

Trafigura

Trafigura's approach to responsible sourcing of recycled lead

August 2025



Trafigura's Responsible Sourcing (RS) Programme



Overview for suppliers

Trafigura is committed to responsible sourcing. Our programme has three main goals:

- 1 To identify and mitigate risks to people and the environment
- 2 To engage and promote positive change
- 3 To report transparently and provide assurances to commercial counterparts where required

We prioritise working with suppliers that are committed to high standards of environmental, social and governance (ESG) performance.



trafigura.com/sustainability

Should you have any questions, please get in touch with your Trafigura contact or email sustainability@trafigura.com

Our Responsible Sourcing Programme builds on a number of important Trafigura policies. These include our:

[Code of Business Conduct](#)

[Corporate Responsibility Policy](#)

[HSEC Business Principles](#)

[Metals and Minerals Responsible Sourcing and Supply Chain Expectations](#)

Our policies and procedures respect international norms including:

[The UN Guiding Principles on Business and Human Rights](#)

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)

Our procedures also underpin compliance for downstream customers with a number of regulatory and market based requirements, such as:

- EU Conflict Minerals Regulation
- Section 1502 of the US Dodd Frank Act
- LME, LBMA, LPPM responsible sourcing requirements
- Various modern slavery and wider human rights due diligence reporting regimes

To support our Responsible Sourcing Programme our suppliers are expected to:



Respond fully, accurately and promptly to requests for information



Cooperate with Trafigura throughout the process, making operational premises and senior staff available where necessary



Address issues raised and implement actions as agreed over the course of the process



Share any questions, comments or feedback as the process develops

We believe our commitment to responsible sourcing not only mitigates ESG risks, it also makes sound commercial sense for our suppliers.

Responsible Sourcing of Recycled Lead

Recycling of Lead has benefits and challenges



Recycling used batteries offers numerous benefits: circularity of raw materials, job creation, and reduced landfill waste.



Used LABs contain hazardous substances therefore recycling processes must adhere to standards designed to protect both workers and the environment.



Trafigura plays a significant role in the lead market



Trafigura is one of the world's largest suppliers of commodities, including lead.



In line with Trafigura's approach to responsible sourcing, we are working with our counterparties with the aim of ensuring that they can meet our Responsible Sourcing Expectations.



Trafigura's approach aligns with the OECD's Due Diligence Guidance for Responsible Mineral Supply Chains, emphasizing collaboration to address challenges proactively, rather than abruptly withdrawing from markets when issues emerge.

Our efforts include:



Conducting Responsible Sourcing Due Diligence Assessments of Suppliers' Facilities

- We are conducting assessments of all our suppliers to map supply chains and identify risks and ESG impacts.



Incorporation of these requirements into Supply Agreements & Monitoring of Improvement Plans

- Where we identify risks that Trafigura can help counterparties mitigate, we amend contractual terms to incorporate our Minimum Expectations and require mutually agreed Improvement Plans.
- We conduct scheduled on-site visits to evaluate progress against improvement plans while delivering targeted technical assistance and knowledge transfer to strengthen our suppliers' operational capabilities



Developing capacity of suppliers (including supplier incentives)

- Delivering targeted technical assistance, essential protective equipment and capacity-building programs to enhance supplier capabilities in areas such as environmental management, worker health and safety, and operational best practice.



Defining clear Minimum Expectations for Responsible Lead Recycling

- Developed in alignment with requirements of Lead360 standard, Government regulations and Sustainable Recycling Industries (SRI) SOPs.
- Consulted with stakeholders such as the Lead Association (ILA) and EUROBAT.



Stakeholder Engagement

- We are also proactively engaging with industry associations, NGOs, and other relevant stakeholders to support responsible practices, address concerns, and collaborate on industry initiatives.



Defining Structured Process for Responsible Disengagement

- We have introduced a responsible disengagement protocol for suppliers who, despite repeated engagement and support, consistently fail to meet our expectations.

Minimum ESG Expectations for Lead Recyclers

Developed in alignment with requirements of Lead360 standard and Sustainable Recycling Industries (SRI) SOPs. Consulted with stakeholders such as the international lead association (ILA) and an international NGO. Expectations cover the following:

1

Regulatory compliance

- Comply with domestic laws/licensing requirements
- Accommodate regulatory inspections/audits
- Operate within lead emission/exposure limits

2

ULAB collection & transportation

- Prohibit electrolyte draining before delivery
- Use un-certified containers for storage/transport
- Properly label as hazardous material
- Require use of appropriate PPE by collectors/transporters

3

Recycling Operations

- Site plants away from residential areas
- Implement full emission control systems
- Establish safe operating procedures
- Provide appropriate PPE and hygiene facilities
- Lead-in-blood monitoring
- Properly manage all waste streams
- Conduct periodic environmental monitoring

4

Community & Remediation

- Implement community lead-in-blood monitoring
- Remediate contaminated sites

Open engagement and co-operation

We engage openly about our approach and performance, fostering transparency and collaboration with industry peers. This commitment helps us manage risks, drive continuous improvements, and build trust with our stakeholders.

Reporting

Publicly reporting on our **financial statement, material sustainability topics and ambitions** since 2014.



[Annual Report](#)



[Sustainability Report](#)



[Modern Slavery Statement](#)



[Payments to Governments Report](#)



Alignment with international standards

Following internationally recognised **reporting and disclosure frameworks**.



Participating in industry associations and multi-stakeholder initiatives



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