

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: https://www.globalbattery.org/media/publications/gba-childlaborindex-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 <a href="https://example.com/here.

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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Acknowledgements

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

Disclaimer: This is an extract in the format of the draft 2024 Battery Passport rulebooks (Forced Labor, Indigenous People's rights, Biodiversity loss, Circular design) which only shows the chapter containing the indicator detailing and requirements.

Structure of the indicators and detailed requirements are based on the provisions of the Child Labour Index.

1 Indicators and Requirements

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 practices

1.1 Policy & Management Systems (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ¹
F. Foundational requirements	 The company fulfils the foundational requirements of the Presence and Quality of Environmental and Human Rights Due Diligence and Risk Management Systems rulebook, and Ensures that child labour is included in the scope of its human rights and environmental due diligence process, including policy and management systems. In addition, it includes the following in its due diligence steps: Child labour and child rights are included in scope for the company's human rights due diligence policy and procedures The company's human rights/ supply chain due diligence policy and processes are aligned with internationally recognised (child labour) due diligence instruments and/ or the OECD 2017 Practical Actions for companies to identify and address the worst forms of child labour in minerals supply chains The company has a policy commitment on the right of children to be free from child labour. This policy Commits to prevent, mitigate and remediate child labour in its operations, business relationships and supply chains Clearly states the minimum age for employment Applies across its operations and business relationships Is in line with the higher standard as captured in either national law or international minimum standard Is aligned with ILO Convention 138 (Minimum Age) and 182 (Worst Forms of Child Labour) Permits safe and decent working conditions for young workers, if such work exists within the company's own operations or supply chain The company has processes for implementing its child labour policy, including a procedure to check the age of job applicants The company has a document or code that sets out its expectations to their business partners on how to address child labour in its medium- and high-risk operations and business relationships The company has a document or code that sets out its expectations to their business	 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 Towards Sustainable Mining Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for Mineral Supply Chains)

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

	7. 2 Is aligned with ILO Convention 138 (Minimum Age) and 182 (Worst Forms of Child Labour) 7.3 Permits safe work and decent working conditions for young workers, if such work exists	
I. Intermediate requirements	In addition to (F), 8. In addition to age checking procedures, the company has established additional procedures for checking the age of workers where there is a risk that identification documents may be lacking or forged 9. When a child is legally performing non-hazardous work, the company shall assess and minimize the risks to their physical and mental health, and ensure that regular monitoring of the child's health, working conditions and hours of work occurs by the national labour authority, or if that is not possible, by the company itself 10. The company has established, documented, maintained and effectively communicated to personnel and other interested parties, written policies and procedures for remediation of child laborers, and provides adequate financial and other support to enable such children to attend and remain in school 11. The company has procedures in place where young workers are subject to compulsory education laws, they work only outside of school hours 12. Children under the age of 18 will not be employed in hazardous work 13. All work of persons under the age of 18 will be subject to an appropriate risk assessment and regular monitoring of health, working conditions, and hours of work	 Initiative for Responsible Mining Assurance (IRMA) Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for Mineral Supply Chains) IFC Performance Standard 2
L. Leading practices	In addition to (F) and (I), 14. The child labour policy 14.1 Is aligned with Target 8.7 of the UN SDGs 14.2 Commits to non-discrimination of young workers in the workplace 15. The trained personnel responsible for the policy's implementation reports to the person accountable for implementation of the child labour policy 16. Internal and/or external experts in the protection of children's rights have been consulted to ensure the development of a robust child labour policy and processes. 17. The company has a commitment to take actions to help address the root causes of child labour where it has agency to do so whether in its operations, business relationships, supply chains, or communities 18. The company clearly defines and categorises hazardous tasks and/or roles in their operations. 19. If these funds (the financial and other resources for the implementation of the child labour policy and supporting processes) are not used the company invests the surplus into preventative child labour work in high-risk areas 20. The company has an additional policy on working conditions which stipulates the following payments to all employees: 20.1 Statutory sick pay 20.2 Overtime pay 20.3 Social contributions	

- 20.4 And outlines protective measures for maternal health in the workplace
- 21. The company has additional family-friendly policies for workers with caregiving responsibilities, irrespective of gender
- 22. Based on a risk-based approach, the company checks their suppliers' human rights due diligence policies and procedures for the inclusion of child labour and/or child rights and whether these align with the suppliers' human rights policy.
- 23. The company verifies that its suppliers' minimum age policy applies across suppliers' operations and business relationships, including supply chain.
- 24. Any failure to adhere to the minimum age policy, which is not remedied within the shortest timeframe possible (to be agreed between the parties), leads to the termination of the contractual relationship with the supplier.
- 25. If the medium or high-risk tier 1 supplier doesn't have a policy clearly stating the minimum age for employment in line with national law or international minimum standards, the company supports them to implement one
- 26. If a medium or high-risk tier 1 supplier doesn't have processes to implement the policy, the company supports them to develop these
- 27. The company requires its tier n medium- and high-risk suppliers for child labour have a commitment to prevent, mitigate and remediate child labour in their operations, business relationships and supply chains
- 28. Any failure to include safe work and decent working conditions for young workers in the child labour policy, where applicable, which is not remedied within the shortest timeframe possible (to be agreed between the parties), leads to the termination of the contractual relationship with the supplier
- 29. The company requires its tier 1 suppliers to clearly define and categorise hazardous tasks and/or roles in their operations
- 30. The company verifies that its tier 1 suppliers describe the processes their personnel must implement to fulfil their child labour or child rights commitment or policy
- 31. The company checks that these processes include a procedure to check the age of job applicants
- 32. The perspectives of tier n suppliers at high risk of child labour issues have been considered in the development of the policy
- 33. The company checks that all its medium and high-risk tier n suppliers have fully integrated child labour into their human rights risk management and/or due diligence processes.
- 34. The company checks that all its medium and high-risk tier n suppliers commit to respecting and supporting the fulfilment of child rights
- 35. The company checks that tier 1 suppliers have assigned responsibility internally for implementing the identification, mitigation, prevention and remediation of child labour risks and impacts arising in their operations and supply chains
- 36. The company checks that its medium- and high-risk suppliers provide and/or have received training on how to address child labour
- 37. And where medium and high-risk tier n suppliers do not have access to training, the company makes training on how to address child labour available to them
- 38. The company verifies that suppliers that have caused or contributed to a child labour impact have assigned trained personnel and sufficient financial and other resources to implement appropriate remedy

- 39. Helps them build the capacity to do so, where required
- 40. The company checks that its suppliers' policies on working conditions stipulate the payment of statutory sick pay, overtime pay, and social contributions to all its employees and outlines protective measures for maternal health in the workplace
- 41. The company verifies that its tier 1 suppliers and their sub-contractors
- 41.1 Have family friendly policies
- 41.2 Grant parental leave to both male and female employees for newborn, adopted and other dependent children
- 41.3 Provide day-care for children that are not in school during business hours
- 41.4 Extend flexible employment practices to support workers in their roles as parents or caregivers, irrespective of workers
- 41.5 Comply with the provisions of ILO Convention No. 183 on maternity protection, including the international minimum of 14 weeks paid maternity leave with a compulsory 6-week period after birth

1.2 Risk & Impact Assessment (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ²
F. Foundational requirements	 The company fulfils the foundational requirements of the Presence and Quality of Environmental and Human Rights Due Diligence and Risk Management Systems rulebook, and Ensures that child labour is included in the scope of its human rights and environmental due diligence process, including risk and impact assessment. 	 OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions EU Batteries Regulation EU CSRD (General disclosures) EU CSDDD Initiative for Responsible Mining Assurance (IRMA) The Copper Mark Criteria for Responsible Production
I. Intermediate requirements	In addition to (F), 1. The company communicates impacts to affected stakeholders in ways that are physically accessible and understandable 2. The company identifies areas and activities of hazardous work in its operations, with reference to the country of operation's list of hazardous activities, its labour laws and regulations, to define which work can be performed by young workers and prevent the employment of young workers in hazardous work 3. The company identifies the root causes of the actual or potential child labour risks and impacts in its operations 4. The company ensures there is no substantial evidence of child/ underage labour at subcontractor level	 The Copper Mark Criteria for Responsible Production Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for Mineral Supply Chains)
L. Leading practices	In addition to (F) and (I), 5. The company follows expert guidance when designing or conducting any engagement with potentially affected children or their families. Where such engagement is not possible, the company considers consulting with credible proxies for children's views 6. Stakeholders themselves can initiate engagement with the company 7. The child labour risk monitoring and/or assessment is gender-responsive 8. The company verifies that its tier 1 suppliers have established additional procedures checking the age of young workers where there is a risk that identification documents may be lacking or forged 9. The company has trained child rights focal points within its own business, business partners and third party grassroot organizations or the local community to regularly report observed risks of or use of child labour through the available grievance mechanisms	

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

- 10. The company checks that its medium- and high-risk suppliers have child rights focal points that are trained to regularly report observed risks of or use of child labour through the available grievance mechanisms.
- 11. Where its suppliers do not have such focal points, it supports them to identify, empower and train them.
- 12. The company identifies the root causes of the actual or potential child labour risks and impacts in its business relationships
- 13. The company bases its mitigation actions upon this information
- 14. The company checks that medium to high-risk suppliers carry out root cause analysis of the actual or potential child labour risks and impacts in their supply chains with suppliers, where possible.
- 15. The company supports suppliers that need it to do root cause analysis through collaborative assessments
- 16. The company checks that its mitigation actions are based upon this information obtained by the root cause analysis
- 17. The company undertakes joint fact-finding processes on incidents of child labour with local NGOs, communities, government agencies, trade unions and/or workers to identify root causes, including hearing the perspectives of affected people (children, parents) or their legitimate representatives
- 18. The company undertakes joint fact-finding processes on incidents of child labour in its supply chains with its suppliers, local NGOs, communities, government agencies, and/or independent third parties

1.3 Prioritisation, Prevention & Mitigation (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ³
F. Foundational requirements	 0. The company fulfils the foundational requirements of the Presence and Quality of Environmental and Human Rights Due Diligence and Risk Management Systems rulebook, and 0.1. Ensures that child labour is included in the scope of its human rights and environmental due diligence process, including risk prioritisation, prevention and mitigation. In addition, it includes the following in its due diligence steps: 1. It is company policy to support high-risk suppliers to develop a roadmap or action plan where they do not have the capacity to do so alone 	 OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions EU Batteries Regulation EU CSRD (General disclosures) EU CSDDD The Copper Mark Criteria for Responsible Production
I. Intermediate requirements	In addition to (F), 2. The company has communicated the commitments and assigned responsibilities for implementation, which means 2.1 The commitments to prohibit and prevent child labour, and action plans have been communicated to relevant staff, suppliers, customers, business partners and stakeholders 2.2 Roles, responsibilities, and accountabilities for implementation of the commitment and action plans are clear, and resources have been assigned to support implementation 2.3 Measures to prevent child labour and protect young workers are included in the training of relevant personnel 3. The action plan to prevent and mitigate risks of child labour has been implemented, which means to 3.1 Provide Occupational Health and Safety training specific to young workers 3.2 Define working hours and scope of work that do not harm young workers and allow attendance of school or training programs 3.3 Where the company engage contractor workforces providing services on Sites – such as construction, engineering, operating a business process or activity, cleaning, catering and security – it ensures that the policies, procedures or processes are applied in full to these workforces 4. Where the company identifies the risk of association of child labour with businesses in their supply chain, it takes enhanced measures to ensure the policy and procedures are applied 5. The company shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable laws and regulations. 6. The company shall provide appropriate support and training to all student workers	 Initiative for Responsible Mining Assurance (IRMA) The Copper Mark Criteria for Responsible Production Responsible Business Alliance Code of Conduct and Validated Assessment Program (VAP)

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

	8. In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks	
L. Leading practices	In addition to (F) and (I), 9. In addition to (F) and (I), the company has taken steps to understand what constitutes an adequate living wage for its employees in its country of operation 10. The company has identified and considered what steps can be taken to provide a living wage to employees – enabling families to survive without recourse to child labour – for operations in countries where there is a disparity between minimum wage and living wage 11. The company verifies that its business partners and suppliers are paying a living wage to their workers 12. Where they are not, incentivizes and facilitates them to do so 13. The company checks if pricing levels for workers who are paid by piece or yield are relatively equivalent to the local living wage 14. The company grants parental leave to both male and female employees for newborn, adopted and other dependent children 15. The company provides access to day-care for children that are not in school during business hours. 16. The company has a mechanism in place for supervision of young workers, with clear instructions on how to perform tasks safely and effectively 17. The company verifies that its tier 1 suppliers have a mechanism in place for supervision of young workers, with clear instructions on how to perform tasks safely and effectively if applicable 18. The company identifies and maintains up-to-date records of all young workers and their task allocations; involving workers' representatives or trade unions 19. The company verifies that its tier 1 suppliers lave a michanism in place records of all young workers and their task allocations 20. The company carries out a young persons' risk assessment to determine what jobs can be safely performed by young workers 21. The company has a list of job functions that can safely be performed by young workers 22. The company has a list of job functions that can safely be performed by young workers 23. The company provides training for young workers on their rights and the training includes how to ac	

supporting or investing in local initiatives in its communities/operating environment, even where direct linkage to company activity is not known

- 29. The company can demonstrate that it prioritizes investments in community activities that address the root causes of child labour in its sourcing communities
- 30. Working with its suppliers, the company supports local stakeholders to fulfil children's rights in its supply chains by supporting or investing in local initiatives.
- 31. The company is a member of multistakeholder, joint or industry initiatives that create onthe-ground changes that have demonstrated positive impacts on child rights, including to address and eliminate child labour, whether in their operating or sourcing environments
- 32. The company participates actively in this initiative, e.g., as a contributing member of working groups, expert panels, advocacy work, etc.
- 33. The company has successfully incentivized a supplier to either become a member of a multistakeholder, joint or industry initiative dedicated to addressing and eliminating child labour, or to gain support from a specialized NGO or governmental organization.
- 34. The company engages with local and/or national authorities to understand and remove the barriers to eliminating child labour in its own operations and its medium- and high-risk supply chains (either directly, or with or through its suppliers of multistakeholder/ joint initiatives)
- 35. The company works with NGOs, CSOs and women's organizations to implement projects to address child labour in parts of its operations and supply chain with a high risk of child labour.
- 36. The company works directly with vocational education training structures to train community youth in trades which are in high demand in the community or in high demand in the relevant industry.
- 37. The company checks that its suppliers take steps to promote economic diversification and employment of youth. For example, they work directly with vocational education training structures to train community youth (with particular attention to girls) in trades which are in high demand in the community or in high demand in the relevant industry
- 38. The company works with its suppliers to proactively offer vocational training and decent work opportunities to youth (with particular attention to girls) in trades which are in high demand in the community or in high demand in the relevant industry
- 39. The company consults the community when planning social investment
- 40. The company considers how its social investment projects will support the most vulnerable girls and boys in the community
- 41. Apprenticeships and training programs are implemented in line with good practices, as identified by the International Labour Organization, for providing quality apprenticeship programs that bridge training to productive and decent work
- 42. There is a gender quota for these programs
- 43. The company invests in programs to support free, easy, and/or safe access to education for children of its workers or in its communities
- 44. This program privileges support to vulnerable girls and boys
- 45. The company invests in programs to support free, easy, and safe access to education for children in its supply chain communities where child labour is prevalent
- 46. The company invests in programs to support free, easy and/or safe access to feeding programs for the children of its workers or in its (supplier) communities
- 47. This program privileges support to vulnerable girls and boys

1.4. Effectiveness (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ⁴
F. Foundational requirements	 0. The company fulfils the foundational requirements of the Presence and Quality of Environmental and Human Rights Due Diligence and Risk Management Systems rulebook, and 0.1 Ensures that child labour is included in the scope of its human rights and environmental due diligence process, including effectiveness assessment. In addition, it includes the following in its due diligence steps: 1. This includes but is not limited to assessing the effectiveness of its roadmap/action plan to address root causes of child labour 1.A. In its own operations 1.B. In its supply chains 2. The company uses a cohesive and comprehensive system of tools to track the effectiveness of its efforts to prevent and address child labour impacts in its own operations and business relationships. 2.A. In its own operations 2.B. In its supply chains 	 OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions EU Batteries Regulation EU CSRD (ESRS S1) The Copper Mark Criteria for Responsible Production
I. Intermediate requirements	In addition to (F), 3. Where there is a high risk of child labour in the supply chain, the company shall develop and implement procedures to monitor its suppliers to determine if children below the minimum age for hazardous or non-hazardous work are being employed	Initiative for Responsible Mining Assurance (IRMA)
L. Leading practices	In addition to (F) and (I), 4. The company monitors the implementation of its suppliers' roadmaps as part of its own risk monitoring processes 5. The company monitors the prevalence, rates, and trends of child labour in its 5.A. High-risk operating environments and communities, paying particular attention to 'red flags' 5.B. High-risk supply chains, paying particular attention to 'red flags' 6. The company analyses whether and how its child labour risk management systems are effectively and efficiently addressing the reasons for child labour in its operations and business relationships 7. The company can demonstrate how the outcomes of this performance tracking have influenced improvements in its child labour due diligence processes 8. The company involves suppliers in its performance tracking and analysis of trends identified	

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

through its child labour incident monitoring, resolution, remediation, reporting and general management of child labour risks in its supply chains

1.5. Reporting (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ⁵
F. Foundational requirements	 0. The company fulfils the foundational requirements of the Presence and Quality of Environmental and Human Rights Due Diligence and Risk Management Systems rulebook, and 0.1 Ensures that child labour is included in the scope of its human rights and environmental due diligence process, including reporting. In addition, it includes the following in its due diligence steps: 1. Formal communications by the company include the following 1.1 Child labour incidents arising, where applicable 1.1.A. In the own operations 1.1.B. In the supply chains 1.2 Child labour risk management systems 1.2.A. In the own operations 1.2.B. In the supply chains 1.2.B. In the supply chains 	 OECD DD Guidance f. RBC - Due Diligence Sub steps and Practical Actions EU Batteries Regulation EU CSRD (ESRS S1) The Copper Mark Criteria for Responsible Production
I. Intermediate requirements	In addition to (F), 2. Children's safety, privacy and identities are protected throughout reporting	 The Copper Mark Criteria for Responsible Production
L. Leading practices	In addition to (F) and (I), 3. The company reports on its child labour risks and impacts in alignment with the Global Reporting Initiative framework: "Children's Rights in Sustainability Reporting 4. This reporting is gender-responsive 5. The company verifies that its high-risk suppliers are formally and publicly reporting on how they address child labour and/or child rights impacts, on the effectiveness of their child labour risk management systems, and in ways that are gender-responsive 6. This reporting is gender-responsive 7. Where this is not the case: 8. The company encourages its high-risk suppliers to formally and publicly report on child labour	

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

- 9. The company requires its tier 1 suppliers to report to it on how they address child labour issues in their operations and supply chains, on the effectiveness of their child labour risk management systems
- 10. This reporting is gender-responsive
- 11. The company supports its small-scale suppliers in their reporting either directly (making internal resources available) or indirectly (financing 3rd party support on DD), if applicable
- 12. Formal communications by the company include information or observations from internal and external stakeholders
- 13. The company requests its suppliers to report on child labour incidents arising, where applicable; child labour risk management systems; and information or observations from internal and external stakeholders
- 14. The company helps them to build the capacity to do this reporting, where required
- 15. Where the company has not recorded any child labour incidents despite sourcing from high-risk areas, it carries out or commissions research and exchange with child rights experts to ascertain if there are reasons to believe its grievance and monitoring systems may not be adequate and what can be done to resolve this

1.6. Remediation (first draft)

Scoring	Proposed consolidated language	Mapped Regulations / Standards ⁶
F. Foundational requirements	 0. The company fulfils the foundational requirements of the Presence and Quality of Environmental and Human Rights Due Diligence and Risk Management Systems rulebook, and 0.1. Ensures that child labour is included in the scope of its human rights and environmental due diligence process, including remediation. 	 OECD DD Guidance f. RBC - Due Diligence Substeps and Practical Actions EU Batteries Regulation EU CSRD (ESRS S1, S2) The Copper Mark Criteria for Responsible Production Responsible Business Alliance Code of Conduct and Validated Assessment Program (VAP)
I. Intermediate requirements	In addition to (F), 1. The operating procedures ensure that actions are taken to protect the rights of children 2. The company shall train young workers on how to use the grievance mechanism 3. The company designs each remediation case in accordance with its remediation procedure and with due regard to the specific circumstances of each child labour case 3.A. In its own operations 3.B. In its supply chains 4. For each child labour case in its operations, the company provides support by following the measures most appropriate to the child's circumstances, with the goal of avoiding perverse incentives. 5. In each case where a child has been found to be subject to child labour in the company's operations, the company can demonstrate that it has taken the following actions: removed the child from all work immediately, explained to the child (and parents or carers if there are any) about potential remediation measures, obtained the child's (and parents' or carers' if there are any) agreement to enrol the child in a remediation program, provided free food and free and safe accommodation to the child until a remediation program is operational, where applicable	 Initiative for Responsible Mining Assurance (IRMA) The Copper Mark Criteria for Responsible Production

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

In addition to (F) and (I),

- 6. The procedures ensure that actions do not perversely incentivize child labour within the family or community
- 7. The remediation approach includes a commitment to work with independent child rights organisations or governments to ensure that the implementation of the procedure will protect the rights of the impacted child and stakeholders
- 8. The company verifies that these operating procedures include a commitment to work with independent child rights organisations or governments to ensure that the implementation of the procedure will protect the rights of the impacted child and stakeholders.
- 9. The company verifies that suppliers that have caused or contributed to a child labour impact have assigned trained personnel and sufficient financial and other resources to implement appropriate remedy
- 10. Helps them build the capacity to do so, where required
- 11. The company assigns child labour remediation case handling to an independent third party
- 12. Through this third party the company seeks to directly engage with affected children or their families, particularly regarding design and implementation of remedy, assessing its impacts and tracking the effectiveness of its responses. Where such engagement is not possible, the company consults credible proxies for children's views.
- 13. The company requires its tier n suppliers to assign child labour remediation case handling to an independent third party
- 14. The company requires that through this third party its suppliers engage with affected children or their families, particularly regarding design and implementation of remedy, assessing the supplier's impacts and tracking the effectiveness of its responses
- 15. The company checks that where such engagement is not possible, its suppliers consult credible proxies for children's views
- 16. In each case where a child has been found to be subject to child labour in the company's supply chain, the company verifies that its affected supplier has taken the following actions: removed the child from all work immediately, explained to the child (and parents or carers if there are any) about potential remediation measures, obtained the child's (and parents' or carers' if there are any) agreement to enrol the child in a remediation program, provided free food and free and safe accommodation to the child until a remediation program is operational, where applicable
- 17. The company verifies that its supplier follows the supplier's remediation procedures in designing the specific remediation approach for each child labour case.
- 18. This support is for a determined period
- 19. For each child labour case in its supply chains, the company verifies that its supplier provides support by following the measures most appropriate to the child's circumstances, with the goal of avoiding perverse incentives.
- 20. That this support is for a determined period
- 21. The company assesses the positive and adverse impacts of its remediation program on each affected child and their family
- 22. The company checks that its suppliers assess the positive and adverse impacts of their remediation program on each affected child and their family
- 23. Where the supplier is a small company and does not have the capacity to adequately

L. Leading practices

remedy the harm, the company provides additional support to bridge the gap if the company contributed to the child labour impact	

1. 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.
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." This may include "vendors, franchisees or licensees, business customers, clients, governments, suppliers, contractors, and consultants." 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.
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 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 dateThis definition is more expansive than business partners and includes entities over which the enterprise may have weaker leverage. and includes entities over which the enterprise may have weaker
	leverage.
Cause, contribute or directly linked to	There are three ways an enterprise may be linked to an adverse human rights impact:
human rights impacts through business	Cause the impact through its own activities
relationships	Contribute to the impact through its own activities (directly or through another entity, such as business or government)

	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.
	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.
Checks, verifies, requires	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.
Child	Anyone under the age of 18 years is considered a child, according to the United Nations.
Child labour	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.
Conflict minerals	Based on the US Dodd-Frank Act, "conflict minerals" commonly refers to tin, tantalum, tungsten and gold, and their ores.
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.
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. 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 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.
Enterprise	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.
Expert	Individual with the special skill or knowledge representing mastery of a particular subject derived from training or experience.
Factual circumstances	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." 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," and undertaking "an in-depth review of the context of all red-flagged locations and the due diligence practices of any red-flagged suppliers." 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 Guidance Appendix: Guiding Note for Upstream Company Risk Assessment 18.
Gender-responsive	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.
Hazard/risk	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).
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.
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, comprised of the Universal Declaration of Human Rights (1948) 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, 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.
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
Human rights commitment, policy and/or procedures	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.
Human rights risks	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.
Impact Domain 1	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.

Impact Domain 2	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 highrisk supply chains, save for the core indicators of the CLI which apply to all supply chains.
Legitimate artisanal and small-scale mining	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 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."
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.
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.
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. The Children's Rights Atlas is a free resource by UNICEF.
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"
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.
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". This is in comparison to the broader definition of stakeholder, which includes any 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.
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).
Red Flags	A Red Flag is a warning of heightened risk that prompts deeper due diligence by the enterprise. For example, list of red flags in relation to child labour include: 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."

	Regular work is work that is done by adults which can also be done by
Regular work	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.
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.
Salient human rights issues	"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." 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 rights: 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.
Stakeholder	Any individual or organisation who may affect or be affected by an enterprise's activities.
Standard business practice	Business practices that are widely practiced and accepted as conventional and 'normal' for a comparable enterprise.

Suppliers	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.
Supply Chain	The network of organisations that cooperate to transform raw materials into finished goods and services for consumers.
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.
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.
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.
Youth employment	Youth employment is the employment of youth. The United Nations defines youth as people between the ages of 15 and 24 inclusive. 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 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.
YOUNG WORKER	Child between the ages of the legal minimum age for employment and 18 that are engaged in youth employment.

Annex 1 – Reporting template

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