



MODERN SLAVERY STATEMENT

for financial year ending September 30, 2022

Introduction

At Energizer we do the right thing to deliver results. To do this, we lean into our culture as an organization – we win together, while serving each other, with a willingness to act boldly, all while doing right.

We believe that how we do business is just as important as the business we do – no result is ever worth compromising our integrity. We are committed to living our values and expect our suppliers and partners to practice the similar values and standards of conduct that we ask of our own organization.

We strive to manufacture our products responsibly while upholding our values and abiding by the laws of the countries in which we operate. We are committed to taking reasonably practicable steps to ensure that slavery and human trafficking are not present either in our business nor in our supply chains.

“Promoting human rights, labor rights and health and safety are fundamental to the way we operate.”

This statement is prepared in accordance with the California Transparency in Supply Chains Act, the Australia Modern Slavery Act 2018, and the UK Modern Slavery Act 2015 and covers all Energizer companies. The specific Australian and United Kingdom Energizer companies covered by this statement for the fiscal year ending September 30, 2022 are listed on page 2.

All Energizer companies are required to comply with applicable global Energizer policies, so we make references to actions taken to assess and address modern slavery risks in our operations and supply chains at a global level in this statement. It also describes certain actions we are taking or have taken under our broader Environmental, Social and Governance (“ESG”) strategy.

Australian and UK Reporting Entities

This statement is jointly made by the following entities in Australia and the UK under the Energizer group of companies:

- **Australian Reporting Entity:** Energizer Australia Pty. Ltd. (ACN 003 539 026) and its subsidiary, Energizer Auto Australia Pty Ltd. (146 911 104); and
- **United Kingdom Reporting Entities:** Energizer Trading Limited (CRN 02078560); Custom Accessories, Europe, Limited (CRN 02642811); Energizer Auto UK Limited (CRN 02362589); Energizer Auto UK Parent Limited (CRN 07403263); Energizer Brands UK Limited (CRN 10306582); Energizer Group Limited (CRN 03937798); Energizer UK Limited (CRN 09584890); Ever Ready Limited (CRN 02014108); and Berec Overseas Investments Limited (CRN 01352433).

These Australian and United Kingdom Reporting Entities are wholly owned subsidiaries of Energizer International Group B.V., which is ultimately owned by Energizer Holdings Inc.

Throughout this statement, we refer to these entities in our corporate group collectively as “**Energizer**”, “**we**”, or “**our**”, unless otherwise stated.

About Energizer

Headquartered in St. Louis, Missouri, USA, Energizer Holdings Inc. is a public company that trades on the New York Stock Exchange under the symbol “ENR”. Energizer, through its operating subsidiaries, is one of the world’s largest manufacturers and distributors of primary batteries, portable lights, and auto care appearance, performance, refrigerant and fragrance products. We have operations in more than 40 locations and distribution in more than 140 countries.

We have approximately 6,000 employees located across 38 countries, including approximately 2,400 employees based in North America, 1,900 employees in Asia Pacific, 900 employees in Europe, the Middle East and Africa, and 800 employees in Latin America.

“Energizer is the beneficiary of over 100 years of expertise in the battery and portable lighting products industries.”

Our portfolio of globally recognized brands includes Energizer®, Eveready®, Armor All®, Rayovac®, STP®, Varta®, A/C Pro®, Refresh Your Car!®, California Scents®, Driven®, Bahama & Co.®, Lexol®, Eagle One®, Nu Finish®, Scratch Doctor® and Tuff Stuff®. As a global branded consumer products company, Energizer’s mission is to be the leader in our categories by better serving consumers and customers.

Additional information about our company, business and organizational structure can be found in our [2022 Annual Report](#) and [2022 Sustainability Report](#).

Our Standards

Our Energizer Code of Conduct, Supplier Code of Conduct, and our policies set forth our guiding principles, establish our expectations regarding human rights, and guide our efforts to manufacture responsibly. Our Code of Conduct, Supplier Code of Conduct, and policies can be found here:

[Energizer Code of Conduct](#)

[Energizer Supplier Code of Conduct](#)

[Energizer Holdings Policies](#)

Our Risks

Energizer's modern slavery risks primarily are in the external supply chain. There are large groups of vulnerable, lower-skilled labor available to some Energizer suppliers, from the miners of battery raw materials to manufacturers of components.

Our Actions

Energizer's ESG strategy is guided by our corporate purpose to responsibly create products that make people's lives easier and more enjoyable. We recognize that our business and operations can have an impact on our colleagues, partners, and local communities in which we operate.

Our long-standing commitments to promote human rights, labor rights, and health and safety are set forth in our [Corporate Social Policy](#) and part of our broader ESG strategy. Compliance with our Corporate Social Policy is overseen by the Board of Directors and is a crucial part of our governance structure.

Energizer is taking the following actions to continue promoting ethical business practices and policies to protect workers from being abused and exploited:

- Assessing strategic suppliers during the sourcing process, which includes a risk assessment evaluating legal, quality, reputational, operational, and financial risks.
- Requiring our suppliers to complete and sign a self-assessment / certification at the time of registration to clearly communicate our expectations to our suppliers. We reserve the right to terminate our relationship with a supplier if issues of noncompliance with our policies are discovered and/or noncompliance is not addressed in a timely manner.

- Confirming any key suppliers' compliance with standards for human trafficking and forced labor through one or more of the following measures: (i) a supplier's declaration of compliance; (ii) an inspection by Energizer personnel; or (iii) an independent third-party audit.
- Requiring our own manufacturing facilities and our third-party manufacturers to commit to the following as detailed in our Supplier Code of Conduct:
 1. Workers employed based on their ability. Discrimination is not tolerated.
 2. Forced labor of any kind shall not be used.
 3. Workers must meet applicable age requirements. Child labor shall not be employed.
 4. Working hours are in compliance with applicable laws.
 5. Wages & benefits are in compliance with applicable laws.
 6. Freedom of association is respected.
 7. Safe and healthy work environment is provided.
 8. No physical or psychological coercion is allowed.
- Performing compliance screens on suppliers against watchlists, international sanctions, and denied parties databases.
- Conducting enhanced due diligence on suppliers presenting relatively higher modern slavery risk, including conflict minerals.
- Employing auditing organizations, such as Intertek and SGS, to assess compliance in certain aspects of our operations and those of our suppliers.
- Conducting trainings on modern slavery risk, increasing the number of people trained on anti-modern slavery principles.
- Offering the Energizer HelpLine which allows Energizer colleagues and external partners to ask questions or raise concerns via phone or web. Users of the Energizer HelpLine can also seek guidance about how to deal with potential violations and concerns. Managed by an independent third party, reporters can choose to provide their contact information or remain anonymous. Energizer does not tolerate retaliation against anyone who raises a good faith concern or who participates in the review of a concern.

Our Commitment

We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking are not present either in our business nor in our supply chains. We are committed to working closely with our suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

We will continue to identify which of our business locations and functions are most likely to interact with higher risk entities. Doing so will help us to guide our review of relevant policies, procedures, and training to ensure we are working effectively to address any identified instances of slavery and human trafficking.

“Energizer seeks to maintain an atmosphere of open discussion, so that problems can be identified and quickly addressed.”

Consultation

In the process of developing this statement we consulted the relevant companies we own or control and our cross-functional team that collaborate to deliver our broader ESG strategy.

Approval

The Global Ethics & Compliance team has approved this statement on behalf of all Energizer companies. The Board of Directors of Energizer International Group B.V. has further approved this statement on behalf of the Australian and United Kingdom Reporting Entities listed on page 2.

/s/ Aaron Kann
Head of Global Ethics & Compliance
Energizer Holdings, Inc.
29 March 2023

This statement was approved by the Board of Directors of Energizer International Group B.V. by way of resolution on 29 March 2023.

/s/ Kathryn Dugan
Director A