



Preparing for the 2024 EU Battery Regulation

Practical pathways for BESS developers to
verify supplier compliance

Key themes



**What is the EU
Battery Regulation?**



**How can energy
storage companies
get ready?**

What is the EU Battery Regulation?

Overview

Energy Storage



Who does it apply to?

ALL companies that are *placing stationary battery energy storage systems or other industrial batteries on the market or putting them into service*



What does it apply to?

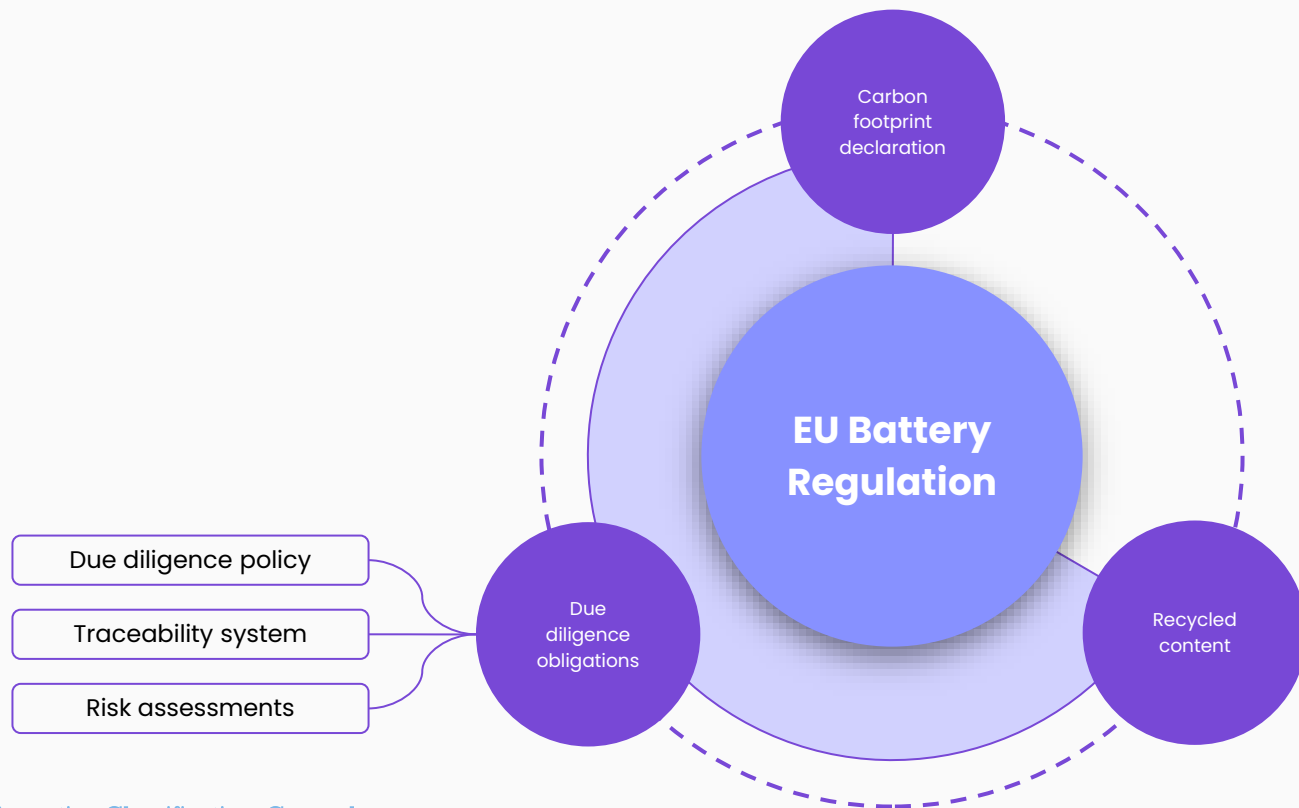
ALL stationary battery energy storage systems or industrial batteries



When does it apply?

Staggered intervals starting on 18 February 2024

What the EU Battery Regulation Is



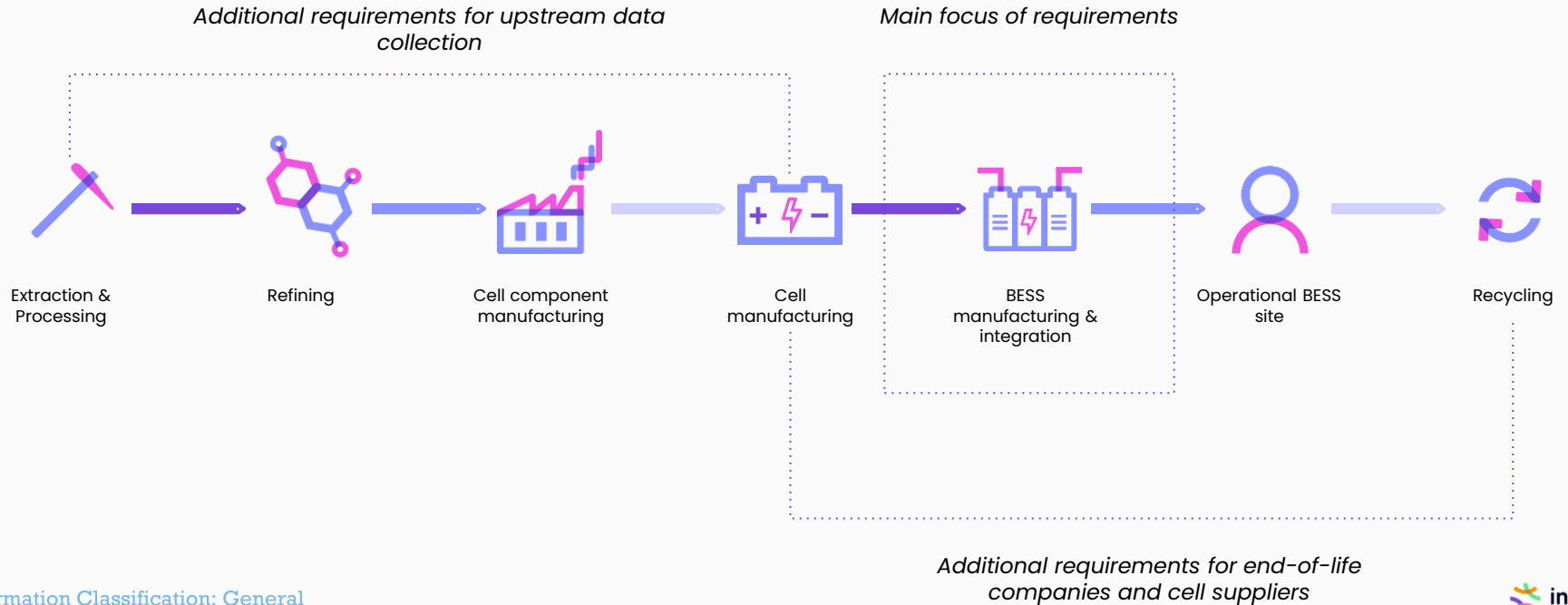
Companies that don't meet these rules
will **NOT** be able to access Europe's
battery market, currently valued at
\$23.34 billion



**\$23.34
billion**

EU Battery market

Who does it apply to?



What are the Due Diligence Requirements?

The EU Battery Regulation's due diligence requirements have multiple steps that build on one another



Policy

- Due diligence policy
- International standards
- Document management
- Third-party verification
- Top management responsibility



Supply chain processes

- Supply chain traceability system
- Due diligence policies in supplier contracts
- Grievance mechanism
- Plan for & identify supply chain risk and impacts
- Respond & mitigate any identified risks and impacts

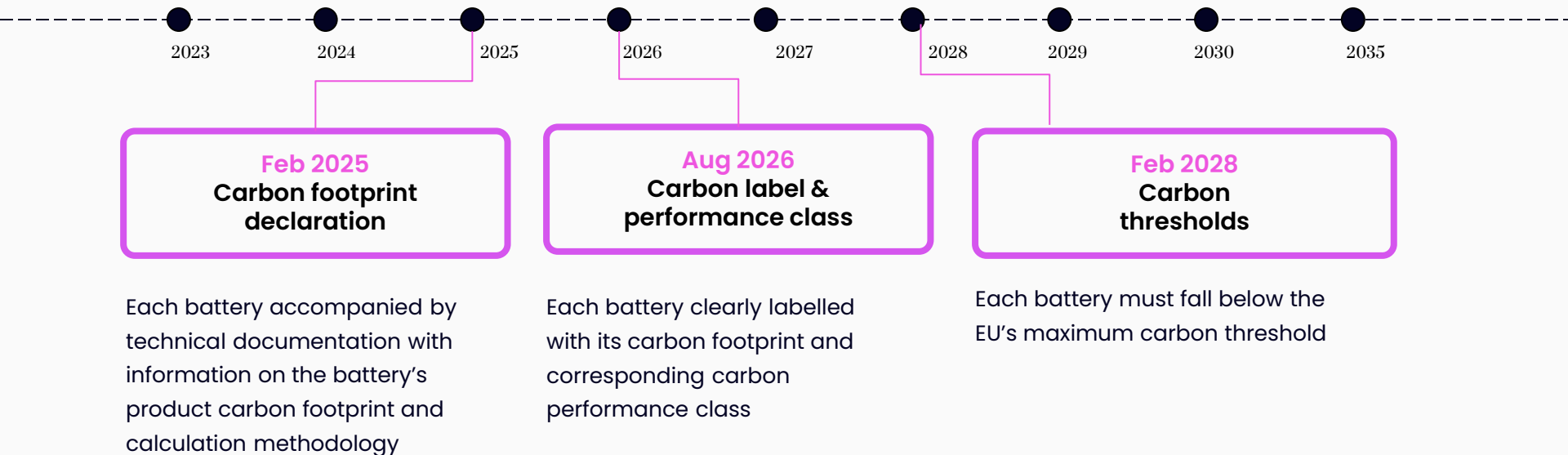


Reporting

- Reporting to downstream actors
- Annual public-facing report
(& feeds into broader reporting requirements)

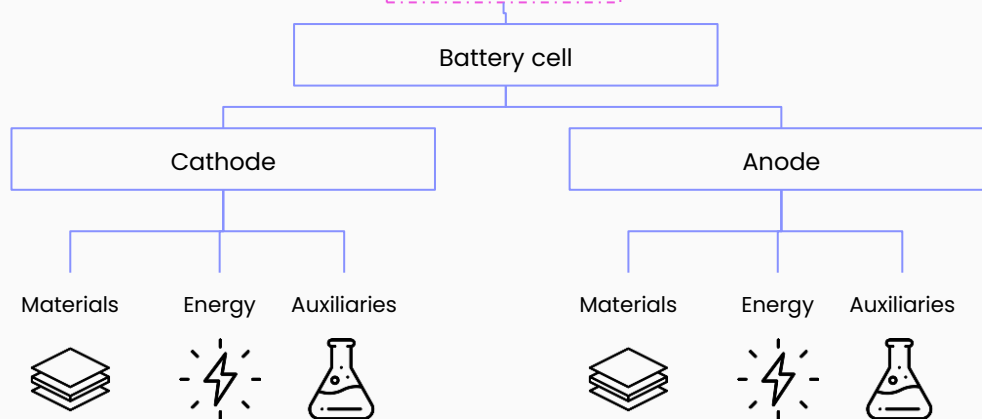
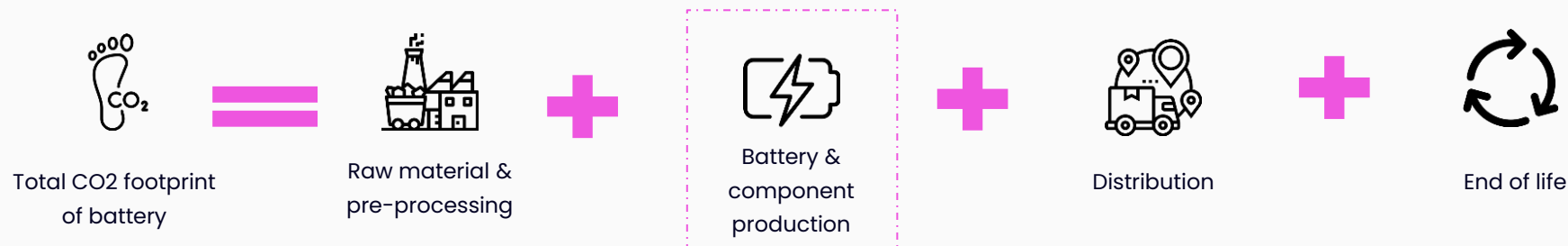
What are the carbon requirements?

The EU Battery Regulation's carbon footprint requirements cover the battery's lifecycle and will be implemented in 3 steps



Battery carbon footprint requires supply chain collaboration

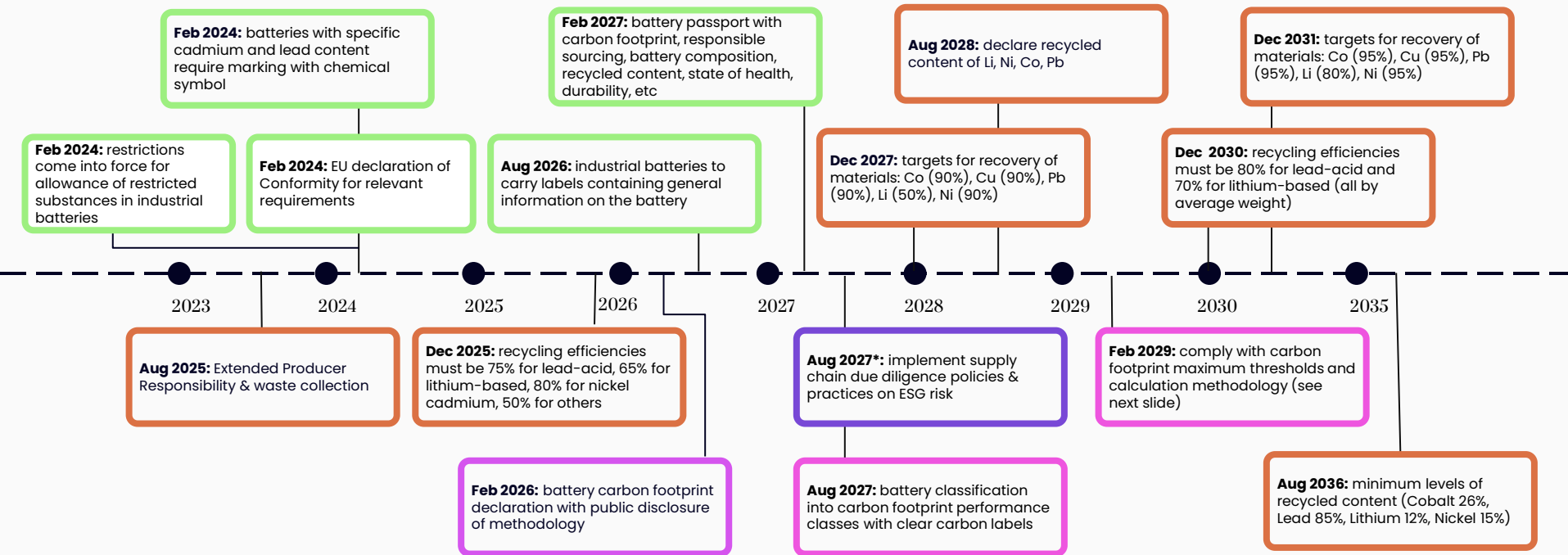
The EU Battery Regulation's battery carbon footprint methodology covers four life cycle stages, and requires a combination of actual data and generic data from the company and suppliers' manufacturing processes



Companies will need to collect actual activity data from their suppliers for each major battery component. Actual data must be specific to each battery model produced and the production plant.

EU Battery Regulation from 2024 onwards

● Due Diligence ● Carbon ● Circularity ● Reporting

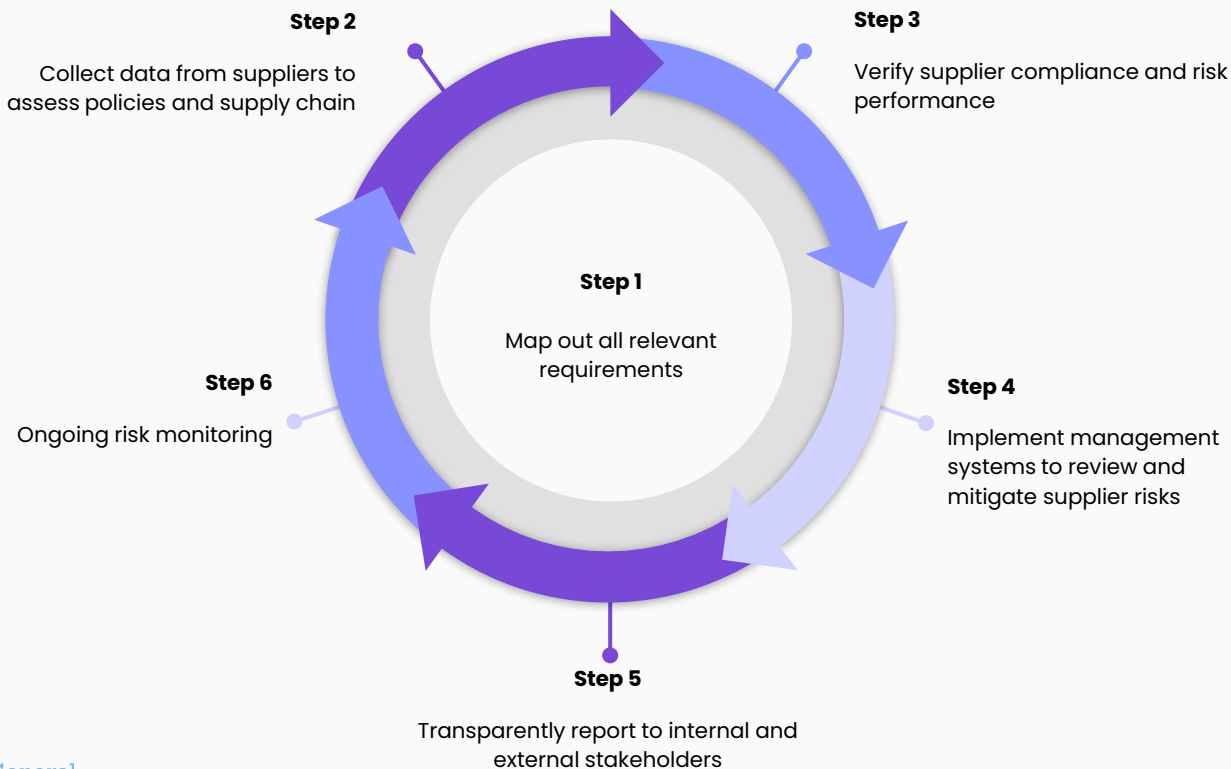


[EU Commission Classification - General](#)
The Commission has postponed implementation until from August 2024 to August 2027.

Dates are mainly applicable to industrial battery category. Battery passport and carbon footprint requirements only apply to batteries above 2 KWh.

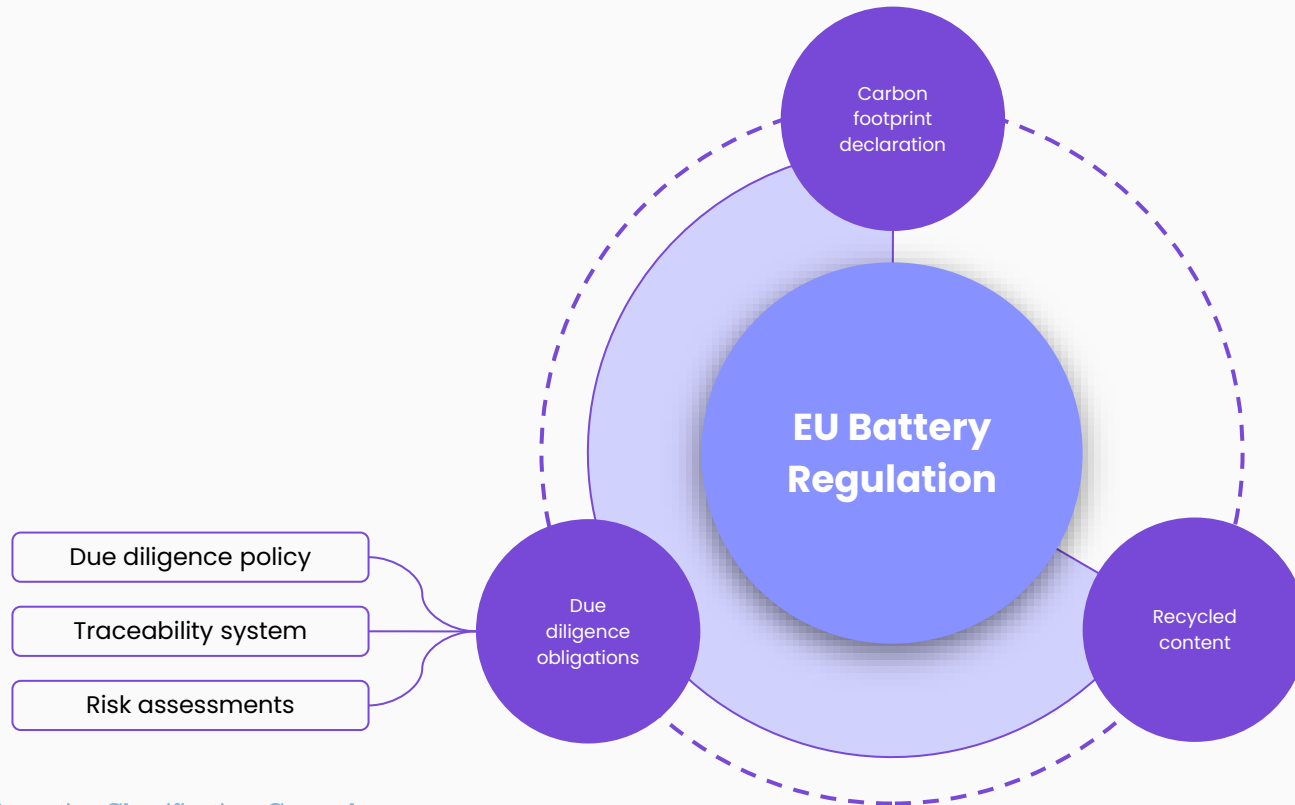
How to get ready

Six-point plan for BESS developers to get ready for the EU Battery Regulation



Step 1

Map out all relevant requirements

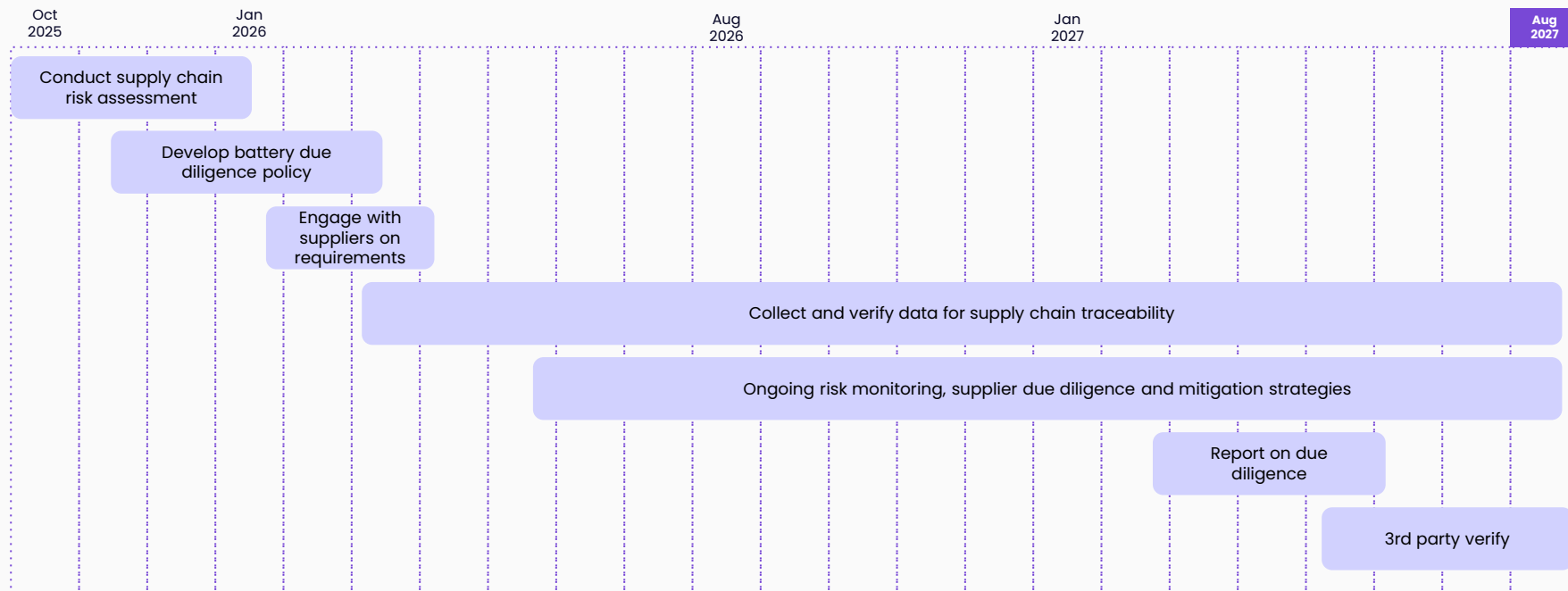


Step 1

Example: Getting Ready for Due Diligence Obligations

Aug
2027

**Due diligence
deadlines**



Step 2

Engaging Suppliers to Collect Supply Chain & Policy Data



Assess supplier readiness and internal capacity to provide ESG and compliance data



Develop processes for gathering accurate supply chain and policy information

The screenshot displays the infyos platform interface. On the left is a dark sidebar with the infyos logo and a navigation menu. The main content area shows a questionnaire titled "Demo Volt's Supplier Sustainability Questionnaire".

infyos

DEMO VOLT
Tier: Battery Manufacturer

- Dashboard
- Strategy
- Actions
- Metrics
- Impacts
- Suppliers**
- Products
- Regulations
- Switch account

Demo Volt's Supplier Sustainability Questionnaire

Air Pollution

- ✓ Air Pollution
- ✓ Biodiversity Loss
- ✓ Circularity
- ✓ Energy & GHGs
- ✓ Hazardous & Non-hazardous Waste
- ✓ Water & Soil Pollution
- ✓ Water Scarcity
- ✓ Artisanal & Small-scale Mining
- ✓ Child Labour

Does your company have a formal environmental policy that includes air quality?

☒ Yes, the company has a formal environmental policy that includes air quality
☐ The company has a formal environmental policy, but it does not include air quality
☐ The company has an environmental policy that includes air quality, but it is informal
☐ The company does not have a formal environmental policy

If required please upload evidence to back up the question above [View](#)

Does your company include commitments related to air quality in its Supplier Code of Conduct or similar policies?

☐ Yes, air quality is included in the company's Supplier Code of Conduct or similar policies
☒ No, air quality is not included in the company's Supplier Code of Conduct or similar policies

Step 3

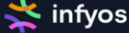
Verify supplier compliance and risk performance



Analyse supplier compliance status and risk scores



Develop a mitigation plan with suppliers

		Suppliers / Belgard Org			
Belgard Org		GENERAL USERS QUESTIONNAIRES ANALYSIS MITIGATION ACTION PLAN			
DEMO VOLT Tier: Battery Manufacturer					
Dashboard Strategy Actions Metrics Impacts Suppliers Products Regulations Switch account Logout					
IMPACT AREA	STATUS	SUMMARY	SOCIETAL IMPACTS	PERFORMANCE	
Community rights and impacts	VERY HIGH	Assess the risk a company's operations or supply chains violate the rights of local communities and/or Indigenous Peoples	VERY HIGH	POOR	Edit
Employee health and safety	VERY HIGH	Assesses the risk that a company's operations or suppliers negatively impact their employees health & safety	VERY HIGH	POOR	Edit
Forced labour and modern slavery	VERY HIGH	Assesses the risk a company's operations or supply chains are exposed to forced labour and/or modern slavery	HIGH	POOR	Edit
Air pollution	HIGH	Assesses the risk a company's operations or supply chains contribute to poor air quality	HIGH	WEAK	Edit
Biodiversity loss	HIGH	Assesses the risk that a company's operations or supply chains contribute to biodiversity loss	VERY HIGH	WEAK	Edit
Child labour	HIGH	Assesses the risk a company's operations or supply chains are exposed to child labour	HIGH	WEAK	Edit

Step 4

Implement sustainability management systems to monitor and review progress



Easily track progress and identify gaps instantly



Use data to improve current processes and develop targeted actions



Store evidence in one, centralised location

The screenshot displays the infyos sustainability management system interface. On the left is a dark sidebar with the infyos logo and a navigation menu including Dashboard, Strategy, Actions, Metrics, Impacts, Suppliers (highlighted), Products, Regulations, Switch account, and Logout. The main content area is titled 'DEMO VOLT Tier: Battery Manufacturer' and features a 'Pre-contractual measures' section with the goal: 'Ensure all Demo Volt's pre-contractual measures are addressed before August 2023'. Below this, there are two subgoals and a table of actions.

SUBGOALS & ACTIONS		FURTHER INFORMATION			
1. Pre-contractual mitigation measures based on Supplier Sustainability Assessment					
2. Pre-contractual measures based on review of Belgard's supply chain					
ACTION	TIMELINE	STATUS	OWNER	COMMENTS	+ Action
Provide the official remediation report relating to recorded incidents with local communities in the Obi Islands, Indonesia	2023-07	DELIVERED	John Doe - Belgard, Compliance	Report has been received; Demo Volt is satisfied with Belgard's response to the incidents	+ Edit
Provide evidence of compliance with Uyghur Forced Labor Prevention Act (UFLPA) in the United States	2023-07	IN PROGRESS	John Doe - Belgard, Compliance	Demo Volt was not satisfied with initial response. Belgard is currently compiling further evidence	+ Edit
METRIC	VALUE	UNIT	COMMENTS		+ Metric

Step 5

Transparently report to internal and external stakeholders



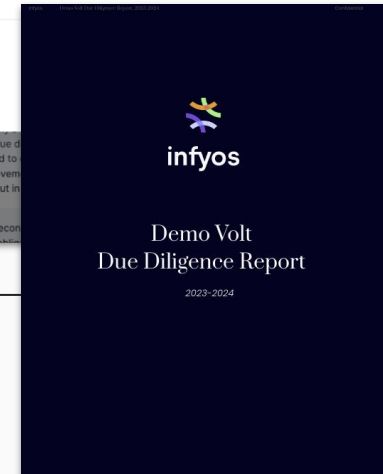
Communicate progress and impact based on standard KPIs



Report compliance with key regulatory requirements



Demonstrate sustainability leadership to investors and customers



Ongoing Risk Monitoring



Implement continuous monitoring of supplier risks and ESG performance



Update due diligence processes as regulations evolve, maintaining proactive compliance

Supplier

Impact

Copper One

Battery First Co.

Lithium Co

Lithium Ltd

Aluminium Co

Supplier	Publication	Publish Date	Incident Date	Description	Source	Responses
Copper One	er One	12/04/2023	12/04/2023	Copper One has been found to be employing over 50+ minors in its mines in the Democratic Republic of the Congo, as reported by the Washington Post.		Respond
Forced labour & slavery	Battery First Co.	09/06/2026	09/06/2026	In May 2025, Battery First Co. was put on the Uyghur Forced Labour Prevention Banned Entity (UFLPA) list. The UFLPA Entity List, maintained by the U.S. Department of Homeland Security, is a compilation of entities connected to Uyghur forced labor in the Xinjiang Uyghur Autonomous Region (XUAR) of China. This list, updated regularly, is used to prevent the importation of goods produced by or associated with these entities into the United States.		Respond
Forced labour & slavery	Lithium Co	04/06/2019	04/06/2019	The workers union at the Lithium Mine in Argentina, in which Lithium Co. Ltd invested, reported that they "are being abused at Chinese mines", with reports of forced labour, child labour and exploitation of vulnerable populations. Inspection by local entities revealed that 24 workers' identification documents were detained (Washington Post, 2024).		Respond
Community rights & impacts	Lithium Ltd	31/12/2019	31/12/2019	In 2019, Lithium Co was accused of community displacement and violation of Indigenous Peoples' rights, including a non-compliance of the Free, Informed Consent Procedure (Washington Post, 2019).		Respond
Forced labour & slavery	Aluminium Co	02/07/2024	02/07/2024	Aluminium Co. is connected to many of Xinjiang region's aluminum suppliers; it has been flagged by Sheffield Hallam report to have have a high risk exposure of forced labour in the region.		Respond
				Lithium Mine in Argentina, in which Lithium Co. Ltd invested, reported that they "are being abused reports of forced labour, child labour and exploitation of vulnerable populations. Inspection by at 24 workers' identification documents were detained (Washington Post, 2024).		Respond

Mongabay Series: Land rights and extractives

Indonesian nickel project harms environment and human rights, report says

by Hans Nicholas Jong on 26 February 2024

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The New York Times

Solar Company Says Audit Finds Forced Labor in Malaysian Factory

Infyos combines in-house expertise with software to support BESS developers throughout the entire sustainability journey



ESG risks and regulation requirement analysis



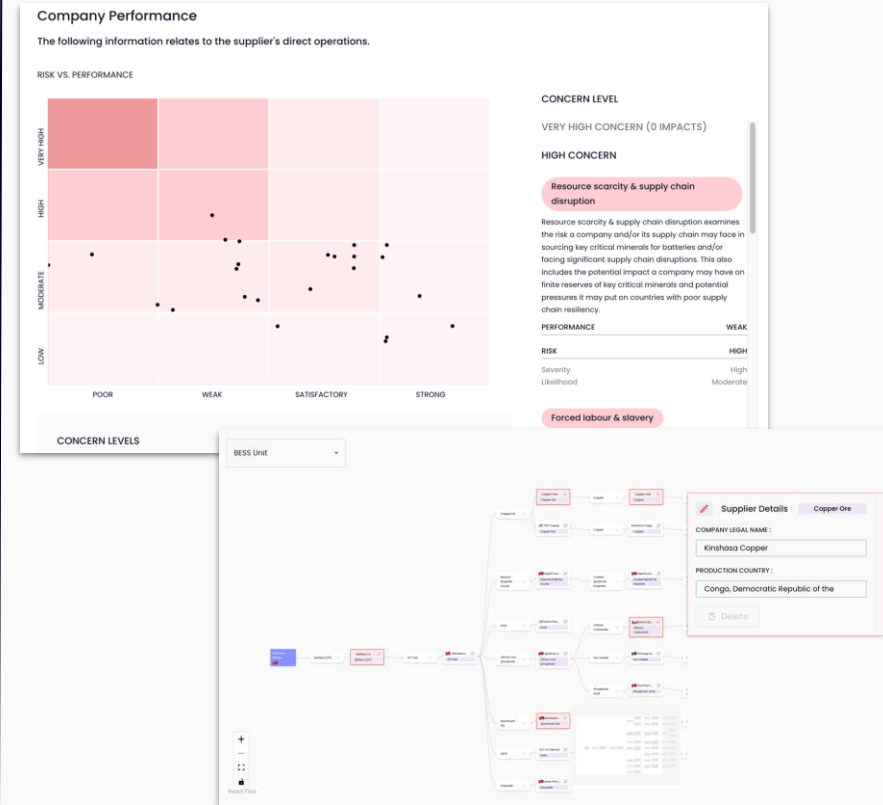
Supplier ESG & regulation due diligence



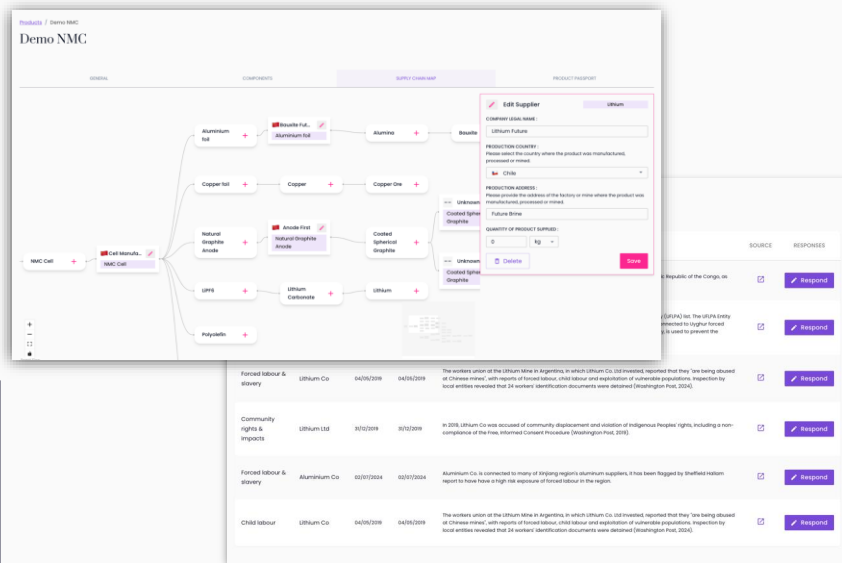
Supply chain traceability and risk monitoring



Streamlined reporting for battery passport



Unlocking Supply Chain Visibility



octopusenergy
generation



TESLA



FLOWER



CATL



SUNGROW
Clean power for all



Questions?



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