

**EU Battery Regulation
Due Diligence Policy**

I. Introduction

Doosan Bobcat* is committed to ensuring that all batteries placed on the EU market are sustainable, efficient, and safe throughout their lifecycle. This policy outlines the due diligence processes and procedures that Doosan Bobcat has implemented as part of business best practices that demonstrate compliance with the EU Battery Regulation (EU) 2023/1542. This policy is aligned with Doosan Bobcat's Supplier Code of Conduct and other relevant guidelines available on the *Doosan Bobcat Global Procurement website*. Additionally, it incorporates the principles from the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the OECD Handbook on Environmental Due Diligence in Mineral Supply Chains.

* Where stating Doosan Bobcat, the reference is made to any company controlled by Doosan Bobcat incorporated located in the Republic of Korea, 155 Jeongjail-ro, Bundang-gu, Seongnam-si, Gyeonggi-do, register number 062667.

II. Scope

This policy applies to all batteries and battery materials sourced, manufactured or imported by Doosan Bobcat for placement on the EU market. It covers the entire battery supply chain, from raw material extraction to recycling. The policy is available on [Doosan Bobcat Global Procurement website](#) and follows the OECD's recommendations for responsible business conduct and environmental due diligence.

III. Due Diligence Principles

Doosan Bobcat's due diligence process is based on internationally recognized principles, including the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance for Responsible Supply Chains. These principles are also reflected in our Supplier Code of Conduct, which promotes responsible and ethical behavior throughout the supply chain and echoes the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct on human rights, labor rights, environment, bribery, consumer interests, and more.

IV. Chain of Custody and Transparency

Doosan Bobcat has established and operates a system of controls and transparency regarding the battery supply chain. This includes:

- Identifying upstream actors in the supply chain.
- Establishing a chain of custody or traceability system.
- Requiring suppliers to declare information about the battery material supply chain, including the country of origin, smelters, and refiners.
- Providing material disclosures to satisfy reporting requirements of global material regulations such as EU REACH, EPA TSCA, and others.

Doosan Bobcat has partnered with 3rd party service providers to actively collect product material, ESG, and sustainability-related information to ensure transparency of the materials and business practices used in products and services provided to Doosan Bobcat.

These measures are consistent with the requirements outlined in our Product Material Compliance engineering standard and the OECD Handbook on Environmental Due Diligence in Mineral Supply Chains.

V. Risk Assessment and Mitigation

Doosan Bobcat, in cooperation with its 3rd party service providers, conducts risk assessments to identify and evaluate risks related to human rights, labor rights, and environmental impacts in the battery supply chain. Risk management plans are developed to prevent, reduce, or redress adverse impacts. This process aligns with the risk management practices detailed in our Supplier Quality Manual and OECD Guidelines.

VI. Grievance Mechanism

Doosan Bobcat has implemented grievance mechanisms to allow stakeholders, including personnel and communities, to report abuses or adverse impacts through means including its public-facing Whistle Blowing Center. This also involves engaging with civil society organizations, local governments, and affected communities. Our grievance mechanisms are designed to be in line with the principles outlined in our Supplier Code of Conduct and the OECD Guidelines.

VII. Annual Reports and Independent Audits

Doosan Bobcat performs annual reviews of its due diligence methods and reports the findings. Where required by law, independent third-party audits are conducted to verify the effectiveness of the due diligence processes and ensure compliance with Global Laws and Regulations, including the EU Battery Regulation. These audits are conducted in accordance with the standards set forth in our Supplier Quality Manual and the OECD Guidelines.

VIII. Supplier Requirements

Doosan Bobcat requires its battery material suppliers to adhere to the due diligence principles outlined in this policy. Suppliers must:

- Comply with the EU Battery Regulation and other applicable laws.
- Provide information about the battery material supply chain.
- Participate in risk assessments and mitigation efforts.
- Undergo independent audits as required.

IX. Continuous Improvement

Doosan Bobcat is committed to continuously improving its due diligence processes. Feedback from stakeholders and audit findings are used to enhance the effectiveness of the policy and ensure ongoing compliance with global laws and regulations, including the EU Battery Regulation.

X. Communication and Training

Doosan Bobcat communicates this policy to all relevant stakeholders, including suppliers, employees, and business partners. Training programs are implemented to ensure understanding and compliance with this policy. These training programs are designed in accordance with the guidelines provided in our Supplier Code of Conduct and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Disclaimer

Doosan Bobcat may modify or terminate this Policy at any time.

