

Product safety



Battery Due Diligence Policy

Policy Purpose

The regulation (EU) 2023/1542 (hereafter referred to as 'the regulation') was published in the official journal on 18th August 2024. The regulation enhances the requirements of several directives, to create a legal basis for placing batteries on the EU market. The regulation introduces further obligations for economic operators, particularly with respect to procurement. This policy is designed to ensure Renishaw meet our obligations under the regulation.

Accountable Functions

The functions that:

- approve the interpretation of, and definitions of Renishaw's business operations under the regulation.
- are responsible for the disciplines which need to undertake actions to demonstrate the fulfilment of Renishaw's obligations under the regulation
 - procurement,
 - product safety
 - manufacturing services quality

Renishaw importing entities and sustainability

Applicability to the Renishaw Group

The regulation applies to any economic operator, including Renishaw Plc, which:

- is responsible for placing batteries on the EU market including manufacturers, importers and distributors.
- has, or is part of a group which has, an annual turnover exceeding 40 million Euro.

Responsible Individuals

All employees who are involved in:

- creating and managing
 - performing and undertaking
 - monitoring and verifying
- the processes that enable Renishaw to meet its obligations under the regulation.

Any employees can raise concerns of non-compliance with the regulation by contacting product.safety@renishaw.com.

Policy statement

Renishaw shall ensure the following principles are integrated into our operations and processes to ensure compliance with the battery regulation as an economic operator involved in supply and importation of batteries into the European Union.

1. Due Diligence – Supply Chain Risk Management: Procurement Operations

1.1. Indicate Renishaw's expectation for batteries to be supplied in compliance with the regulations when initiating purchase orders.

The following processes will be put in place before the implementation date of the respective requirements under the Regulation.

1.2. Collaboration with first tier suppliers, through a procurement campaign, to ensure Renishaw's expectations are clear and risks are managed successfully.

1.3. Integration of the requirements of the battery regulation into the procurement terms and conditions.

1.4. Development of a risk assessment and management strategy encompassing the following:

1.4.1. Management system to control and maintain transparency and traceability in the supply chain.

1.4.2. Annual reporting on the management and risk mitigation activities in the supply chain to senior management.

1.4.3. Mitigation of the risk of procuring batteries that contain cobalt, lithium, graphite and nickel from conflict affected and high-risk areas.

1.4.4. Mitigation of the social, welfare and environmental impact and risks associated with raw material extraction and refining operations of batteries procured by Renishaw.

2. Evidence of Product Compliance: Product Safety

- 2.1. Review and retention of evidence of conformity of purchased batteries utilised in the product development process with the requirements of the regulations.
- 2.2. Ensure our expectation that supplied batteries shall comply with the regulation is communicated on the purchase order.
- 2.3. Ensure end users have instructions for the replacement of batteries in products and for environmentally responsible recycling of waste batteries.

3. Evidence of Product Verification: MSD Quality

- 3.1. Verification of the conformity of supplied batteries to all Renishaw sites with the regulation.
- 3.2. Managing active stock of batteries installed in products.
- 3.3. Progress corrective actions for the resolution of non-conformities arising during the verification process or from other quality concerns through the use of audited processes.

4. Provision of End User Information: Entities Importing into the EU

- 4.1. Provision of importer contact details on the Renishaw product packaging which accompanies the battery to the end user.
- 4.2. Communicating feedback from end users, concerning the compliance or safety of batteries, to Renishaw Plc.

5. Fulfilment of Producer Obligations: Sustainability

- 5.1. Maintenance of a process for registration of Renishaw Plc or European Renishaw entities with the competent authority in each EU state and record of registration numbers.
- 5.2. Managing Renishaw's extended producer obligations for the collection and recycling of batteries placed on the EU market in collaboration with Producer Responsibility Organisations.
- 5.3. Confirmation that Producer Responsibility Organisations are meeting our obligations for registering (where appropriate), reporting and environmentally responsible recycling on an annual basis.

6. Verification of Regulatory Compliance: Product Safety

- 6.1. Monitor developments in the regulation and ensure the framework of this policy continues to allow Renishaw to operate in compliance with the regulation.

The following processes will be put in place before the implementation date of the respective requirements under the Regulation.

- 6.2. Arrange third party auditing of this policy.
- 6.3. Coordinate the risk management concerns, risk mitigation activities and produce a summary of the third-party verification report on an annual basis for management review.

7. Effectiveness of Compliance with Regulation (EU) 2023/1542: Group Quality

Auditing of the processes and procedures created by each discipline to demonstrate compliance with this policy, as requested by Product Safety, highlighting non-conformities and opportunities for improvement.

Issue	Change description	Effective	Author	Reviewers	Owner
01	First issue	12-08-2025	Alan Walsh	Ian Jennings; Jamie Britton; Jim Long	David Wallace

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