



# Sustainable Supply Chain Charter

## ✓ Purpose

The following Sustainable Supply Chain Charter applies to any Supplier doing business with Automotive Cells Company SE (ACC) or its subsidiaries and is part of any contract with ACC that obligates a Supplier to comply with ACC sustainability requirements or policies, including the Codes of Conduct.

## ✓ Scope

The Manual applies to all ACC activities and sites.

## ✓ Version follow-up

Version	Date	Change history
A	11/06/2024	Creation

## ✓ Approval

According to the validation flow in DMS tool.

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# 1 References

## 1.1 Internal references

POL-LEG-001	Ethic Code
POL-HSE-001	Environmental Policy
MA-003 MA-002	Supplier Quality Manual Supplier Logistics Manual ACC Questionnaires

## 1.2 External references

ISO 14000	Series environmental management systems
ISO 45001	Occupational Health and Safety Management Systems
	International Bill of Human Rights, including the international covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights
	Universal Declaration of Human Rights
	UN Guiding Principles for Businesses and Human Rights
	OECD Guidelines for Multinational Enterprises
	International Labor Organization (ILO) Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
	ILO International Labor Standards
	ILO Code of Practice in Safety and Health
	OECD Due Diligence Guidance for Responsible Business Conduct
	OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
	REACH, Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), establishing a European Chemicals Agency) (European regulation, applicable to imports to Europe)
	RoHS, European directive 2002/95/CE concerning Restriction of hazardous substances in electrical and electronic equipment
	Eco-Management and Audit Scheme (EMAS)
	Greenhouse Gas Protocol
	European Union Battery Regulation 1542/2023 – 12 July 2023 Repealing Directive 2006/66
	German Supply Chain Act
	Principles of the Extractive Industries Transparency Initiative



## 2 Abbreviations

<b>ACC</b>	Automotive Cells Company
<b>ASI</b>	Aluminium Stewardship Initiative
<b>CAHRAs</b>	Conflict Affected High-Risk Areas
<b>CEO</b>	Chief Executive Officer
<b>CMRT</b>	Conflict Minerals Reporting Template
<b>CO2</b>	Carbon Dioxide
<b>CSR</b>	Corporate Social Responsibility
<b>ICMM</b>	International Council on Mining and Metals
<b>ILO</b>	International Labor Organization
<b>IRMA</b>	Initiative for Responsible Mining Assurance
<b>EITI</b>	Extractive Industries Transparency Initiative
<b>EMRT</b>	Extended Minerals Reporting Template
<b>GHG</b>	Greenhouse Gas
<b>RFI</b>	Request For Information
<b>RFQ</b>	Request For Quotation
<b>RMAP</b>	Responsible Minerals Assurance Process
<b>3TG</b>	Tin, Tantalum, Tungsten and Gold



### **3 Editorial**

ACC was created in September 2020 to become a global reference player in the development and production of batteries for electric vehicles and the European leader in automotive batteries, enabling clean and efficient mobility for the greatest number of people.

ACC's ambitions are to be a high-tech and innovative centre of excellence, to be competitive, to make automotive batteries more affordable than ever, to be socially and environmentally responsible and to create highly skilled jobs and employment opportunities also in its value chain. Therefore, building a sustainable supply chain with Suppliers that respect the best social and environmental standards and with full traceability of raw materials, especially strategic metals, is paramount for ACC. This is an important part of our Corporate Social Responsibility (CSR) approach. Our Suppliers make a significant contribution to ACC's value creation and innovation. We firmly believe that they play an important role in helping us achieve our sustainability goals, such as reducing lifecycle CO2 emissions, improving resource efficiency and ensuring responsible and ethical business practices. They are also key players in the transformation of the automotive industry. We can only improve the overall sustainability performance of the electric mobility sector through cooperation and a consistent commitment to CSR along the entire value chain, from mining to OEM and recycling. It is therefore essential that our business partners meet the same environmental, social and governance standards that we set for ourselves.

We have developed this charter to outline ACC's approach to supply chain responsibility. It summarises ACC's guiding principles for its global Supplier network, in line with globally accepted standards and internationally recognised guidelines on environmental, social and governance issues, known as ESG issues. We require our business partners to ensure legal compliance at all levels, to protect the environment and to respect human rights in accordance with international expectations, and we request that ACC Suppliers take all necessary steps to ensure that their practices are consistent with the content and spirit of this Charter. A successful Supplier-customer relationship is based on many elements such as technical specifications, quality, price, service and technology, environmental and social impact. This Charter is one of the key tools we use to determine the quality of our Suppliers. We would prefer to work with partners who can demonstrate a commitment to sustainable development.

Yann VINCENT  
CEO of ACC



## **4 Preamble**

### **4.1 ACC's Vision**

ACC's mission is to accelerate the transition to sustainable and affordable mobility for all, significantly reducing greenhouse gas emissions. Our objective is to innovate and deliver high- performing cells and modules, while helping to drive the industrial and environmental transition to cleaner mobility.

ACC is committed to establishing and managing a supply chain that is equitable, transparent, and environmentally sustainable. Additionally, we continuously strive to minimize the environmental footprint of battery cells and modules at every stage of their lifecycle. ACC has implemented and is updating its policies and procedures according to the applicable law, makes them publicly available and communicates them to interested parties.

As quality is one of ACC's high priorities, the Supplier must comply with all relevant quality requirements and regulations to develop manufacture and deliver high quality and high technology and innovative battery cells and modules. For more information, please refer to the requirements stated in the Supplier Quality Manual - MA 003.

### **4.2 Charter scope and legal effect**

This Charter is an integral component of the contractual documents from the Purchasing department and applies to all ACC Suppliers and their supply chain.

ACC is selecting the Suppliers based on criteria such as technical specifications, quality, price, service and technology, environmental and social impact.

The Supplier must share with ACC the information required in this Charter, during Request For Information (RFI) / Request For Quotation (RFQ), via the EcoVadis assessment and via ACC questionnaires. As long as the Supplier is in a business relationship with ACC, these information need to be updated and provided to ACC at least once a year and at each change in the supply chain. Each piece of information provided to ACC must be supported with evidence documents. ACC is entitled to inspect or audit, via third-party auditor, to confirm compliance with this Charter, but is not limited to the scope of this Charter.

#### **4.2.1 Supplier commitment to respect this Charter**

In all cases, the Supplier must comply with national and local regulations, and ACC's requests. If the principles defined by ACC are more demanding than those regulations, then the Supplier must constitute the reference principles. In addition, the Supplier must anticipate any new regulation by ensuring a regulatory watch.

By signing this Charter, the Supplier hereby accepts it and agrees to comply with its principles, or to implement a performance improvement initiative aimed at conforming to them.

The Supplier commits to pass on the principles of sustainable procurement and respective requirements in its own supply chain.

#### **4.2.2 Non-compliance**

If the self-assessment process, monitoring steps or other evidence indicate that elements of the Sustainable Supply Chain Charter are not being met, the Supplier will be required to provide explanation and/or evidence that corrective action is planned to amend the situation and prevent any recurrence.

ACC will assess the situation according to its Grievance Mechanism. If a violation of the Sustainable Supply Chain Charter is confirmed, ACC will draw up and implement a mitigation concept. The Supplier must use its best efforts to co-operate with and support ACC in ending the violation and minimizing the adverse impacts.

In case the mitigation attempts fail, or mitigation is deemed unfeasible with regard to the specific violation, ACC will terminate the business relationship with such Supplier as a last resort.





## **5 Ethics in Supply Chain**

ACC is highly committed to ethical business practices and places paramount importance on the integrity and sustainability of its supply chain. ACC is adhering to a comprehensive set of ethical guidelines outlined in its Ethic Code. ACC commits to treat the Suppliers with fairness and respect.

### **5.1 Fair competition (Fair dealing & fair selection & conflict of interest)**

The Supplier is obliged to adhere to laws that protect and promote fair competition, including all antitrust regulations. It is mandatory for the Supplier to follow the principles of fair competition and it should not enter into agreements or business practices that would illegally restrict competition.

The Supplier must not engage in any actions with competitors nor enter into any contracts that could distort the free market. The Supplier must also refrain from any other anti-competition behaviour. This includes, for instance and without limitation, unlawfully manipulating prices or partitioning markets.

When dealing with its Suppliers, the Supplier must base decisions solely on transparent criteria and must not permit personal interests to influence its choices. The Supplier must openly disclose any potential or actual conflicts of interest and determine an appropriate response.

### **5.2 Compliance with laws**

The Supplier must comply with all relevant laws and regulations, both in its own business operations and in its relationships with Suppliers on local, national, and international scales. The Supplier is prohibited from directly or indirectly engaging in criminal activities in any country or in any form.

### **5.3 Corruption, Bribery and Extortion**

In the course of the business relationship with ACC, the Supplier must restrain from all practices which may lead to criminal liability due to corruption, bribery, extortion or other corruption crimes. As outlined in the ACC anti-corruption code, the Supplier must desist from performing, suggesting or promising cash payments, services, individual gifts or invitations to civil servants, public officials or external partners or accepting such advantages.

The Supplier must hand down these requirements to its supply chain.

If the Supplier violates the forementioned obligation, ACC has the right to immediately terminate the business relationship with the Supplier.

Combating corruption is of particular importance in the context of raw material supply. Therefore, raw material Suppliers must not offer, promise, give or demand any bribes and must resist the solicitation of bribes to conceal or disguise the origin of minerals. They must truthfully disclose all taxes, duties, and license fees paid to governments for extraction, trading, handling, transportation, and export. Raw material Suppliers must also undertake to disclose payments according to the principles of the Extractive Industries Transparency Initiative (EITI).

#### **5.4 Financial disclosing and money laundering**

The Supplier must take action to contribute to the effective elimination of money laundering. This includes identifying and rectifying any case or risk of money laundering arising in the course of the Supplier's business operations or of its Suppliers. It also includes putting a system of suitable preventive measures in place.

In order to combat money laundering, the Supplier must disclose all financial information in accordance with the applicable national and international provisions. Such information includes the necessary taxes, duties and license fees in the course of the Supplier's business activities. The Supplier is obliged to follow up on the applicable regulatory developments and adapt its disclosure accordingly.

#### **5.5 Data protection and data security**

The Supplier's compliance with all applicable data protection laws and regulations is crucial. The Supplier is therefore obliged to process data responsibly and transparently. The Supplier must take all necessary steps to adequately protect personal data acquired in the course of its business activities.

Confidential information must be protected from unauthorized third parties by ways of state-of-the-art technologies. The Supplier may only use confidential information for the purposes agreed upon.

#### **5.6 Protection of intellectual property**

The Supplier must abide by all applicable national and international intellectual property laws. The notion of intellectual property comprehends registrable intellectual property rights – e.g. patents, designs and trademarks – copyrights, domains and competition law requirements.

The Supplier should prevent intellectual property rights infringements by holding all the necessary rights of use.

#### **5.7 Financial disclosing and money laundering**

The ACC grievance mechanism [<https://www.acc-emotion.com/fr/bienvenue-sur-le-portail-dalerte-dacc> ; [ethics@acc-emotion.com](mailto:ethics@acc-emotion.com)] is open to anyone reporting on violations or risks of violations of this Sustainable Supply Chain Charter, the ACC Anti-Corruption Code of Conduct, the Ethic Code and/or the ACC Health and Safety rules.

If the reported violation or risk of violation concerns the business area of the Supplier or its supply chain, ACC informs the Supplier of the grievance. The Supplier must immediately take all suitable measures to remediate the situation. ACC will support the Supplier's remedial action where possible.

The Supplier should communicate the existence and encourage the use of the ACC grievance mechanism within its supply chain.



## **6 Respect of Human & Labour Rights**

ACC prioritizes the protection of human and labour rights. This commitment extends beyond mere transparency. ACC actively engages in due diligence, aligns with international standards, and consistently upholds responsible business conduct.

### **6.1 Child Labour**

The Supplier prohibits child labour within its own operations and throughout its supply chain, without exception. The Supplier must adhere to the following international regulations:

- ILO Minimum Age Convention, No. 138 sets a general minimum age of 15 for employment with some exceptions for developing countries,
- ILO Worst Forms of Child Labour Convention, No. 182 prohibits worst forms of child labour, including hazardous work by young workers under 18,
- The UN Convention on the Rights of the Child prohibits child labour and requires signatories to regulate minimum age and conditions of work for children.

The Supplier recognizes the importance of children's unimpeded development and education, ensuring their health and safety remain uncompromised.

The Supplier is expected to incorporate this stipulation into their legally binding contracts and agreements.

### **6.2 Forced and compulsory labour and modern slavery**

The Supplier ensures that its employment practices adhere to the guidelines set by

- ILO Convention No. 29 on Forced Labour,
- ILO Convention No. 105 on the Abolition of Forced Labour,
- Modern Slavery Act.

This includes the assurance that all employees, including those under contract, engage in work voluntarily and possess the freedom to terminate their employment by providing appropriate notice. The Supplier is obligated to prohibit all forms of forced labour, encompassing compulsory labour, debt bondage, human trafficking, and any other forms of modern slavery. Employees should not face financial burdens arising from the withholding of wages, expenses, or the imposition of fees during the hiring process. Additionally, the Supplier must not restrict the freedom of movement of employees by withholding their identity documents or implementing any measures against their will.

The Supplier is required to define explicit policies that detail the procedures for the execution of hiring, promotion, and termination processes.

### **6.3 Freedom of association and the right to collective bargaining**

The Supplier guarantees its employees' freedom of association in accordance with

- ILO Convention No. 87 on Freedom of Association,
- ILO Convention No. 98 on the Right to Organize and Collective Bargaining.

The Supplier actively recognizes employees' right to engage in collective bargaining without any interference, discrimination, reprisal, or harassment. The Supplier is obligated to acknowledge the employees' right to associate, join a union, appoint representation, and be elected for union roles. If legal constraints disturb the freedom of association and collective bargaining, the Supplier is required to seek alternative approaches to uphold the principles delineated in ILO conventions while complying with local laws.

The Supplier is required to communicate to its employees their applicable rights and conduct manager training in a manner that the rights are applicable without restrictions.

### **6.4 Fair treatment**

#### **6.4.1 Elimination of discrimination in the workplace and equal opportunities**

The Supplier ensures the fair and respectful treatment of all employees, aligning with

- ILO Convention No. 100 on Equal Remuneration,
- ILO Convention No. 111 on Discrimination in Employment and Occupation.

It is mandatory to apply equal pay for work of equal value, regardless of gender. The Supplier is required to ensure equal opportunities within the workplace, prohibiting all forms of discrimination based on factors such as gender, ethnicity, membership in a specific population group, skin colour, disability, union membership, political affiliation, origin, religion, age, pregnancy, or sexual orientation.

To uphold these standards, the Supplier must establish corresponding regulations and effectively communicate them to all employees. Additionally, prompt measures should be implemented to address and cease specific instances of discrimination, ensuring the protection of the affected parties without undue delay.

#### **6.4.2 Fair working conditions (fair remuneration, working hours)**

The Supplier is required to guarantee appropriate remuneration that meets at least the minimum wage mandated by applicable law. Wages and social benefits should be regularly reviewed.

Agreement on these matters should be reached through negotiations with unions or other participatory mechanisms. The Supplier is encouraged to participate in industry initiatives that advocate for wages and salaries exceeding the legally mandated minimum. The Supplier must set out clear guidelines for employees working hours in the sense of

- ILO Convention No. 1,

- ILO Convention No. 30 on Hours of Work.  
Overtime should only be provided on a voluntary basis.

### **6.4.3 Health and safety**

The Supplier must set out clear rules on health and safety. The Supplier can take as references:

- OHSAS 18001,
- ISO 45001,
- ILO Convention No. 155 on occupational health and safety,
- ILO Convention No. 187 on promoting health and safety.

The Supplier must set up a health protection system that ensures compliance with regulatory requirements applicable to its scope and an occupational safety organization to ensure a high level of occupational safety within its company.

This means having procedures in place to protect the health and safety of its staff, its own subcontractors, local people, and for example the implementation of a documented health and safety policy and management system, the assessment of potential emergency situations in the workplace with emergency plans and response procedures.

The Supplier has to provide a safe working environment and must ensure that its activities are not hazardous to the health of:

- its employees,
- its subcontractors,
- the local community,
- users of its products.

The Supplier should commit to limiting workers exposure to chemical, carcinogenic, mutagenic or toxic substances to as low as reasonably achievable and adopt a continuous improvement program in this regard. The Supplier should continuously strive to reduce health and safety risks and improve working conditions for the workforce including sub-contractors working on site.

The Supplier must recognize that in addition to minimize the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. The Supplier also must recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

### **6.5 Protection of Human rights defenders**

If there are potential risks to human rights defenders associated with the products or services offered, the Supplier is obligated to condemn any instances of intimidation, threats, defamation, or criminalization directed towards human rights defenders.

## **6.6 Protection of Local Communities and Indigenous Peoples**

The Supplier assures to respect the rights of local communities and indigenous peoples impacted by its business activities. It commits to considering and mitigating potential adverse effects on their health, safety, and living conditions. The Supplier explicitly avoids unlawful forced relocation and adheres to the principles of free, prior, and informed consent, as outlined in

- ILO Convention No. 169.

The Supplier assures to respect the cultural heritage, environmental interests, and land connections of indigenous peoples.



## **7 Environment**

With an unyielding commitment to preserving the environment, ACC leads by example in its supply chain, employing sustainable strategies to mitigate ecological impact and promote responsible stewardship.

### **7.1 Environmental management**

The Supplier must comply with national and international standards and regulations. All required environmental permits, approvals and registrations are to be obtained, maintained, and regularly updated.

The Supplier must inform ACC in case of any fine or non-monetary sanction for non-compliance with environmental laws and/or regulations and communicate its action plan.

The Supplier should seek to implement an effective and certified environmental management system according to ISO 14001, EMAS, or any equivalent system to continuously minimize their resource consumption (i.e. energy, water, raw materials, primary materials) and environmental impact (i.e. emissions, pollutants, waste).

### **7.2 Energy management**

The Supplier must create a system to minimize energy waste, enhance energy efficiency, and reduce overall energy consumption. Regular reviews of the energy management system, ensuring updates to opportunities, risks, ambitions, and targets, must be conducted by skilled personnel. The Supplier is encouraged to pursue certification for its energy management system (e.g., ISO 50001). Additionally, the Supplier must commit to continuously increase the use of renewable and low carbon energy sources.

### **7.3 Waste management**

When dealing with chemicals and hazardous substances on its premises or generated during production, the Supplier must identify and label them appropriately and comply with applicable laws. This includes providing suitable storage areas, handling processes and appropriate PPE, and instructions for employees. The Supplier must take preventive measures, such as technically feasible means, to minimize hazards like air and soil pollution, water contamination, and other harmful effects from these substances.

Furthermore, the Supplier is required to implement effective waste management systems, ensuring proper on-site classification, sorting, collection, storage, compliant transportation and treatment of waste. Illegal disposal of waste must be strictly avoided by the Supplier. In general, waste must be managed in compliance with the regulations and obligations in force.

## **7.4 Water management**

The Supplier is required to evaluate the environmental effects of discharges and soil disturbance to prevent surface water or groundwater contamination. Specifically, the Supplier must implement appropriate organizational and technical measures to safeguard against potential harm to freshwater or seawater during its product sourcing and manufacturing processes.

## **7.5 CO<sub>2</sub> reduction and GHG emissions**

The Supplier must implement effective measures to reduce their direct and indirect Greenhouse Gas (GHG) emissions, including their upstream supply chain and transport, in line with the Paris Agreement.

The Supplier must provide transparency regarding emissions data from their own operations as well as from upstream activities. The Supplier must disclose its Scope 1, 2 and 3 emissions of its product / supplied part via ACC's environmental questionnaire (direct discussion between ACC and the Supplier, via ACC's chosen platform, or via a third party) and must provide updated values when change in the production process impacting GHG emissions occurs, and minimum on annual basis.

The Supplier must comply with the Battery Regulation Article 7 (Regulation (EU) 2023/1542), and if not applicable, should use a recognized method of calculation such as the GHG Protocol (<https://ghgprotocol.org/standards>).

The Supplier is encouraged to implement robust plan to achieve carbon neutrality in its own scope and to cascade the same requirements to its supply chain.

## **7.6 Saving resources**

The Supplier must establish an organization ensuring that its use of resources, including water and energy, and generation of waste of all types is reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

The Supplier is encouraged to make continuous efforts in prioritize the use of recycled material and promote development of new recycled materials. The Supplier must provide evidence to demonstrate that material is recycled and provide the share of post-consumer and post-industry material.

The Supplier must ensure the application of the packaging requirements listed in the MA-002-Supplier Logistic Manual.

## **7.7 Preventing environmental pollution**

The Supplier has to characterize, monitor, control and treat as required air and water emissions generated from operations, according to the local environmental regulation prior to discharge. The Supplier shall conduct routine monitoring of the performance of its air and water emission control



and treatment systems. Upon request, the Supplier should provide the results of the release analyses.

The Supplier must inform ACC in case of environmental accidents impacting local communities and the environment (as for example but not limited to ground water).

## **7.8 Chemical products**

The Supplier and its supply chain must comply with all applicable laws and regulations regarding the restriction and registration and where necessary, authorization or notification of chemical substances contained in the end product or production process according to the statutory requirements that apply to the corresponding market (e.g. REACH and RoHS for the European market).

The Supplier has to inform ACC in case of changes in laws and regulations and propose alternative substances.

The Supplier must comply with all applicable laws, regulations and ACC requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labelling for recycling and disposal. The Supplier must provide a Safety Data Sheet for all chemicals in the current format of the country of delivery.

In case additional material information is requested (physical and chemical characteristics) by ACC,

the Supplier should deliver the requested information.

The Supplier ensures that the labelling of chemical products complies with CLP regulation.

## **7.9 Biodiversity**

The Supplier must prevent its business activities from either contributing to or gaining advantages from the illegal conversion of natural ecosystems, including illegal deforestation.

The Supplier should respect the environment and the natural habitat of wild animals. The Supplier should therefore not engage in actions harming the environment and respect local regulations.

The Supplier should extend this commitment to its supply chain and must conduct due diligence. If the product value chains carry the risk of natural forest or ecosystem conversion, the Supplier is required to implement due diligence measures. These measures aim to ensure the sustained protection of these ecosystems, encompassing the safeguarding of both natural and cultural assets.

## **8 Responsible sourcing for Specific Suppliers**

Specific Suppliers refers to Suppliers with products, and/or parts, and/or processes including the following raw materials: Lithium, Nickel, Natural Graphite, Cobalt, 3TG (Tin, Tantalum, Tungsten & Gold), Aluminium, Copper and/or Mica.

### **8.1 Due Diligence in the Supply Chain**

The Specific Supplier must establish its due diligence process in its company. Upon ACC's request, the Specific Supplier must disclose associated information about identified risks and mitigating measures and must transfer a documentation of its due diligence measures.

The Specific Supplier must in particular identify critical choke points (such as mines, smelters, and refineries) and provide information about them (for example, company and production site of the choke point). The Specific Supplier must

- Identify Conflict Affected High-Risk Areas (CAHRAs), warning signs or Red Flags;
- Map factual circumstances where the Specific Supplier's due diligence process has triggered warning signs or Red Flags;
- Enhance due diligence where Red Flags or warning signs are identified for Suppliers, sources or circumstances;
- Verify the choke points of the due diligence management system especially the due diligence on country of mineral origin, transit and transportation routes used between mine and smelters/refiners, and or other red flag circumstances (best practice is the on-the-ground risk assessment for the supply chain and or Supplier concerned);
- Assess the risks against ACC's requirements;
- Deliver the risk assessment procedure and records.

For high-risk Suppliers, i.e. Suppliers in whose supply chains Red Flags were identified, on-the-ground assessments are recommended as best practice.

### **8.2 Supply chain transparency**

The Specific Supplier must indicate the provenance of raw materials and the processing location according to ACC Questionnaires (as for example but not limited to: ACC CSR Questionnaire, ACC Environmental Questionnaire, ACC Traceability Questionnaire, etc.), and must provide updated versions when significant change occurs in the supply chain, and minimum on annual basis as a mass balance occasion. Upon ACC's request, the Specific Supplier must be able to ensure traceability of the full supply chain of the raw materials used in the products sold to ACC and collaborate with ACC on the selected traceability platform.

The Supplier must ensure the application of the traceability requirements listed in the MA-003-Supplier Quality Manual.



### **8.3 RMI conformant status requirement**

The Specific Supplier delivering commodities containing 3TG (Tin, Tantalum, Tungsten and Gold) Cobalt and Mica, and its Suppliers must identify and disclose all the smelters and refiners in their supply chain. They must evaluate whether these entities have undertaken an OECD-compliant due diligence process.

The Specific Supplier is obligated to follow established procedures with the Responsible Minerals Assurance Process (RMAP), such as the minimum requirement. The Specific Supplier must ensure that the procurement of these materials exclusively occurs from refineries and smelters meeting the Responsible Minerals Assurance Process (RMAP) requirements, meeting the "Conformant" status for parts delivered to ACC. As evidence, the Specific Supplier is expected to provide annual Extended Minerals Reporting Template (EMRT) and/or Conflict Minerals Reporting Template (CMRT).

### **8.4 Mining Standards**

The Specific Supplier must source raw materials from audited sources assessed against the highest mining standards and using third-party assurance, such as the Initiative for Responsible Mining Assurance (IRMA), Aluminium Stewardship Initiative (ASI), the Copper Mark, the Nickel Mark, International Council on Mining and Metals (ICMM).

ACC believes that IRMA has established the highest mining standards. As active member of IRMA, we highly endorse the adoption of IRMA's Standard for Responsible Mining for the Specific Supplier delivering commodities containing Nickel, Lithium, Cobalt, Manganese, Natural Graphite and/or Copper.

ACC strongly encourages the Specific Supplier delivering commodities containing Aluminium to source from Aluminium Stewardship Initiative (ASI) certified supply chain.