

Supply Chain Due Diligence (Article 52, Regulation (EU) 2023/1542)

Product: Lead-Acid Battery

Manufacturer: {LONG SING TECHNOLOGY GROUP (HONG KONG) LIMITED}

Address: {Room 809, 8 floor, Data Technology Hub, 5 Chun Cheong Street, Tseung Kwan O, Hong Kong}

Brand: {LONGSING ENERGY}

Battery Model: {BT-12M1.2AT}

Unique Battery ID: {{UBI_SN}}

1. Information on policies, procedures and disclosure of results

1.1 Corporate Due Diligence Policy

Our company has formulated a formal mineral supply chain due diligence policy fully aligned with Article 52 of the EU Battery Regulation and OECD Due Diligence Guidance for Responsible Mineral Supply Chains.

The policy applies to all raw materials used in lead-acid batteries, primarily recycled lead, copper, polypropylene, carbon black and sulfuric acid. The policy document is maintained internally and available for inspection by EU market surveillance authorities upon request.

1.2 Internal Implementation Procedures

Supplier qualification audit: All lead raw material suppliers and smelters must submit business licenses, recycling certificates and source traceability documents before cooperation. Unqualified suppliers will be eliminated.

Batch traceability management: Each batch of lead raw materials retains purchase invoices, smelter delivery certificates and weight records, forming complete traceability links from smelter to finished lead-acid batteries.

Regular annual supplier review: Conduct annual on-site or documentary audits of key lead smelters to verify legal raw material sources.

Risk assessment mechanism: Carry out supply chain risk screening every six months to identify risks of illegal mining, conflict minerals and unregulated waste lead.

1.3 Disclosure of due diligence results

No conflict minerals (cobalt, tantalum, tin, tungsten / 3TG) are contained in our lead-acid batteries.

All lead feedstock is post-consumer recycled lead from formal domestic certified secondary lead smelters, without virgin lead from unregulated mines.

Full due diligence records including supplier audit reports, raw material batch certificates and risk assessment files are stored at the manufacturing plant for at least 5 years as required by EU rules.

When requested by EU competent authorities, we will fully disclose all due diligence supporting documents without delay.

2. EMRT of the supplied batteries

EMRT = Extended Mineral Responsibility Traceability

2.1 Scope of EMRT Applicable Minerals

Per EU battery regulation, only copper among raw materials of this lead-acid battery falls under EMRT mandatory traceability scope. Lead from recycling streams is exempted from full EMRT reporting requirements for finished lead-acid storage batteries.

2.2 Traceability statement for copper

Copper used for battery terminals and busbars is sourced from certified legal metal refineries with complete smelter registration information. All copper purchase certificates, delivery orders and batch traceability records are archived on site. We can provide refinery audit data and mineral source trace files during official inspections.

2.3 Exemption statement for other raw materials

Recycled lead: Derived 100% from waste battery recycling channels, formal secondary smelters, no virgin mineral exploitation involved, exempt from full EMRT submission.
Polypropylene, sulfuric acid, carbon black: Non-mineral raw materials, outside EMRT regulatory scope.

No cobalt, lithium, nickel, 3TG conflict minerals used in production, no related EMRT documentation required.

2.4 EMRT Document Storage Rule

All EMRT supporting documents (supplier certificates, metal batch trace files, smelter compliance declarations) are retained at the manufacturer's premises for a minimum retention period of 5 years, available for inspection by EU market surveillance authorities at any time.