

	GUIDELINES	
	TITLE: ECOBAT MODERN SLAVERY STATEMENT	EFFECTIVE DATE: 31 DECEMBER 2022
	VERSION NUMBER: V1	LAST REVIEWED: 31 DECEMBER 2022
	ISSUING FUNCTION: Legal/Compliance	APPROVED BY: Executive Committee
AFFECTED FUNCTIONS/LOCATIONS: Global	DELEGATED OWNER: Elizabeth Tuma	

I. Ecobat Modern Slavery Statement 2022

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 Ecobat, LLC (“Ecobat”), and its global subsidiaries for the financial year ending 31 December 2022.

A. INTRODUCTION

At Ecobat, we’re committed to ensuring that materials used in our products are sourced in an ethical manner. We are committed to ensuring that our supply chain reflects our values and respect for human rights.

In line with our corporate culture and ethics, Ecobat is committed to being a good corporate citizen. This includes ensuring the health, safety, and protection of people who come into contact with our products and business, as well as managing our obligations in relation to modern slavery. Under the law, modern slavery includes forced labor, servitude, human trafficking, and other hidden third-party exploitation of workers. We expect a similar commitment from its global supply chain partners.

B. OUR ORGANIZATION

Ecobat is the world’s largest producer of lead, producing over 800,000 metric tons per year from over 15 facilities in Europe, the USA, and South Africa. Ecobat 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, Ecobat 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

C. OUR SUPPLY CHAIN & EMPLOYEE GUIDELINES

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

i. ECOBAT CODE OF ETHICS AND BUSINESS CONDUCT

The Ecobat 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 behavior; superior product offerings; service quality; health, safety, and environmental leadership; technology innovation – these values define Ecobat. 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 Ecobat’s guidelines 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.

ii. ETHICS AND CONFIDENTIAL HELPLINE GUIDELINES

Ecobat also operates an Ethics and Confidential Helpline Guidelines, otherwise known as the “SpeakUp Line”, which encourages individuals to report wrongdoing in any form, including but not limited to human rights violations, such as modern slavery. The SpeakUp line allows for anonymous complaints to reduce the risk or fear of retaliation, and can be reached via telephone, text message, web, or email. A copy of the SpeakUp Line contact details is

displayed throughout our sites, with awareness reiterated and discussed as part of our ongoing communication and training.

iii. CONFLICT MINERALS STATEMENT

Ecobat 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. Ecobat endeavors, however, not to directly purchase conflict minerals that directly or indirectly finance, or benefit armed groups in the Democratic Republic of Congo (“DRC”) or adjoining countries. To this end, Ecobat requires its direct suppliers to be DRC conflict-free and, in addition, has implemented internal due diligence measures for conflict-free sourcing.

D. OUR SUPPLY CHAIN DUE DILIGENCE MEASURES

Ecobat uses a wide range of suppliers who supply goods for sale, provide services to, and otherwise support our operations. The supply chain involved in the manufacture of some of our products is complex, involving multiple levels between Ecobat and the source of raw materials entering the manufacturing process. To effectively manage the risks of modern slavery throughout the entire supply chain, we actively manage and clearly communicate our expectations down the supply chain to our direct suppliers.

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

i. SUPPLIER VERIFICATION

Ecobat is committed to working only with suppliers that do not use any indentured or forced labor, slavery, servitude, or any other methods that could contribute to slavery or human trafficking. We train our employees to use supplier agreements and contracts that require suppliers to verify that they are conducting business and operations in accordance with all applicable jurisdictional laws and regulations, including those pertaining to legally acceptable labor practices.

ii. SUPPLIER CERTIFICATION AND AUDITING

Ecobat provides relevant employees with supplier agreements and contracts that 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 labor and workplace laws and regulations. Ecobat trains its employees on requiring that 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. Ecobat endeavors to include Ecobat’s right to conduct compliance audits of its suppliers in its supplier agreements.

Ecobat maintains business relationships with companies that do not use any slavery, servitude, indentured or forced labor, or any other methods that could contribute to modern slavery or human trafficking.

iii. INTERNAL HIRING PRACTICES – EMPLOYEES AND TEMPORARY AGENCY WORKERS

Ecobat 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 permit and is of an appropriate age to work. All new employees joining Ecobat are provided with copies of the relevant guidelines including our Code of Ethics and Business Conduct, which is also explained to them during their onboarding. In addition, each separate entity has their own guidelines which are more specific to the location and reinforce the Ecobat values and expectations of all employees.

iv. INTERNAL STANDARDS AND TRAINING

Ecobat employees are required to adhere to all applicable laws and standards and to behave in an ethical manner throughout their work for Ecobat as a condition of employment. Ecobat requires its commercial employees who have direct responsibility for supply chain management, as well as personnel responsible for Ecobat’s internal human resources management, to participate in training relating specifically to identifying modern slavery conditions, forced labor and human trafficking issues, and how to mitigate risks within the supply chain. In addition to employee training, Ecobat raises further awareness of modern slavery issues by displaying posters across our UK entities and operating facilities

v. STRONGER2GETHER CAMPAIGN

Ecobat’s UK operations have incorporated elements and resources from the Stronger2gether campaign into our induction program to raise awareness of modern slavery, particularly forced labor, labor trafficking, and other hidden third-party exploitation of workers, and ensure that all new employees have information available regarding the above.

vi. KEY PERFORMANCE INDICATORS

Ecobat has reviewed its key performance indicators (KPIs) in respect of compliance with modern slavery and responsible sourcing and has set the following targets for monitoring:

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

E. LOOKING AHEAD

Ecobat uses a wide range of suppliers who supply goods for sale, provide services to, and otherwise support our operations. The supply chain involved in the manufacture of some of our products is complex, involving multiple levels between Ecobat and the source of raw materials entering the manufacturing process. To effectively manage the risks of modern slavery throughout the entire supply chain, we actively manage and clearly communicate our expectations down the supply chain to our direct suppliers.

In addition to the planned actions above 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 direct and indirect suppliers.

Together with our other Corporate Social Responsibility statements, this Ecobat Technologies Modern Slavery Statement is available on our website together with our other Sustainability and Corporate Social Responsibility information.

APPROVED BY THE BOARD ON JANUARY 26, 2023

DocuSigned by:
Marcus Randolph
5F08455FB78B401...

Marcus Randolph
Chief Executive Officer & Chairman of the Board