the Battery Passport Greenhouse Gas Rulebook v2.1, the GHG Protocol Corporate Standard or GRI 305: Emissionsfor credible methodological approaches to quantifying scope 3 emissions. The product level may refer to either goods or services provided.

[22] See the Battery Passport Greenhouse Gas Rulebook v2.1,, the GHG Protocol Corporate Standard or GRI 305: Emissionsfor credible methodological approaches to quantifying and monitoring scope 1 and 2 emissions.

[23] See the Battery Passport Greenhouse Gas Rulebook v2.1, the GHG Protocol Corporate Standard or GRI 305: Emissionsfor credible methodological approaches to quantifying scope 3 emissions.

[24] See the Battery Passport Greenhouse Gas Rulebook v2.1,the GHG Protocol Corporate Standard or GRI 305: Emissions for credible methodological approaches to quantifying and monitoring scope 1 and 2 emissions.

[25] See the Battery Passport Greenhouse Gas Rulebook v2.1,, the GHG Protocol Corporate Standard or GRI 305: Emissions for credible methodological approaches to quantifying and monitoring scope 3 emissions.

[26] See the Battery Passport Greenhouse Gas Rulebook v2.1,the GHG Protocol Corporate Standard or GRI 305: Emissions for credible methodological approaches to reporting on scope 1 and 2 emissions.

[27] See the Battery Passport Greenhouse Gas Rulebook v2.1,the GHG Protocol Corporate Standard or GRI 305: Emissions for credible methodological approaches to reporting on scope 3 emissions.

[28] - Protected areas may include IUCN category I-IV protected areas, Ramsar sites, UNESCO Biosphere Reserves or World Heritage Sites, natural and cultural, or any other protected areas as recognised by national law of the host government. See glossary for definitions of protected areas and references to sources for site lists.
- Protected Areas of High Biodiversity Value: Legally designated national or international areas of high biodiversity significance, often overlapping KBAs, but subject to enforceable protections.
- Established under national laws or international conventions (e.g., CBD, Ramsar).
- IUCN Categories I-IV: Strict conservation focus (e.g., national parks, wilderness areas).
- Other designations: UNESCO World Heritage Sites, Natura 2000 (EU), Ramsar wetlands.

[29] - Key Biodiversity Areas: Sites that contribute significantly to the global persistence of biodiversity. Scientifically identified areas of international importance for the conservation of species, ecosystems, and ecological processes.
- A Global Standard for the Identification of Key Biodiversity Areas Criteria for KBA Identification (at least one must be met):
• Threatened biodiversity – areas that support species categorised as Critically Endangered, Endangered, or Vulnerable by the IUCN Red List.
• Geographically restricted biodiversity – sites important for species with limited ranges.
• Ecological integrity – sites that are largely undisturbed and functioning naturally.
• Biological processes – sites important for breeding, migration, feeding, or aggregation (e.g., nesting beaches for turtles).
• Irreplaceability – no alternative locations that would protect the same biodiversity values.
- For credible Biodiversity Net Gain (BNG) calculations aligned with international standards (TNFD, SBTN, IFC PS6), follow these step-by-step recommendations, methodologies, and tools:

1. Core Calculation Frameworks
    a) DEFRA Biodiversity Metric (UK Standard)
    Metric: Habitat hectares × distinctiveness × condition × strategic significance.
    Output: BNG Units (1 unit = 1 hectare of high-distinctiveness habitat in good condition).
    Net Gain Requirement: Minimum 10% gain (≥1.1:1 offset ratio).
    Tool: DEFRA Metric 4.0 Calculator.
    b) IUCN Global Standard for Nature-based Solutions Metrics:
    Habitat Integrity Index: % improvement in ecosystem functionality.
    Species Recovery Rate: Increase in IUCN Red List species populations.
    Net Gain Threshold: >0% positive change from baseline (validated via monitoring).
    c) Science Based Targets Network (SBTN) Land Footprint:
    Target: 25% reduction in land footprint intensity by 2030.
    Calculation: Net Gain = (Area restored × ecological value) – (Area degraded × degradation factor)

2. Step-by-Step Calculation Process
Step 1: Establish Baseline
Map pre-intervention biodiversity using:
IBAT (Key Biodiversity Areas, protected areas).
Global Forest Watch (deforestation/degradation).
Ecosystem Integrity Index (remote sensing + field surveys).
Step 2: Quantify Impacts
Habitat Loss: Area (ha) × distinctiveness (low=1, high=6) × condition (poor=0.25, good=1).
Species Impact: # of IUCN Red List/CITES species affected × sensitivity.
Step 3: Apply Mitigation Hierarchy
Hierarchy Step Calculation Action
Avoid Exclude impacts from BNG math (e.g., redesign project to spare KBAs).
Minimize Reduce residual impacts (e.g., reduce footprint by 30%).
Restore Add gains from on-site rehabilitation (e.g., 50 ha wetlands restored × 0.8 condition).
Offset Only for unavoidable impacts: Purchase BNG units ≥110% of residual loss.
Step 4: Calculate Net Gain
Formula: BNG = (Restoration gains + Offsets) – (Residual impacts after avoidance/minimisation)
Threshold: Outcome must be ≥10% positive (per TNFD/CSRD).
3. Critical Technical Rules
a) Spatial Prioritisation
Proximity: Offsets within same watershed/biome (max 50 km from impact site).
Like-for-like: No trading mangroves for grasslands (ecological equivalence ≥80%).
b) Time Discounting
Habitat Maturity: Apply discount if offset takes >10 years to reach baseline condition (e.g., 1.5:1 ratio for slow-growing forests).
c) Additionality: Gains must be beyond legal requirements and baseline trends (e.g., no counting protected areas).

[30] - Consider TNFD's LEAP Approach to assess nature-related risks/dependencies.
- Locate interfaces with nature (e.g., water sources, pollinator habitats).
- Evaluate dependencies/impacts (use ENCORE tool).
- Assess risks (e.g., soil degradation affecting crop yields).
- Prepare responses (set targets via SBTN).

[31] RMI Copper Mark (2023) RRA Criteria Guide : "Biodiversity offsets are an acceptable mitigation measure when significant impacts on biodiversity cannot be avoided. The decision to use offsets to mitigate residual impacts on biodiversity should be considered only when all other possible methods to avoid, minimise, restore or replace impacts have been exhausted. Where sites are left with no other plausible options other than to offset, selecting the appropriate intervention should be considered carefully and with reference to international best practice standards. Where possible, such offsets should prioritise interventions that help preserve and enhance existing terrestrial carbon stocks sequestered in biodiversity and ecosystem."

[32] - Mitigation hierarchy, as applied to biodiversity, means to:
• Avoid negative impacts on biodiversity.
Use IBAT or Global Biodiversity Score to screen sites.
Example: Re-route infrastructure away from Key Biodiversity Areas (KBAs).
• Minimise negative impacts on biodiversity that were not avoided.
Adopt biodiversity-inclusive Environmental Impact Assessments (EIAs).
Tool: CBD's Biodiversity-inclusive EIA Guidelines.
• Restore & rehabilitate affected ecosystems.
Apply Society for Ecological Restoration (SER) Standards.
Example: Active reforestation using native species.
• Actions taken to offset residual negative impacts on biodiversity as a last resort.
Ensure like-for-like habitat replacement (e.g., via Biodiversity Credits).
Standard: BBOP (Business and Biodiversity Offsets Programme).
- Maintain a buffer zone between operations and any protected areas, and continue existing operations within protected areas only when: it is legally permissible; undertaken in consultation with affected populations and relevant government authorities; and approved by a reputable conservation organisation or academic institution assessing biodiversity and ecosystem services risks.

[33] Practical Restoration Guidance
a) IUCN Global Standard for Nature-based Solutions
- Assess degradation (e.g., using Restoration Opportunities Assessment Methodology (ROAM)).
- Prioritise interventions (e.g., mangroves for coastal protection).
- Monitor via MST (Monitoring and Reporting Tool). Resource: IUCN NbS Global Standard.
b) FAO's Framework for Ecosystem Restoration
- Soil rehabilitation: Cover cropping, reduced tillage.
- Species reintroduction: Prioritize keystone species (e.g., wolves, bees).
- Community engagement. Guide: FAO Restoration Monitoring.

[34] - Set quantifiable targets, i.e. Science Based Targets for Nature (SBTN)
- Assess priority locations (e.g., water-stressed basins).
- Measure impacts (e.g., land footprint via Global Footprint Network tools).
- Set targets (e.g., "Reduce water withdrawal by 30% in high-stress basins by 2030").

[35] - Company may choose to report independently, or to do so using the CSRD, GRI, and/or CDP (formerly the Carbon Disclosure Project), or another recognised framework.

- CDP integrated biodiversity in 2024: “Report on actions taken to avoid ecosystem conversion and degradation; Disclose locations of operations in or adjacent to KBAs (Key Biodiversity Areas)/protected areas; Quantify impacts on species (e.g., IUCN Red List species affected).”
- Alignment with Frameworks: CDP integrates TNFD recommendations and SBTN targets, and maps to CSRD, GRI, and ISSB standards.

[36] Under the EU Corporate Sustainability Reporting Directive (CSRD), biodiversity reporting requirements are primarily detailed in European Sustainability Reporting Standards (ESRS) E4 “Biodiversity and Ecosystems” (adopted by Commission Delegated Regulation (EU) 2023/2772). Below are the exact legal references and key requirements:
- European Sustainability Reporting Standards (ESRS) Core Requirements

ESRS E4 imposes three tiers of disclosures:
a) Disclosure Requirement 1 (E4-1): Policies, Targets, and Resources
Policies: Describe adopted policies to manage biodiversity impacts/dependencies.
Targets: Set time-bound, measurable targets (e.g., “zero deforestation in a specific commodity supply chain by 2027”).
Resources: Disclose financial/technical resources allocated to biodiversity protection.
b) Disclosure Requirement 2 (E4-2): Impacts and Dependencies
Impact Assessment: Report on operational sites in or adjacent to protected areas (e.g., IUCN I-IV, Natura 2000).
Quantify impacts on
- Habitats: Area (hectares) degraded/restored.
- Species: Impacts on IUCN Red List species.
Dependency Assessment:
- Disclose reliance on ecosystem services (e.g., water, pollination).
- Use tools like ENCORE or IBAT for mapping.
c) Disclosure Requirement 3 (E4-3): Action Plans
- Mitigation Hierarchy: Demonstrate application of Avoid > Minimise > Restore > Offset for biodiversity loss.
- Restoration Plans: Detail projects to rehabilitate degraded ecosystems (e.g., reforestation, wetland recovery).
- Supply Chain Due Diligence: Implement procedures to eliminate deforestation (aligned with EUDR 2023).

[37] - Such as CSRD (European Sustainability Reporting Standards (ESRS)E4): NG in Protected Areas: ≥10% net gain in connectivity/quality of adjacent ecosystems (e.g., buffer zones around Natura 2000 sites).
- Metric: % increase in habitat integrity (e.g., via IBAT scores) or Business for Nature’s “Nature Positive” Pledge:
- NG of Species Populations: Halt species loss in operations by 2030; >10% increase by 2040.

[38] - Measurable approaches biodiversity remediation, aligned with IFC Performance Standard 6 (PS6) and CSRD/HYPERLINK “https://finance.ec.europa.eu/capital-markets-union-and-financial-markets/company-reporting-and-auditing/company-reporting/corporate-sustainability-reporting_en#legislation”European Sustainability Reporting Standards (ESRS) E4, including methodologies and reporting frameworks.E4, including methodologies and reporting frameworks.
- Mitigation Hierarchy: Avoid > Minimise > Restore > Offset (per IFC PS6).
- Net Gain Goal: Achieve measurable net positive impact (NPI) or no net loss (NNL).
- Science-Based Targets: Use metrics validated by the Science Based Targets Network (SBTN).
- Core Principles:

1. Habitat Restoration (IFC PS6, ESRS E4)
IFC PS6: Demonstrate «like-for-like or better» restoration.
CSRD: Report under ESRS E4 (Biodiversity & Ecosystems)
2. Invasive Species Control (IFC PS6, ESRS E4)
IFC PS6: Quantify “reduction in threats to biodiversity.”
CSRD: Disclose in ESRS E4 (direct impact mitigation).
3. Corporate Biodiversity Offsets (IFC PS6)
IFC PS6: Adhere to BBOP Standards.
CSRD: Map to ESRS E4 (financed biodiversity impacts).
4. Supply Chain Remediation (ESRS E4 §AR4)
CSRD: Report in ESRS E4 (upstream/downstream impacts).
Remediation should include relocating wildlife back after damaged areas have been restored.

- Grievance mechanism should follow the general expectations set out in Step 6, Level A, of the Risk and Sustainability Management and Stakeholder Engagement modules.

[39] “Better off” is a measure that must be determined in consultation with stakeholders and rights holders, not solely determined by the facility.

[40] European Sustainability Reporting Standards (ESRS) require that business undertakings shall disclose odour pollution prevention and control measures.

[41] Maximum accepted air & water quality pollutant concentration thresholds are given in IRMA Standard for Responsible Mining chapter 4.2 & 4.3. Air pollutant thresholds are also specified by the EU Air Quality Standards.

[42] ESRS require that business undertakings shall disclose odour pollution prevention and control measures.
Credible frameworks could include for example the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Odour for Planning, or the European Air Quality Standard.

[43] Grievance mechanism should follow the general expectations as set out in Step 6 Level A of the Risk and sustainability management and Stakeholder engagement modules

[44] Credible targets: actionable, science-driven, and audit-proof. They prioritise waste avoidance first, align with global standards (ICMM/IRMA/OECD), and are transparently tracked.

[45] Grievance mechanism should follow the general expectations as set out in Step 6 Level A of the Risk and Sustainability Management and Stakeholder Engagement modules

[46] For Reference:
- UNEP UNEA Resolution 4/19 on Mineral Resource Governance
- UN Globally Harmonised System of Hazard Classification and Labelling; Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal; International Cyanide Management Code; Minamata Convention on Mercury; Intergovernmental Forum on Mining, Minerals, Metals and Sustainable Development (IGF) Mining Policy Framework
EU Extractive Waste Directive (2006)
[47] Resources for reference:
- Global Industry Standard on Tailings Management (GISTM) applies to tailings waste, but does not strictly include all mining waste such as overburden, or water-based tailings.
- Towards Sustainable Mining (TSM) Tailings Protocol
- Earthworks Guidelines for Responsible Tailings Management; Global Tailing Review
- International Assessment of Marine and Riverine Disposal of Mine Tailings
- RMI Guiding Note to the Risk Readiness Assessment (RRA) Criterion 31: Tailings Management.
Note: construction of new upstream tailings dams has already been banned in Brazil, Chile, Peru and Ecuador (earthworks) due to demonstrated risk associated with upstream dam construction, upstream dams must not be built at any new facilities. Upstream construction is especially problematic in areas with moderate or high seismic risk, or in wet climate areas with net precipitation (more precipitation than evaporation), especially as weather events become increasingly severe with climate change.
[48] EU Critical Raw Materials Act: "Member States should promote the recovery of critical raw materials from extractive waste by improving the availability of information and by addressing legal, economic and technical barriers. A possible solution that Member States should look into are risk-sharing mechanisms between operators and the Member State to promote recovery from closed waste facilities. The Board should also facilitate the exchange of best practices between Member States, on the design and implementation of their national programmes."
[49] Substitution refers to reagents used in ore processing, such as cyanide.
[50] - Cooperation may include, for example, financing studies, conducting investigations, and contributing to databases.
- Reference the Guiding Principles and Actionable Recommendations from the UN Secretary General's Panel on Critical Energy Transition Minerals Report.
[51] - Young workers are those under 18 years of age.
- ILO Convention C138 provides for the employment of children under the age of 15 in the following circumstances:
• a minimum work age of 14 years where countries' economy and educational facilities are insufficiently developed; or where work is an integral part of education / training from a school or training institution or orientation programmes facilitating a choice of occupation, so long as they are approved by a competent authority after consultation with organisations of employers and workers concerned.
• 13- to 15-year-old children may engage in "light" work that is not likely to be harmful to their health or development and does not prejudice their attendance at school, participation in vocational orientation or training programmes approved by competent authorities and capacity to benefit from any instruction received. 12-year-old children are allowed to engage in light work where countries' economy and educational facilities are insufficiently developed.
- Some national jurisdictions allow for children to be paid a certain fraction of the wages of the minimum wage. Additionally, those partaking in vocational training or under initial probationary periods may also not be paid a full wage in some countries, so long as their remuneration is adequate (see ILO Recommendation R208) and the probationary periods are reasonable.
[52] - Identify applicable child labour laws and regulations in country of operation, alongside international instruments and industry standard requirements.
- Uyghur Forced Labor Prevention Act (UFLPA) Section 2 – Definitions
The Act incorporates by reference definitions of "forced labour" including child labour, under 19 U.S.C. §1307, which prohibits importation of goods made "wholly or in part by forced labour, convict labour, or forced or indentured child labour."
[53] Such as processes to ensure young workers only work outside of school hours where young workers are subject to compulsory education laws, for remediation of child labourers, and for providing adequate financial and other support to enable such children to attend and remain in school.
[54] - Protocols for age/ID verification as well as authenticating documents can include having a formal recruitment / hiring procedure and an age-verification procedure, reviewing government issued birth certificates, passports, ID cards and other vital records in coordination with relevant authorities or, where available, cross-checking with government online record databases. Risk assessment of workplace hazards, documented job descriptions, and employment contracts are additional ways to monitor for child labour risks.
- For the requirements related to child labour: IRMA Standard for Responsible Mining 1.0 Guidance Document
- Uyghur Forced Labor Prevention Act (UFLPA) Section 3 – Rebuttable Presumption
Any goods produced in whole or in part in Xinjiang, or by an entity linked to forced labour in Xinjiang, are presumed to be made with forced labour and are banned from U.S. importation, unless the importer can rebut the presumption.
If child labour is part of the forced labour practice (e.g., coercion in state-sponsored labour programs involving minors), the goods are subject to seizure by U.S. Customs and Border Protection (CBP).
EU Forced Labour Ban Article 2 – Definitions
"Forced labour means work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily, including forced child labour."
Article 3 – Prohibition
"Products made in whole or in part with forced labour shall not be placed or made available on the Union market or exported."
[55] EU Forced Labour Ban Article 5 – Investigation & Risk Prioritisation: Authorities must assess and prioritize cases based on: Scale and severity of forced labour; Whether child labour is involved; Geographic and sectoral risk factors.
[56] Unacceptable child labour refers to those cases given in foundational step 1.
[57] ESRS Standard: ESRS S3 – Affected Communities, part of the first set of mandatory standards, explicitly includes:
- Disclosure Requirement S3-1 – Policies related to affected communities
  Companies must disclose: "Policies that address actual or potential negative impacts on affected communities, including child labour, forced labour, land rights, indigenous peoples' rights."

- Disclosure Requirement S3-2 – Actions and Resources
  Companies must describe: “Actions taken to identify, prevent, mitigate, or remediate child labour risks and incidents in their operations or value chain.”
- Disclosure Requirement S3-4 – Metrics
  Total number of substantiated incidents involving child labour
  Measures taken in response
  Remediation offered to victims or communities

[58] - Forced labour includes but is not limited to debt bondage, exploitative or involuntary prison labour, human trafficking, indentured labour, slavery or slavery-like practices. See glossary for complete definition and for definitions of debt bondage, forced labour, human trafficking and recruitment fees. Forced labour risk may impact domestic and migrant labour, labour transfers, direct and indirect employees.
- Indirect employees include those employed by contractors, subcontractors or through recruitment agencies.

[59] Uyghur Forced Labor Prevention Act (UFLPA) Section 2 – Definitions: The Act incorporates by reference definitions of “forced labour” under 19 U.S.C. §1307, which prohibits importation of goods made “wholly or in part by forced labour, convict labour, or forced or indentured child labour.” Commitment to pay back recruitment fees, when such fees have been identified, should include interest rates and loss of opportunity.

[60] To reflect commitment to ethical recruitment reference to ILO General Principles and Operational Guidelines on Fair Recruitment and the Definition of Recruitment Fees and Related Costs, ILO C097- Migration for Employment Convention, ILO C143-Migrant Workers Convention and ILO C181-Private Employment Agencies Convention.
Additional relevant resource: IOM Migrant Worker Guidelines for Employers: Promoting Respect for the Human and Labour Rights of Migrant Workers through Ethical Recruitment and Deployment, Responsible Employment and Safe Return

[61] - Check existing lists (like RBA/On the Level and/or Responsible Recruitment Gateway) of certified recruitment agencies.
- Potentially exploitative recruitment practices can be identified by, at a minimum, assessing:
  - contractual agreements.
  - on-site accommodation condition and any rental agreements.
  - outstanding debts employees have with any contractor or recruitment agencies.
  - recruitment agencies’ business licence, registration or articles of incorporation.
  - wage payments.
  - work permits of any foreign employees.
  - working hours; and
  - incidents of any of the forms of forced labour listed in the glossary caused by or contributed to by the facility.

[62] - Uyghur Forced Labor Prevention Act (UFLPA) Section 3 – Rebuttable Presumption
Any goods produced in whole or in part in Xinjiang, or by an entity linked to forced labour in Xinjiang, are presumed to be made with forced labour and are banned from U.S. importation and subject to seizure by U.S. Customs and Border Protection (CBP), unless the importer can rebut the presumption.
- EU Forced Labor Ban Article 2 – Definitions
“Forced labour means work or service which is exacted from any person under the menace of any penalty and for which the person has not offered himself or herself voluntarily.”
- Article 3 – Prohibition
“Products made in whole or in part with forced labour shall not be placed or made available on the Union market or exported.”

[63] - Contractors, recruitment agencies or suppliers found to use forced labour can be engaged with the following escalating measures:
  - continuing trade with risk mitigation efforts while implementing measures to reduce the identified risks.
  - suspending trade while pursuing ongoing risk mitigation; and
  - disengaging from suppliers as a last resort, if mitigation efforts fail or are not feasible, or if adverse impacts are severe
- Actions to address exploitative recruitment practices may include but are not limited to:
  - adjustment of contractual terms, such as working hours and leave, or clarification of employment conditions.
  - compensating employees financially for any undue deposits, recruitment or other fees they have paid.
  - document work permits of any foreign workers.
  - immediate dismissal of any employees found to be perpetrating forced labour abuses or exploitative recruitment practices.
  - providing work contracts in language understandable to employees; and
  - return of documentation, such as government-issued identification, travel authorisations or work permits.

[64] EU Forced Labor Ban Article 5 – Investigation & Risk Prioritisation: Authorities must assess and prioritize cases based on: Scale and severity of forced labour; Geographic and sectoral risk factors.

[65] ESRS Standard: ESRS S3 – Affected Communities
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- Disclosure Requirement S3-2 – Actions and Resources
  Companies must describe: “Actions taken to identify, prevent, mitigate, or remediate forced labour risks and incidents in their operations or value chain.”
- Disclosure Requirement S3-4 – Metrics
  Total number of substantiated incidents involving forced labour
  Measures taken in response
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[66] Measures may include but are not limited to donating proceeds to NGOs engaged in remediating forced labour; identifying and adopting alternatives; or withdrawing products from the market where there is evidence linking them to forced labour, as appropriate. Case Examples include action taken by the Malaysian glove industry following the identification of forced labour and human trafficking risks; stockpile

management of 3T minerals in the DRC; companies donating profits to NGOs help remediate forced labour in cases where tainted products reached the market. Consult relevant regulations (i.e. EU Forced Labor Ban and the UFLPA regarding approaches to product seizure and/or removal from the market)

[67] VPSHR requirement II.9 promotes observance of the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and the UN Code of Conduct for Law Enforcement Officials, which are also relevant for the management of public security forces.

[68] Voluntary Principles Initiative

[69] - Relevant ILO Conventions include:
- C001 (Hours of Work), C014 (Weekly Rest)
- C087 (Freedom of Association and Protection of the Right to Organise)
- C095 (Protection of Wages)
- C098 (Right to Organise and Collective Bargaining Convention)
- C131 (Minimum Wage Fixing)
- C132 (Holidays with Pay), and
- ILO Recommendation R115 on Workers' Housing.

- ILO Convention 135 on Employee Representatives.
- Leave rights include sick and parental leave.
- Information about wages includes also overtime rates, benefits, deductions and bonuses.

[70] Allow social partners to promote collective bargaining for establishing fair working conditions and fostering sound industrial relations, negotiate the terms of employment, including wages, working hours, and other conditions and stipulate these in a CBA that they jointly sign.

[71] Presence of a grievance mechanism shall not require aggrieved parties to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies.

[72] - Relevant ILO Conventions include:
- C087 (Freedom of Association and Protection of the Right to Organise)
- C095 (Protection of Wages)
- C098 (Right to Organise and Collective Bargaining Convention)

- ILO Convention 135 on Employee Representatives.
- ILO Convention 144 om Tripartite Consultation
- Good-faith participation includes, providing workers' representatives access to facilities to freely carry out their functions, and not unnecessarily delaying union recognition or collective bargaining.
- Alternative mechanisms must not be used to avoid unions, and must themselves be independent and democratic.

[73] A "neutrality agreement" is a contract between a union and an employer under which the employer agrees to support a union's attempt to organize its workforce. See e.g., https://www.nrtw.org/what-is-a-neutrality-agreement-and-how-does-it-affect-workers

[74] Presence of a grievance mechanism shall not require aggrieved parties to waive their right to seek recourse from the company for the same complaint through other available mechanisms, including administrative, non-judicial or judicial remedies.

[75] Note: It is recommended that safeguards be put in place to address any unintended consequences of financial incentives, such as the underreporting or concealment of injuries to manipulate data. This is particularly relevant where a facility collects OHS performance indicators with the aim of reducing the number of incidents below industry peers, and where management and staff are internally incentivised to meet such targets.

[76] The types of OHS hazards include but are not limited to confined spaces and ventilation; biological hazards, chemical; equipment and machinery; fire; sanitation; structural; temperature exposure; vehicles; walking and working surfaces; worker accommodation and working at heights.

[77] Credible data sources can include for example e.g. calculations performed by qualified engineers, laboratory analyses conducted by qualified labs, and medical assessments by qualified medical professionals

[78] Physical stability risks can be caused by but not limited to access roads; failures due to potential storm events; foundational failures; fluid extraction areas; subsidence; surface mines; underground mines; wate reservoirs.

[79] - The Health and Safety Controls Hierarchy involves eliminating the hazard; substituting the hazard with a lesser risk; isolating the hazard; using engineering controls; using administrative controls and using personal protective equipment. See glossary for expanded definition.
- Risk controls include for example personal protective equipment (PPE) and provision of first aid.
- Risks in scope should include biological hazards and risks (ILO Convention 192).

[80] Conditions that enable all individuals to perform their roles, include consideration for bodily needs, such as urination/menstruation/menopause etc; gender specific medical issues; and care giving responsibilities.

[81] - Personal characteristics include the following categories: age, caste, disability, ethnicity, familial status, indigeneity, gender (identity), marital status, nationality, neurodiversity, political affiliation, pregnancy, race, religion, sexual orientation, socio-economic background or veteran status.
- Unfair disciplinary action may include alteration of schedules; corporal punishment; deductions to wages, benefits or leave; harsh or degrading treatment; physical or sexual harassment; mental, physical or verbal abuse, coercion or intimidation.

[82] A safe and healthy working environment, per the ILO: https://www.ilo.org/topics-and-sectors/safety-and-health-work/safe-and-healthy-working-environment-fundamental-principle-and-right-work

[83] - Discrimination includes psychological harm, harassment or violence.
- Diversity metrics include among others, self-identified disability, ethnicity and gender.
- Barriers to, objectives and opportunities on diversity promotion should cover recruitment, remuneration, representation, performance management, retention & termination and development & advancement processes.
- Efforts to identify and assess risks related to discrimination, harassment, violence or barriers to DEI are to include a cross-section of workers from diverse perspectives and experiences, particularly under-represented groups. This should include a system whereby workers can anonymously report any psychological hazards or other risks and may include a worker questionnaire.

[84] - Plans to prevent or mitigate risks related to discrimination, harassment, violence or barriers to DEI are to include a cross-section of workers from diverse perspectives and experiences, particularly under-represented groups.

- Remuneration, including benefits, should follow the principle of equal remuneration for work of equal value.
- Examples of steps to address DEI barriers include but are not limited to:
  • Rectification of remuneration inequities.
  • Providing gender-appropriate PPE, changing, lactation and sanitation facilities are available to all workers.
  • Allowing special working hour arrangements for pregnant workers and allow return to their position following paternal leave; and
  • Make reasonable allowances for religious practices such as dress code, prayer or rest days.

[85] Independent or supporting the work of an occupational health and safety (OHS) committee, including wellbeing and a healthy lifestyle, and provide access to psychological support.

[86] Monitoring effectiveness of steps taken to prevent or mitigate discrimination, harassment, violence or reduce barriers to DEI are to include a cross-section of workers from diverse perspectives and experiences, particularly under-represented groups.

[87] Community life risk category from EUBR (references UN definitions): Community development: “a process where community members come together to take collective action and generate solutions to common problems”.

[88] Note that the buffer zones are not regarded as part of World Heritage Sites but are generally legally defined by host governments to protect their outstanding universal value. States may additionally legally define non-World Heritage protected areas.

[89] Physical displacement scenarios due to land acquisition and resettlement that could cause adverse impacts include but are not limited to:
  • Land (use) rights acquired through expropriation or other compulsory procedures.
  • Land (use) rights acquired through negotiated settlements with property owners / those with legal land rights, if failure to reach settlement would have resulted in expropriation / other compulsory procedures.
  • Customary land tenure rights holders.
  • Legacy resettlement impacts from previous site owners.
  • Involuntary restrictions on land use / access to natural resources causing communities to lose access to resource usage where they have traditional / recognisable usage rights.
  • Situations requiring evictions of people occupying land without formal, traditional or recognisable land usage rights;
  • Restriction on land / other resource use access, including communal property such as marine & aquatic resources, timber & non-timber forest products, freshwater, medicinal plants, hunting & gathering grounds, or grazing & cropping areas
  • Meaningful stakeholder involvement means for example having translators accompany engagement, ensure documents have been reviewed,

[90] Certain stakeholder groups may be at greater risk to adverse impacts, such as underrepresented or vulnerable groups.

[91] - Measures to prevent or mitigate adverse impacts to cultural heritage should include establishment of procedures in the case of chance finds of previously unknown cultural heritage.
- Measures to prevent and mitigate adverse impacts of land acquisition and physical displacement can include but are not limited to:
  • Explore & assess other viable project design options and site locations.
  • Develop resettlement action plans where resettlement is unavoidable, prohibiting forced displacement.
  • Negotiate potential land acquisition settlements and offer fair compensation for assets lost due to acquisitions at full cost, even if sites have legal capacity to purchase land without obtaining consent of seller.
  • Provide relocation assistance.
  • Give those resettled are given security of tenure and not at risk of further displacement.
  • Consult with affected stakeholders during initial planning stages of future expansions / major changes to operational activities that may cause physical / economic displacement.

[92] - Where all offers to avoid, minimise, restore or compensate for adverse community impacts due to land acquisition and resettlement have been rejected, facilities can:
  • Offer fair compensation for land or assets lost due to acquisitions at full cost.
  • Offer recourse via external judicial or non-judicial mechanisms.
  • Only remove people from their lands in accordance with the law and international best practice, including timely and adequate notice of removal, ensuring those carrying out evictions are trained on procedures for cases of violent opposition to removal and the appropriate use of force, and the presence of relevant government officials.
  • Where necessary, provide temporary transitional resettlement in agreement with those affected, including adequate housing, access to basic amenities and due compensation for disruption to their lives; or
  • Explore opportunities to collaborate with responsible government agencies and play active role in resettlement planning, implementation and monitoring to risk of impoverishment of affected people.
- Where unavoidable impacts to irreplaceable or critical cultural heritage occur:
  • Remove and preserve cultural heritage in line with best available techniques in collaboration with traditional owners, users and responsible authorities, where possible.
  • Compensate affected stakeholders in accordance with national law and international best practice standards, where removal and preservation of cultural heritage is not possible.

[93] - Where all offers to avoid, minimise, restore or compensate for adverse livelihood impacts due to land acquisition and resettlement have been rejected, facilities can allow continued access to resources on associated lands from which those affected derive their livelihoods.
- Where unavoidable impacts to intangible critical cultural heritage occur, support reconnection of those affected to that intangible heritage.

[94] - Business integrity violations include but are not limited to anti-competitive behaviour, bribery, collusion, conflict financing, conflicts of interest, corruption (including facilitation payments), extortion, fraud, inappropriate gifts, insider trading, money laundering or the non-payment of legally required taxes or other fees.

[95] - Indirect employees are employed by a company working in supporting roles that do not generate revenue or directly contribute to the provision of goods or service (e.g. finance, HR, IT), whereas subcontractors are external staff hired for a specific time period or deliverable.

[96] - Potential business integrity, armed conflict or human rights violations risk or impacts identified here are categorised as Annex II risks by the OECD Due Diligence Guidance for Conflict-Affected or High-Risk Areas (CAHRAs), such as extortion or illegal taxation by security forces, bribery, money laundering, gross human rights violations or support to non-state armed groups.

[97] The International Code of Conduct for Private Security Service Providers, paragraph 63, provides guidelines for reporting security incidents.

[98] - Grievances typically pertain to complaints affecting only the individual or group reporting grievances and submitted to the facility's management, while whistleblowers report misconduct perpetrated by the facility that do not necessarily affect the whistleblower, and which can be submitted to external bodies.
- UN Guiding Principles provides guidance on remediation where security personnel have caused or contributed to human rights impacts.
[99] RMI, Responsible Minerals Assurance Process Facility Standard for Social, Environmental, OHS and Governance Risks Glossary (2025)
[100] - OECD, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs (Steps 2–3)
- ISO 31000:2018 (Risk Management) (2023)
- IFC, Performance Standards (2012)
- EU CSRD (ESRS 1 §AR 13) (2022)
- ISO 14001:2015 (Environmental Risk) (2025)
- TNFD, TNFD LEAP Framework (2022)
[101] RMI, Responsible Minerals Assurance Process Facility Standard for Social, Environmental, OHS and Governance Risks Glossary (2025)
[102] - IRMA, IRMA Standard for Responsible Mining Glossary (2018)
- IFC, Policy & Performance Standards and Guidance Notes (2012)
[103] (same with ft 106) RMI, Responsible Minerals Assurance Process Facility Standard for Social, Environmental, OHS and Governance Risks Glossary (2025)
[104] - IRMA, IRMA Standard for Responsible Mining Glossary (2018)
- IFC, https://www.ifc.org/content/dam/ifc/doc/2021/20210614-ifc-ps-guidance-note-1-en.pdf (2021), page 7
[105] OECD, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from CAHRAs (2012)
[106] EITI Standard (2023), page 20
[107] 1992 Convention on Biological Diversity (1992), Article 2
[108] UNESCO
[109] RMI, Responsible Minerals Assurance Process Facility Standard for Social, Environmental, OHS and Governance Risks Glossary (2025)
[110] The World Heritage Resource Manual Preparing World Heritage Nominations (2nd edition, UNESCO 2011
(wrong link)
[111] RMI, Responsible Minerals Assurance Process Supply Chain Due Diligence Plus Glossary (2025)
[112] RMI, Responsible Minerals Assurance Process Facility Standard for Social, Environmental, OHS and Governance Risks Glossary (2025)
[113] IRMA, IRMA Standard for Responsible Mining Glossary (2018)
[114] EU Batteries Regulation Annex X (2023)
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[246] The Other mapped standards have been mapped by the GBA Secretariat, to support reporting and provision of assurance according to the Assurance Escalator. The respective standard setters have not reviewed the accuracy of the mapping for this Beta Release. The GBA welcomes engagement and review during the public consultation.
[247] ASI has not reviewed the mapping of its standard against the GBA in detail. ASI looks forward to providing a detailed review of the mapping as part of the public consultation ahead of preparation of the full certification scheme.
[248] CopperMark has reviewed the mapping of the Responsible Production Criteria in detail for the Joint Due Diligence Standard (JDDS); the GHG and Energy Efficiency; and Child Labour modules. CopperMark looks forward to providing a detailed review of the mapping of the remaining modules as part of the public consultation ahead of preparation of the full certification scheme.
[249] ICMM is transitioning into the Consolidated Mining Standard Initiative (CMSI) and has therefore not reviewed the mapping of the outgoing ICMM Performance Expectations for the Beta release of the GBA Battery Benchmarks.

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