

Certificate GB14/90757

SGS

The management system of

Ecobat Solutions UK Limited

Crescent Work Industrial Park Willenhall Road Darlaston Wednesbury West Midlands WS10 8JR United Kingdom

has been assessed and certified as meeting the requirements of

ISO 14001:2015

For the following activities

Bin placement and collection services for obsolete and waste batteries. Diagnostics, disassembly, re-engineering, and reclamation of materials from obsolete and waste batteries and associated equipment.

This certificate is valid from 23 February 2023 until 02 February 2026 and remains valid subject to satisfactory surveillance audits.

Issue 8. Certified since 14 January 2014




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Compliance Obligations

The industrial business sector in which we work, and the nature of things that we do, places us under the governance of a bewildering amount of legislation - for environmental protection as well as our Health and Safety. This has prompted us to identify the UK and EU environmental legislation that is directly or indirectly relevant to the environmental aspects of our processes and activities and determine to what extent the compliance obligations apply to our business.

A Legal Compliance Register has been drawn up that lists all of our company's compliance obligations that are directly or indirectly relevant, or for information purposes only. Legislation that may impact the business in the future, or that could be of concern to our interested parties has also been identified.

The key obligations placed on the business by each piece of relevant environmental and health & safety legislation, together with a brief summary of the actions we have taken to ensure that compliance with them is achieved, is listed in this register for management information purposes. This register will be referred to when carrying out an annual Legal Compliance audit on the business.

The current primary source of information is Legislation Updating Service (Newground). Other data sources include trade publications, government websites, industry consultants and regulatory bodies, such as the Environment Agency and the HSE.

The Compliance Department retains electronic copies of the relevant legislation on the P drive of the company's server, together with the Legal Compliance Register, for information purposes for the Site Management Team, as well as for departmental reference.

Verifying Legal compliance


We have an established procedure to periodically evaluate the extent to which our processes and activities comply with relevant legal obligations and significant environmental aspects.

Legal compliance will be verified and validated by the Compliance Dept. during internal audits, inspections and observations; or in the event that employees, visitors or contractors raise concerns of a potential legal failing. These observations and reports will generate non-conformance reports that will be recorded on the Corrective Action Forms Register. Corrective or Improvement action will be assigned to the appropriate departmental head to implement.

In the event of relevant legislation being introduced or amended, or the withdrawal of legislation occurring, the Compliance Dept. will bring the relevant information to the attention of Site Management Team at the monthly management meeting - or immediately should the change be of a significant nature.

A full review of the legal registers is completed at least once per two years.

End of Section Two

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Section THREE Environmental Management system controls applicable to ISO14001:2015

Our Environmental Policy

We, the Site Management Team of Ecobat Solutions UK, a trading entity of Ecobat Resources UK Ltd, hereon referred to as the Company, are committed to managing the company’s environmental aspects to the highest possible standard; whilst maintaining its position at the forefront of our industry sector. All its employees and contractors have duties and responsibilities related to this Policy, and we will regularly review the company’s environmental performance to ensure they are being met.

We have identified the potential and actual impacts that our work-based activities can make on the environment and recognise that they can be minimised - and perhaps even eliminated - if we conduct our business in a responsible and sustainable manner. To this end, we are wholly committed to best environmental practice across all of the company’s processes and activities, and will encourage our contractors, business partners and members of the wider community to play their part in this worthy effort.

In order to achieve this, we have

- established this Environmental Policy for which the site Management Team has ultimate responsibility, and which forms part of the company’s strategic business planning
- developed and taken ownership of a comprehensive Environmental Management System, based on ISO 14001:2015 to underpin the company’s compliance with all relevant Environmental Legislation, including Acts, Regulations, Codes of Practice, and any other standards that are applicable to our business processes and activities
- made a commitment to take whatever actions are required to protect the environment and to prevent pollution.

We have considered the company’s significant environmental aspects and impacts and have set objectives to establish a course for the continual improvement and enhancement of its environmental performance that will be monitored by regular checks and audits - measured against agreed Key Performance Indicators - and reviewed at Site Management team meetings.

We have determined that these significant (both actual and potential) environmental impacts are linked to:

- energy use
- operational processes
- operational and residual waste produced during processes and activities
- heavy goods vehicle transport
- factory emissions to land, air, and water.

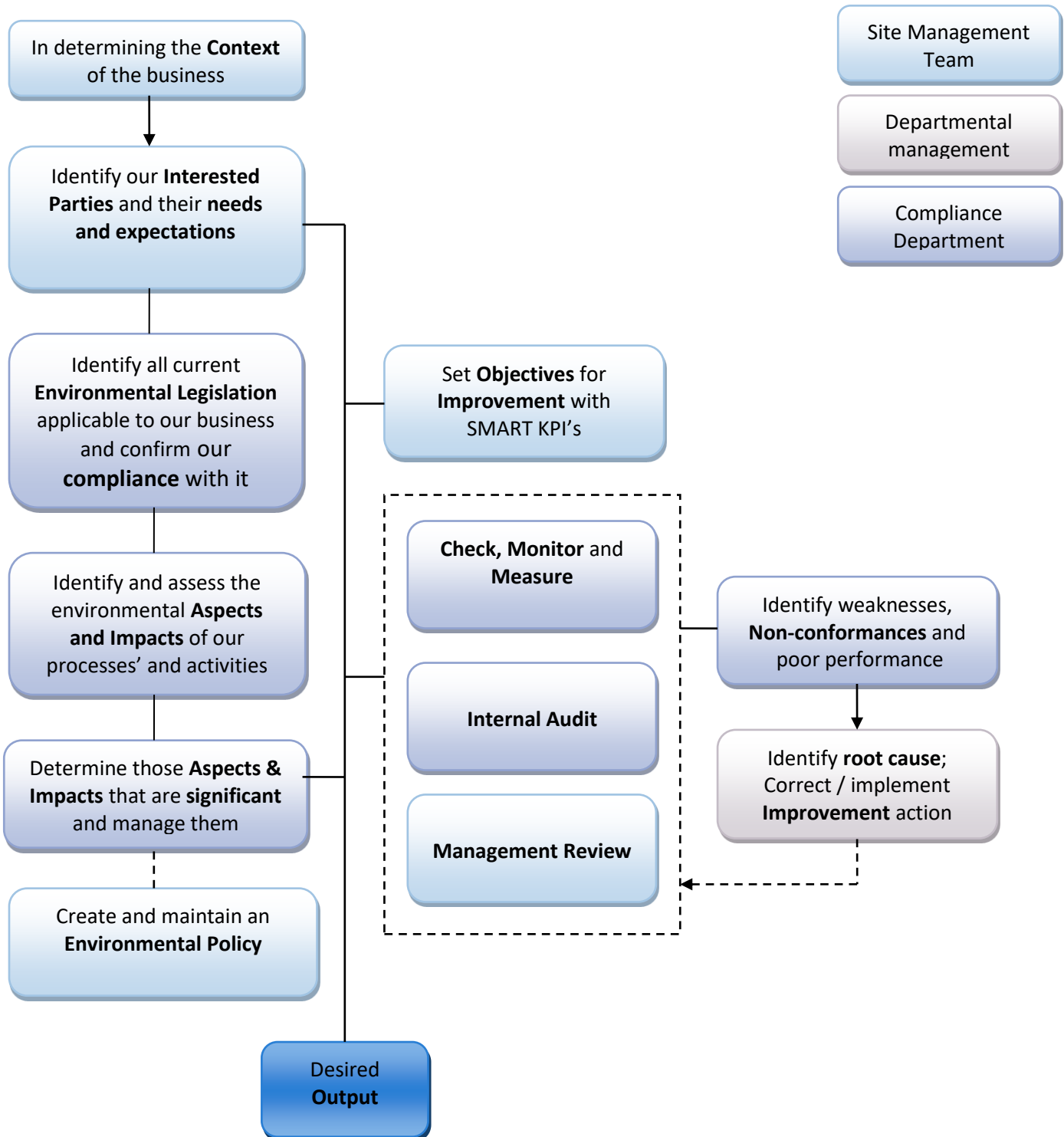
and we will strive to ensure that the highest environmental standards are maintained in all company processes and activities, meeting, and if practicably possible, exceeding, the relevant legislative requirements by:


- continually assessing our processes and activities and identifying areas where we can minimise or eliminate their negative impacts on the environment
- minimising waste by the considerate and efficient use of materials and energy
- training employees and encouraging their participation in good environmental workplace practices
- developing and maintaining an environmentally-sound heavy goods vehicle logistics strategy
- minimising or eliminating exposure to risks from environmental or health and safety hazards to employees and others in the vicinity from our processes and activities
- taking a proactive approach when developing solutions for potential environmental issues
- considering environmental and ethical aspects when making investment decisions for the business.

Our Environmental Management System has been designed to address all the key environmental issues related to the company’s processes and activities, both on and off site and it will be continually assessed for its effectiveness by the Site Management Team, as endorsed below, and we encourage you all to uphold the principles of this policy.

This Policy has been communicated to all company employees and is available to all interested parties upon request. It will be reviewed periodically to ensure it remains relevant and appropriate to the Company.

**ISO 14001:2015 Environmental Management System Process flow
Management Responsibilities**



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Planning

Environmental Aspects and Impacts

We have assessed all of the company's activities and services from a life-cycle perspective (Ref EM13) and used a set methodology by which to determine the significance of their environmental aspects. (Refer to Method ref. EM10)

The degree of significance of each aspect has been assessed by way of a scoring system, based on the

- potential severity of the impact
- likelihood of the impact occurring
- severity during abnormal conditions or emergencies
- interested parties affected
- past occurrences or events
- positive environmental benefit (if any)

Those aspects that have been determined as being significant are listed separately (refer to the Significant Environmental Aspects and Impacts Summary ref. EF16) and have been communicated to the relevant Departmental Heads and operational employees.

Environmental aspects are reviewed periodically (at least annually) but will be immediately reassessed in the event of:

- new environmental legislation (whether more or less stringent)
- repealed or withdrawn environmental legislation
- advances in technology
- a modification or wholesale change to an activity
- an additional process step or service offering
- an abnormal operating or environmental condition occurring or threatening to occur
- a reasonably foreseeable emergency situation

and as a result of this reassessment, we will determine whether the aspect remains significant.

Note: Significant Aspects, if adequately managed, will not necessarily be considered as Objectives for improvement.

Environmental objectives and planning to achieve them

Environmental Objectives

Having taken into account our significant environmental aspects and associated compliance obligations, and considered the risks and opportunities to the business, we have established some environmental objectives for improvement.


These objectives are consistent with our Environmental Policy and are measurable and monitored against Key Performance Indicators and regularly communicated throughout the business.

Planning actions to achieve environmental objectives

Some of our specific targets and objectives are of a constantly evolving nature and in these cases, we have to take a dynamic approach when considering what actions to take in order to achieve them. The company currently has a number of specific targets and objectives that are linked primarily to commercial, environmental, safety and employee welfare issues; all of which are underpinned by a general drive to improve the business overall.

Specific targets and objectives of our Quality and Safety Management systems may be integrated with those from this Environmental Management system.

Many of our objectives will have a Health and safety, Environmental and Quality orientation, purely because of the nature of our business.

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The Objectives we set will be ‘SMART’, that is to say they will be

- S**pecific - well defined
- M**easurable - quantified and with a timescale
- A**chievable - credible and realistic
- R**elevant – useful and appropriate
- T**ime framed – realistic timescales for their implementation

We have produced a number of risk-based operating procedures and works Instructions (Methods) to provide guidance on most of our work activities, but especially those that have a potential to produce a significant environmental hazard or an undesirable outcome. These methods are available in pdf format on the ‘P’ drive, in the Compliance area. Employees with no access to a computer will be issued with hard copies as required.

Support for, and the continual improvement of our management systems is driven by the Site Management Team and others delegated by them; the key roles and responsibilities of which are defined in Section One of this manual.

Operational Control

We have established operating criteria and controlled processes that enable us to identify opportunities, minimise risks and pursue our objectives for improvement.

To achieve effective planning and control from a life cycle perspective, the following principles are applied:

- Identifying operations and activities with significant environmental aspects
- Establishing procedures to manage and control activities and situations that could present significant environmental impacts
- Documenting, implementing, and maintaining environmental operational control procedures
- Establishing procedures to control any significant environmental aspects associated with materials and services provided by our suppliers and contractors
- Implementing and maintaining environmental supplier and contractor control procedures

Operational procedures and policies that provide these controls can be accessed from the Compliance area on the P drive by staff and management.


Emergency Preparedness and Response

We have established a management process to ensure that we are prepared and will be ready to respond adequately to emergency situations of an environmental nature. To this end, we will:

- consider the types and scale of emergency situations and accidents that could occur and assess the significance of their impact on the environment
- establish procedures to respond to actual emergency situations and accidents that could have an impact on the environment
- test the environmental emergency response procedures
- respond to actual environmental emergencies and accidents
- prevent or mitigate the adverse environmental impacts that emergencies and accidents can and do cause
- regularly review and revise, if necessary, the environmental emergency preparedness and response procedures, in line with legislative changes, or as a result of learning from the results of tests
- provide information and training on environmental emergency preparedness and response action to relevant parties and individuals.

The environmental emergencies that are most relevant to our business, which have been documented in our Environmental Aspects assessment are:

- Fire, including fugitive gases and contaminated water runoff
- Acid spillages and leachate from other battery chemistries
- Diesel spillages both onsite and on the highway

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- Road traffic incidents resulting in shedding of (possibly hazardous) load
- Escaping waste

The Operational procedures covering the above can be accessed from the Compliance area on the P drive by staff and management. These are:

Emergency Plan SM12

Control of Spillages EM19

Environmental Incidents & Near Misses EM20

Waste Battery Pre-acceptance Process EP11

Waste Battery Acceptance & Sampling Process EP12

All Portable and Non-Lead Industrial Batteries QM17

Automotive Lead Batteries QM15

Industrial Lead Batteries QM16

Site Operations All Chemistries QM14

Diagnostic and Disassembly Centre Overview QM71

End of Section Three