



LEAD BATTERY

360°

Assurance Manual

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I. Introduction to the Assurance Manual

Purpose of this Document

To obtain a Lead Battery 360° claim, Participants must demonstrate their commitment to, and conformance with, the Guiding Principles of the Lead Battery 360° and the Performance Expectations that underpin them, as articulated in the Lead Battery 360° Code. This manual sets out the assurance process of Lead Battery 360°, which is otherwise referred to as the Lead Battery 360° Assurance Programme or as the Programme.

The manual gives instruction and guidance on:

- The requirements to make a Lead Battery 360° claim.
- The process for achieving Lead Battery 360° certification.
- The methodology for third-party assessments.
- The system for continual improvement.

Principles and Desired Outcomes of the Lead Battery 360° Assurance Programme

The assurance process as prescribed in the Lead Battery 360° Assurance Programme follows the principles outlined in the [ISEAL Assurance Code of Good Practice Version 2.0.](#)

Drawing from the ISEAL Assurance Code, the desired outcomes from implementation of the Lead Battery 360° Assurance Manual are that:

- The effectiveness and efficiency of the Lead Battery 360° assurance process are improved over time.
- The Lead Battery 360° assessment process results in accurate assessments of conformance.
- The Lead Battery 360° assessment process is accessible and adds value to Lead Battery 360° Participants.

Criteria Underpinning the Lead Battery 360° Programme

The assurance process as prescribed by the Lead Battery 360° Assurance Programme aligns with the following criteria:

- Impact: Lead Battery 360° makes a difference where it matters. As defined in our Roadmap to Change, Lead Battery 360° addresses the root causes of sustainability issues in lead and lead battery value chains and has a clear purpose to drive positive social, environmental, and economic impacts, including through its assurance process, the Lead Battery 360° Assurance Programme.
- Collaboration: Lead Battery 360° is a global alliance of lead and lead battery industry groups and works with relevant stakeholders through partnerships and knowledge-sharing towards shared sustainability objectives.
- Value Creation: Lead Battery 360° adds value to Participants in the Programme. It operates efficiently, minimising barriers to access, and empowers Participants through resources and tools and a clear business case for participating in its Programme.
- Measurable Progress: Lead Battery 360° can demonstrate the difference it makes through the collection and analysis of data to measure, understand, and demonstrate the progress towards its sustainability objectives.
- Stakeholder Engagement: Lead Battery 360° listens and learns; it is inclusive and non-discriminatory. It empowers stakeholders to participate in decisions and hold the Programme to account. It provides clear and transparent feedback on stakeholder input and concerns. It has fair, impartial, and accessible mechanisms for resolving complaints and conflicts.
- Transparency: Lead Battery 360° makes important information publicly available and easily accessible, while protecting confidential and private information of its Participants. It enables

stakeholders to understand and evaluate the Programme's processes, decision-making, results, and impacts, to actively participate in decisions or raise concerns

- Impartiality: Lead Battery 360° is impartial. It identifies and avoids or mitigates conflicts of interest throughout its governance and operations and ensures the Programme's integrity through transparency and stakeholder engagement.
- Reliability: Lead Battery 360° provides trustworthy assessments of Participants' performance. Its systems and processes are consistently implemented and assessed, and ensures that Participants' assessments are competent and accurate, and support any claims it allows Participants to make.
- Truthfulness: Lead Battery 360° claims and communications can be trusted. They are clear, relevant, and can be checked through publicly available evidence. They enable Participants and other stakeholders to make informed choices.
- Continual improvement: Lead Battery 360° drives continual improvement. It evaluates the impacts and outcomes of its activities and applies the lessons learned to improve. It responds to new evidence, stakeholder input, and external changes, adapting its strategies to improve its impacts and remain fit for purpose. It drives Participant's performance improvement through the introduction of progressive steps for certification and through the monitoring of overall progress against the Code. It gathers evidence on the implementation of Performance Improvement Plans designed during the assessment stage, regular re-assessments, and annual reporting against Key Performance Indicators (KPIs). These data are collected, aggregated, and reported in an aggregate manner at industry level.

Supporting Documents and References

The following documents provide additional supporting information to assist with participating in the Lead Battery 360° Assurance Programme, implementing the Performance Expectations of the Lead Battery 360° Code and achieving and communicating a Lead Battery 360° claim:

- Lead Battery 360° Code: articulates the Guiding Principles and the verifiable Performance Expectations for achieving a Lead Battery 360° certification.
- Lead Battery 360° Guidance: provides further details for meeting and assessing individual Performance Expectations for each Principle.
- Lead Battery 360° Assessment Tool: provides instructions for businesses to self-assess and for assessors to determine the conformance with the Performance Expectations and design Performance Improvement Plans.
- Lead Battery 360° Equivalency Matrix: provides guidance on which and how existing assurance / certification schemes are recognized by Lead Battery 360°.
- Lead Battery 360° Assessors Approval Criteria and Process: describes the approval process, the expertise and experience required of assessors, and Lead Battery 360° approach to avoiding conflict of interests.
- Lead Battery 360° Claims Guide: provides guidance on how to obtain, maintain, and communicate a Lead Battery 360° claim.
- Lead Battery 360° Governing Bodies and Terms of Reference: provides detailed information on the roles and responsibilities of different governing bodies of Lead Battery 360°.
- Lead Battery 360° Grievance Mechanism: details the process by which grievances about Lead Battery 360° or its Participants can be made.

II. Introduction to Lead Battery 360°

About Lead Battery 360°

In 2019, a global alliance of lead and lead battery industry groups adopted a set of seven Guiding Principles designed to help further protect workers and the environment. The Guiding Principles were designed to promote sustainable practices in three key areas. First, to encourage continuous improvement in the management of lead exposure and emissions through responsible health and safety and environmentally sound production practices. Second, to promote the adoption of responsible sourcing policies, working through supply chains to ensure that the lead used for battery manufacturing is sourced from companies that uphold high environmental, social and governance (ESG) standards. Third, to further minimize the environmental impact of used lead batteries through responsible recycling practices.

The Guiding Principles are:

1. Support responsible battery manufacturing and recycling by placing environmental health and safety excellence at the heart of our operations.
2. Promote the sound management of lead exposure and emissions by setting continuous improvement targets and sharing best practices.
3. Adopt responsible sourcing policies for lead-containing materials, seek to identify risks in the supply chain, and use our influence to promote best practices for EHS performance in suppliers' operations.
4. Minimise the environmental impact of our products by encouraging the development of programs that ensure effective collection, transportation and environmentally sound recycling of used lead batteries.
5. Adopt business practices that consider the communities impacted by our operations, respect the human and labour rights of our employees and work against corruption in all its forms.
6. Proactively engage key stakeholders in an open and transparent manner.
7. Partner with key stakeholders and government agencies to share our expertise and promote environmentally sound recycling of lead batteries in low and medium-income countries.

The Lead Battery 360° Programme is a comprehensive assurance process that allows participating companies to demonstrate their commitment to implement the seven Guiding Principles. It has been designed to: define the fundamental environmental, social, and governance elements that characterize responsible sourcing and production of lead and lead batteries; and allow independent assessment of such elements through the definition and third-party assessment of clear Performance Expectations.

The Promise and Claims of Lead Battery 360°

The Lead Battery 360° Assurance Programme is open to primary and secondary lead producers and battery manufacturers. Companies that sign on to and successfully complete the Lead Battery 360° assurance process will be able to use a Lead Battery 360° claim, which will provide assurance that they committed to and/or operate and source responsibly, in line with the standards set by the Guiding Principles.

Please refer to the Lead Battery 360° Claims Guide for further information on the use of these claims, and to the section 'Scoring Methodology for Claims and Certifications' in this Assurance Manual for further information on the methodology adopted to award these claims.

III. Roles and Responsibilities

Overview

The Lead Battery 360° Secretariat, Lead Battery 360° Participants and Lead Battery 360° approved assessors all play distinct roles in the Lead Battery 360° assessment process. In summary:

- The Lead Battery 360° Secretariat is responsible for the development of the Lead Battery 360° Code and for overseeing the assurance process.
- Lead Battery 360° Participants are responsible for operating relevant parts of their business in conformance with the Lead Battery 360° Code.
- Lead Battery 360° approved independent assessors are responsible for assessing whether a Lead Battery 360° Participant's systems are in conformance with the Lead Battery 360° Code.

Lead Battery 360° Secretariat

The roles and responsibilities of the Lead Battery 360° Secretariat include to:

- Develop, review, and update the Lead Battery 360° Code for currency, relevance, and effectiveness.
- Oversee the quality, integrity, and credibility of the Lead Battery 360° assurance process.
- Develop and maintain tools and guidance for the Lead Battery 360° assurance process.
- Approve third-party independent assessors to conduct assessments that meet Lead Battery 360° criteria.
- Provide Participants and Assessors with training and support.
- Undertake a due diligence review of companies seeking participation with the intention to understand, proactively manage, and monitor potential reputational risks to the Lead Battery 360° Assurance Programme.
- Issue Lead Battery 360° certifications, monitor claims, and maintain up-to-date information regarding Participants' status on the Lead Battery 360° website.
- Maintain internal records for all relevant aspects and outcomes of the assurance process.
- Administer and oversee rules around claims associated with participation in the Lead Battery 360° Assurance Programme.
- Administer the Lead Battery 360° complaints mechanism, including disciplinary proceedings where required.
- Monitor, evaluate and publicly report on the impacts of Lead Battery 360° Assurance Programme in the context of Lead Battery 360° Roadmap to Change.

The Secretariat undertakes these activities in collaboration with, and under the strategic direction of, the Lead Battery 360° Board and other governing bodies where appropriate, as described in the document 'Lead Battery 360° Governing Bodies and Terms of References.'

Lead Battery 360° Participants

The roles and responsibilities of Lead Battery 360° Participants include to:

- Operate relevant parts of their business in conformance with the Lead Battery 360° Code.
- Communicate and train personnel about the Lead Battery 360° Performance Expectations and how to meet them.
- Dedicate internal resources to maintain conformance with the Lead Battery 360° Code.
- Engage Lead Battery 360° approved assessors to conduct third-party assessments within the applicable timeframes.
- Provide Lead Battery 360° approved assessors with access to facilities, personnel and relevant information and records, and ensure they are aware of any health, safety, security, or other requirements on site.

- Implement Performance Improvement Plans, as appropriate, to achieve and maintain conformance and continual improvement.
- Promote responsible business practices within their supply chain.

Lead Battery 360° Approved Assessors

The roles and responsibilities of Lead Battery 360° approved assessors include to:

- Conduct independent third-party assessments of the business practices of Lead Battery 360° Participants against the Performance Expectations of the Lead Battery 360° Code.
- Identify any gaps which require the implementation of a Performance Improvement Plan by the Participant, where applicable.
- Recognise when assessment objectives are unattainable and report the reasons to the Participant and the Lead Battery 360° Secretariat.
- Complete the Assessment Tool with the outcome of the assessment.
- Review Participants' progress on any Performance Improvement Plans.

Further qualification requirements are detailed below under [Approved Assessors](#). The document 'Lead Battery 360° Assessors Approval Criteria and Process' describes the approval process, the expertise and experience required of individual assessors, and Lead Battery 360° approach to avoiding conflict of interests.

IV. Lead Battery 360° Participation Journey

Participation Requirements

The Lead Battery 360° Code articulates the Guiding Principles and Performance Expectations (PEs) that define the industry standard in the lead and lead battery value chain.

Companies who seek to make a Lead Battery 360o Claim and obtain a certification will qualify as 'Participants' to the Lead Battery 360o Assurance Programme and must commit to undergoing a site assessment and meeting all PEs within the allocated timeframe detailed below in [Steps to a Lead Battery 360° Certification](#). For companies that do not wish to make a Lead Battery 360° claim and obtain a certification, these are eligible to the Supporter status. Both Participant and Supporter status is detailed in [Claims Description and Methodology](#) below.

Claims about participation in the Lead Battery 360° Assurance Programme and certification status must otherwise comply with the Lead Battery 360° Claims Guide.

Eligibility to participate in the Lead Battery 360° Assurance Programme, either as a Supporter or a Participant is dependent on the outcome of a due diligence review undertaken by the Lead Battery 360° Secretariat with the intention to understand, proactively manage, and monitor potential reputational risks to the Lead Battery 360° Assurance Programme.

Based on the outcome of the due diligence review, an applicant to either becoming a Supporter or a Participant will be rejected in the following instances:

- The site is located in a sanctioned country, such as defined by the sanctions list of the European Union, Switzerland, United Kingdom, or United States. Other governmental sanctions lists may be considered.

- An owner, main shareholder, managing director, CEO, officer or trustee of the entity appears on the sanctions list such as that of the European Union, Switzerland, United Kingdom, or United States. Other governmental sanctions lists may be considered.
- The identification of risks or impacts linked to one or more of the following areas: money laundering, bribery, corruption, fraud, other economic crimes, other risks to legal compliance.

Steps to a Lead Battery 360° Certification

To obtain a Lead Battery 360° certification, participating companies follow a stepped process illustrated below.



Step 1: Pledge: As a first step, to express interest in the Lead Battery 360° Assurance Programme, the site submits an application to the Secretariat and pays the participation fees and provides relevant information regarding its operations and ownership.

If eligible (see [Participation Requirements](#)) the site makes a pledge and signs a Letter of Commitment, becoming a 'Participant.' The Letter of Commitment expresses the site's willingness to promote the Guiding Principles; to complete a site-assessment within 12 months of signing the letter of Commitment and to meet all the PEs of the Lead Battery 360° Code within 24 months of signing the Letter of Commitment. A new Letter of Commitment will need to be signed for each new cycle and re-assessment. A possible timeline might look like:

- 1 January 2025 – First Letter of Commitment signed
- 1 January 2026 – Initial site assessment completed
- 1 January 2027 – Performance Improvement Plan (PIP) finalised, all PEs are 'fully meets'
- 1 January 2028 – Second Letter of Commitment signed
- 1 January 2029 – Re-assessment completed

The timespan between the 12th and 24th months allows Participants close any performance gaps detected during their site assessment while they seek to obtain or maintain certification.

Step 2: Self-Assessment: The Participant completes a self-assessment, using the 'Lead Battery 360° Assessment Tool,' and collects evidence of conformance against the PEs underpinning the Guiding

Principles, as articulated in the Lead Battery 360° Code. The outcome of the self-assessment will help Participants understand their performance and take the time needed to address potential gaps before submitting the self-assessment along with appropriate documented evidence listed in the Assessment Tool to an approved assessor. The self-assessment should be submitted within 6 months of signing the Letter of Commitment.

Focus on the Self-Assessment:

Participants are required to undertake a self-assessment against the Performance Expectations of the Lead Battery 360° Code, to better understand their level of conformance and to address potential gaps before engaging an Assessor.

During the compilation of the self-assessment, Participants should:

- Collect site-level information and documentation necessary to evaluate and demonstrate conformance with the PEs of the Lead Battery 360° Code.
- Collect reports for existing assurance / certification schemes that apply to the site.
- Consider preparedness for the third-party assessment of step 3 and improve practices in advance where required.
- Identify key individuals and their contact information, including those outside the organisation that may be required for engagement by the assessor.
- For Performance Expectations that are not applicable, explain why they are not applicable to the site and provide relevant, verifiable documentation to support the explanation, where possible.

It is recommended that Participants designate an internal co-ordinator for the purposes of the self-assessment and third-party assessment of step 3 to drive the Programme internally and be a central point of contact for the Secretariat and other relevant stakeholders.

Where Participants may lack the capacity, resources, or confidence to complete their self-assessment, or to develop systems and processes required by Lead Battery 360°, Lead Battery 360° will seek to provide assistance including trainings, resources and tools.

Step 3: On-Site Assessment: Lead Battery 360° requires that all applicable PEs are independently assessed at the site level, on-site, in order to maintain or obtain a Lead Battery 360° claim.

Lead Battery 360° recognizes existing 'equivalent' systems that are independently assessed at site-level. For this reason, companies that have been subject already to a verification / assessment / audit / certification by a scheme recognized by the Lead Battery 360° Programme in one or more areas of the Code, will have their accreditation recognized for the area covered by the third-party scheme to reduce the assessment burden and avoid duplication. See section '[Recognition of External Schemes](#)' in this document.

Focus on the outcome of the third-party assessment

- PEs are categorised as either critical or non-critical. The list of critical and non-critical PEs is available below in section '[Conformance Ratings](#)'.
- Sites that achieve 'fully meets' for all PEs will obtain a Lead Battery 360° certification and be known as Certified Participants.
- Sites that achieve only 'fully meets' on critical PEs and 'partially meets' on non-critical PEs will obtain a Lead Battery 360° certification and be known as Certified Participants, at the condition

that they undertake a Performance Improvement Plan (PIP) for the 'partially meets' non-critical PEs.

- Sites that obtain 'does not meet' on non-critical PE, 'does not meet' and/or 'partially meets' on critical PEs will not be granted certification and will need to implement a PIP to maintain their Participant status and seek certification during the same cycle.
- For re-assessment, Certified Participants will retain their Certified status until the site re-assessment. The same rules as for first-time Participants will then apply.

		Critical PEs		
		Fully meets	Partially meets	Does not meet
Non-critical PEs	Fully meets	Certification No PIP required	No certification PIP required to maintain Participant status	
	Partially meets	Certification PIP required to maintain Certified Participant Status		
	Does not meet	No certification PIP required to maintain Participant status		

Please refer to the section V. 'Independent Third-Party Assessments' below for further information on the types, methodology and outcomes of the third-party assessments.

Step 4: Performance Improvement Plan (PIP): If some PEs are rated 'partially meets' or 'does not meet' during their assessments, Participants are offered the opportunity to implement a PIP.

- If the Participant obtains only 'fully meets' on critical PEs and 'partially meets' on non-critical PE: The Participant will be granted certification, at the condition they commit to a PIP. The implementation of the PIP must be finalised and result in only 'fully meets' conformance ratings, within 24 months of signing the Letter of Commitment. Evidence of PIP implementation will be reviewed by the assessor during either a desktop or an on-site review. The need for an on-site review will be determined by the assessor. If after the PIP, not all PEs are 'fully meets', the Participant will be suspended, lose their certification and will need to sign a new Letter of Commitment and begin a new cycle to seek certification.
- If the assessment identified any 'does not meet' or 'partially meets' on critical PEs: The Participant will not be granted certification but can maintain their Participant status at the condition they commit to a PIP. The implementation of the PIP must be finalised and result in only 'fully meets' conformance ratings, within 24 months of signing the Letter of Commitment. Evidence of PIP implementation will be reviewed by the assessor during either a desktop or an on-site review. The need for an on-site review will be determined by the assessor. If the assessor confirms all PEs are 'fully meets', the Participant will be granted certification. If after the end of the PIP, not all PEs are 'fully meets', the Participant will be suspended and will need to sign a new Letter of Commitment and begin a new cycle to seek certification.

There is no pre-determined timeline to submit PIP implementation evidence to the assessor for review. It is however the Participant's responsibility to either evidence early enough to allow the assessor to review the PIP's outcome and confirm all PEs are 'fully meets' before the end of the 24-month period from signing the Letter of Commitment.

If the assessor detects critical gaps during the site assessment or the PIP review (such as immediate risks to workers' health and safety, child or forced labour, environmental damages), they can request that these are closed immediately with an anticipated re-assessment conducted at a timeline determined by the assessor.

Step 5: Disclosure and Reporting of Key Performance indicators (KPIs): To maintain their Lead Battery 360° claim, Participants allow Lead Battery 360° to publicly disclose the outcome of the assessment process on the Lead Battery 360° website.

Re-Assessment: Participants must demonstrate continued conformance through a full re-assessment (Step 3) every three years, and within 12 months of their last Letter of Commitment.

V. Independent Third-Party Assessments

Purpose of the assessments

The objective of third-party assessments is to assess Participants' systems and performance, to establish whether they conform to the Lead Battery 360° Code.

Depending on at which stage along the participation journey Participants are, and/or the outcome of assessments, several different assessment types may be triggered, as described in the section [Assessment Types, Timelines, Frequency and Extensions](#) below.

Assessment Types, Timelines, Frequency and Extensions

The table below illustrates the range of assessments that are used to achieve and then maintain a Lead Battery 360° claim and certification:

Assessment type	Timeline / Frequency	Details
Site assessment	Within 12 months from signing the Letter of Commitment to participate in the Lead Battery 360° Programme.	Complete on-site assessment. Mandatory to make a Certified Participant claim.
Performance Improvement Plan (PIP) implementation review	Outcome provided within 24 months from signing the Letter of Commitment	To verify the implementation of a PIP. This can be done via desktop review or may require a site visit, as determined by the assessor. Final PIP outcome results must be provided before the end of the 24-month period from signing the Letter of Commitment, so that the 'fully meets' status is confirmed before the deadline has lapsed.
Re-assessment	At the end of the initial assessment period Within 12 months from signing a new Letter of Commitment	Complete on-site assessment. Mandatory to maintain a certified Participant claim.
Other	As appropriate	Additional re-assessments may be necessary, for example: <ul style="list-style-type: none"> ● In case of significant changes in circumstances. ● As an input to, or outcome of, the Lead Battery 360° Grievance Mechanism. ● If the assessor detects critical gaps during any type of assessment.

In exceptional circumstances, a maximum six-month extension may be considered, at the discretion of the Lead Battery 360° Secretariat and/or Board. These circumstances must impact the ability of the Participant to schedule an assessment within the deadline, and include:

- Lack of available approved assessors.
- Sudden changes in corporate structure or key personnel.
- Changes to the Lead Battery 360° Code or assurance process.

- 'Force majeure' type situations.

Approved Assessors

Independent third-party assessments are conducted by Lead Battery 360° approved assessors, approved on the basis of their knowledge and experience in the industry. Participants can choose an assessor based on the available pool of approved assessors, following disclosure of any potential conflict of interest.

An assessment may be conducted by one approved person or by a team. In all cases, a lead assessor must be appointed and is responsible for ensuring the efficient and effective conduct of the assessment. An assessment team must include people with the skills and competency necessary to achieve the objectives of the assessment, including specialist knowledge, and depending on the location of the assessment, language, and cultural considerations.

All assessors assigned to an assessment team must be approved by Lead Battery 360° and fulfil the following requirements:

1. Relevant Professional Qualifications:

- University degree or equivalent in a relevant field.
- Completed LeadBattery360° training and modules as needed. Specialised training on Guiding Principle 2 may be required in some situations..

2. Subject Matter Expertise

- Minimum of five (5) years working experience in relevant areas such as environmental management, health and safety, labour relations, social impact assessments, and mineral supply chain due diligence.
- Demonstrated experience in industries such as mining, smelting, refining, or similar sectors.
- Knowledge of practices, processes, and risks typical of the lead battery industry.

3. Audit experience

- Qualified auditor with document experience and/or certification on conducting ISO19011 audits.
- Ability to apply a risk-based approach to auditing and make evidence-based decisions.
- Assessment report writing skills.

Approved assessors are required to perform assessments in accordance with the principles as identified by ISO 19011:

- Integrity: the foundation of professionalism.
- Fair presentation: the obligation to report truthfully and accurately.
- Due professional care: the application of diligence and judgement.
- Confidentiality: security of information.
- Independence: the basis for the impartiality and objectivity of conclusions.
- Evidence based approach: the rational method for reaching reliable and reproducible conclusions through a systematic process.

Please refer to the document Lead Battery 360° Assessors Approval Criteria and Process for further details.

Assessment Time and Cost

The time for undertaking an on-site assessment is estimated as follows (for non-mining sites, and excluding travels): up to 3 days per site.

[consider placeholder to incentivize preparedness]

In general, the time required for an assessment is distributed as follows:

- 30% of time devoted to planning and preparation
- 50% of time for the on-site component of the assessment
- 20% of time for post-assessment follow-up and reporting.

This Guidance is not prescriptive, and assessors should determine the necessary time relevant for the defined assessment scope. For example, the time necessary for the assessment may vary based on the following non-exhaustive list of circumstances:

- The scope of the assessment (e.g., the number of PEs in scope of the assessment, based on applicability and on the recognition of equivalent schemes).
- The assessment includes interviews with Indigenous Peoples.
- The assessment is located in a Conflict-Affected or High-Risk Area (CAHRA).
- IUCN vulnerable or endangered red list species/ecosystems or sacred sites are present, where Protected Areas or a biodiversity hotspot are adjacent to the site.

For PIP reviews, the time required will be based on the number of non 'fully meets' PEs to review. Assessment cost is a direct function of the time required and the rates charged by the assessor. Rates vary based on specific market factors and are subject to commercial arrangements between the Participant and the assessor.

Independent Third-Party Assessment Process

The independent third-party assessment process includes the following steps:

STEPS	ACTIVITY	DESCRIPTION
Pre-Assessments Planning	Initial kick-off	<p>Prior to an assessment taking place, the Participant will confirm the following with the chosen approved assessor:</p> <ul style="list-style-type: none"> • The assessment scope and objectives. • The date and timing of the assessment. • The assessment team. • Logistics involved, including any safety concerns or provisions. • The availability of the Participant’s key personnel. • The potential need for a pre-assessment visit, if needed to obtain sufficient information on the business, including its size, complexity, processes, workforce and geographic context. This is not mandatory and should only take place if agreed to by the Participant.
	Commercial arrangements and confidentiality	Assessors may have access to confidential or commercially sensitive information during the assessment. For this reason, it is at the Participant’s discretion whether to require that their chosen assessor enter into confidentiality agreements to prevent disclosure of information to third parties.
	Gathering and reviewing of preliminary information	<p>Assessors should endeavour to gain as much advance understanding of a Participant’s business as possible before the assessment. Relevant preliminary documentation to be collected and reviewed includes, among others:</p> <ul style="list-style-type: none"> • The completed self-assessment. • Organisational charts outlining structure, responsibilities, and authorities. • Stakeholder lists, including: name, contact information, relationship with the Participant. • Description of the products and processes, including: infrastructure, facilities and equipment; work hours and shifts. • Reports of previous assessments & audits. • Understanding of applicable law. • Policies, procedures, specifications etc.
	Definition of the assessment scope	<p>The assessment scope defines the extent and boundaries of the assessment and is defined by the assessor in consultation with the Participant. It should be established as to take into account the following non-exhaustive list of criteria:</p> <ul style="list-style-type: none"> • The self-assessment. • The applicable PEs.

		<ul style="list-style-type: none"> ● The results of previous assessments, audits and certifications by Lead Battery 360° or equivalent schemes and the status of implementation of the PIP if applicable. ● The associated facilities and area of Influence. ● For multi-site Participants, the results and extent of previous assessments and potential need to visit the head office.
	Development and Approval of the Assessment Plan	<p>At this stage, the Participant, the assessor and the Secretariat agree on the Assessment Plan which will include:</p> <ul style="list-style-type: none"> ● Assessment objectives. ● Dates, places and time of the assessment. ● Name(s) of assessor(s). ● Assessment Scope: the PEs to be assessed and facilities to be visited. ● Expected time and duration for each major activity. ● Meetings scheduled to be held with the Participant’s business management, workers (both employees and/or contractors), the nominated co-ordinator and affected stakeholders. ● Personnel or functional roles to be interviewed. ● Likely documentation to be reviewed.
Assessment	Opening meeting	<p>Upon arrival on-site for an assessment, the first activity is an opening meeting. The purpose is to:</p> <ul style="list-style-type: none"> ● Introduce the assessment team. ● Confirm the purpose and scope of the assessment. ● Review the timetable and agenda. ● Provide a short summary of the methods and procedures for the assessment. ● Explain the confidential nature of the assessment. ● Answer questions from the Participant’s personnel present at the meeting. <p>The names of those present should be recorded by the assessor.</p>
	Collection of objective evidence: documentary review	<p>During the assessment process, the assessor obtains and evaluates objective evidence, including through observation, documentary review and interviews.</p> <p>Documentary evidence includes written policies and procedures or records generated from implementing practices and processes.</p> <p>The assessor should normally review records and other documents from the previous 12 months. In some instances, where this may not be sufficient to provide accurate and useful evidence, the assessor may need to see older documents as well.</p> <p>Documents collected and reviewed for the assessment should be consistent with the following criteria for objective evidence:</p>

		<ul style="list-style-type: none"> ● Relevant to the time period and scope of the assessment. ● Traceable. ● Clear and unambiguous. <p>Examples of documents which constitute objective evidence include, but are not limited to:</p> <ul style="list-style-type: none"> ● Organisational charts. ● Legal permits, licenses or other authorisations. ● Reports of previous assessments. ● Written materials describing products and processes. ● Risk assessment registers. ● Communication records, etc. <p>The process of collecting documentary evidence may require sampling. The methods used to define samples must ensure that they are representative and free from bias, based on the assessor’s professional and informed judgement (for example, to support a suspicion of a problem), or through probabilistic sampling approaches (for example, random sampling).</p>
	Collection of objective evidence: interviews	<p>During on-site assessments, assessors have the opportunity to engage with the Participant and its relevant management and personnel, as well as other relevant stakeholders, through interviews.</p> <p>When conducting on-site interviews, the assessor identifies appropriate stakeholders, and selects a pool of interviewees spanning across functions, gender, age groups, ethnicity, and other factors, as relevant, to ensure a fair representation of management and workers. The assessor strives to ensure there is a gender balance in the sample of individuals interviewed and should apply a gender lens in the approach to conducting interviews.</p> <p>Assessors will draw a representative sample of workers to interview based on an assessment of the size and scale of the operations and the number of employees. A minimum of ten workers are to be interviewed.</p> <p>The assessor conducts the interviews in line with best practice stakeholder engagement standards. For example, interviews are conducted apart from site representatives, in local language, and in a culturally sensitive manner.</p> <p>When planning the assessment, affected stakeholders should be identified for interview, including but not limited to the following, as appropriate, and at the discretion of the external stakeholders:</p> <ul style="list-style-type: none"> ● Indigenous Peoples. ● Local communities.

		<ul style="list-style-type: none"> ● Regulatory authorities with responsibility for governance, environment and/or social matters. ● Representatives from Labour Unions. ● Social and environmental NGOs. <p>In accordance with the protocols of the Indigenous Peoples, when meeting with Indigenous Peoples the assessor attempts to meet with:</p> <ul style="list-style-type: none"> ● Leadership (elder, leader, council). ● The representative(s) which have worked with the site, if any. ● Representatives of the Community, including youth and elders, men and women, where needed, and especially where Free, Prior and Informed Consent is within the assessment scope. ● National and/or regional bodies, where they exist.
	<p>Collection of objective evidence: observation</p>	<p>During on-site assessments, the assessor has the opportunity to enrich the assessment, and triangulate findings, through observation. Observation is information gathered by observing activities and practices which can be used as objective evidence.</p> <p>During the assessment, the assessor should ensure it undertakes effective observation, meaning, avoid preconceived ideas and assumptions to influence the observation and substantiate observation with objective evidence.</p> <p>The assessor should note down all evidence that has been examined in the Assessment Tool. Where specific measurable data is required for grading, actual results should be included in notes to compare to required metrics.</p>
	<p>Evaluation of results and documentation of potential gaps</p>	<p>Based on the objective evidence collected, the assessor determines the level of conformance of the Participant's systems and practices with the PEs of the Lead Battery 360° Code, as described in section 'Conformance Ratings' in this document. Levels of conformance are 'fully meets', 'partially meets' and 'does not meet'.</p> <p>The assessor determines whether potential gaps are identified wherever the conformance levels are 'partially meets' or 'does not meet'. Such gaps will need to be resolved during a PIP so that the Participant, whether certified or not, can demonstrate that they meet all PEs within 24 months of signing their Letter of Commitment.</p> <p>The gaps are:</p> <ul style="list-style-type: none"> ● Presented to the Participant at the exit meeting. ● Recorded in the Assessment Tool.

		<ul style="list-style-type: none"> Articulated in a PIP as part of the post-assessment activities. <p>If the assessor detects critical gaps during the site assessment or the PIP review (such as immediate risks to workers' health and safety, child or forced labour, environmental damages), they can request that these are closed immediately with an anticipated re-assessment conducted at a timeline determined by the assessor.</p>
	Closing meeting	<p>A closing or exit meeting is conducted to verbally present preliminary findings and recommendations to the Participant. The closing meeting provides a final opportunity to:</p> <ul style="list-style-type: none"> Seek acknowledgement and understanding from the Participant regarding the findings and any gaps. Answer any questions. Discuss misunderstandings and/or clarify points of difference. Provide an overview of the follow-up steps. <p>The names of those present at the exit meeting should be recorded.</p>
Post-assessment follow-up and reporting	Approval of Performance Improvement Plans	<p>Where gaps are identified, the Participant and the assessor agree on a PIP, drafted by the Participant, and to be submitted to the Lead Battery 360° Secretariat for approval.</p> <p>Before submission to the Secretariat, the assessor checks that the PIP:</p> <ul style="list-style-type: none"> Addresses the root cause of the gap. Is addressed as to prevent a recurrence of the gap. Is realistic. Is 'fit for purpose'. Is anchored in clear timelines and objectives.
	Lead Battery 360° Assessment Tool	<p>The assessor submits a completed Assessment Tool to the Participant and the Lead Battery 360° Secretariat.</p> <p>In the Lead Battery 360° Assessment Tool, based on the methodology described in the section 'Conformance Ratings' of this Manual and on its professional judgement, the assessor makes a recommendation as to whether the Participant may obtain a Certification.</p> <p>The Lead Battery 360° Secretariat will review the Assessment Tool to ensure that it confirms with the assurance process described in this Assurance Manual; as well as the assessor recommendation in order to confirm the potential issuing of a Lead Battery 360° certification.</p> <p>Reports must be in English.</p>

	Issuing of the Lead Battery 360° claim and publication of the Summary Report	<p>Based on the recommendations of the assessor, where appropriate, the Lead Battery 360° Secretariat confirms the issuing of a Certification.</p> <p>The Certification and a summary of the assessment will be published on the Lead Battery 360° website with due regard for business confidentiality and other competitive concerns and will include at a minimum the following information:</p> <ul style="list-style-type: none">• Name of the site.• Type of facility.• Date of the assessment activities and the assessment period.• Assessment conclusions and summary of the key findings.• Statement of conformance.• Duration of the site’s claim and its expiry date, and the schedule for the next re-assessment.
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Conformance Ratings

The site’s performance and conformance against the Lead Battery 360° Code will be assessed against a ‘meets’ scale for each Performance Expectation. Specific indications for each PE rating is available in the respective Guiding Principles. The scale below is available for general reference.

Fully meets:

- Has a management system designed that aligns with all of the core requirements of the PEs, AND
- Is able to demonstrate effective, consistent implementation of the system, AND
- Monitors and tracks the implementation of the management system, AND
- Reviews the effectiveness of the management system and update as appropriate.

Partially meets: Anything that does not fall into the ‘does not meet’ or ‘fully meets’ category

Does not meet:

- Does not have a management system in place that aligns with the core requirements of this criterion, OR
- Does not have a management system designed but it does not align with the core requirements of the criteria, OR
- Is not able to demonstrate consistent implementation of the management system.

Not Applicable:

- Some Performance Expectations may not be applicable to the site. Credible and verifiable reasons should be provided to support the determination that the Performance Expectation is not applicable.

Certification Criteria

The site’s performance and conformance against the Lead Battery 360° Code will be assessed against a set of critical and non-critical Performance Expectations (PEs), as described below:

Guiding Principle	Performance Expectation	Rating performance required
1A	(a) OH&S Legal Compliance.	Fully meets required
1A	(b) Occupational Health and Safety (OH&S) Policy	Fully meets required
1A	(c) Hazards and Risks Assessment and Management.	Fully meets required
1A	(d) Workers’ engagement on OH&S	Fully meets required
1A	(e) Access to occupational health services	Fully meets required
1A	(f) Incident follow-up	Fully meets required

1A	(g) Education and training on OH&S	Fully meets required
1A	(h) Emergency Response	Fully meets required
1A	(i) OH&S Performance	Fully meets required
1B	(a) Environmental Legal Compliance	Fully meets required
1B	(b) Environmental Policy	Fully meets required
1B	(c) Environmental Risks and Impacts Assessment and Management	Fully meets required
1B	(d) Air quality	Fully meets required
1B	(e) Water quality	Fully meets required
1B	(f) Spills and Leakages	Fully meets required
1B	(g) Energy consumption	Partially meets required
1B	(h) Greenhouse Gas (GHG) emissions	Partially meets required
1B	(i) Water consumption and availability	Partially meets required
1B	(j) Hazardous waste management	Fully meets required
1B	(k) Recycling Efficiency	Partially meets required
1B	(l) Biodiversity protection	Partially meets required
1B	(m) Decommissioning, closure and rehabilitation	Partially meets required
2	(a) Lead Exposure Legal Compliance	Fully meets required
2	(b) Workers' occupational lead exposure assessment	Fully meets required
2	(c) Workers' occupational lead exposure management	Fully meets required
2	(d) Provision of Personal Protective Equipment (PPE)	Fully meets required

2	(d) Workers' occupational lead exposure performance	Fully meets required
2	(e) Provision of Hygiene and Welfare Facilities	Fully meets required
2	(f) Take-home Lead	Fully meets required
2	(g) Control of Point and Fugitive Lead Emissions	Fully meets required
2	(h) Management of Slags and Residues	Fully meets required
2	(i) Battery Breaking	Fully meets required
2	(j) Lead Materials Handling and Storage	Fully meets required
3	(a) Responsible Sourcing Policy	Fully meets required
3	(b) Sourcing from Conflict-Affected and High-Risk Areas (CAHRAs)	Fully meets required
3	(c) Environmental, Health and Safety Performance of Suppliers – Lead Exposures and Emissions	Partially meets required
3	3(d) Sourcing of Used Lead-Acid Batteries (ULABs), Battery Components (paste and plates) and other Lead Containing Scrap	Fully meets required
3	(e) Sourcing of Lead Bullion and Refined Lead	Fully meets required
3	(f) Supplier Engagement	Partially meets required
4	(a) Undertake Due Diligence of Available Recyclers	Partially meets required
4	(b) Producer Responsibility	Fully meets required
4	(c) Battery Recycling	Fully meets required
4	(d) Transportation of Used Lead-Acid Batteries (ULABs).	Fully meets required
4	(e) Maximizing use of recycled materials for battery manufacturing	Partially meets required

4	(f) Reducing carbon footprint of battery manufacturing processes	Partially meets required
5A	(a) Community Health and Safety Risks and Impacts Assessments	Fully meets required
5B	(b) Human Rights Assessment and Management	Partially meets required
5B	(c) Employment Terms	Partially meets required
5B	(d) Working Hours	Partially meets required
5B	(e) Paid Leave	Partially meets required
5B	(f) Remuneration	Partially meets required
5B	(g) Child Labour	Partially meets required
5B	(h) Forced Labour	Partially meets required
5B	(i) Freedom of Association and Collective Bargaining	Partially meets required
5B	(j) Non-Discrimination	Partially meets required
5B	(k) Disciplinary Practices & Harassment	Partially meets required
5B	(l) Workers' Grievance and Whistle-Blowing Mechanisms	Partially meets required
5C	(m) Legal Compliance	Fully meets required
5C	(b) Anti-Corruption Policy	Partially meets required
6	(a) Stakeholder Engagement	Partially meets required
6	(b) Stakeholder Feedback Mechanism	Partially meets required
6	(c) Transparency and Disclosure	Partially meets required
7	(a) Support International Initiatives Designed to Eliminate Lead Pollution	Partially meets required
7	(b) Knowledge Sharing	Partially meets required

7	(c) Support Policy Makers to Develop National Strategies	Partially meets required
7	(d) Sustainable Development of Impacted Communities	Partially meets required

Applicability

Some Performance Expectations (PEs) may not be applicable to all lead production or battery manufacturing, as presented below:

Performance Expectation	Primary production lead	Secondary production lead	Battery manufacturing
1.A.(a)	√	√	√
1.A.(b)	√	√	√
1.A.(c)	√	√	√
1.A.(d)	√	√	√
1.A.(e)	√	√	√
1.A.(f)	√	√	√
1.A.(g)	√	√	√
1.A.(h)	√	√	√
1.A.(i)	√	√	√
1.B.(a)	√	√	√
1.B.(b)	√	√	√
1.B.(c)	√	√	√
1.B.(d)	√	√	√
1.B.(e)	√	√	√

1.B.(f)	√	√	√
1.B.(g)	√	√	√
1.B.(h)	√	√	√
1.B.(i)	√	√	√
1.B.(j)	√	√	√
1.B.(k)		√	
1.B.(l)	√	√	√
1.B.(m)	√	√	√
Performance Expectation	Primary production	lead Secondary production	lead Battery manufacturing
2.(a)	√	√	√
2.(b)	√	√	√
2.(c)	√	√	√
2.(d)	√	√	√
2.(e)	√	√	√
2.(f)	√	√	√
2.(g)	√	√	√
2.(h)	√	√	√
2.(i)	√	√	
2.(j)		√	
2.(k)		√	

Performance Expectation	Primary production lead	Secondary production lead	Battery manufacturing
3(a)	√	√	√
3(b)	√	√	√
3(c)	√	√	√
3(d)	√	√	
3(e)		√	√
3(f)	√	√	√
Performance Expectation	Primary production lead	Secondary production lead	Battery manufacturing
4.(a)			√
4.(b)			√
4.(c)			√
4.(d)		√	√
4.(e)			√
4.(f)		√	√
Performance Expectation	Primary production lead	Secondary production lead	Battery manufacturing
5.A.(a)	√	√	√
5.B.(a)	√	√	√
5.B.(b)	√	√	√
5.B.(c)	√	√	√

5.B.(d)	√	√	√		
5.B.(e)	√	√	√		
5.B.(f)	√	√	√		
5.B.(g)	√	√	√		
5.B.(h)	√	√	√		
5.B.(i)	√	√	√		
5.B.(j)	√	√	√		
5.B.(k)	√	√	√		
5.C.(a)	√	√	√		
5.C.(b)	√	√	√		
Performance Expectation	Primary production	lead	Secondary production	lead	Battery manufacturing
6.(a)	√	√	√		
6.(b)	√	√	√		
6.(c)	√	√	√		
Performance Expectation	Primary production	lead	Secondary production	lead	Battery manufacturing
7.(a)	√	√	√		
7.(b)	√	√	√		
7.(c)	√	√	√		
7.(d)	√	√	√		

Claims Description and Methodology

Based on the conformance of a site's systems and processes against each PE, the following claims and a Certification may be awarded. Please review the Lead Battery 360° Claims Guide for further information.

CLAIM	DESCRIPTION AND METHODOLOGY
<p>CERTIFIED PARTICIPANT</p>  <p>The badge is circular with a green border. Inside, there is a stylized green leaf and a green lightning bolt. To the right of the leaf and lightning bolt, the text 'Lead Battery 360°' is written in green. Below this, a green rectangular box contains the word 'CERTIFIED' in white. At the bottom of the circle, the text 'SITE NAME' is written in green.</p>	<p>Description: To make a Lead Battery 360° 'Certified Participant' claim, Participants are required to be independently assessed and achieve a performance rating of 'fully meets' for specific critical Performance Expectations (PEs), or commit to a Performance Improvement Plan (PIP) for 'partially meets' non-critical PEs.</p> <p>The full assessment process needs to be completed within 12 months of signing a Letter of Commitment.</p>
<p>PARTICIPANT</p>  <p>The badge is circular with a grey border. Inside, there is a stylized green leaf and a green lightning bolt. To the right of the leaf and lightning bolt, the text 'Lead Battery 360°' is written in green. Below this, a grey rectangular box contains the word 'PARTICIPANT' in white. At the bottom of the circle, the text 'SITE NAME' is written in grey.</p>	<p>Description: the site has joined the Lead Battery 360° Assurance Programme, signed the Letter of Commitment and is preparing for a site assessment of its practices or implementing a PIP.</p>
<p>SUPPORTER No badge available</p>	<p>Description: the site supports the objectives of the Lead Battery 360° Assurance Programme but is not eligible for third-party assessment.</p>
<p>No claim</p>	<p>Companies scoring below the performance needed to maintain a Participant claim will not be able to make any Lead Battery 360° claim.</p>

Recognition of External Schemes

Lead Battery 360° acknowledges that a site may have undergone third-party audits or assessments as part of their involvement in other sustainability standards or certification systems covering operating areas and practices comparable to those covered by the Lead Battery 360° Code.

A core principle of Lead Battery 360° is to recognize as 'equivalent' other sustainability systems, good practice frameworks and certifications where they are materially comparable in scope and intent to Lead Battery 360° Code and Assurance Process.

Sites may wish to demonstrate that one or more of Lead Battery 360° PEs have already been independently assessed by a third-party through an equivalent system.

A list of external standards and systems recognised by Lead Battery 360° is available in the Lead Battery 360° Equivalency Matrix. The Matrix will be reviewed regularly. Requests for evaluation of other external Standards and Schemes should be sent to <http://www.leadbattery360.org/contact-us>

Where the site can demonstrate having undertaken a third-party assessment against an equivalent standard or scheme, the relevant Performance Expectation(s) will not need to be further assessed by the assessor.

VI. Oversight, Grievance Mechanism and Disciplinary Procedures

The Lead Battery 360° Programme ensures accountability and integrity through a robust oversight and grievance mechanism. This mechanism serves to address concerns, resolving disputes, and maintaining the credibility of the Programme.

Oversight Functions

The Lead Battery 360° Secretariat holds the primary responsibility for overseeing the assurance process, ensuring its transparency, impartiality, and continuous improvement. Oversight is achieved through several key activities:

- Approval and monitoring of assessors: The Secretariat approves independent third-party assessors who are responsible for conducting site assessments and evaluations. These assessors undergo regular training and are evaluated to ensure they maintain high standards of professionalism, impartiality, and expertise.
- Ongoing monitoring of participants: After certification, Participants are regularly monitored to ensure they maintain the performance standards required by the Lead Battery 360° Code. This includes reviewing annual reports submitted by Participants and results of Performance Improvement Plans (PIPs) implementation reviews.
- Public disclosure: In line with the Programme's commitment to transparency, key assessment findings, including conformance ratings and the issuance of certifications, are published on the Lead Battery 360° website.

Grievance Mechanism

The grievance mechanism provides stakeholders with a fair, accessible, and impartial process for raising concerns or complaints regarding Participants or the Programme itself. Complaints may be submitted by any stakeholder, including local communities, employees, or other third parties, who believe that a Participant has failed to meet the Lead Battery 360° Code or that there has been misconduct in the certification process. Grievances are to be directed to the Lead Battery 360° Secretariat through designated channels on the Lead Battery 360° [website](#), ensuring confidentiality and protection of the complainant's identity when necessary.

Disciplinary Procedure

The Lead Battery 360° Programme ensures accountability by ensuring performance gaps from the PEs are monitored and closed. When an issue is identified—whether through a site assessments or stakeholder grievance—a formal review process shall begin. The Participant may be required to implement PIP. If performance gaps persist, disciplinary actions such as suspension of certification or public disclosure of the incident may follow.

VII. Glossary

Approved assessor: An independent third-party individual or team approved by Lead Battery 360° to conduct assessments of Participants' systems and performance against the Lead Battery 360° Code. Refer to the Lead Battery 360° Assessors Approval Criteria and Process for additional information.

Site assessment: Independent third-party assessments evaluating a Participant's conformance with the Lead Battery 360° Code by approved assessors.

Certified Participant: A site that has been independently assessed and has met the critical Performance Expectations. They are granted the right to use the Lead Battery 360° Certified Participant claim.

Conflict-Affected and High-Risk Areas (CAHRAs): Geographical areas identified by elevated risks due to conflict, political instability, or other factors, where responsible sourcing practices must be implemented and documented.

Critical Performance Expectations (CPEs): Performance Expectations that must be fully met to obtain or maintain certification.

Letter of Commitment: A document signed by a Participant indicating their commitment to align with the Lead Battery 360° Code and undergo assessment and meet all Performance Expectations within specific timeframes.

Non-Critical Performance Expectations (NCPEs): Performance Expectations that may only be partially met for certification but require a Performance Improvement Plan to maintain certification.

Participant: A site that has joined the Lead Battery 360° Programme, signed the Letter of Commitment, and is undergoing the assessment process or a Performance Improvement Plan but has not yet obtained certification.

Performance Expectations (PEs): The specific criteria derived from the Lead Battery 360° Guiding Principles that companies must meet to achieve certification.

Performance Improvement Plan (PIP): A formal plan designed to address gaps identified during a site assessment. Participants must implement these improvements within a defined timeline to maintain or achieve certification.

Primary Lead Production: The process of producing lead from mined ores through smelting and refining operations.

Secondary Lead Production: The process of recovering lead from recycled lead-containing materials, such as used lead-acid batteries (ULABs).

Self-Assessment: An internal evaluation performed by Participants using the Lead Battery 360° Assessment Tool to gauge their readiness for a site assessment.

Surveillance Assessment: An assessment conducted after the initial assessment to verify the implementation of Performance Improvement Plans.

Supporter: A site that supports the objectives of the Lead Battery 360° Assurance Programme but is not eligible for third-party assessment.

Terms of Reference (ToR): A document outlining the roles, responsibilities, and procedures governing the Lead Battery 360° Assurance process.

Used Lead-Acid Batteries (ULABs): Spent lead-acid batteries that are collected for recycling in secondary lead production facilities.

General Enquiries

Lead Battery 360° welcomes questions and feedback on this document.

Contact form: <http://www.leadbattery360.org/contact-us>

Disclaimer

This document does not intend to, nor does it, replace, contravene, or otherwise alter the requirements of any applicable national, state, or local government laws, regulations or other requirements regarding the matters included herein. This document gives general guidance only and should not be regarded as a complete and authoritative statement on the subject matter contained herein. Lead Battery 360° documents are updated from time to time, and the version posted on the Lead Battery 360° website supersedes all other earlier versions.

Companies that make Lead Battery 360°-related claims are each responsible for their own compliance with applicable law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times.

Lead Battery 360° does not accept liability for any violations of applicable law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any Lead Battery 360° document or other material, recommendation or directive issued by or on behalf of Lead Battery 360°. Lead Battery 360° gives no undertaking, representation or warranty that

compliance with Lead Battery 360° document or other material, recommendation or directive issued by or on behalf of Lead Battery 360° will result in compliance with any applicable law or will avoid any breach from occurring.

The official language of Lead Battery 360° is English. Lead Battery 360° aims to make translations available in a range of languages and these will be posted on the Lead Battery 360° website. In the case of inconsistency between versions, reference shall default to the official language version.