



**GLOBAL
BATTERY
ALLIANCE**

BATTERIES POWERING
SUSTAINABLE DEVELOPMENT

GBA BATTERY
PASSPORT

Forced Labour Rulebook

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 piloting, whilst recognising 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 finalised 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.

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1 Introduction

1.1 GBA overview

The Global Battery Alliance (GBA) is a public-private collaboration platform founded in 2017 at the World Economic Forum to help establish a sustainable battery value chain by 2030.

The GBA brings together over 160 leading international organizations, NGOs, industry actors, academic institutions, and multiple governments to align collectively in a pre-competitive approach and to drive systemic change along the entire value chain. Action Partnerships provide a collaborative platform for members to pool their expertise to achieve the shared goals of circularity, environmental protection, and sustainable development. Members of the Alliance collaborate to achieve the goals set out in the GBA 2030 Vision and agree to the GBA's Ten Guiding Principles. The GBA's multi-stakeholder governance structure aims to ensure inclusivity in decision-making and strategic focus.

1.2 The GBA vision

The GBA aims for batteries to be catalysts of sustainable development, striving for a circular battery value chain to meet the Paris Agreement goals, fostering a low-carbon economy to generate economic growth and employment, and upholding human rights in line with the UN Sustainable Development Goals.

The GBA's mission is to set trusted criteria and benchmarks for battery sustainability, mobilize collective action to improve the battery value chain's ESG footprint, and to communicate with one voice and strong media visibility to enhance the industry's public profile and accountability.

1.3 The GBA Battery Passport

Based on this foundation, the GBA envisions to accelerate the scaling of sustainable, responsible, and circular battery value chains by

- Establishing a global battery passport ecosystem, including harmonized sustainability performance expectations for batteries
- Making company efforts measurable, trusted and comparable
- Tracking and rewarding improvement actions across the value chain with a comprehensive ESG score for consumers

The GBA conceptualized the Battery Passport as a framework to increase transparency across the battery value chain. It establishes a digital twin of the physical battery that conveys information about all applicable sustainability and lifecycle requirements based on a comprehensive definition of a sustainable battery. In scope are EV batteries at initial stage; the Battery Passport is chemistry-agnostic and encompasses all major types of EV batteries present on the market.

The GBA's Battery Passport is unique as it is a key instrument is data-based, standardized, comparable, and auditable. Its ultimate goal is to provide end-users with a quality seal based on the battery's sustainability performance, according to reporting rules agreed upon by stakeholders from industry, academia, non-governmental organisations (NGOs) and government.

With the Battery Passport and the underlying rulebooks, the GBA aims to define a comprehensive set of sustainability indicators to create global and credible performance expectations with other relevant global players in the battery value chain. GBA multi-stakeholder working groups play an essential role in raising and validating the key sustainability performance expectations captured in the indicator framework.

The Battery Passport will both certify compliance with sustainability and societal expectations and clearly differentiate more valuable batteries in the market based on their sourcing impact and performance.

To implement the vision of the Battery Passport, the GBA collaborates with several key external stakeholders: standard setters, regulators/ policy makers, track & trace/ data verifying agencies, other initiatives with similar targets, corporate organisations, the financial community, non-corporate and public organisations, and end-users of vehicles/ batteries.

1.4 About the rulebooks

The objective of the rulebooks is to set globally harmonized rules that define which indicators and requirements are to be tracked within the battery passport which feeds into the sustainability score of the GBA Battery Passport. The rulebooks aim to provide a sound set of performance expectations for batteries and are intended to be applicable to all types of battery value chain members, regardless of where they operate or do business.

Development of the rulebook has taken place in the GBA's multistakeholder Working Groups, which were set up to define what stakeholders expect from sustainable performance and overseen by the Steering Committee which sets the high-level principles upon which the ESG issues of the GBA Battery Passport are to be developed. The rulebooks were created through a robust, intensive collaborative process based on drafts building on regulatory requirements and international standards. In online Working Group sessions, GBA members reviewed the content of this rulebook, debated key performance expectations, and agreed upon commonly acceptable positions. *Member organisations can choose not to agree on elements of the final rulebook in case consensus cannot be found. External stakeholders and groups representing affected people are consulted and their feedback on the requirements collected and included according to the working group's decision.*

2 Issue Definition

In their quest to realise the full economic and social development potential of the transition to electrified mobility through creation of employment opportunities throughout the battery value chain and establishing fair working conditions, members of the GBA have committed to its Ten Guiding Principles, including to “*Immediately and urgently eliminating child and forced labour (...) of those employed by the value chain.*”

In line with the GBA commitment, the Forced labour rulebook provides guidance to its members on fostering positive impacts created by the economic opportunities of the green mobility transition, including on tackling this social challenge. This rulebook outlines the performance expectations included in the Battery Passport related to managing the risk of forced labour according to international conventions and established practice. It seeks to make them practical by aligning them with existing regulations and voluntary standards, allowing companies to report according to existing, recognised assurance processes – where possible. The following section defines the concept of forced labour and outlines its links to other environmental, social and governance (ESG) issues present in the battery value chain.

2.1 Forced Labour

Forced labour constitutes a serious violation of human dignity and fundamental human rights.¹ Despite international commitments by governments and companies in all economic sectors to abolish forced labour, the phenomenon is still widespread and has grown in recent years.² The most recent report on Global Estimates of Modern Slavery³ estimates that nearly 28 million people faced an instance of forced labour in 2021. Close to 10% of these instances are associated with children.

The International Labour Organization (ILO) defines forced labour in the ILO Forced Labour Convention, 1930 (No. 29) as “*all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily.*”⁴ Forced labour affects adults and children alike. It is widely considered as one potential case of the worst forms of child labour.⁵ Forced labour can be summarized as work that is performed involuntarily under any threat of penalty.⁶ It occurs where work is forced upon people or a person by state authorities, by private enterprises or by individuals.

The concept of “forced labour”, “compulsory labour” and “modern slavery” are often used interchangeably. In in this rulebook, forced labour will be used according to the legal definition set up at the ILO Convention.⁷

The most common indicators, according to ILO, that point to a potential situation of forced labour are:⁸

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and/or sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

¹ As recognised in the Preamble to the 2014 Protocol to ILO Convention No. 29.

² Ibid.

³ https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_854733.pdf.

⁴ <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>.

⁵ https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_762168.pdf.

⁶ <https://www.ilo.org/global/topics/forced-labour/definition/lang--en/index.htm>.

⁷ In some instances, to further detail performance expectations and requirements, the (legal) definitions of the underlying regulations and standards are used as an extension (see chapter 3.2).

⁸ https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_203832.pdf

2.2 Forced Labour Risks in the Battery Value Chain

Like other industrial sectors, the global battery value chain may face ESG challenges, amongst them, the risk⁹ and in some cases, documented instances of forced labour.¹⁰ The concept of forced labour covers a wide range of coercive practices that are prevalent globally and may affect all industries and parts of the battery value chain:¹¹ “[u]nless strictly managed, operations in the battery value chain could have unfavourable effects on regional communities through violations of (...) forced labour”.¹² Amongst the most severe risks that have been identified with regard to forced labour, are the physical violence of child workers, their extortion and intimidation which belong to the worst forms of child labour.¹³

Therefore, this rulebook is applicable to all actors along the value chain and companies should report against this issue.

Companies participating in the Battery Passport can draw upon the guidance in this rulebook to ensure they have the management systems, policies and practices in place to foster fair working conditions throughout the value chain. These include the systems to identify, prevent, mitigate, and account for any forced labour risks based on the ILO indicators above.

With the help of appropriate policies and action plans that prohibit the use of physical coercion, abuse, or inhuman treatment practices as well as the restriction of the freedom of movement of workers in the workplace or in on-site housing as part of the company's due diligence management system, these risks can be prevented and/ or mitigated (indicator 1).

Risks can be best prevented or mitigated by ensuring compliance with applicable national regulation on forced labour as well as international principles of responsible recruitment – whichever is the more protective norm - for the company's own operations, supply chain, products, or market access (see indicator 2). A solid risk-based due diligence system on forced labour (indicator 2) will account for risks such as the withholding of wages or the retention of identity documents.

Good practices require also systematic and transparent monitoring of risks and incidents, and use of such statistics (see indicator 3) to review the effectiveness of risk management systems and remediation.

The prevention, mitigation, and remediation of all forced labour risks can be generally tackled by instituting a reporting channel that is independent, accessible to external third parties, allows for double way communication, ensures anonymity and identity protection (indicator 4). In case risks materialize, a framework to remediate the identified potential negative impacts on forced labour needs to be established (indicator 4). The risk of labour exploitation may prevail,¹⁴ with abusive working and living conditions as well as deception demonstrating other high-risk situations¹⁵, and companies are encouraged to manage also other social and labour impacts, and overall risk management systems.

While the listed indicators provide for a proxy of potential risks for exposed person(s) to these situations, identifying forced labour practices is challenging, as the definitions in law do not capture the complexities of this practice on the ground. It is difficult to identify forced labour solely based on documents or assessments made by existing management systems.¹⁶ Therefore, implementing companies seeking to address forced labour in their own operations and in supply chains need to support the empowerment of people at risk¹⁷ and engage directly with potentially exposed actors.¹⁸

⁹ See for instance section 82 in the EU Battery Regulation that highlights “(...) social risks (i.e., forced labour) inherent in the extraction, processing and trading of certain raw materials and secondary raw materials used for the purposes of battery manufacturing.” or the United States Department of State emphasizing poverty-driven child labor in the mining part of the EV battery supply chains (see <https://www.state.gov/wp-content/uploads/2022/07/Forced-Labor-and-the-Clean-Energy-Transition-Finding-A-Responsible-Way-Forward.pdf>)

¹⁰ See for instance the report “Driving force - Automotive Supply Chains and Forced Labor in the Uyghur Region” from 2022 <https://www.business-humanrights.org/en/latest-news/report-driving-force-automotive-supply-chains-and-forced-labor-in-the-uyghur-region/> or ILO's “Child Labour in Mining and Global Supply Chains” https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-manila/documents/publication/wcms_720743.pdf or U.S. Department of State's Trafficking in Persons: Democratic Republic of the Congo 2021 Report

¹¹ ILO. Forced labour, human trafficking and slavery. International Labour Office - Topics. [Online] 7 November 2016. <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>

¹² <https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/battery-2030-resilient-sustainable-and-circular>.

¹³ https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-manila/documents/publication/wcms_720743.pdf.

¹⁴ https://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-manila/documents/publication/wcms_720743.pdf.

¹⁵ https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf.

¹⁶ <https://www.antislaverycommissioner.co.uk/media/1683/sedex-recognising-forced-labour-risks-in-global-supply-chains-october-2021.pdf>.

¹⁷ ILO IPEC+ Flagship Strategy. Geneva : ILO Fundamentals, 2016.

¹⁸ https://www.ilo.org/wcmsp5/groups/public/---ed_norm/--declaration/documents/publication/wcms_101171.pdf.

2.3 Forced labour, cross-cutting Due Diligence Indicators and other ESG Issues

The *Presence and quality of risk management systems* and *Presence and quality of sustainability management systems* represent cross-cutting issues that will be addressed specifically in separate rulebooks. These rulebooks will contain requirements and performance expectations on management systems for company-wide environmental, social and human rights due diligence processes in line with best practices from the United Nations Guiding Principles (UNGP) and the Organisation for Economic Cooperation and Development (OECD) (See Figures 1 and 2).



Figure 1: Components of the UNGP due diligence.¹⁹

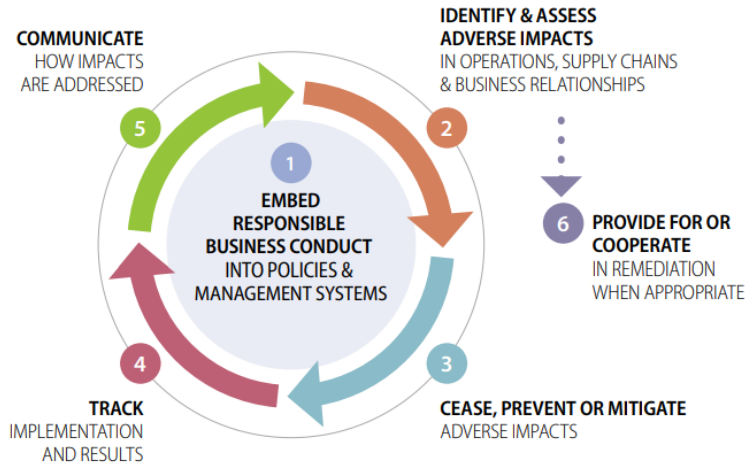


Figure 2: Steps of the OECD due diligence Process.²⁰

The environmental, social, governance and economic (ESG) pillars of sustainable development are reflected in the ESG issues covered by the Battery Passport. Many of these issues are interlinked. Forced Labour is particularly linked to issues highlighted in Figure 3. The GBA therefore advises companies to look at the different rulebooks of *Child Labour*, *Human Rights*, *Worker health and safety*, *Freedom of association and collective bargaining* on related issues side by side when implementing and reporting forced labour requirements. They are further encouraged to find useful links in the rulebooks *Respect for Indigenous People’s Rights* and *Livelihood attainment*.

¹⁹ <https://www.ohchr.org/sites/default/files/Documents/Issues/Business/B-Tech/key-characteristics-business-respect.pdf>.

²⁰ <https://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>.

Cross-cutting		
Due diligence		
1. Presence and quality of environmental & human rights due diligence and risk management systems		
Environmental	Social & Economic	Governance
Energy and GHG 2. GHG emissions 3. Energy efficiency Environmental degradation 4. Pollution (air, water, soil, hazardous substances, noise and vibration, plant safety) 5. Biodiversity loss Circularity 6. Material consumption/usage 7. Water management (usage, recycling, depletion) 8. Waste management (generation, recycling/reuse) 9. Circular design	Human rights 10. Child labor 11. Forced labor Workers' rights 12. Freedom of association and collective bargaining 13. Worker health and safety Community impacts and rights 14. Respect for Indigenous Peoples' rights 15. Community life 16. Diversity	Local economy 17. Contribution to local economic development (payments to governments and local supplies and employment) 18. Engagement with artisanal and small-scale miners Product cost 19. Total cost of ownership (consumer) Compliance & good governance 20. Product quality and safety 21. Data security and privacy 22. Occurrence of corruption and bribery

Figure 3: Overview of GBA ESG issue list²¹

²¹ This figure will be updated based on the final issue framework.

3 Forced Labour Indicators

This chapter presents the indicator framework related to the Forced labour rulebook and other Battery Passport rulebooks. Furthermore, it introduces the regulations and standards which address the issue of Forced labour and were drawn upon to develop the set of forced labour indicators and their requirements.²² These four indicators are detailed out subsequently.

3.1 Indicator Framework

To obtain a battery passport, companies need to demonstrate having due diligence frameworks in place. The due diligence should address a wide range of ESG issues, among them forced labour. The UNGP and OECD provide widely applied due diligence frameworks which are also applicable to other regulations. This rulebook seeks inspiration from both frameworks (UNGP-DD, OECD-DD) to inform the implementation of indicators. These frameworks build a practical foundation for the companies' efforts to achieve the GBA objectives. Furthermore, they give a structure on how organisations can organize their work around the implementation of the indicators.

In order to identify, prevent, mitigate and account for how they address their adverse forced labour impacts, companies should carry out due diligence. The frameworks display the widely accepted steps of due diligence to ensure that companies manage negative impacts associated with their activities aligned within the scope, vision, and impact sphere of the GBA. With the help of these framework and further selection criteria, a core set of indicators was determined.

Companies participating in the GBA Battery Passport program should demonstrate the implementation of the outlined indicators and the requirements associated with the forced labour issue.

The indicator framework is comprised of 4 indicators that can be mapped to the components of the UNGP-DD process as well as the OECD-DD steps:

Forced Labour Indicators	UNGP-DD Components	OECD DD steps
1) Policy and action plan to eliminate all forms of forced labour	4	1
2) Embedded a risk-based due diligence framework on forced labour	1 2 3	2 3 4 5
3) Make publicly available reporting associated with the elimination of forced labour	4	5
4) Existence of a remediation and grievance framework for forced labour	2	6

Table 1: GBA Forced Labour Indicators in relevance to UNGP and OECD components.

²² Both regulations and standards provide for addressing forced labour risks on company's own workforce and those associated with their employees in the value chains. Companies are encouraged to refer to these documents in their efforts to eradicate forced labour in the operations and supply chain. Companies are also welcome to identify relevant voluntary practices applicable to the industry sector in order to target efforts relevant to the type of risks faced at different stages of the battery value chain.

3.2 Regulations

At the international level, the ILO regulates the eradication of forced labour through two core conventions, complemented by a protocol.²³ Both conventions are almost universally ratified, meaning that nearly²⁴ all countries worldwide adhere to and report on them regularly. Companies operating in countries that have ratified the ILO conventions, are in turn, required to observe these legal frameworks.

In addition, some countries have enacted national regulations instructing companies to combat or restrict all forms of forced labour and associated practices in their own operations and in their supply chains. The legal expectations on companies are mainly associated with the preventive nature. However, some jurisdictions have a stronger focus on identifying, remediating, and eliminating instances of forced labour. Eliminating forced labour solely via regulations has unfortunately not proven to be effective. Its root causes need to be tackled which are closely connected with poverty and the lack of bargaining power to negotiate decent wages.

International regulations (compliance baseline) that were reviewed for this rulebook are:

 China	<ul style="list-style-type: none"> • New Energy Vehicle Industry Development Plan (2021-2035)
 EU	<ul style="list-style-type: none"> • EU Battery Regulation • Corporate Sustainability Due Diligence Directive (EU CSDDD) • Taxonomy Regulation • REACH Regulation • Supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas • Corporate Sustainability Reporting Directive (CSRD) • General Data Protection Regulation (GDPR) • The EU Global Human Rights Sanctions Regime • Regulation on Deforestation-free Products • <i>Proposal-</i> Critical Raw Materials Act • <i>Proposal-</i> Eco-design for Sustainable Products Regulation (ESPR)
 USA	<ul style="list-style-type: none"> • The Inflation Reduction Act of 2022 (Public Law 117-169) • Foreign Corruption Practice Act (FCPA) • Countering China’s Exploitation of Strategic Metals and Minerals and Child and Forced Labor in the Democratic Republic of the Congo Act (U.A. Bill) • The Uyghur Forced Labor Prevention Act (Public Law No. 117-78)
 UK	<ul style="list-style-type: none"> • <i>Proposal-</i> Zero Emission Vehicles (ZEV) Mandate (Proposal) • Due diligence on forest risk commodities provision in the UK, Environment Act 2021 • Modern Slavery Act 2015

Other jurisdictions with regulations relevant for forced labour that were not part of this compliance baseline could be included in a subsequent revision.

For the forced labour indicators which constitute the sustainability performance expectations (requirements) on this issue to be reported for the GBA Battery Passport, the following regulations were drawn upon:

- Canada’s Modern Slavery Act
- EU Battery Regulation
- German Supply Chain Due Diligence Act (SCDDA)
- Norwegian Transparency Act
- The Corporate Sustainability Reporting Directive (CSRD)

²³ International Labour Organization (ILO). Forced labour Convention No. 29, 1930. and the ILO Abolition of Forced Labour Convention, 1957 (No. 105) (the 1957 Convention) which are binding on those member States which have ratified them. The 1930 and 1957 Conventions were supplemented further in 2014 by the Forced Labour Protocol, ratified by 59 States, imposing obligations to prevent, protect and remedy in relation to forced or compulsory labour and bringing trafficking for the purposes of forced or compulsory labour into scope. The Forced Labour (Supplementary Measures) Recommendation, 2014 (No.203) (11 June 2014) provide nonbinding practical guidance to member States in meeting their obligations.

- Uyghur Forced Labor Protection Act (UFLPA Operational Guidance for Importers)

Most of these regulations refer not only to the above-mentioned forced labour conventions and protocol, but to the eight fundamental ILO conventions.²⁵ The EU Battery Regulation as well as the CSRD both also explicitly build upon the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE)²⁶ and the ILO Declaration on Fundamental Principles and Rights at Work.

- The key features of national laws on forced labour prescribe companies to:
 - Issue a statement or policy on forced labour
 - Conduct risk assessments to identify, mitigate and address negative impacts on forced labour
 - Establish a reporting channel for forced labour
 - Enable remediation mechanisms
 - Issue an annual report on their work

Some regulations also forbid access to the market or introduce a ban on products and services linked to forced labour practices: In the US, the Section 307 of the Tariff Act of 1930 (19 U.S.C. §1307) prohibits importing any product that was mined, produced, or manufactured wholly or in part by forced labour, including forced or indentured child labour; the Uyghur Forced Labor Protection Act (UFLPA) prohibits the importation into the United States of goods manufactured in whole or in part in a region in the People's Republic of China or in a listed company. Mexico implemented the USMCA Forced Labor Import Ban to prohibit the importation of goods produced in whole or in part by forced or compulsory labour, including forced or compulsory child labour, mirroring the provisions of the Section 307 of the U.S. Tariff Act²⁷ In the EU, the Proposal for a ban on goods made using forced labour suggests a regulation to ban products made using forced labour, including child labour, on the European Union internal market. With significant steps already taken, the proposal is soon to be expected in the trilogue negotiations.²⁸

The GBA is sensitive to the evolution of the regulations. Therefore, the framework and reference regulations are reviewed on a regular basis.

3.3 Standards

While national regulations are normative, voluntary standards offer a wealth of practical guidance to companies aiming to systematically address the potential risk of negatively contributing to forced labour. Voluntary standards usually arise from industry organizations, labour unions, or non-governmental organizations, or cooperation between stakeholders, and they provide recommendations companies can leverage to approach the issue from an operative perspective by considering aspects on how to identify, prevent, mitigate, and account for the existence of forced labour practices in their value chain and own operations. Voluntary frameworks are associated with voluntary reporting practices, as well as data verification, assurance and audit practices. Companies should apply whichever is the more protective norm.

The voluntary standards that were reviewed for this rulebook are²⁹:

- Aluminium Stewardship Initiative (ASI) Performance Standard
- Aluminium Stewardship Initiative (ASI) Chain of Custody Standard
- CRAFT Code
- Extractive Industries Transparency Initiative Standard (EITI)
- Global Reporting Initiative Standards (GRI) 409 – Forced or Compulsory Labor 2016
- International Finance Corporation (IFC) Performance Standard 2
- ILCS Guidelines concerning the measurement of forced labor (ILO)
- Initiative for Responsible Mining Assurance (IRMA) Standard for Responsible Mining 2018
- International Council of Mining and Metals (ICMM) Mining Principles - Performance Expectations
- ISO 31000:2018 Risk Management

²⁵ https://ilo.primo.exlibrisgroup.com/discovery/fuldisplay/alma994092313402676/41ILO_INST:41ILO_V2.

²⁶ The MNE Declaration is the only ILO instrument that provides direct guidance to enterprises (multinational and national) on social policy and inclusive, responsible and sustainable workplace practices.

²⁷ <https://www.ropesgray.com/en/insights/alerts/2023/03/mexico-bans-imports-made-with-forced-labor-in-alignment-with-the-usmca>.

²⁸ [https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/739356/EPRS_BRI\(2023\)739356_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/739356/EPRS_BRI(2023)739356_EN.pdf).

²⁹ The standards from which GBA has drawn guidance for the indicators are highlighted in bold and dark green.

- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chain of Minerals from Conflict- Affected and High-Risk Areas
- Responsible Minerals Initiative Standard (RMI - RMAP ESG Standard for Mineral Supply Chains)
- Sustainability Accounting Standards Board (SASB) – Metals & Mining
- The Copper Mark Criteria for Responsible Production/ RMI RRA Criteria Guide
- The Copper Mark Joint Due Diligence Standard (JDDS) for Copper, Lead, Molybdenum, Nickel and Zinc
- The Copper Mark Chain of Custody Standard
- United Nations Guiding Principles on Business and Human Rights
- International Recruitment Integrity System (IRIS) Standard
- International Organization for Migration (IOM) Migrant Worker Guidelines for Employers Comp. 3
- Responsible Mining Initiative (RMI) Risk Readiness Assessment (RRA) Criteria
- Towards Sustainable Mining (TSM)
- Responsible Business Alliance (RBA), Trafficked & Forced Labour Guidance
- Responsible Labour Initiative (RLI), Forced Labour Standards
- Drive Sustainability Self Assessment Questionnaire
- Responsible Business Alliance (RBA) Code of Conduct and Validated Assessment Program (VAP)
- CCCMC Due Diligence Guidance
- International Responsible Mining Association (IRMA) Chain of Custody Standard 2023

3.4 Indicators and Requirements

The following indicators represent the requirements that need to be fulfilled for the battery passport. They display a consolidated version of the underlying regulations, standards, and best practices with the goal to make the issue operationalizable for the companies. Whenever applicable, further guidance and background is provided.³⁰

The GBA recognizes that some of the best practices outlined in the indicator requirements reflect changes in global practice and norms that have come to the fore only in recent years.³¹

Companies participating in the GBA battery passport are required to fulfil the set of forced labour indicators. Each indicator is composed of several requirements. These requirements are divided into various requirement levels which directly relate to the performance score of participating companies. These levels are:

These levels are:

- I. Foundational requirements – drawing on the regulatory compliance baseline
- II. Intermediate requirements – drawing on the regulatory compliance baseline and voluntary sustainability standards
- III. Leading practice – drawing on the regulatory compliance baseline and voluntary sustainability standards

³⁰ See Annex 1.

³¹ While the type of forced labour risks and incidents need to be identified in accordance with the United Nations Guiding Principles (UNGP) or the OECD Due Diligence Process, yet recent reporting legislation (especially in the EU) requires actual numbers to be reported.

3.4.1 Overview of indicators and reference regulations and standards

Content:			
Nr.	Indicator	Level	Applicable Regulation / Standard
1.	<u>Indicator 1: Policy and action plan to eliminate all forms of forced labour</u>	<u>1.1 Foundational requirements</u>	<ul style="list-style-type: none"> - EU Batteries Regulation - CSRD (ESRS S1, S2) - UNGP - OECD - RMAP ESG - IRIS - IOM Migrant Worker Guidelines f. Employers - The Copper Mark DD - The Copper Mark RRA Criteria Guide - IRMA - IFC Performance Standard 2 - ASI Performance Standard - ICMM Mining Principles - Performance Expectations - CCCMC Due Diligence Guidance
		<u>1.2 Intermediate requirements</u>	<ul style="list-style-type: none"> - OECD - UFLPA Op. Guidance - RMI RRA Criteria - The Copper Mark RRA Criteria Guide - IFC Performance Standard 2 - Drive Sustainability Self Assessment Questionnaire - CCCMC Due Diligence Guidance
		<u>1.3 Leading practice</u>	/

<p>2.</p>	<p><u>Indicator 2: Embedded a risk-based due diligence framework on forced labour</u></p>	<p><u>2.1 Foundational requirements</u></p>	<ul style="list-style-type: none"> - EU Batteries Regulation - CSRD (ESRS S1, S2) - UNGP - OECD - RMAP ESG - GRI 409 - IOM Migrant Worker Guidelines f. Employers - The Copper Mark RRA Criteria Guide - RMI RRA Criteria - IRMA - TSM - SASB Metals & Mining - Drive Sustainability Self Assessment Questionnaire - ASI Performance Standard - ICMM Mining Principles - Performance Expectations - RBA Code of Conduct - CRAFT Code - CCCMC Due Diligence Guidance
		<p><u>2.2 Intermediate requirements</u></p>	<ul style="list-style-type: none"> - IRMA - The Copper Mark RRA Criteria Guide - RMAP ESG
		<p><u>2.3 Leading practice</u></p>	<p>/</p>

3.	<u>Indicator 3: Make publicly available reporting associated with the elimination of forced labour</u>	<u>3.1 Foundational requirements</u>	- CSRD (ESRS S1)
		<u>3.2 Intermediate requirements</u>	- UNGP OECD GRI 409
		<u>3.3 Leading practice</u>	/
4.	<u>Indicator 4: Existence of a remediation and grievance framework for forced labour</u>	<u>4.1 Foundational requirements</u>	/
		<u>4.2 Intermediate requirements</u>	- German SCDDA - Norwegian Transparency Act - Canada's Modern Slavery Act - OECD - The Copper Mark RRA Criteria Guide - IRMA - IOM Migrant Worker Guidelines f. Employers - ASI Performance Standard - IRMA Chain of Custody - CCCMC Due Diligence Guidance
		<u>4.3 Leading practice</u>	/

3.4.2 Policy and action plan to eliminate all forms of forced labour

Scoring	Proposed consolidated language	How to report
<p>F. Foundational requirements</p>	<p>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</p> <p>0.1 Ensures that the forced labour is included in the scope of its human rights and environmental due diligence process, including policy and action plan.</p> <p><i>In addition, it includes the following in its due diligence steps:</i></p> <p>1. The company shall have set up and implemented a policy and action plan that</p> <p>1.1 Clearly states the commitment to prohibit, prevent, remedy and eliminate all forms of forced labour for workers in its own operations and supply chains which includes not to engage, directly or indirectly, tolerate, or support forced labour in line with ILO conventions and other internationally recognised frameworks</p> <p>1.2 Includes a statement for respecting all ILO Fundamental Principles and Rights at Work, including strict neutrality towards the freedom of association and collective bargaining, and does not prohibit or discourage from joining or forming trade unions and bargain collectively</p> <p>1.3 Adheres to internationally recognized responsible recruitment principles</p> <p>1.4 Is reviewed and revised on an annual basis with data and information on findings of significant adverse impacts on forced labour, and how they have been addressed (this shall also cover, where relevant, access to information, public participation in decision-making and access to remedy in regard to forced labour matters)</p> <p>1.4.A. In its own operations</p> <p>1.4.B. In the supply chain</p>	<p>Companies may report at least as per one of the following options:</p> <ul style="list-style-type: none"> • Issue a forced labour public statement • Make publicly available its forced labour policy • Ensure that forced labour indicators are included in a publicly available overall Human Rights statement or policy <p>Alignment with CSRD Report:</p> <ul style="list-style-type: none"> • CSRD requirements are aligned with GBA FL indicators 1. a) - c). The report should describe in addition how the company responds to GBA FL indicators 1. d) - f).
<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i></p> <p>2. The company has established</p> <p>2.1 Implemented measures and training programs on forced labour for HR personnel, HES personnel, providers of recruiting services or hired workforce, and subcontractors to ensure understanding and compliance with the prohibition and aim of eradicating of forced labour in own operations and supply chain</p> <p>2.2 Specified the number or percentage of hired workforce for own operations who have received training on identifying and mitigating risks associated with forced labour</p>	<p>Companies may report at least as per one of the following options:</p> <ul style="list-style-type: none"> • Provide explanations to this indicator at any publicly available report i.e. Sustainability Report, Human Rights Due Diligence report • Provision of links to relevant internal or external documents addressing this information.
<p>L. Leading practice</p>	<p>/</p>	

Indicator 1 - Policy and action plan to eliminate all forms of forced labour

Requirements (draft)	EU Battery Regulation	EU Taxonomy	ESRS S1 (CSRD)	ESRS S2 (CSRD)	German SCDDA	Norwegian Transparency Act	Canada' s Modern Slavery Act	UNGP	OECD DD f. RBC	RMAP ESG	IRIS	UFLPA Op. Guidance	IOM Migrant Worker Guidelines for Employers	GRI 409	The Copper Mark DD	The Copper Mark RP/ RMI RRA Criteria Guide	RMI RRA Criteria	IRMA	Drive Sustainability Self-Assessment Questionnaire	ISO 31000:2018	SASB - Metals & Mining	IFC Performance Standard 2	ASI Performance Standard	EITI	ICMM Mining Principles - Performance Expectations	TSM	RBA Code of Conduct and VAP	ASI Chain of Custody	IRMA Chain of Custody	The Copper Mark Chain of Custody	CRAFT Code	CCCMC					
Foundational Requirements																																					
1.																																					
1.1	x		x	x				x	x	x	x		x		x	x		x					x	x													
1.2	x		x					x	x						x	x		x				x													x		
1.3	x		x	x								x						x																			
1.4	x			x				x	x									x																	x		
1.5	x							x	x									x																		x	
1.6	x		x						x				x																							x	
1.7	x		x					x	x			x						x																		x	
1.8	x							x	x									x																		x	
1.9	x		x						x																												
Intermediate Requirements																																					
2.																																					
2.1			x																																		
2.2									x			x																									x
2.3																																					
Leading Practice																																					
3.			x							x																											

3.4.3 Embedded a risk-based due diligence framework on forced labour

Scoring	Proposed consolidated language	How to report
<p>F. Foundational requirements</p>	<p>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</p> <p>0.1 Ensures that the forced labour is included in the scope of its human rights and environmental due diligence process, including risk-based due diligence.</p> <p><i>In addition, it includes the following in its due diligence steps:</i></p> <p>1. The company carries out forced labour due diligence in its own operations and supply chain in order to identify, prevent, mitigate, and account for potential risks and actual forced labour incidents and/or negative impacts for workers directly and indirectly employed by the company. The due diligence process should</p> <p>1.1 Ensure compliance with applicable national regulation on forced labour for its operations, supply chain, products or market access as well as international principles of responsible recruitment</p> <p>1.2 Draw on internal and/or independent external forced labour expertise</p> <p>1.2.A. In its own operations</p> <p>1.2.B. In the supply chain</p> <p>1.3 Cover high-risk areas for forced labour, exposed mineral supply chains and information on how the company has contributed to the prevention of forced labour abuses</p> <p>1.4 Perform meaningful social dialogue with potentially affected groups, suppliers, workers, workers' representatives and other relevant stakeholders at own operations and in supply chain</p> <p>1.5 Put processes in place that are commensurate to jurisdictional risks to ensure the prevention of forced labour, included bonded or indentured or involuntary prison labour</p> <p>1.6 Have processes put into place to monitor supply chains and relationships with recruitment agencies for human</p> <p>2. The company's due diligence management system addresses the following forced labour preventive/mitigation actions:</p> <p>2.1 An action plan that prohibits the use of physical coercion, abuse, or inhuman treatment practices as well as the restriction of the freedom of movement of workers in the workplace or in on-site housing</p> <p>2.1.A. In its own operations</p> <p>2.1.B. In the supply chain</p> <p>2.2 Workers must not be required to pay employers', agents' or sub-agents' recruitment fees, deposit loans or any other related fees for their employment (i.e., for equipment) either directly or through recruitment agencies. If any such fees are found to have been paid by workers, such fees must be repaid to the worker</p> <p>2.3 Contract terms related to employment are clear, transparent, and provided in writing in the employee's native language prior to recruitment</p> <p>2.4 Workers must be provided a copy of their contract prior to leaving their country of origin</p> <p>2.5 No substitution or change(s) shall be allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms</p> <p>2.6 All work must be voluntary, and workers must be free to leave work at any time or to terminate their employment without penalty if reasonable notice is given as per worker's contract</p> <p>2.7 Wages have to be paid on time and to each worker directly</p> <p>2.8 Valid work permits have to be maintained for all workers</p> <p>2.9 Originals of government issued identification and personal documentation are not held by the employer/labour agent/contractor</p> <p>2.10 Employers can only hold documentation if such holdings are required by law. In this case, at no time should</p>	<p>Companies may report at least as per one of the following options:</p> <ul style="list-style-type: none"> Issue a forced labour due diligence report (according to relevant national regulations, when applicable, CSDDD, OECD DD, UNGP, etc.) Ensure the sustainability report includes information on the results of the due diligence on forced labour (as per OECD DD guidelines). <p>Alignment with CSRD Report:</p> <ul style="list-style-type: none"> CSRD requirements (S1, AG 53.c)) are aligned with GBA FL indicators XX. <p>Provision of links to relevant (internal) Due Diligence documents.</p> <p>Links to cross-cutting indicator on risk assessment and due diligence</p>

workers be denied access to their documents
 2.11 There are no unreasonable restrictions on the movement of workers and the access to basic liberties
 2.12 Workers are not required to work excessive overtime (leaving them with little or no rest or recovery time, work non-stop without breaks during the working day or where they have to work for weeks or months without any days off)
 2.13 The prohibition of forced labour is included in the training of relevant personnel

3. The publicly available due diligence report of the company discloses
 3.1 significant risk for incidents of forced labour in all
 3.1.A. Operations
 3.1.B. Suppliers
 3.2 Under which circumstances stakeholder consultations occurs and whether the result of these engagements is being integrated into the company's decision-making processes
 3.2.A In its own operations
 3.2.B In the supply chain
 3.3 Any geographies, commodities or products associated with any forced labour adverse impacts for cause and contribute to or significant risk of forced labour
 3.3.A In its own operations and among its own workforce
 3.3.B In the supply chain
 3.4 Whether negative impacts on forced labour are widespread or systemic in context
 3.4.A. Where the company operates
 3.4.B. Has sourcing or other business relationships
 3.5 Measures taken by the company in the reporting period intended to contribute to the elimination of all forms of forced labour

I. Intermediate requirements

In addition to (F)
4. As part of its due diligence assessment, the company documents
 4.1 The current human rights context in
 4.1.A. The operating countries
 4.1.B. The supply chain
 4.1.C. And project areas
 4.2 Relevant human rights/ forced labour laws and norms
 4.2.A For the own operations
 4.2.B For the supply chain
 4.3 A comprehensive list of the forced labour risks alongside an evaluation of the potential severity of impacts for each identified forced labour risk for the
 4.3.A. Own operations
 4.3.B. Business relationships
 4.4 The identification of rights holders, an analysis of the potential differential risks to and impacts disaggregated by rights holder group
 4.5 Recommendations for preventing, mitigating and remediating identified risks and impacts, giving priority to the most salient forced labour issues

5. The company shall take steps to engage with workers at high risk of forced labour (i.e., subcontracted workers, migrant workers, recruited through agencies, working in isolated compounds, outsourced auxiliary functions) via surveys or interviews and documented the number or percentage of workers engaged to detect forced labour risks and incidents. Where there is a risk, take measures for its prevention and remediation

Companies may report at least as per one of the following options:

- Assurance process according to RMI RRA
- Provision of links to relevant (internal) Due Diligence and or ESG documents addressing the stated requirements.

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3.4.4 Make publicly available reporting associated with the elimination of forced labour

Scoring	Proposed consolidated language	How to report
<p>F. Foundational requirements</p>	<p>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</p> <p>0.1 Ensures that the forced labour is included in the scope of its human rights and environmental due diligence process, including reporting.</p> <p><i>In addition, it includes the following in its due diligence steps:</i></p> <p>1. The company publicly discloses forced labour statistics that document the number of forced labour risks and incidents connected to the (in)direct workforce which occurred in the reporting year</p> <p>1.1 This shall include a report of the number of forced labour incidents confirmed during the reporting period in own operations and supply chains</p> <p>1.1.A. In its own operations</p> <p>1.1.B. In the supply chain</p> <p>1.2 The number of forced labour incidents where the company has played a role in securing remedy for those affected</p> <p>1.2.A. In its own operations</p> <p>1.2.B. In the supply chain</p> <p>1.3 A clear statements when no such incidents have been identified</p> <p>1.3.A. In its own operations</p> <p>1.3.B. In the supply chain</p> <p>2. The company states the number of persons experiencing forced labour in the reporting period</p> <p>2.A. In its own operations</p> <p>2.B. In the supply chain</p>	<p>Companies may ensure the required information is made publicly available in for example websites, publications or:</p> <ul style="list-style-type: none"> • Integrate these into forced labour/Human Rights due diligence reports (according to relevant national regulations, when applicable, CSDDD, OECD DD, UNGP, etc.) • Ensure the sustainability report includes information on the results of the due diligence on forced labour/Human Rights (as per OECD DD guidelines). • Linked to cross-cutting BP indicators on human rights due diligence and risk assessment
<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i></p> <p>3. The company discloses the type of forced labour risks and adverse impacts the company causes, contributes to and is directly linked to through its own operations</p> <p>4. The company discloses the type of forced labour risks and adverse impacts the company causes, contributes to and is directly linked to through its supply chain by indicating the number of business relations and industrial sectors these are connected to</p> <p>5. The company states the number or percentage of operations considered to have significant risk for incidents of forced labour either in terms of</p> <p>5.1 Type of operation (such as manufacturing plant)</p> <p>5.2 Countries or geographic areas with operations considered at risk</p> <p>6. The company states the number or percentage of suppliers considered to have significant risk for incidents of forced labour either in terms of</p> <p>6.1 Type of supplier</p> <p>6.2 Countries or geographic areas with suppliers considered at risk</p>	<p>As per A, and:</p> <ul style="list-style-type: none"> • If the company is GRI 409-1 compliant/audited, no need to report /will automatically be scored B

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practice**

In addition to (F) and (I),

7. The company states the amount (numerical or percentage) of forced labour risks mitigated

7.A. In its own operations

7.B. In the supply chain

8. The company states the amount (numerical or percentage) of forced labour incidents prevented, mitigated, remediated and sought to eliminate. This can include a description of the mechanisms used to address each situation

8.A. In its own operations

8.B. In the supply chain

As per A

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3.4.5 Existence of a remediation and grievance framework for forced labour

Scoring	Proposed consolidated language	How to report
<p>F. Foundational requirements</p>	<p>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</p> <p>0.1 Ensures that the forced labour is included in the scope of its human rights and environmental due diligence process, including remediation and grievance.</p> <p><i>In addition, it includes the following in its due diligence steps:</i></p> <p>1. The company shall establish a remediation and grievance mechanism that puts in place processes to enable the remediation of any forced labour incident/ impact the company causes or contributes to in its own operations and supply chain. These mechanisms shall:</p> <p>1.1 Grant the possibility to directly submit a grievance/complaint on forced labour allegations to any internal and external stakeholder, covering for example: persons who are affected or have reasonable grounds to believe that they might be affected by an adverse impact, to trade unions and other workers’ representatives representing individuals working in the value chain concerned, and to civil society organisations active in the area concerned</p>	<p>Companies may report at least as per one of the following options:</p> <ul style="list-style-type: none"> Issue a forced labour due diligence report (according to relevant national regulations, when applicable, CSDDD, OECD DD, UNGP, etc.) Ensure the sustainability report includes information on the results of the due diligence on forced labour (as per OECD DD guidelines). <p>Alignment with CSRD Report:</p> <ul style="list-style-type: none"> CSRD requirements are aligned with GBA FL indicator 3 <p>Provision of links to relevant (internal) documents, reports, a records system, etc.</p> <p>Links to cross-cutting indicator on risk assessment and due diligence</p>
<p>I. Intermediate requirements</p>	<p><i>In addition to (F),</i></p> <p>2.The company establishes a remediation and grievance mechanism that puts in place processes to enable the remediation of any forced labour incident/ impact the company causes or contributes to in its own operations and supply chain. These mechanisms shall</p> <p>2.1 Be designed to investigate the root causes of forced labour incidents</p> <p>2.1.A. In its own operations</p> <p>2.1.B. In the supply chain</p> <p>2.2 Lead to the immediate termination of practices that result in forced labour in the own operations</p> <p>3. The company shall</p> <p>3.1 Always seek to restore affected workers to the situation they would be in had the adverse impact not occurred and be proportionate to the impact suffered by the workers (i.e., repayment of recruiting fees or induced debt, enabling workers to return to their home countries, upon remuneration of agreed payment)</p> <p>3.1.A. In its own operations</p> <p>3.1.B. In the supply chain</p>	<p>Companies may report at least as per one of the following options:</p> <ul style="list-style-type: none"> Provision of links to relevant (internal) documents, reports, a records system, organization structure, etc. IRMA audit report

	<p>3.2 Provide access to qualified independent third parties that can handle the case, if necessary, and to a legitimate escalation channel (i.e., state-based judicial or non-judicial grievance mechanism) to which the worker can recur if the company is not able to provide effective remedy</p> <p>3.2.A. In its own operations</p> <p>3.2.B. In the supply chain</p> <p>4. The company puts in place a process that allows access to grievance and remediation mechanisms to workers at high risk of forced labour i.e., subcontracted workers, migrant workers, recruited through agencies, working in isolated compounds</p> <p>4.1 The company can engage with these high-risk groups via interviews or surveys and document the number or percentage of people engaged</p> <p>4.1.A. In its own operations</p> <p>4.1.B. In the supply chain</p> <p>4.2 The company can state any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour</p> <p>4.2.A. In its own operations</p> <p>4.2.B. In the supply chain</p> <p>4.3 The company can provide for remediation to any substantiated adverse forced labour impact it is directly linked to</p> <p>4.3.A. In its own operations</p> <p>4.3.B. In the supply chain</p> <p>5. The company is expected to state in its public report</p> <p>5.1 Whether and how the intended users are trained to use the grievance mechanisms and remediation processes</p> <p>5.2 How satisfied users are with the grievance mechanisms and remediation processes, and with the resulting outcomes, as well as how the company assesses user satisfaction</p>	
<p>L. Leading practice</p>	<p>/</p>	

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IV. Data Quality and Reporting

Companies may report against the battery passport in one or more of the following ways:

- Where they are assured or audited against a regulation or standard equivalent to the battery passport requirement, provide proof of audit, assurance or other verification
- Provide original documentation pertaining to company policies, practices, results, in line with guidance derived from materially existing standards

Please refer to the Battery Passport data governance rulebook for additional information on data verification in these two scenarios.

Companies will report on the forced labour rulebook via the associated reporting templates. Please see Annex A and B for further guidance.

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V. Final Remarks and Outlook

The GBA acknowledges the extensive array of jurisdictions worldwide which have enacted legislation in the context of human rights due diligence, including forced labour.³² While comprehensive research has been undertaken, the compliance baseline for the Battery Passport has been established based on a select set of these regulations, reflecting a rigorous standard of compliance. Recognizing the ongoing evolution and emergence of related standards³³, the GBA commits to the regular review and timely update of this rulebook to ensure alignment with the latest legal requirements and best practices in human rights protections.

Regulations world-wide addressing forced labor are under continuous development. This rulebook has been developed under a forward-looking vision and contains, therefore, references to upcoming draft regulations³⁴. The GBA plans to provide further guidance to reporting/ participating companies in the battery passport to guarantee the battery pass quality seal stems from compliance with the applicable regulations and standards.

Looking forward, the GBA is committed to adapting to evolving global standards in human rights and environmental stewardship, particularly in the context of forced labour in the battery supply chain. The GBA will continue to collaborate with international bodies and stakeholders to refine the compliance baseline, integrating new legislative developments and technological advancements. This approach is aimed at not only achieving compliance but also setting a benchmark for ethical and sustainable practices in the battery industry.

³² For instance, Mexico and its Forced Labour Administrative Regulation setting the goods which importation is subject to regulation by the Ministry of Labour and Social Welfare (2023) or the draft of the EU Regulation banning products made out of forced labour from EU market (not adopted yet).

³³ For instance, ILO is currently about to publish a recommended due diligence process in 6 steps on forced labour.

³⁴ Reference to draft regulations have been made explicit.

VI. Glossary

Term	Definition
Social dialogue	All types of negotiation, consultation or simply exchange of information between, or among, representatives of governments, employers, their organisations and workers' representatives, on issues of common interest relating to economic and social policy. It can exist as a tripartite process, with the government as an official party to the dialogue or it may consist of bipartite relations only between workers' representatives and management (or trade unions and employers' organisations). ³²
Adverse impact	An "adverse human rights impact" occurs when an action removes or reduces the ability of an individual to enjoy his or her human rights. ³³
Due diligence	Due diligence has been defined as "such a measure of prudence, activity, or assiduity, as is properly to be expected from, and ordinarily exercised by, a reasonable and prudent [person] under the particular circumstances; not measured by any absolute standard, but depending on the relative facts of the special case". In the context of the Guiding Principles, human rights due diligence comprises an ongoing management process that a reasonable and prudent company needs to undertake, in the light of its circumstances (including sector, operating context, size and similar factors) to meet its responsibility to respect human rights. ³⁴
Stakeholder	A stakeholder refers to any individual who may affect or be affected by a company's activities. An affected stakeholder refers here specifically to an individual whose human right with regard to forced labour has been affected by a company's operations, products or services.
Appropriate training (grievance mechanism)	Relevant professional training or existing professional experience in the field of mediation & conflict resolution, human resources, or sustainability issues along supply chains, completed further training on the topic or demonstrable experience in the investigation and processing of individual cases.

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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