



The Human Rights Index

**INTERIM VERSION REPUBLISHED FOR BATTERY PASSPORT PILOTS AS
“PRESENCE AND QUALITY OF ENVIRONMENTAL AND HUMAN RIGHTS DUE DILIGENCE AND RISK
MANAGEMENT SYSTEMS”
JUNE 2024**

**GLOBAL
BATTERY
ALLIANCE**

BATTERIES POWERING
SUSTAINABLE DEVELOPMENT

Developed in collaboration with



ABOUT THIS INTERIM DRAFT FOR BATTERY PASSPORT PILOTS

The GBA battery passport rulebooks and corresponding data collection templates are interim versions released in June 2024 by the Global Battery Alliance. This version has been developed by the GBA's multistakeholder Environment, Social & Governance working groups for the purpose of Battery Passport. It has been initially published in 2022:

www.globalbattery.org/media/publications/gba-humanrightsindex-v1rev2.pdf

This version is restructured for the purposes of battery passport pilots, whilst recognizing that there remain selected substantive and editorial comments to be resolved together with feedback collected from the pilots. The Battery Passport pilots aim to test reporting against the performance indicators, as well as elements of data verification, aggregation and calculation of the GBA's ESG score for batteries. Following the piloting, the GBA will be hosting a structured public consultation phase on the indicator framework. Based on the feedback from the pilots and that gathered from thematic experts and other stakeholders, the rulebooks and data collection templates will be finalized and re-published in 2025.

Please find more information about the GBA's Battery Passport and the pilots [here](#). If you would like to take part in the evolution of the GBA Battery Passport and future rulebooks across salient ESG issues, please [join the GBA](#) or contact us secretariat@globalbattery.org.

Disclaimer: This document is published by the Global Battery Alliance. The findings, interpretations and conclusions expressed herein are a result of a collaborative process facilitated and endorsed by the Global Battery Alliance but whose results do not necessarily represent the views of the entirety of its Members, Partners or other stakeholders.

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Contents

1.	Indicators and Requirements	4
1.1.	Policy & Management Systems (first draft)	5
1.2	Risk & Impact Assessment (first draft)	11
1.3	Prevention & Mitigation (first draft)	16
1.4	Effectiveness	20
1.5	Reporting	24
1.6	Remediation	27
2.	Glossary.....	30
	Annex 1 – Reporting template	43

Acknowledgements

GBA member organisations and external partners actively participated in the elaboration of the performance expectations in this rulebook.

1. Indicators and Requirements

Disclaimer: This is an extract in the format of the new rulebooks (e.g., Forced Labor, Indigenous People's rights, Biodiversity loss etc.) which only shows the chapter containing the indicator detailing and requirements.

The structure of the indicators and detailed requirements are based on the provisions of the Human Rights Index.

DRAFT: The following indicators represent the requirements that need to be fulfilled for the battery passport. They display a consolidated version of the relevant and recognised regulations, standards, and Leading practices with the goal to make the issue operationalizable for the companies. Whenever applicable, further guidance and background is provided.

The GBA recognizes that some of the Leading practices outlined in the indicator requirements reflect changes in global Practices and norms that evolved over the past decades.

Companies participating in the GBA battery passport are required to fulfil the set of indigenous people's rights indicators. Each indicator is composed of several requirements. These requirements are divided into various levels which directly relate to the performance score of participating companies.

DRAFT: These levels are:

- I. Foundational requirements
- II. Intermediate requirements
- III. Leading practice

1.1. Policy & Management Systems (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ¹
<p>F. Foundational requirements</p>	<p>1. The company has due diligence policies and public commitment to respect responsible business conduct (RBC) that</p> <p>1.1 Are in line with internationally recognized human rights and environmental due diligence frameworks, and/or explicitly references the company's commitment to conform to the internationally instruments covering the relevant risks and relevant internationally recognized due diligence instruments, such as The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, The OECD Handbook on Environmental Due Diligence in Mineral Supply Chains, and the United Nations Guiding Principles for Business and Human Rights</p> <p>1.2 Apply across the company's own operations, supply chain, and other business relationships</p> <p>1.3 Concern raw materials and associated social and environmental risk categories of Annex X in the EU Batteries Regulation and/or further ones (as applicable)</p> <p>1.4 Are updated to reflect significant developments in the prevalence and nature of RBC issues relevant to the company's operations, supply chain and communities</p> <p>1.5 Are updated to reflect lessons learned from tracking compliance with and effectiveness of the company's due diligence policies</p> <p>1.6 Are verified by a notified body ('third-party') and periodically audited by that notified body to ensure that they are aligned with the EU Batteries Regulation Art. 49, 50, and 52</p> <p>2. The company disseminates its due diligence policies to all relevant stakeholders, including managers, employees, suppliers, subcontractors and the public by</p> <p>2.1 Making them publicly available (e.g. by posting the policies on the company website, promoting them through social media or inserting references to the policies in the contracts with third parties)</p> <p>2.2 Communicating it internally to all personnel</p> <p>2.3 Proactively communicating it to the external stakeholders who need to be aware of it to ensure its effective implementation (e.g. suppliers, business relationships, government agencies, community members, NGOs, civil society organizations, women's organizations and the legitimate representatives of vulnerable people)</p> <p>3. The due diligence policies are approved at the most senior level of the company</p> <p>4. The company keeps a 10-year documentation demonstrating their fulfilment of the EU Batteries Regulation's fulfilments of Art. 48, 49, 50 and 52 (including the verification and audit report of 1.5, the approval decision of Art. 51)</p> <p>5. The company describes the processes its personnel must implement to fulfil the due diligence policies</p> <p>6. The company has assigned sufficient resources to the implementation of the due diligence policies and supporting procedures, invests in training and capacity building and ensures</p>	<ul style="list-style-type: none"> • OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions • EU Batteries Regulation • EU CSRD (General disclosures) • EU CSDDD • Aluminum Stewardship Initiative (ASI) Performance Standard • Initiative for Responsible Mining Assurance (IRMA) • The Copper Mark Criteria for Responsible Production • Extractive Industries Transparency Initiative (EITI) Standard • Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for Mineral Supply Chains) • The Copper Mark Joint Due Diligence Standard (JDDS) • Aluminum Stewardship Initiative (ASI) Chain of Custody Standard • Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains • IFC Performance Standards

¹ For a detailed reference of referenced parts of the regulations and standards, please check the corresponding standard equivalency mapping.

REPUBLISHED FOR BATTERY PASSPORT PILOTS

	<p>leadership is accountable for oversight and implementation. This is done by</p> <p>6.1 Embedding the due diligence policies within the management systems and implementing them as part of the company's regular business</p> <p>6.2 Making senior management accountable to the executive for the implementation of the due diligence policies and supporting processes</p> <p>6.3 Providing training on identifying, mitigating, preventing and remedying RBC issues to its personnel, to ensure integration of the due diligence policies and processes across functions within the company (by the company itself or a third-party)</p> <p>6.4 Assigning responsibility for leading the identification, mitigation, prevention and remediation of RBC risks and adverse impacts in its own operations and business relationships to personnel trained in due diligence policies</p> <p>6.5 Allocating sufficient internal resources (e.g. financial, human, social, physical, other capital) to enable these personnel to respond effectively to RBC issues arising in its operations, business relationships, and supply chains</p> <p>6.6 maintaining records of the management systems for a minimum for 10 years</p> <p>7. The company defines what is expected of its business relationships to support the fulfilment of their due diligence policies</p> <p>8. The company embeds the due diligence policies within its business relationships as part of its regular business processes by</p> <p>8.1 Incorporating or referencing the due diligence policies into commercial contracts and/or written agreements with suppliers and business partners</p> <p>8.2 Having contractual assurances such as covenants, conditions, representations, and warranties in the commercial contracts and/or written agreements with the suppliers and business partners that the due diligence policies will be adhered to</p> <p>9. The company offers its expertise to inform the development of suppliers' and business partners' due diligence policies, when requested</p> <p>10. As part of supplier onboarding or renewal, the company</p> <p>10.1 Requires its supplier to describe what is expected of its business relationships with regards to respect RBC</p> <p>10.2 Requires its suppliers to have due diligence policies in line with internationally recognized RBC frameworks that apply across their own operations and supply chains</p> <p>10.3 Requires its suppliers to describe the processes their personnel must implement to fulfil their due diligence policies</p>	
<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i></p> <p>11. The due diligence policies comprehensively cover universal human rights by</p> <p>11.1 Not explicitly excluding any internationally recognized human rights from its coverage</p> <p>11.2 Not limiting the company's recognition of human rights to the provisions of national law or wider industry practice where these are weaker than the international standards</p> <p>12. The due diligence policies are accessible and understandable to all employees and as relevant identified stakeholders</p>	<ul style="list-style-type: none"> • Initiative for Responsible Mining Assurance (IRMA) • The Copper Mark Criteria For Responsible Production • IFC Performance Standards

<p>L. Leading practice</p>	<p><i>In addition to (F) and(I),</i></p> <p>13. In the development of the due diligence policies the company involves staff in key internal functions, such as procurement and human resources, as well as relevant human rights and gender expertise from inside and outside the company, where possible, to ensure incorporation of leading practice from within the company's sector. The company involves senior leadership in approving the due diligence policies to help signal its importance. This is done by</p> <p>13.1 Consulting relevant internal and external experts and considering their perspectives in the due diligence policies' development (e.g. the board, senior level management, trade unions and employee representatives, recognized due diligence experts in the industry, communities and/or affected stakeholders, etc.)</p> <p>13.2 Consulting relevant business partners and considering their perspectives in the due diligence policies' development (e.g. customers, tier 1 suppliers, tier n suppliers in high and medium-risk supply chains or vulnerable people in provenances to which the company has a high likelihood of linkage)</p> <p>13.3 Consulting potentially affected people (e.g. workers and their legitimate representatives) and considering their perspectives in the due diligence policies' development</p> <p>14. The company ensures leadership is accountable for oversight and implementation of the policies. This is done by</p> <p>14.1 Giving workers/ trade union a role in holding management accountable for the implementation of the due diligence policies and supporting processes</p> <p>14.2 Checking that its tier n suppliers have assigned accountability for implementation of the due diligence policies and supporting processes to senior management or the executive</p> <p>14.3 Incentivizing its suppliers to do so, where accountability is not assigned to senior management or an executive</p> <p>15. The due diligence policies are built on meaningful social dialogue with workers (and/or their representatives) as priority internal stakeholders to cover their input fairly</p> <p>16. The ensures leadership is accountable for oversight and implementation of the policies. This is done by</p> <p>16.1 Ensuring that its standard business processes do not make demands of business partners that might cause them to violate human rights</p> <p>16.2 Having a clear timeframe for terms of payment and has systems in place to ensure they are not exceeded</p> <p>17. The company ensures that its purchasing and pricing policies and practices do not make demands of suppliers that might cause them to violate human rights</p> <p>18. The company supports its SME business partners, including ASM, to establish conformant due diligence policies</p> <p>19. The company supports its tier n SME suppliers, including ASM, to establish conformant due diligence policies</p> <p>20. The company has a commitment to proactively do business with SMEs</p> <p>21. The company has introduced processes which make it easier for SMEs to become vendors</p> <p>22. The company has payment terms which do not exceed 45 days from point of invoicing by vendors for SME vendors or 10 days from point of receipt of funds by company from the client where the vendor is a sub-contractor</p> <p>23. The company checks that its suppliers provide and/or have received training on identifying, mitigating, preventing, and remedying human rights issues to their personnel in accordance</p>	<p>/</p>
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with the UNGPs Reporting Framework

24. The company defines its approach for suppliers who do not have due diligence policies with the defined quality aspects, including supporting them to develop one within the shortest timeframe possible (to be agreed between the parties) where appropriate

25. The company embeds the due diligence policy within its management systems regarding the supply chain by

25.1 Using a risk-based approach to determine whether it should audit a supplier's embedding of its due diligence policy within its management systems, and verifies this through second- or third-party audit based on risk level and whether or not a prior audit can be relied upon

25.2 Encouraging suppliers to consider the perspectives of potentially affected people (e.g. workers and their legitimate representatives) in the policies development where this has not been the case

26. The company's policies reflect an understanding that certain human rights are particularly salient for the company

27. The company's policies ensure that human rights are considered in relation to their impacts on people and not (only) the business

28. The RBC due diligence training for employees is

28.1 Delivered annually

28.2 Delivered when onboarding any new employee

28.3 Delivered upon demand

28.4 Delivered in accordance with the UNGP's Reporting Framework



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Indicator 1 - References to regulations and standards (some may still be added as standard equivalency mapping proceeds)

Requirement	OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions	EU Battery Regulation	EU CSRD (ESRS 2 General disclosures, no topical ESRS)	EU CSDDD	Aluminium Stewardship Initiative (ASI) Performance Standard	Initiative for Responsible Mining Assurance (IRMA) Draft Mineral Processing	The Copper Mark Criteria For Responsible Production	Extractive Industries Transparency Initiative (EITI) Standard	Towards Sustainable Mining (TSM)	Initiative for Responsible Mining Assurance (IRMA) Draft Chain of Custody	Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for The Copper Mark Joint Due Diligence Standard (JDDS))	Copper Mark Chain of Custody Standard	Aluminium Stewardship Initiative (ASI) Chain of Custody Standard	Responsible Business Alliance Code of Conduct and Validated Assessment	Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains	IFC Performance Standards
Foundational Requirements																
1.																
1.1	X	X	X	X	X	X	X	X			X	X			X	X
1.2	X	X	X	X	X	X	X	X			X	X			X	X
1.3	X	X	X	X	X	X	X	X			X	X			X	X
1.4	X	X	X	X	X	X	X	X			X	X			X	X
1.5	X	X	X	X	X	X	X	X			X	X			X	X
1.6	X	X	X	X	X	X	X	X			X	X			X	X
2	X	X	X	X	X	X	X	X			X	X			X	X
2.1	X	X	X	X	X	X	X	X			X	X			X	X
2.2	X	X	X	X	X	X	X	X			X	X			X	X
2.3	X	X	X	X	X	X	X	X			X	X			X	X
3.	X	X	X	X	X	X	X	X			X	X			X	X
4.	X	X	X	X	X	X	X	X			X	X			X	X
5.	X	X	X		X	X	X				X	X			X	X
6.	X	X	X		X	X	X				X	X			X	X
6.1	X	X	X		X	X	X				X	X			X	X
6.2	X	X	X		X	X	X				X	X			X	X
6.3	X	X	X		X	X	X				X	X			X	X
6.4	X	X	X		X	X	X				X	X			X	X

REPUBLISHED FOR BATTERY PASSPORT PILOTS

7.	X	X	X		X	X	X				X	X				X	X
8.	X	X									X	X				X	
8.1	X	X									X	X				X	
8.2	X	X									X	X				X	
9.	X	X									X	X				X	
10.	X	X									X	X				X	
10.1	X	X									X	X				X	
10.2	X	X									X	X				X	
10.3	X	X									X	X				X	
Intermediate Requirements																	
11.																	
11.1						X											
11.2																	X
12.							X										

1.2 Risk & Impact Assessment (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ²
<p>F. Foundational requirements</p>	<p>1. Following a risk-based approach associated with the risk categories listed in point 2 of Annex X of the EU Batteries Regulation and international environmental and human rights due diligence frameworks (as mentioned in Indicator 1) as part of its management plan, including on the basis of the information provided pursuant to Art. 49 EU Batteries Regulation and any other relevant information that is either publicly available or provided by stakeholders, by reference to its battery due diligence policy, the company, as the basis for risk identification</p> <p>1.A. Maps its own operations (e.g. geographies, entities, and products) 1.B Maps its supply chains, including its business relationships (e.g. geographies, entities, and products) 1.1 Identifies RBC issues with which it may be connected to (whether causing, contributing to, or linked) throughout 1.1.A. Its own operations, 1.1.B. Supply chain (including business relationships)</p> <p>3. The company maps the factual circumstances that are red flagged or marked as high-risk for RBC violations of</p> <p>3.1 The own operations 3.2 Suppliers (including business relationships)</p> <p>3. The company has established and operates a system of controls</p> <p>3.1 With a set of processes, mechanisms, and tools (e.g. regular supplier audits and assessments, supply chain mapping, traceability systems) to ensure visibility and accountability throughout the supply chain 3.2 That is supported by documentation with at least the following information: 3.2.1 A description of the raw material, including its trade name and type 3.2.2 The name and address of the supplier that supplied the raw material present in the batteries to the company that places the batteries containing the raw material in question on the market 3.2.3 The country of origin of the raw material and the market transactions from the raw material's extraction to the immediate supplier to the company that places the battery on the market 3.2.4 The quantities of the raw material present in the battery placed on the market, expressed in percentage or weight 3.2.5 Third-party verification reports issued by a notified body and concerning the suppliers as referred to in EU Batteries Regulation Art. 50(3) 3.2.6 If the reports referred to in point 3.2.5 are not available and where the raw material originates from a conflict-affected and high-risk area, additional information in accordance with the specific recommendations for upstream economic operators, as set out in the OECD Due diligence guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, where relevant, such as the mine of origin, locations where the raw material is consolidated, traded and processed, and taxes, fees and royalties are paid</p> <p>4. The company periodically and each time relevant circumstances change carries out</p>	<ul style="list-style-type: none"> • OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions • EU Batteries Regulation • EU CSRD (General disclosures) • EU CSDDD • Aluminium Stewardship Initiative (ASI) Performance Standard • Initiative for Responsible Mining Assurance (IRMA) • The Copper Mark Criteria for Responsible Production • Responsible Minerals Initiative Standard (RMI – RMAP ESG Standard for Mineral Supply Chains) • The Copper Mark Joint Due Diligence Standard (JDDS) • Aluminum Stewardship Initiative (ASI) Chain of Custody Standard • Responsible Business Alliance Code of Conduct and Validated Assessment Program (VAP) • Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains • IFC Performance Standards

² For a detailed reference of referenced parts of the regulations and standards, please check the corresponding standard equivalency mapping.

- 4.1 Operational fact and risk assessments to assess RBC risks and impacts in its high-risk operations and whether and how (through cause, contribution and/or direct linkage) it is or may be connected in alignment with 1.2
- 4.2 On-the-ground assessments to assess human RBC risks and impacts in its high-risk supply chains and whether and how (through cause, contribution and/or direct linkage) it is or may be connected in alignment with 1.2
- 5. The company reports its findings to senior management on**
 - 5.1 High-risk areas
 - 5.2 Suppliers (including business relationships)
- 6. In assessing the risks and impacts of RBC, the company:**
 - 6.A. Related to its own operations
 - 6.A.1 Identifies potentially affected people (and their legitimate representatives or reasonable alternates)
 - 6.A.2 Consults with potentially affected people (or their legitimate representatives or reasonable alternates)
 - 6.A.3 Takes into account impacts on stakeholders from groups or populations that may be at heightened risk of vulnerability or marginalization
 - 6.A.4 Pays particular attention to the different kinds of impacts that can be experienced by varying genders
 - 6.A.5 Consults with internal and external stakeholders
 - 6.B. Related to its supply chains (including business relationships)
 - 6.B.1 Identifies potentially affected people (and their legitimate representatives or reasonable alternates)
 - 6.B.2 Consults with potentially affected people (or their legitimate representatives or reasonable alternates)
 - 6.B.3 Takes into account impacts on stakeholders from groups or populations that may be at heightened risk of vulnerability or marginalization
 - 6.B.4 Pays particular attention to the different kinds of impacts that can be experienced by varying genders
 - 6.B.5 Consults with internal and external stakeholders
- 7. The company assesses the extent to which business relationships and suppliers have appropriate policies and processes in place, by**
 - 7.A. In its own operations
 - 7.A.1 On the basis of salience
 - 7.A.2 By taking into account the perspectives of (potentially) affected people
 - 7.B. In its own operations
 - 7.B.1 On the basis of salience
 - 7.B.2 By taking into account the perspectives of (potentially) affected people
- 8. The company prioritizes actions to prevent and mitigate potential and actual impacts by**
 - 8.1 Checking if their due diligence policies explicitly reference relevant internationally recognized due diligence instruments and/or RBC frameworks
 - 8.2 Checking if they include the quality aspects set out in Indicator 1
 - 8.3 Checking if the perspectives of potentially affected people (e.g. workers and their legitimate representatives) have been considered in their development

REPUBLISHED FOR BATTERY PASSPORT PILOTS

	<p>8.4 Checking if they embed their due diligence policies and commitments within their management systems and implement it as part of regular business processes (e.g. have a mitigation action plan to reduce the salience of RBC risks and severity of impacts to which they are connected)</p>	
<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i> 9. The company monitors whether and how it is or may be causing, contributing to and/or be directly linked to RBC issues through ongoing risk monitoring (e.g. through early warning systems or grievance mechanisms) 9.A In its operations 9.B. In its supply chain (including business relationships)</p>	<ul style="list-style-type: none"> • OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions • The Copper Mark Criteria for Responsible Production • Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for Mineral Supply Chains) • Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains
<p>L. Leading practice</p>	<p><i>In addition to (F) and (I),</i> 10. The company encourages its suppliers to map their supply chains and their factual circumstances 11. The company requires high risk business partners - which have not gone through a 2nd or 3rd party audit already - to undergo on the ground assessments which can be via collective schemes 12. Each time circumstances change, the company checks that its tier n suppliers determine whether and how, through cause, contribution and/or direct linkage, they are or may be connected to actual or potential human rights issues in their operations, including through their business relationships, and their supply chains 13. Where business partners do not do any of these things, the company encourages them to do so (reference to 2.1.7.) 14. In engaging its tier 1 suppliers to understand the quality of their risk and impact assessment, the company checks that these suppliers: 14.1 Identify and engage with potentially affected people, particularly regarding assessing the supplier's impacts 14.2 Consult with relevant stakeholders, including potentially affected people, when assessing the risks and impacts to human rights in its operations and supply chains 14.3 Take into account impacts on stakeholders from groups or populations that may be at heightened risk of vulnerability or marginalization 14.4 Pay particular attention to the different kinds of impacts that can be experienced by varying genders 15. Where suppliers do not do any of these things, the company encourages them to do so</p>	<p>/</p>

Indicator 2 - References to regulations and standards (some may still be added as standard equivalency mapping proceeds)

Requirement	OECD DD f. RBC - Due Diligence	EU Battery Regulation	EU CSRD ESRS 2	EU CSDDD	ASI Performance Standard	IRMA Draft	The Copper Mark	EITI Standard	TSM Standard	IRMA Draft Chain of Custody	RMI - RMAP ESG Standard	The Copper Mark Joint Due Diligence Standard (JDDS)	Copper Mark Chain of Custody	ASI Chain of Custody	Responsible Business Alliance Code of Conduct (VAP)	CDDG Responsible Mineral Supply Chains	IFC Performance Standards
Foundational requirements																	
1.																	
1.1	X	X				X	X				X	X					X
1.2	X	X				X	X				X	X					X
2.	X	X	X	X	X	X	X					X		X	X	X	X
3.	X	X	X	X	X	X	X					X		X	X	X	X
3.1	X	X	X	X	X	X	X					X		X	X	X	X
3.2	X	X	X	X	X	X	X					X		X	X	X	X
3.2.1	X	X	X	X	X	X	X					X		X	X	X	X
3.2.2	X	X	X	X	X	X	X					X		X	X	X	X
3.2.3	X	X	X	X	X	X	X					X		X	X	X	X
3.2.4	X	X	X	X	X	X	X					X		X	X	X	X
3.2.5	X	X	X	X	X	X	X					X		X	X	X	X
3.2.6	X	X	X	X	X	X	X					X		X	X	X	X
4	X	X	X	X	X	X	X					X		X	X	X	X
4.1	X	X	X	X	X	X	X					X		X	X	X	X
4.2	X	X	X	X	X	X	X					X		X	X	X	X
5.	X	X	X	X	X	X	X					X		X	X	X	X
6.	X	X	X	X	X	X	X					X		X	X	X	X
6.1	X	X	X	X	X	X	X					X		X	X	X	X
6.2	X	X	X	X	X	X	X					X		X	X	X	X
6.3	X	X	X	X	X	X	X					X		X	X	X	X

REPUBLISHED FOR BATTERY PASSPORT PILOTS

6.4	X	X	X	X	X	X	X					X		X	X	X	X
6.5	X	X	X	X	X	X	X					X		X	X	X	X
Intermediate requirements																	
7.	X						X					X					X
7.1	X						X					X					X
7.2	X						X					X					X
8.	X						X					X					X
8.1	X						X					X					X
8.2	X						X					X					X
8.3	X						X					X					X
8.4	X						X					X					X

1.3 Prevention & Mitigation (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ³
<p>F. Foundational requirements</p>	<p>1. The company has designed and implemented a strategy to respond to the identified risks to prevent, mitigate, and otherwise address adverse impacts 1.A. For its own operations 1.B. For its supply chain 2. The company engages with relevant stakeholders when they identify RBC issues in their operations and supply chains in order to gather information or explore opportunities for collaborative action to prevent and address adverse impacts 3. The company adopts risk management measures 3.A For its own operations 3.A.1 That are consistent with the internationally recognized due diligence instruments listed in point 4 of Annex X of the EU Batteries Regulation 3.A.2 That consider the company's ability to influence and where necessary take steps to exert pressure on suppliers, including their subsidiaries and subcontractors who can most effectively prevent or mitigate the identified risk 3.B For its supply chain 3.B.1 That are consistent with the internationally recognized due diligence instruments listed in point 4 of Annex X of the EU Batteries Regulation 3.B.2 That consider the company's ability to influence and where necessary take steps to exert pressure on suppliers, including their subsidiaries and subcontractors who can most effectively prevent or mitigate the identified risk 4. The company designs and implements a risk management plan for prevention and mitigation that is regularly reviewed and updated based on the findings of periodic risk assessment and ongoing monitoring 4.A. For its own operations 4.B. For its supply chain 5. Where suppliers do not have sufficient capacity to address the risks or impacts arising in their own operations or supply chain, the company supports them to build that capacity to cease, prevent or mitigate the impact 6. Where the company's own operations, products or services are or may be directly linked to an adverse impact through its business relationships or within the supply chain, the company exercises its leverage in order to seek to address the risk or impact 7. Where the company does not have sufficient leverage to address the risk or impact or is unsuccessful in using it in a business relationship or within its supply chain 7.1 it seeks to build its leverage to address potential or actual risks and impacts to the greatest extent possible 7.2 it considers all relevant factors to determine the appropriate action to take 8. The company considers suspending or discontinuing engagement with a supplier of its subsidiary or subcontractor after failed attempts at prevention and/or mitigation, based on</p>	<ul style="list-style-type: none"> • OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions • EU Batteries Regulation • EU CSDDD • Initiative for Responsible Mining Assurance (IRMA) • The Copper Mark Criteria for Responsible Production • Responsible Minerals Initiative Standard (RMI – RMAP ESG Standard for Mineral Supply Chains) • The Copper Mark Joint Due Diligence Standard (JDDS) • Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains • IFC Performance Standards

³ For a detailed reference of referenced parts of the regulations and standards, please check the corresponding standard equivalency mapping.

	<p>relevant contracts and agreements referred to in Art. 49(1) of the EU Batteries Regulation 9. If the company pursues risk mitigation efforts while continuing trade or temporarily suspending trade, it shall consult with suppliers and with the stakeholders concerned, including local and national government authorities, international or civil society organizations and affected third parties such as local communities, before establishing a strategy for measurable risk mitigation in the risk management plan</p>	
<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i> 10. In preparing for the effective mitigation of RBC issues, the company identifies relevant stakeholders (e.g. workers or their representatives, trade unions, policy-focused civil society organizations, women's organizations, international organizations and individual governments) to engage with about RBC issues in its operations and supply chains 11. The company makes specific training on RBC due diligence available to its high-risk tier 1 suppliers. This training is 11.1 offered when onboarding any new supplier 11.2 offered upon demand 11.3. Made available to its relevant risk tier n suppliers on the specific salient human rights issues arising in its supply chains 12. Where the company's tier n suppliers' operations, products or services are or may be directly linked to an adverse impact through their business relationships, the company exercises and builds its leverage in order to influence its supplier or other stakeholders to address the risk or impact</p>	<ul style="list-style-type: none"> • The Copper Mark Criteria for Responsible Production • Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for Mineral Supply Chains)
<p>L. Leading practices</p>	<p><i>In addition to (F) and (I),</i> 13. The company verifies that tier n suppliers use (or increase) their leverage in order to seek to address the risks or impacts arising in their own supply chains 14. Where tier n suppliers do not have sufficient leverage to prevent, mitigate or address a risk or impact, the company provides capacity building support to help its suppliers increase their leverage, for the purpose of addressing potential or actual risks and impacts to the greatest extent possible 15. The company has a process to follow in the event of non-compliance with its human rights policy or supporting processes 16. The company participates in joint initiatives that bring economies of scale and standardization to upstream RBC due diligence 17. The company encourages its suppliers to participate in a due diligence program through membership and/or financial support.</p>	<p>/</p>

Indicator 3 - References to regulations and standards (some may still be added as standard equivalency mapping proceeds)

Requirements	OECD DD f. RBC - Due Diligence	EU Battery Regulation	EU CSRD ESRS 2	EU CSDDD	ASI Performance Standard	IRMA Draft	The Copper Mark	EITI Standard	TSM Standard	IRMA Draft Chain of Custody	RMI - RMAP ESG Standard	The Copper Mark Joint Due Diligence Standard (JDDS)	Copper Mark Chain of Custody	ASI Chain of Custody	Responsible Business Alliance Code of Conduct (VAP)	CDDG Responsible Mineral Supply Chains	IFC Performance Standards
Foundational requirements																	
1.	X	X		X		X	X				X	X				X	X
2.	X	X		X		X	X				X	X				X	X
3.	X	X		X													
3.1	X	X		X													
3.2	X	X		X													
4.	X	X		X													
5.	X	X		X													
6.	X	X		X													
7.	X	X		X													
8.	X	X		X													
8.1	X	X		X													
8.2	X	X		X													

REPUBLISHED FOR BATTERY PASSPORT PILOTS

9.	X	X		X													
10.	X	X		X													
Intermediate requirements																	
11.							X				X						
12.							X				X						
12.1							X				X						
12.2							X				X						
12.3							X				X						
12.4							X				X						
13.							X				X						

1.4 Effectiveness

Scoring	Proposed consolidated language	Mapped Regulations / Standards ⁴
<p>F. Foundational requirements</p>	<p>1. The company monitors and tracks performance of its RBC due diligence activities and uses the lessons learned to improve the processes in the future (i.e., policy or commitment and the respective processes, risk identification and assessment process as well as risk minimization, prevention, and mitigation plan) 1.A. For its own operations 1.B. For its supply chain 2. The company reports the effectiveness of its risk management plan back to its top management level assigned in accordance with Art. 49 of the EU Batteries Regulation 2.A. For its own operations 2.B. For its supply chain 3. The company carries out third party verifications of its own due diligence chains via a notified body in accordance with Article 51 3.A. For its own operations 3.B. For its supply chain 4. The company periodically carries out risk-based assessments of the due diligence practices of their business relationships and suppliers to verify that risk mitigation measures are being pursued, to validate that adverse impacts have actually been prevented or mitigated, and that they are monitoring the implementation and effectiveness of their efforts in own operations and supply chain, including the engagement with (potentially) affected people (or their legitimate representatives) 5. The company measures the effectiveness of its approach to addressing RBC risks and impacts using both quantitative and qualitative methods 5.A. For its own operations 5.B. For its supply chain 6. The company uses what it learns to do whichever of the following is applicable: Improve its due diligence policies or processes; inform its RBC risk identification and assessment process; inform its risk minimization and prevention plan; take disciplinary action for business partners that do not comply 6.A. For its own operations 6.B. For its supply chain</p>	<ul style="list-style-type: none"> • OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions • EU Batteries Regulation • EU CSDDD • Aluminium Stewardship Initiative (ASI) Performance Standard • Initiative for Responsible Mining Assurance (IRMA) • The Copper Mark Criteria for Responsible Production • Responsible Minerals Initiative Standard (RMI – RMAP ESG Standard for Mineral Supply Chains) • The Copper Mark Joint Due Diligence Standard (JDDS) • Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains • IFC Performance Standards
<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i> 7. The company periodically verifies the compliance with its human rights commitment or policy and supporting processes by periodic effectiveness monitoring of the measures to identify, prevent, mitigation, mitigate and where appropriate, support remediation of impacts in its own operations 8. The company seeks to engage with (potentially) affected people as part of monitoring and tracking the effectiveness of its responses to identified human rights impacts, including along</p>	<ul style="list-style-type: none"> • The Copper Mark Criteria for Responsible Production • Initiative for Responsible Mining Assurance (IRMA)

⁴ For a detailed reference of referenced parts of the regulations and standards, please check the corresponding standard equivalency mapping.

	<p>its supply chain 9. The company uses (third-party) audits to inform the effectiveness of its RBC due diligence obligations</p>	
<p>L. Leading practice</p>	<p><i>In addition to (F) and (I),</i> 10. The company has developed a database and record-keeping system related to monitoring human rights risks, incidents and impacts in its operational and supply chain business relationships 11. The company uses independent third-party assurance reports to ensure its high-risk suppliers' human rights due diligence policy or commitment and supporting processes are being implemented properly 12. The company checks that its tier 1 suppliers' mitigation action plans relate to the findings of their periodic risk assessments and ongoing monitoring 13. The company has a process to follow for suppliers that do not meet its supplier requirements related to its RBC policy and supporting processes 14. The company demonstrates how the information gathered in this monitoring has influenced improvements in its RBC due diligence processes 15. The company uses diverse systems to monitor RBC impacts and track the effectiveness of its efforts to address human rights impacts in its own operations and along its supply chain 16. The company uses diverse systems to monitor RBC impacts and track the effectiveness of its efforts to address human rights impacts in its own operations and along its supply chain 17. The company verifies that its tier 1 suppliers use diverse systems as part of their monitoring and tracking of their human rights impacts and the effectiveness of their efforts to address these 18. Tailored KPIs are developed to help the company track whether or not its efforts are improving outcomes for potentially affected people in its operations and business relationships 19. The company monitors changes in risk salience in its operations and business relationships along the supply chain 20. The company monitors: 20.1 The number of incidents discovered in the past 12 months in its operations 20.2 The type of incidents (e.g. harassment, discrimination, wage violation, forced labour, child labour, torture, gender based violence, etc.) 20.3 The percentage (%) of cases where remediation was achieved successfully 20.4 The average duration of remediation, from discovery of a case to successful remedy 21. The company has reported this data into the Battery Passport 22. The company monitors changes in risk salience in its supply chains 23. The company monitors: 23.1 The number of incidents discovered in the past 12 months in its supply chain 23.2 The type of incidents (e.g. harassment, discrimination, wage violation, forced labour, child labour, torture, gender based violence, etc.) 23.3 The percentage (%) of cases where remediation was achieved successfully 23.4 The average duration of remediation, from discovery of a case to successful remedy 23.5 The satisfaction with remedy expressed by affected stakeholders 23.6 The rate and direction of change in these KPIs over time 24. The company organizes the statistics by Geography, Product (mineral, metal, component</p>	<p>/</p>

type etc.), and provenance

25. The company has reported these figures into the Battery Passport

26. Where a supplier is not gathering data such that the company can monitor these KPIs in its supply chains, the company supports its suppliers to institute such KPIs for reporting purposes

INTERIM

Indicator 4 - References to regulations and standards (some may still be added as standard equivalency mapping proceeds)

Requirements	OECD DD f. RBC - Due Diligence	EU Battery Regulation	EU CSRD ESRS 2	EU CSDDD	ASI Performance Standard	IRMA Draft	The Copper Mark	EITI Standard	TSM Standard	IRMA Draft Chain of Custody	RMI - RMAP ESG Standard	The Copper Mark Joint Due Diligence Standard (JDDS)	Copper Mark Chain of Custody	ASI Chain of Custody	Responsible Business Alliance Code of Conduct	CDDG Responsible Mineral Supply Chains	IFC Performance Standards
Foundational requirements																	
1.	X	X		X	X	X	X				X	X				X	X
2.	X	X		X	X	X	X				X	X				X	X
3.	X	X		X	X	X	X				X	X				X	X
4.	X	X		X	X	X	X				X	X				X	X
5.	X	X		X	X	X	X				X	X				X	X
6.	X	X		X	X	X	X				X	X				X	X
Intermediate requirements																	
7.							X										
8.						X											
9.							X										

1.5 Reporting

Scoring	Proposed consolidated language	Mapped Regulations / Standards ⁵
<p>F. Foundational requirements</p>	<p>1. The company reviews and reports formally and publicly, including on the internet, on its RBC due diligence, regarding 1.A. Own operations 1.B. Supply chain</p> <p>2. The company disseminates this report to its diverse stakeholders</p> <p>3. The company considers any risks to potentially affected people that could result from its communications</p> <p>4. The company discloses information with due regards taken of business confidentiality and other competitive concerns</p> <p>5. The company discloses the number of instances where it has had to take disciplinary measures with suppliers due to RBC violations or failed attempts at mitigation</p> <p>6. It does not disclose the identity of those business partners and suppliers, except where the company deems it acceptable to do so in accordance with applicable laws</p> <p>7. The public report 7.1 Is issued annually 7.2 Is easily comprehensible for end-users 7.3 Identified the batteries concerned 7.4 The data and information on steps taken by the company regarding the RBC management systems and risk management obligations, including findings of significant adverse impacts in the risk categories listed in point 2 of Annex X of the EU Batteries Regulation, and how they have been addressed, as well as a summary report of the third-party verifications carried out in accordance with Art. 51, including the name of the notified body, with due regard for business confidentiality and other competitive concerns 7.4.A. For the own operations 7.4.B. For the supply chains 7.5 Includes information on the actions taken by the company to address identified risks (e.g. management systems established; risk assessment methodology implemented; steps taken to manage risks; and efforts made to monitor and track performance for risk mitigation) 7.6 Includes information on the effectiveness of the due diligence management systems 7.6.A. For the own operations 7.6.B. For the supply chains 7.7 Covers where relevant, access to information, public participation in decision-making and access to justice in environmental matters in relation to the sourcing, processing and trading of the raw materials present in batteries</p> <p>8. Where the economic operator referred to in Article 48(1) can demonstrate that the raw materials listed in point 1 of Annex X, that are present in the battery are derived from recycled sources, it shall publicly disclose its conclusions in reasonable detail, with due regard for business confidentiality and other competitive concerns</p>	<ul style="list-style-type: none"> • OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions • EU Batteries Regulation • EU CSRD (General disclosures) • Aluminium Stewardship Initiative (ASI) Performance Standard • Initiative for Responsible Mining Assurance (IRMA) • The Copper Mark Criteria for Responsible Production • Responsible Minerals Initiative Standard (RMI – RMAP ESG Standard for Mineral Supply Chains) • The Copper Mark Joint Due Diligence Standard (JDDS) • Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains

⁵ For a detailed reference of referenced parts of the regulations and standards, please check the corresponding standard equivalency mapping.

REPUBLISHED FOR BATTERY PASSPORT PILOTS

<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i> 9. The company has defined a general approach to mitigating the risks of transparency on its efforts to address identified RBC impacts</p>	<ul style="list-style-type: none"> Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for Mineral Supply Chains)
<p>L. Leading practices</p>	<p><i>In addition to (F) and (I),</i> 10. The company reports on its RBC risks and impacts in a way that aligns with the UN Guiding Principles on Business and Human Rights (UNGPs) Reporting Framework 11. The company verifies that its high-risk suppliers are formally and publicly reporting on how they address RBC impacts 12. The company has an approach in place for high-risk suppliers that are not formally and publicly reporting how they address human rights issues and impacts in their own operations and supply chains (i.e. depending on the supplier uses its leverage to encourage, require, request, facilitate or support formalized and public reporting) 13. The company supports its small-scale suppliers in their reporting either directly or indirectly 14. The public report includes a description of any audits in which the company has participated 15. This information is provided in a way that 15.1 Is gender-responsive 15.2 Is sufficient to allow stakeholders to evaluate its efforts to prevent and address human rights risks and impacts 16. The company requires its tier 1 suppliers to report to it (the company) on how they address RBC issues in their operations and supply chains 17. Provide information on the effectiveness of their RBC due diligence systems 17.1 Provide information on the effectiveness of their RBC due diligence systems 17.2 Provide information on the actions taken by the company to address identified risks 17.3 Provide a description of any audits in which the company has participated 17.4 Are gender-responsive 17.5 Are sufficient to allow stakeholders to evaluate their efforts to prevent and address human rights risks and impacts 18. Where quality controls find supplier reports to be inferior, the company communicates to its supplier on what the principles of good reporting it would expect or provides training in good reporting 19. The company assesses the quality of its suppliers' human rights reporting as part of the supplier onboarding process or whenever there is a change in circumstances</p>	<p>/</p>



Indicator 5 - References to regulations and standards (some may still be added as standard equivalency mapping proceeds)

Requirements	OECD DD f. RBC - Due Diligence	EU Battery Regulation	EU CSRD ESRS 2	EU CSDDD	ASI Performance Standard	IRMA Draft	The Copper Mark	EITI Standard	TSM Standard	IRMA Draft Chain of Custody	RMI - RMAP ESG Standard	The Copper Mark Joint Due Diligence Standard (JDDS)	Copper Mark Chain of Custody	ASI Chain of Custody	Responsible Business Alliance Code of Conduct	CDDG Responsible Mineral Supply Chains	IFC Performance Standards
Foundational requirements																	
1.	X	X	X		X	X	X				X	X				X	
2.	X	X	X		X	X	X				X	X				X	
3.	X	X	X		X	X	X				X	X				X	
4.	X	X	X		X	X	X				X	X				X	
5.	X	X	X		X	X	X				X	X				X	
6.	X	X	X		X	X	X				X	X				X	
7.	X	X	X		X	X	X				X	X				X	
7.1	X	X	X		X	X	X				X	X				X	
7.2	X	X	X		X	X	X				X	X				X	
7.3	X	X	X		X	X	X				X	X				X	
7.4	X	X	X		X	X	X				X	X				X	
7.5	X	X	X		X	X	X				X	X				X	
7.6	X	X	X		X	X	X				X	X				X	
8.	X	X	X		X	X	X				X	X				X	
Intermediate requirements																	
9.											X						

1.6 Remediation

Scoring	Proposed consolidated language	Mapped Regulations / Standards ⁶
<p>F. Foundational requirements</p>	<p>1. The company has established a remediation mechanism in accordance with the UN Guiding Principles on Business and Human Rights or provide for such a mechanism through collaborative agreements with other companies 1.A. For its own operations 1.B. For its supply chains 2. The company has a remediation strategy in place to provide for or participate in adequate remedy when it discovers that it causes or contributes to a RBC impact 2.A. For its own operations 2.B. For its supply chain 3. The remediation strategy was designed in collaboration with relevant stakeholders & potentially affected people 3.A. For its own operations 3.B. For its supply chain 4. The company has a grievance mechanism 4.A With own operations in scope 4.B. With supply chain in scope 4.1 That is aligned with UNGP effectiveness criteria 4.2 That is centered around potentially affected stakeholders 4.3 That is oriented at priority stakeholder groups (communities, workers, (potentially) affected persons, CSOs including women's organizations) 4.4 That include(s) channel(s) for receiving complaints 4.5 That is periodically assessed for its effectiveness 5. The company collaborates with stakeholders affected by human rights impacts around the design of its grievance mechanism(s)</p>	<ul style="list-style-type: none"> • OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions • EU Batteries Regulation • EU CSDDD • Aluminium Stewardship Initiative (ASI) Performance Standard • Initiative for Responsible Mining Assurance (IRMA) • The Copper Mark Criteria for Responsible Production • Aluminum Stewardship Initiative (ASI) Chain of Custody Standard • IFC Performance Standards
<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i> 6. The company requires its suppliers to have effective grievance mechanisms in place that are aligned with UNGP effectiveness criteria</p>	<ul style="list-style-type: none"> • The Copper Mark Criteria for Responsible Production • Initiative for Responsible Mining Assurance (IRMA)
<p>L. Leading practice</p>	<p><i>In addition to (F) and (I),</i> 7. The grievance mechanism is gender responsive 8. The company has a clear process for addressing complaints aligned with the UNGP Assurance Guidance C6.3/a 9. The grievance mechanism provides the opportunity for the complainant to meet with the company's representatives at an appropriate level to discuss potential or actual severe adverse impacts that are the subject matter of the complaint</p>	<p>/</p>

⁶ For a detailed reference of referenced parts of the regulations and standards, please check the corresponding standard equivalency mapping.

10. The company's grievance mechanism is adjusted in response to the findings of this assessment (ref. to 4.5)
11. The company verifies that its tier 1 suppliers have policies and processes that provide a channel for receiving complaints and/or addressing them
12. The company has a process to acknowledge, consider and respond to stakeholder allegations and feedback
13. The company verifies that its tier n suppliers in or sourcing from medium and/or high-risk supply chains have a strategy in place to provide for or participate in adequate remedy where it causes or contributes to a RBC impact
14. The company monitors that the type of remedy or combination of remedies is appropriate for each incident
15. The company verifies that its affected supplier monitors that the type of remedy or combination of remedies is appropriate for each incident
16. The company participates in monitoring, implementation and closure of the remediation of each remedy case in its operations
17. The company monitors the implementation and closure of the remediation of each remedy case in its supply chains

MINTE

Indicator 6 - References to regulations and standards (some may still be added as standard equivalency mapping proceeds)

Requirements	OECD DD f. RBC - Due Diligence	EU Battery Regulation	EU CSRD ESRS 2	EU CSDDD	ASI Performance Standard	IRMA Draft	The Copper Mark	EITI Standard	TSM Standard	IRMA Draft Chain of Custody	RMI - RMAP ESG Standard	The Copper Mark Joint Due Diligence Standard (JDDS)	Copper Mark Chain of Custody	ASI Chain of Custody	Responsible Business Alliance Code of Conduct	CDDG Responsible Mineral Supply Chains	IFC Performance Standards
Foundational requirements																	
1.	X	X		X	X	X	X							X			X
2.	X	X		X	X	X	X							X			X
3.	X	X		X	X	X	X							X			X
4.	X	X		X	X	X	X							X			X
4.1	X	X		X	X	X	X							X			X
4.2	X	X		X	X	X	X							X			X
4.3	X	X		X	X	X	X							X			X
4.4	X	X		X	X	X	X							X			X
4.5	X	X		X	X	X	X							X			X
5.	X	X		X	X	X	X							X			X
Intermediate requirements																	
6.							X										
7.						X											

2. Glossary

For the full Background and Glossary, including links to footnotes, please consult the document provided in tandem with the Indices: <https://www.globalbattery.org/media/publications/backgroundandglossary-rev1.pdf>

Term	Definition
Addressing human rights issues	Includes ceasing, preventing, mitigating, and remediating human rights risks and impacts. For example, in the context of an autocratic state, putting in place measures that can improve access to the perspectives of affected rights holders. See ‘eliminating human rights’.
Artisanal and small-scale mining	“Formal or informal mining operations with predominantly simplified forms of exploration, extraction, processing, and transportation. ASM is normally low capital intensive and uses high labour-intensive technology. ‘ASM’ can include men and women working on an individual basis as well as those working in family groups, in partnership, or as members of cooperatives or other types of legal associations and enterprises involving hundreds or even thousands of miners.” ³
Blind spots	Blind spots are points within an operation or along the supply chain where there is an information deficit and lack of independent data.
Business partner	Business partners are referenced in Impact Domain #1 and include ⁴ “entities with which a company has some form of direct and formal engagement for the purpose of meeting its business objectives.” ⁵ This may include “vendors, franchisees or licensees, business customers, clients, governments, suppliers, contractors, and consultants.” ⁶ For the purposes of these indices business partners are those entities with whom the enterprise has a contractual relationship, excluding joint ventures, which require special consideration and will be brought into scope for GBA indices at a future date.
Business relationships	“The relationships a company has with business partners, entities in its value chain and any other State or non-State entity directly linked to its operations, products or services. They include indirect business relationships in its value chain, beyond the first tier” ⁶ but for the purposes of these indices excludes joint ventures which require special consideration and will be brought into scope for GBA indices at a future

	<p>date. This definition is more expansive than business partners and includes entities over which the enterprise may have weaker leverage.</p>
	<p>and includes entities over which the enterprise may have weaker leverage.</p>
<p>Cause, contribute or directly linked to human rights impacts through business relationships</p>	<p>There are three ways an enterprise may be linked to an adverse human rights impact:</p>
	<p>Cause the impact through its own activities</p>
	<p>Contribute to the impact through its own activities (directly or through another entity, such as business or government)</p>
	<p>Directly linked to an impact caused by an entity with which it has a business relationship and is linked to an enterprise's own products, goods or services.⁷</p>
	<p>Each level of involvement dictates the approach by which an enterprise has a responsibility to prevent, mitigate, cease or remedy an adverse human rights impact.</p>
<p>Checks, verifies, requires</p>	<p>The index sets expectations for enterprises to check, verify, or require things of suppliers in accordance with the following definitions in order of lessening rigour: requires is an expectation that something is done as a condition of doing business and so is included in a supplier code of conduct and/or contract; verifies is having sight of evidence that the supplier has the necessary document or has done the necessary action; checks is receiving written affirmation (e.g. warranty) from supplier that something is in place or has been done.</p>
<p>Child</p>	<p>"Anyone under the age of 18 years is considered a child, according to the United Nations"⁸</p>
<p>Child labour</p>	<p>"Child labour is work that children should not be doing because they are too young, or if they are old enough to work, because it is dangerous or unsuitable for them. Whether or not work performed by children is defined as child labour depends on the child's age, the hours and type of work and the conditions in which the work is performed."⁶</p>

Conflict minerals	Based on the US Dodd-Frank Act, “conflict minerals” commonly refers to tin, tantalum, tungsten and gold, and their ores. ⁹
Conflict-affected and high-risk areas (CAHRAs)	“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, such as 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.” ¹⁰
Contractual relationships	Contractual expectations may include: _ informing the enterprise of all relevant business relationships, including with other suppliers, subcontractors and associates; promptly addressing issues of non-conformance related to human and child rights as and when they arise; participating in any child-focused human rights and social compliance monitoring organized by the company.
Day-to-day business processes	Activities that an enterprise and its employees engage in on a daily basis.
Decent work	“Decent work sums up the aspirations of people in their working lives. It involves opportunities for work that is productive and delivers a fair income, security in the workplace and social protection for families, better prospects for personal development and social integration, freedom for people to express their concerns, organize and participate in the decisions that affect their lives and equality of opportunity and treatment for all women and men.” ¹² Decent working conditions are the conditions that make decent work possible.
Eliminating human rights issues	Eliminating human rights issues involves getting rid of the hazards that generate a threat to people or increase the likelihood of infringements upon their human rights. Addressing root causes of human rights violations supports their elimination. For example, improving democracy and governance or reducing poverty will reduce the likelihood of human

	<p>rights violations; addressing children’s rights will reduce the likelihood of child labour; implementing free, prior and informed consent will protect the rights of indigenous peoples and local communities. Business can contribute to the elimination of human rights issues by ceasing or preventing actions that generate or enhance risk, and by working with other actors to address root causes.</p>
<p>Enterprise</p>	<p>Enterprise refers to the organisation manufacturing or using the battery, and/or purchasing or producing products, components, materials (e.g. metals, minerals) that are contained in the battery.</p>
<p>Expert</p>	<p>Individual with the special skill or knowledge representing mastery of a particular subject derived from training or experience.¹³</p>
<p>Factual circumstances</p>	<p>Based on the OECD Minerals Guidance, mapping the factual circumstances of an enterprise’s supply chains is a necessary precursor to identifying risks because, “any reasonable inconsistency between a factual circumstance and a standard should be considered a risk with potential adverse impacts.”¹⁴ Mapping factual circumstances involves first knowing the provenance of a material (e.g., is it mined at an industrial or artisanal scale or recycled? Where does production take place (jurisdiction or geography)) and then establishing the activities and relationships of all upstream suppliers, including clarifying “the chain of custody and identify(ing) the locations and qualitative conditions of the extraction, trade, handling and export of the mineral,”¹⁵ and undertaking “an in-depth review of the context of all red-flagged locations and the due diligence practices of any red-flagged suppliers.”¹⁶ In sum, one must find out the where, what, who, how of the supply chain in terms of what the enterprise can control and what influences it is subjected to by its operating environment. This means understanding each “entity’s location, structure, ownership and governance, mode of production, [extraction, trade, handling, export/import, transport] and means of controlling ... risk.” The HRI and CLI apply this same approach to an enterprise’s operations and business relationships broadly, including its supply chains. Additional guidance can be found in the OECD Minerals</p>

	<p>Guidance Appendix: Guiding Note for Upstream Company Risk Assessment.</p>
<p>Gender-responsive</p>	<p>Gender-responsiveness is the way through which gender equality is actively promoted through policies, management systems, operational design, research, investments, and so on. It is the approach to both examine and address gender norms, roles, and inequalities. It goes beyond gender-sensitivity, since gender-sensitivity implies only gaining a certain awareness to gender differences whereas gender responsiveness means actually implementing specific actions to empower women and other marginalized genders. Gender responsiveness in policies and planning processes often begins with conducting a gender assessment to establish a baseline and from thereon out inform concrete actions that ensure women’s rights are respected, protected, and included and women are empowered in their households, livelihoods, communities etc. Gender responsive human rights and child labour due diligence involves considering how each due diligence action (e.g. policy setting, risk assessment, mitigation, reporting, grievance mechanism, remedy, stakeholder engagement) have impacted or will impact marginalized genders (reactive) as well as what specific measures have been taken (proactive) to address gender norms, roles and inequalities in human rights interventions, such as by ensuring inclusion of marginalized genders and their interests.</p>
<p>Hazard/risk</p>	<p>“A hazard is anything that has the potential to cause harm. Risk is the chance or probability that a hazard will actually result in injury or illness along with an indication of how serious the harm could be. Therefore, risk = severity of harm x probability of harm. Even if workers are exposed to the same hazard, risks may be greater for young workers than for adult workers because of high severity (e.g. immaturity of immune system) and high probability (e.g. lack of experience).”¹⁹</p>

Hazardous work	“Hazardous child labour is work in dangerous or unhealthy conditions that could result in a child being killed or injured/harmed (often permanently) and/or made ill (often permanently) as a consequence of poor safety and health standards and working arrangements.” ²⁰
High risk suppliers and supply chains	High risk suppliers and supply chains are those that are high risk either due to location (e.g. located in a conflict-affected or high-risk area (CAHRA) per the OECD definition, or in a location known for high risk of specific or general human rights violations), human rights due diligence capacity (e.g. low ability to do a quality of human rights due diligence that is proportionate to their exposure to risk), or human rights due diligence reputation (e.g. they have a history of human rights violations).
Human rights	The International Bill of Human Rights ²¹ , comprised of the Universal Declaration of Human Rights (1948) ²² and two additional international human rights covenants, the International Covenant on Economic, Social and Cultural Rights (1966) and the International Covenant on Civil and Political Rights (1966), make up what is referred to today as universal fundamental human rights. Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. All are entitled to these rights, without discrimination. The United Nations has developed a complex body of human rights law outlining a range of internally accepted rights ²³ , including the right to be free from harmful forms of child labour.
Human rights impacts	A human rights impact includes any situation wherein business operations or activities have had an adverse effect on the human rights enjoyment of impacted rights-holders. ²⁴
Human rights incident	The materialisation of a human rights risk, which may lead to positive and/or adverse impacts for rights holders. Typically recorded as a ‘case’ for monitoring and remediation purposes.
Human rights issues	Includes actual or potential human rights risks and impacts

<p>Human rights commitment, policy and/or procedures</p>	<p>The human rights commitment outlines an enterprise’s commitment to respect human rights. The human rights policy puts this commitment in the context of the company’s vision, mission, values, compliance obligations and existing management systems, including related policies. Human rights procedures outline the structures and processes that direct how the enterprise will implement its human rights policy and through which it may achieve its commitment to respect human rights.</p>
<p>Human rights risks</p>	<p>“A business enterprise’s human rights risks are any risks that its operations may lead to one or more adverse human rights impacts. They therefore relate to its potential human rights impact. In traditional risk assessment, risk factors in both the consequences of an event (its severity) and its probability. In the context of human rights risk, severity is the predominant factor. Probability may be relevant in helping prioritize the order in which potential impacts are addressed in some circumstances (see “severe human rights impact” below). Importantly, an enterprise’s human rights risks are the risks that its operations pose to human rights. This is separate from any risks that involvement in human rights impact may pose to the enterprise, although the two are increasingly related.”²⁵</p>
<p>Impact Domain 1</p>	<p>Impact Domain 1 indicators score performance in an enterprise’s own operations, including its direct business relationships that are under its controls, e.g. sub-contractors.</p>
<p>Impact Domain 2</p>	<p>Impact Domain 2 indicators score performance in an enterprise’s supply chain for any good or service it may purchase or use but which is not within its control. Impact Domain 2 indicators apply to medium- and high-risk supply chains, save for the core indicators of the CLI which apply to all supply chains.</p>
<p>Legitimate artisanal and small-scale mining</p>	<p>The assessment of the legitimacy of ASM takes into account “the good faith efforts of artisanal and small-scale miners and enterprises to operate within the applicable legal framework (where it exists) as well as their engagement in opportunities for formalisation as they become available (bearing in mind that in most cases, artisanal and small-scale miners have very limited or no capacity, technical ability or sufficient financial</p>

	resources to do so). In either case, Artisanal and small-scale mining, as with all mining, cannot be considered legitimate when it contributes to conflict and serious abuses associated with the extraction, transport or trade of minerals.” ²⁶
Leverage	“A company’s ability to affect change in the behaviour of a third party that is causing or contributing to child labour impacts, or that needs to be part of the solution in order to prevent child labour impacts from continuing or recurring.” ²⁷
Light work	“Light work may be permitted for those between the ages of 13 and 15 (or 12 and 14 in developing countries). The Convention No.138 on Minimum Age for Work defines light work for these children as that which is: a) unlikely to be harmful to their health or development b) not such as to prejudice their attendance at school, their participation in vocational orientation or training programmes approved by the competent authority, or their capacity to benefit from the instruction received.” ²⁸
Low-, medium- or high-risk country for children’s rights	The Child Labour Index expects enterprises to determine the risk status of the jurisdictions where they operate or from which they source as the basis for determining which sites, suppliers and supply chains are in scope of the Additional and Incident Criteria of the CLI. Enterprises may do this in one of two ways: 1. By following the human rights risk mapping, identification, assessment and prioritisation processes of the HRI in order to determine for which operations and business relationships, if any, child labour is a salient issue. 2. By ascertaining whether an area of operation or origin is low, medium, or high-risk in accordance with the geographical boundaries of the UNICEF Children’s Rights Atlas, which assigns a risk level based on the prevalence of child labour of a given jurisdiction or country. ²⁹ The Children’s Rights Atlas is a free resource by UNICEF. ³⁰
Medium- and high-risk country(ies)	A country determined to be medium or high-risk for a specific human rights issue, further to human rights risk mapping, identification, assessment and prioritisation processes.
Minimum Age Convention, 1973 (No. 138)	“This fundamental convention sets the general minimum age for admission to employment or work at 15 years (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict

	conditions). It provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed” ³¹
Mitigation	“The mitigation of a negative human rights impact refers to actions taken to reduce the extent of the impact. The mitigation of a human rights risk refers to actions taken to reduce the likelihood that a potential negative impact will occur.” ³²
Perspectives	A point of view expressed as a result of tangible review of the relevant information.
Potentially affected people and their legitimate representatives	Potentially affected people are individuals whose human rights may have been affected by an enterprise’s operations, products or services. Legitimate representatives, including trade unions, civil society organizations and others with experience and expertise related to business impacts on human rights, have mandate to represent the perspectives of (potentially) affected people. Legitimate representatives may include “reasonable alternatives”, where consultation with potentially affected people may not be possible, namely independent experts “including human rights defenders and others from civil society.” ³³ This is in comparison to the broader definition of stakeholder, which includes <i>any</i> individual who may affect or be affected by an enterprise’s activities.
Prevention	“The prevention of a negative human rights impact refers to actions taken to ensure the impact does not occur.” ³⁴
Provenance	Provenance defines the primary origin of a material. Per the OECD Minerals guidance, it includes Artisanal and Small-Scale Mining (ASM), Large Scale Mining (LSM) and recycling. Identifying the provenance means understanding where the mineral originates from (country of origin) and what transport routes it goes through (countries of transit). ³⁵
Red Flags	A Red Flag is a warning of heightened risk ³⁶ that prompts deeper due diligence by the enterprise. For example, list of red flags in relation to child labour include: ³⁷ age of school completion is not the same as the legal working age; high risk or incidence of child labour in the area, country or region; high levels of labour migration; low availability of schooling, low quality of schooling, and low levels of school enrolment

	and education completion; poverty and prevalence of informal economy; weak legal systems, policies and institutions.
Relevant expertise	Relevant expertise means any expertise that can ensure the content and implementation of the human rights or child labour policy and supporting processes is inclusive, fair, effective and aligned with emerging leading practice and lessons from the issue practice area at large. According to the UNGPs, “The level of expertise ... will vary according to the complexity of the business enterprise’s operations. Expertise can be drawn from various sources, ranging from credible online or written resources to consultation with recognized experts.” ³⁸
Regular work	Regular work is work that is done by adults which can also be done by children (from 14 or 15 years old in most countries) but is not hazardous.
Remediation/Remedy	“Refers to both the process of providing remedy for a negative human rights impact and the substantive outcomes that can counteract, or make good, the negative impact. These outcomes may take a range of forms such as apologies, restitution, rehabilitation, financial or non-financial compensation, and punitive sanctions (whether criminal or administrative, such as fines), as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.” ³⁹
Risk-based approach	A risk-based approach means (a.) prioritising putting attention and resources to those business relationships and tier 1 suppliers identified as high risk based its human rights risk assessment process, and (b.) ensuring the enterprise’s actions and response are proportionate to the business partner’s risk level, with higher risk business partners requiring more robust risk controls and potentially greater investment, attention, and support.
Risk profile	A description of any set of risks related to the whole organisation, part of an organisation, or an individual programme or project. ⁴⁰

<p>Salient human rights issues</p>	<p>“Those human rights that are at risk of the most severe negative impacts through a company’s activities or business relationships. They therefore vary from company to company.”⁴¹ Salient issues cover both risks and impacts when referenced throughout this document. An enterprise’s processes to identify their salient human rights issues should focus on the most severe potential negative impacts on human rights¹⁹: a. Most severe: meaning those impacts that would be greatest in terms of: a. their scale: the gravity of the impact on the human right(s); and/or b. their scope: the number of individuals that are or could be affected; and/or c. their remediability: the ease with which those impacted could be restored to their prior enjoyment of the right(s). d. Potential (likelihood): meaning those impacts that have some likelihood of occurring in the future, recognizing that these are often, though not limited to, those impacts that have occurred in the past (following the UNGPs, likelihood is weighted to a lesser degree than severity); e. Negative: placing the focus on the avoidance of harm to human rights rather than unrelated initiatives to support or promote human rights; f. Impacts on human rights: placing the focus on risk to people, rather than on risk to the business. Further guidance on assessing risk salience and impact severity can be found in the UNGPs Reporting Framework.⁴²</p>
<p>Stakeholder</p>	<p>Any individual or organisation who may affect or be affected by an enterprise’s activities.⁴³</p>
<p>Standard business practice</p>	<p>Business practices that are widely practiced and accepted as conventional and ‘normal’ for a comparable enterprise.</p>
<p>Suppliers</p>	<p>Suppliers in these Indices means the direct suppliers of the company completing the Index, supplying the materials required to build the battery, as well as suppliers of goods and services required to run the company’s operations. Where an Impact Domain 2 (supply chain) indicator references high-risk suppliers, only direct cost suppliers of relevance to product manufacture are in scope, e.g. those involved in handling or processing minerals or components that are used within the battery, but not those supplying the machinery used to do the manufacturing.</p>

Supply Chain	The network of organisations that cooperate to transform raw materials into finished goods and services for consumers. ⁴⁴
Survivor-centred	“A survivor centred approach is one which seeks to empower the survivor by putting their rights, needs and wishes first before all actions. Although this may sound obvious, these needs of an individual can easily be forgotten once aspects such as the potential for further conflict and / or reputational damage arise in the light of safeguarding allegations.” ⁴⁵
Tier n	Tier n represents the tier to which an enterprise has visibility up its supply chain.
Value chain	“A company’s value chain encompasses the activities that convert input into output by adding value. It includes entities with which it has a direct or indirect business relationship and which either (a) supply products or services that contribute to the company’s own products or services or (b) receive products or services from the company.” ⁴⁶
Worst Forms of Child Labour Convention, 1999 (No. 182)	“This fundamental convention defines as a “child” a person under 18 years of age. It requires ratifying states to eliminate the worst forms of child labour, including 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; child prostitution and pornography; using children for illicit activities, in particular for the production and trafficking of drugs; and work which is likely to harm the health, safety or morals of children. The convention requires ratifying states to provide the necessary and appropriate direct assistance for the removal of children from the worst forms of child labour and for their rehabilitation and social integration. It also requires states to ensure access to free basic education and, wherever possible and appropriate, vocational training for children removed from the worst forms of child labour.” ⁴⁷
Youth employment	Youth employment is the employment of youth. The United Nations defines youth as people between the ages of 15 and 24 inclusive. ⁴⁸ For the purpose of this index on child labour, youth employment is the employment of children who are between the ages of 14 and 18. “Not all

	<p>work done by children under the age of 18 is classified as child labour. Participation in decent work which does not affect a child's health, personal development or education can be a very positive experience for children or adolescents who have reached the required age. Indeed, millions of young workers around the world between the ages of 14 and 18 are desperate to find decent youth employment."⁴⁹</p>
<p>Young worker</p>	<p>Child between the ages of the legal minimum age for employment and 18 that are engaged in youth employment.</p>

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Annex 1 – Reporting template

Please refer to the Annexed Excel workbook for the reporting template and associated guidance for reporting for each indicator.

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