

Trafigura

# Recycled Lead – Trafigura's Approach to minimizing ESG impacts

June 2025



# Connecting vital resources to power and build the world

At the heart of global supply, Trafigura connects vital resources to power and build the world. And we make it our mission to do that responsibly. We listen to society's needs, and we use our deep understanding of the markets we serve to make supply more efficient, secure and sustainable.

Across our global network, we deploy infrastructure, logistics and financing to connect producers and consumers, bringing greater transparency and trust to complex supply chains. And we invest in renewable energy projects and clean technologies to help facilitate the transition to a low carbon future.

As an employee-owned company, our people are empowered and care about addressing the challenges of a rapidly changing world.

Trafigura





## How we create value

We connect counterparties, build capacity and develop physical commodity markets reliably, efficiently and responsibly. We add value to the global trade of natural resources with exceptional service and performance across the supply chain.

Multi-product  
and service  
business



Global network  
and scale



Market and  
operational  
expertise



Responsible



Reliable and  
resilient



Financial  
strength



Employee  
owned



# 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](https://trafigura.com/sustainability)

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



## Nigeria plays a significant role in lead recycling



Nigeria plays a significant role in lead recycling, supplying both domestic and international demand.



In 2024, the Nigerian government introduced new regulations to address the environmental and health hazards associated with improper ULAB recycling.



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



We believe that actively working to improve a situation is a more effective approach than simply withdrawing from a market.



## Our efforts include:



### Conducting Responsible Sourcing Due Diligence Assessments of Suppliers' Facilities

- In Nigeria, via a third party, we have assessed all our suppliers and are working with them to draw up improvement plans. Other African countries will follow.



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

- Contractual terms codifying Minimum Expectations require Improvement Plans to be agreed between supplier and Trafigura
- Independent third party will conduct quarterly site visits to each supplying facility to:
  - Help Suppliers to develop improvement plans
  - Track progress against improvement plans
  - Ensure ongoing compliance with regulation



### Developing capacity of suppliers (including supplier incentives)

- Providing targeted technical assistance, PPE 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.
- Expectations cover: **Regulatory Compliance; ULAB Collection & Transportation; HSE Standard Operating Procedures; and Community & Remediation.**



### Stakeholder Engagement

- In Nigeria, we have presented our programme to NESREA, Nigeria's environmental agency and the ProBaMet project and members of its implementation team; Oeko-Institut, WVMetalle and SRADev Nigeria.
- Industry groups such as the International Lead Association, EUROBAT and Battery Council International; and development agencies such as UNICEF and Clinton Health Access Initiative (CHAI) have also been consulted on our approach.



### 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.

# 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](#)

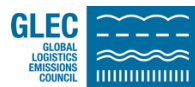


[Payments to Governments Report](#)



## Alignment with international standards

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



## Participating in industry associations and multi-stakeholder initiatives





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## 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