



LEAD BATTERY

360°

Claims Guide

December 2024

Table of Contents

| | |
|---|----|
| Lead Battery 360° | 3 |
| I. Introduction | 4 |
| Claims related to Lead Battery 360° Assurance Programme | 4 |
| Applicability of the Claims Guide | 5 |
| Legal Compliance | 5 |
| Fees related to Lead Battery 360° claims | 5 |
| II. General Requirements for Lead Battery 360° Claims | 6 |
| Rules applying to Lead Battery 360° claims | 6 |
| III. Types of Claims | 6 |
| Supporter Claim | 6 |
| Participant Claim Requirements | 6 |
| Certified Participant Claim Requirements | 7 |
| IV. Monitoring and Enforcement | 9 |
| Monitoring Use of Claims | 9 |
| Identified Misuse of Lead Battery 360° Related Claims | 9 |
| V. Glossary | 10 |
| VI. References | 10 |

Lead Battery 360°

Established in 2019, Lead Battery 360° is a global coalition of lead and lead battery industry organizations—including the International Lead Association, Battery Council International, the Association of European Automotive and Industrial Battery Manufacturers, and the Association of Battery Recyclers. The purpose of Lead Battery 360° is to support the improvement of practices in lead battery recycling in low- and middle-income countries and to set a benchmark for sites in more established markets that were already operating in a regulated environment, through its framework.

Our vision is to power a sustainable world with lead batteries that meet the highest standards in raw materials and batteries sourcing, manufacturing, and recycling globally.

Our mission is to drive the lead battery industry on its journey towards a sustainable supply chain in every territory. We will do this by championing best practices in lead mining, lead production and lead battery manufacturing and recycling, and by encouraging responsible practices along the entire battery value chain no matter where batteries are produced and recycled. Only by achieving this will we truly unlock the power of lead batteries.

Our values are collaboration, inclusivity, accountability and transparency:

Collaboration – Lead Battery 360° has been designed to foster collaboration among industry members and between the industry and stakeholders.

Inclusivity – Lead Battery 360° encourages participation of all entities in the lead battery value chain wherever they are based geographically and whatever stage they are in along their journey to sustainability. We encourage all responsible operations to join us by embedding our seven Guiding Principles into the way they do business.

Accountability – Lead Battery 360° acknowledges that all industry members have a shared responsibility to promote good industry practices as reflected in the Guiding Principles and are accountable for their commitments.

Transparency – Lead Battery 360° communicates transparently on the objectives of the Programme and the progress made over time.

Our 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. Minimize 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.

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 Lead Battery 360° or 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. The 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.

I. Introduction

Claims related to Lead Battery 360° Assurance Programme

To obtain a Lead Battery 360° claim, Participants must demonstrate their commitment to, and conformance with, the Guiding Principles of Lead Battery 360° and the Performance Expectations (PEs) that underpin them, as articulated in the Lead Battery 360° Code. This Claims Guide sets out the requirements to make claims related to the assurance processes of Lead Battery 360°, otherwise referred to as the LeadBattery360 Programme or as the Programme. The Lead Battery 360° Assurance Programme enables participating organisations to make claims. Claims refer to any messages, badges, and images used to indicate that a site is engaged in the Programme or conforms with the expectations of the Lead Battery 360° Assurance Programme.

Claims consist of:

- Use of the Lead Battery 360° badges for either Participant and Certified Participant.
- Use of the Lead Battery 360° certification number.
- A written claim related to the Lead Battery 360° Assurance Programme.

These claims and their related badges are different from the Lead Battery 360° logo, which is shown here below:



This document defines the framework for using claims in marketing materials, communications, annual reports, and other media by companies and facilities officially participating in the Programme.

The framework outlined in this document applies to claims arising from participation in, and certification according to, the Lead Battery 360° Assurance Programme.

This document also establishes the rules for making claims under the Lead Battery 360° Assurance Programme to ensure that such claims are credible and accurate. Therefore, permission from Lead Battery 360° is required before using any related claims. Lead Battery 360° reserves the right to address any use of its name, logo or badges that it deems inappropriate.

If you notice any Lead Battery 360° name, logo, badges or claims being used incorrectly, or if you come across potentially misleading or fraudulent claims or representations about Lead Battery 360° by either Participants or non-Participants, please refer to the grievance mechanism, which is accessible on the Lead Battery 360° website. The monitoring and enforcement of rules pertaining to claim use is further defined in section 4.

Applicability of the Claims Guide

This Guide must be consulted by Participants to the Lead Battery 360° Assurance Programme to make claims related to the Assurance Programme.

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 company / site is 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, Chief Executive Officer, 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.

Legal Compliance

Companies and their sites that use Lead Battery 360° claims are individually responsible for adhering to relevant regulations, including those related to labeling, advertising, consumer protection, and Antitrust laws (applicable laws and regulations relating to antitrust and competition), at all times. Lead Battery 360° cannot be held liable for any legal violations or infringements of third-party rights committed by other organizations.

Fees related to Lead Battery 360° claims

No additional fees are applied for any legitimate use of the Lead Battery 360° badge or related claims for the program's Participants.

II. General Requirements for Lead Battery 360° Claims

Rules applying to Lead Battery 360° claims

The following rules apply to all Lead Battery 360° claims:

- The Lead Battery 360° badges and written claims must be used in accordance with the claims requirements outlined in section 3.2 and 3.3.
- The site name on the badges cannot be translated into other languages unless the English version is also kept for reference.
- The claim or badges must never be presented in a manner that could be misleading, confusing, or harmful to the reputation or credibility of the Lead Battery 360° Assurance Programme:
 1. Deceive or mislead the public into thinking that a Participant's commentary is from the Lead Battery 360° because of the close placement of the Lead Battery 360° name, logo or badges. Any commentary that the public might interpret as coming from the Lead Battery 360° should be revised to clarify that it originates from the Participant.
 2. Suggest or imply Lead Battery 360° participation or certification of a company/site that is not a Lead Battery 360° Assurance Programme Participant or Certified Participant.
 3. Suggest or imply Lead Battery 360° certification before it has been granted.
 4. Suggest or imply performance or practices that are out of scope of the Lead Battery 360° Assurance Programme.
- Using the badges as, or as part of, another brand name as that of the Participant is not allowed.
- The badges should not be positioned in a way that could imply affiliation with any company or organisation other than the Lead Battery 360°.
- Generally, the badges can be used alongside other sustainability logos, marks or seals.

III. Types of Claims

Supporter Claim

Entities that support the objectives of the Lead Battery 360° Assurance Programme as Supporters are not entitled to any claims, including the use of Lead Battery 360° Participant badge.


Participant Claim Requirements

The Participant Claim may be used by a site once its application to join the Lead Battery 360° Assurance Programme is approved. This claim indicates that the site has committed to adhering to the seven guiding principles and to participating in the formal assurance process of the Lead Battery 360° Assurance Programme and has started implementing its requirements. However, it does not provide any information regarding the site's performance in relation to the requirements of the Lead Battery 360° Assurance Programme.

Formal written confirmation that the Participant claim can be used will be provided by the Lead Battery 360° Assurance Programme. This will typically take place simultaneously with the announcement that the site application is approved. No claim should be made prior to receiving formal written confirmation.

1. Participant Graphical Claim

Any approved Lead Battery 360° Participant can use the badge displayed below to indicate in their public and internal communications that they are a Lead Battery 360° Assurance Programme Participant.

| Type | Badge |
|---|---|
| Lead Battery 360° Assurance Assurance Participant badge |  The badge is circular with a grey border. Inside the border, there is a stylized green leaf and a green battery icon. To the right of the icons, the text 'Lead Battery 360°' is written in green. Below the icons, the word 'PARTICIPANT' is written in white on a grey rectangular background. At the bottom of the circle, the text 'SITE NAME' is written in grey. |

2. Participant Written Claim

Once the use of the Participant claim has been approved (see section 3.2), Lead Battery 360° Participants do not need additional approval for written claims related to their Participant status. Written claims shall only apply to the site of the Participant and not to any specific products. Some examples are provided below:

- (Site name) is a Participant of the Lead Battery 360°.
- (Site name) joined the Lead Battery 360° in (year).

Participants cannot make any written claims indicating that the site has reached conformance with Lead Battery 360° performance expectations or has achieved certified status. Such non-permitted claims will be dealt with according to the process outlined in section 4.2.

Certified Participant Claim Requirements

Participants will only be considered as Certified Participant once they have undergone a third-party assessment and achieved certification in line with the Lead Battery 360° Assurance Manual. Certified Participants must have achieved either a 'fully meets' conformance rating on all Performance Expectations (PEs) or have committed to a Performance Improvement Plan (PIP) if they obtained any 'partially meets' for non-critical PEs.

This claim is site-specific and is meant to indicate the level of performance attained by the site. Guidance on certification requirements is explained in detail in the Lead Battery 360° Assurance Manual.

Receiving certification and being considered a Certified Participant allows sites to use the corresponding Certified Participant claim, including with the relevant badge and written claim as a reflection of its conformance with the performance expectation of the Lead Battery 360° Assurance Programme.

Once a site has the right to use the Certified Participant claim, it may continue to do so as long as it maintains conformance with the Lead Battery 360° Assurance Programme requirement and for three

years from the day the certification was granted. The Certified Participant will remain certified when a new cycle begins, i.e when a new Letter of Commitment is signed.


Maintaining certification requires the following:

- Continue to implement the assurance process of the Lead Battery 360° Assurance Programme and comply with the relevant policies and procedures of the Lead Battery 360° Assurance Programme.
- Undergo independent assurance every 3 years.
- Maintain its performance at a level required for the Certified Participant claim.
- Ensure that all fees are paid in full.

Formal written confirmation that the Certified Participant claim can be used will be provided by Lead Battery 360°. This will typically take place simultaneously with the announcement that certification is granted. No claim should be made prior to receiving formal written confirmation.

1. Certified Participants Graphical Claim

Certified Participants can use the Lead Battery 360° badge in their communications (i.e. email signatures, company’s website, annual reports) to indicate their achievement within the Lead Battery 360° Assurance Programme. The claim is linked to the Certified Participant’s site and not to any specific product extracted or produced by the site.

| Type | Badge |
|---|--|
| Lead Battery 360° Assurance Assurance Programme Certified Participant badge |  <p>The badge is circular with a green border. Inside, there is a stylized green leaf icon on the left. To the right of the leaf, 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, with a curved line underneath it.</p> |

2. Certified Participants Written Claim

Once the use of the Certified Participant claim has been approved (see section 3.3), Lead Battery 360° Certified Participants do not need additional approval for written claims related to their Certified Participant status. Written claims shall only apply to the site of the Participant and not to any specific products. Some examples are provided below:

- (Site name) is a Lead Battery 360° Certified Participant
- (Site name) has achieved Lead Battery 360° certification in (year)
- Responsible sourcing is important to (company name) and (site name) achieved Lead Battery 360° certification in (year).

Claims that go beyond the scope of the Lead Battery 360° Assurance Programme are not permitted and will be dealt with according to the process outlined in section 4.2. Examples of non-permitted claims include:

- ‘This product is approved by Lead Battery 360° as environmentally safe’
- ‘Lead Battery 360° certifies this battery as meeting ESG standards’

- ‘Our Lead Battery 360° status guarantees ethical sourcing and manufacturing’
- ‘Our products meet all Lead Battery 360° standards for environmental and social responsibility’

IV. Monitoring and Enforcement

It is crucial for claims to be accurate and reflect a site’s status within the Lead Battery 360° Assurance Programme.

The Lead Battery 360° Secretariat will oversee the public use of claims that are misrepresented. If a claim suggests a formal connection with the Lead Battery 360° that does not exist, leading to deception of business or the public, the Secretariat will take necessary measures (including legal action if required) to safeguard the intellectual property rights of the Lead Battery 360° Assurance Programme.

Monitoring Use of Claims

The Lead Battery 360° Secretariat will employ verification strategies to oversee the use of related claims, according to the below:

- Conducting checks to monitor online claims, using internet search tools.
- Making available a Grievance Mechanism that is accessible on the Lead Battery 360° website so that interested parties can report concerns regarding claims.

Identified Misuse of Lead Battery 360° Related Claims

1. Identified Misuse by Participants

Lead Battery 360° has the authority to suspend or revoke approval for the use of its Programme-related claims if there is a reasonable risk that a claim may be false, misleading, or confusing, or if it is being used in a manner not authorized by the Lead Battery 360°.

Potential misuse of the claims may be identified by the Secretariat itself, by stakeholders reporting to Lead Battery 360°, or through complaints submitted via the Programme’s Grievance Mechanism.

When instances of misuse are detected, the Secretariat will:

- Communicate with the company and site notifying any identified false, misleading, or inappropriate claims, clarifying the requirements for proper use.
- Work together with the company and site to apply immediate corrective action.
- Follow up on the corrective action’s outcome.

If a company/site refuses to comply with the terms of this document, the Secretariat will escalate the matter to the Board of Directors of the Lead Battery 360° Assurance Programme, and appropriate measures will be taken to protect its registered trademarks:

- Suspension of the Lead Battery 360° claim approval and/or certification.
- Suspension or termination of the Participant’s Lead Battery 360° membership.
- Potential legal action against the Participant.

2. Identified Misuse by Non-Participants

Potential misuse of Lead Battery 360° logo, badges or claims by non-Participants (i.e. Supporters) will be dealt with by the Secretariat as it follows:

- Communicate with the company, notifying any identified false, misleading, or inappropriate claims, clarifying the requirements for proper use.
- Seek immediate corrective action from the company, reinforcing the requirements to make such claims.

If a company refuses to comply with the terms of this document, the Secretariat will escalate the matter:

- Send 'Cease and Desist' letter and/or take legal action.
- Publish information about a company's misuse on the Lead Battery 360° website, social media accounts and inform all Participants and stakeholders about the issue.

V. Glossary

Certified Participant: A company 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.

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

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 company that has joined the Lead Battery 360° program, 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.

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

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

VI. References

- ISEAL Alliance – Sustainability Claims Good Practice Guide, version 1.0. May 2015.
- The Consolidated Standard Reporting & Claims Policy Consultation Draft. October 2024.
- The Copper Mark Claims Guide, version 3. March 2023.
- ASI Claims Guide, version 3. April 2023.
- Solar Stewardship Initiative Claims Guide, version 1.0. November 2023.