

Eco-Bat Technologies Modern Slavery Statement 2019

This statement is published in accordance with Chapter 30, Part 6, Section 54 (Transparency in supply chains etc.) of the UK Modern Slavery Act 2015. It constitutes the slavery and human trafficking statement for Eco-Bat Technologies Limited (“Eco-Bat”), and its UK subsidiaries H J Enthoven Ltd. and Manbat Ltd. for the financial year ending 31 December 2019.

INTRODUCTION

Eco-Bat and its global subsidiaries take seriously their corporate responsibility to ensure materials used in their products are sourced in an ethical manner. Eco-Bat is committed to ensuring that its supply chain reflects its values and respect for human rights.

In line with its corporate culture and ethics, Eco-Bat is committed to being a good corporate citizen including ensuring the health, safety and protection of people who come into contact with its products and business, as well as managing its obligations in relation to modern slavery which is defined to include forced labour, servitude, human trafficking and other hidden third party exploitation of workers. Eco-Bat expects a similar commitment from its global supply chain partners.

OUR ORGANISATION

Eco-Bat Technologies is the world’s largest producer of lead, producing over 800,000 metric tonnes per year from over 15 facilities in Europe, the USA and South Africa. Eco-Bat maximizes the value of its operations by producing the highest quality lead and lead alloys, specifically designed for the battery, mining and other industries both from recycled and primary materials. In addition, Eco-Bat processes and supplies in various forms silver, lead anodes and sheet, zinc, aluminum, industrial minerals, plastics, polyfoams, and provides services including spent battery collection and distribution of new batteries. Excellence is the watchword throughout all operations, but particularly in customer service, technical expertise and health, safety and environmental matters.

OUR EMPLOYEE & SUPPLY CHAIN POLICIES

Eco-Bat continues to champion due diligence efforts to combat any form of modern slavery, forced labour or human trafficking as evident in our Corporate Social Responsibility statements which include the following separate documents:

Eco-Bat Code of Ethics and Business Conduct: The Eco-Bat Board of Directors and the Senior Management Team are committed to our Group’s core values and expect the same commitment from every employee. Ethical behaviour; superior product offerings; service quality; health, safety and environmental leadership; technology innovation – these values define Eco-Bat. Preserving the trust and respect of our stakeholders is the responsibility of every individual in the Group. Our Code of Ethics and Business Conduct (the “Code”) is designed to help each of us meet that obligation. The Code explains Eco-Bat’s policies for how we conduct business around the world. The principles support full compliance with applicable laws. They also represent the practical ways that we put our values to work every day. We must all commit to understanding, upholding and abiding by the Code.

Ethics and Confidential Helpline Policy:

Eco-Bat also operates an Ethics and Confidential Helpline Policy which encourages individuals to report wrongdoing in any form, including but not limited to human rights violations, such as Modern Slavery. A copy of the Confidential Helpline contact details are displayed throughout our sites, with awareness reiterated and discussed as part of our ongoing communication and training.

Conflict Minerals Policy Statement: Eco-Bat has determined that it currently requires the use of one or more of the four listed conflict minerals for the production of some of its products. However, Eco-Bat endeavours not to directly purchase any Conflict Minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. To this end, Eco-Bat requires its direct suppliers to be DRC conflict-free and, in addition, has implemented internal due diligence measures for conflict-free sourcing.

OUR SUPPLY CHAIN DUE DILIGENCE MEASURES

Eco-Bat uses a wide range of suppliers who supply goods for sale, provide services at and support our operations. The supply chain involved in the manufacture of some of our products is complex, involving multiple levels between Eco-Bat and the source of raw materials entering the manufacturing process. Whilst this makes it a challenge to effectively manage the risks of Modern Slavery throughout the entire supply chain, the approach we take is to actively manage and use our direct suppliers as the means by which we clearly communicate our expectations down the supply chain.

In furtherance of the goal of ensuring that slavery and human trafficking are not used within its supply chain, Eco-Bat has implemented the following internal due diligence measures for ethical sourcing:

Supplier Verification

Eco-Bat is committed to working only with suppliers that do not use any indentured or forced labour, slavery, servitude, or any other methods that could contribute to slavery or human trafficking. Within the terms of supplier agreements and contracts, Eco-Bat requires suppliers to verify that they are conducting business and operations in accordance with all applicable jurisdictional laws and regulations, including those pertaining to all acceptable labour practices.

Certification and Auditing

Eco-Bat's supplier agreements and contracts include clauses and provisions confirming that suppliers conduct business and operations in compliance with all applicable laws relating to hiring, wages, hours and conditions of employment, occupational health and safety, and all other labour and workplace laws and regulations. While Eco-Bat has not conducted audits of its suppliers, Eco-Bat's supplier agreements endeavor to include Eco-Bat's right to conduct compliance audits of its suppliers. Eco-Bat also requires that its suppliers certify that they will conduct their activities in compliance with all applicable laws, including those that require them to treat workers fairly, to respect human rights, and to provide safe and healthy work environments. Eco-Bat will continue to maintain business relationships only with companies that do not use any slavery, servitude, indentured or forced labour, or any other methods that could contribute to modern slavery or human trafficking.

Internal Standards and Training

Eco-Bat employees are required to adhere to all applicable laws and standards and to behave in an ethical manner at all times as a condition of employment. Eco-Bat provides its employees with direct responsibility for supply chain management with additional training relating specifically to identifying modern slavery, forced labour and human trafficking issues, and how to mitigate risks within the supply chain. In addition to employee training, Eco-Bat plans to raise further awareness of modern slavery issues by displaying posters across our entities and operating facilities.

Employee “Right to Work”

Eco-Bat undertakes “Right to Work” checks on all direct employees, contractors, associates and suppliers prior to them commencing any role or work with the business. This includes checking, where applicable, that the proposed employee has a valid work permits and is of an appropriate age to work. All new Employees joining Eco-Bat are provided with copies of the relevant policies including our Code of Ethics and Business Conduct is explained to them during their induction. In addition, each separate entity has their own Eco-Bat Employee Handbook which is more specific to the location and reinforces the Eco-Bat values and expectations of all employees.

Stronger2gether Campaign

In July 2018, we incorporated a new element to our induction programme which utilises resources from the Stronger2gether campaign to raise awareness of Modern Slavery, particularly forced labour, labour trafficking and other hidden third-party exploitation of workers, and ensures that all new employees have information available regarding information about the above.

KEY PERFORMANCE INDICATORS

The organisation has reviewed its key performance indicators (KPIs) in respect of compliance with Modern Slavery Compliance and has set the following targets for monitoring;

- requiring all staff working in our procurement and HR teams to have completed training on modern slavery during 2020; and
- development, distribution and display of awareness posters and materials across all UK sites.

LOOKING AHEAD

In addition to the planned actions above over the course of the next financial year we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

Together with our other Corporate Social Responsibility statements, this Eco-Bat Technologies Modern Slavery Statement is available on our website under our Sustainability and Corporate Social Responsibility page.

BOARD APPROVAL


President & CEO's signature:

Jimmy R. Herring
President & CEO, and Board Member:

02/21/20
Date: