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We recommend the following key initiatives to help BTSC begin prioritizing its ESG issues. If BTSC is interested in addressing ESG issues it must go through the process in a thoughtful way.

1. Appoint a Chief Sustainability Officer ("CSO"). The CSO should be a person of authority within the company and have the necessary resources (including time) available to implement an effective ESG program. The CSO should establish a mechanism for employees and third parties to report ESG concerns, including a mechanism that allows reporting concerns anonymously. The CSO should develop and rollout training on ESG issues to the company's employees. Upon appointment of the CSO, the company can disclose the appointment and that the company is working to assess and improve its ESG performance. After completing the ESG analysis, the CSO should prepare and make available on the company's website an annual sustainability report which address the material ESG issues, and the company's improvement on relevant metrics.

2. Materiality Assessment and Adopt ESG policies.

The Company should then do the work to improve its ESG performance on all levels, including environmental. First, the company should determine the relevant stakeholders related to ESG issues, including suppliers, customers, employees and investors. Next, the company can determine those areas of the business that have material ESG issues, for example supply chain and disposal of hazardous waste. Then the company can assess the its current performance on those material ESG issues and set goals for improvement. This should include a business plan to achieve those goals.

Through this process, the company should adopt ESG policies. Those policies should include, for example, a Supplier Code of Conduct that informs suppliers of the company's minimum requirements regarding ESG matters. The Supplier Code of Conduct should address environmental matters, worker health and safety, and human rights among other issues. The company should consider including a requirement to comply with its Supplier Code of Conduct in its template supply agreements. The company should conduct due diligence on its suppliers to confirm they are adhering to the Supplier Code of Conduct. The company should evaluate whether it is covered by the California Transparency in Supply Chains Act (SB 657 Home Page I State of California - Department of Justice - Office of the Attorney General), e.g., and if so, prepare and post on its website a statement regarding its efforts to identify and mitigate the risk of human rights violations in its supply chain.

As the company improves on its performance it should report on that improvement.

3. Practice. The company should evaluate its environmental footprint from a lifecycle perspective including impacts associated with production of its products and with the distribution and use of its products. The company should identify specific targets to minimize the environmental impacts associated with its business, including its waste batteries. For example, the company should consider joining a waste battery recycling scheme, e.g. Collection Partner I Call2Recycle I United States. The company should be aware that some states have waste battery handling requirements and federal law imposes special handling requirements on certain types of batteries. The company should consider whether other materials, such as product packaging may also be recycled and ways to minimize the carbon emissions from the distribution of its products. The company should regularly assess its performance on achieving its environmental targets and implement measures to improve its program based on these assessments.

Submitted by:
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