



# Corporate Social Policy

Global Policy  
Effective Date: March 9, 2022  
Last Revision: October 3, 2024

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## Section 1: Policy Background

At Energizer, serving each other and doing right are at the core of our corporate culture. We recognize that our business and operations can have an impact on our colleagues, partners, and local communities in which we operate. Therefore, promoting human rights, labor rights and health and safety are fundamental to the way we operate.

This Social Policy (the "Policy") applies to all directors, officers, colleagues, contractors, sub-contractors, and consultants of Energizer Holdings, Inc or its subsidiaries, divisions, affiliates, or agents (collectively referred to herein as "Energizer") across all geographic locations. All suppliers, partners and third parties that produce goods for, or provide goods or services, to or on behalf of Energizer are expected to comply with the principles set forth in this Policy in addition to the [Energizer Supplier Code of Conduct](#).

This Policy should be read in conjunction with the comprehensive social issue-specific Energizer policies available on the company website at [www.energizerholdings.com/company/policies](http://www.energizerholdings.com/company/policies) and [investors.energizerholdings.com/corporate-governance](http://investors.energizerholdings.com/corporate-governance):

### Supply Chain

- [Energizer Supplier Code of Conduct](#)
- [Purchase Order Terms and Conditions](#)
- [Energizer Conflict Minerals Sourcing](#)
- [California Transparency in Supply Chain Act](#)
- [Supplier Travel](#)

### Human Resources

- [Equal Employment Opportunities One-Pager](#)
- [Equal Opportunity Policy Statement](#)
- [Pay Transparency Nondiscrimination Provision](#)
- [Gender Equality Statement for France](#)
- [2022 EEO-1 Report](#)
- [2021 EEO-1 Report](#)
- [2020 EEO-1 Report](#)

### Governance Documents

- [Corporate Governance Principles](#)
- [Code of Conduct](#)



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## Section 2: Policy Owner and Statement of Responsibility

This policy is owned by the Head of Sustainability. It is the responsibility of this individual and or members of the ESG Team to implement, review annually, and revise this policy as needed in consultation with internal and external stakeholders.

Name	Title	Phone	Email
Lauren Bruning	U.S. HRBP Leader and Head of ESG		Lauren.Bruning@Energizer.com

## Section 3: General Principles

Energizer is committed to promoting human and labor rights and ensuring the health, safety and wellbeing of workers throughout its global supply chain in accordance with the principles expressed in 1) the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles for Business and Human Rights (UNGP), 2) the European Human Rights Convention, 3) the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, 4) the International Covenant on Economic, Social and Cultural Rights, 5) the International Covenant on Civil and Political Rights, and 5) the International Labor Organizations' Declaration on Fundamental Principles and Rights at Work. We strive to comply with all applicable laws, rules and regulations (“Laws”) in every location where we operate. Any entity working for or doing business with Energizer must comply with the Policy and all applicable laws as well.

## Section 4: Respect for Human Rights

For the purposes of this Policy, Human Rights is defined as the internationally recognized fundamental rights that all human beings possess regardless of nationality, place of residence, gender, gender identity or expression, national or ethnic origin, race, color, religion, veteran status, age, language, sexual orientation, physical or mental disability, or any other characteristic.

We have established certain standards as described in our [Code of Conduct](#) that are designed to protect human rights and also expect our suppliers and business partners to follow these standards.

Namely, Energizer is committed to upholding the following core human rights:

### 1. Child Labor

Energizer prohibits the use of child labor in its own operations and its value chain. The company employs only workers who meet the applicable minimum legal age



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requirement or are at least 16 years of age and requires suppliers and other third parties to meet the same standard.

## 2. Forced Labor

The use of prison, indentured, involuntary or forced labor of any kind, is strictly prohibited. This same prohibition applies to third parties, as reflected in our [Supplier Code of Conduct](#). Further information on how Energizer addresses the risk of human trafficking and modern slavery in its supply chain in compliance with the California Transparency in Supply Chains Act and UK Modern Slavery Act can be found in our Modern Slavery Statement linked [here](#).

## 3. Minority rights

Energizer pays particular attention to the protection of minority groups, including women's rights, by identifying, preventing, mitigating, and remedying the special risks they face in the communities where the company is present.

Energizer also recognizes the value of economic inclusion in identifying and selecting suppliers.

## 4. Right to Water

Energizer acknowledges that the right to sufficient, safe, accessible and affordable water is sacrosanct, and is committed to responsibly and efficiently use water resources and provide access to water to colleagues.

## 5. Community Engagement

We support and strive to have a positive impact on the communities where we operate.

## 6. Security

We provide for the security of our colleagues in the workplace by implementing measures such as badging systems and fire safety measures in the countries where we operate.

## 7. Conflict Minerals and Cobalt

Energizer acknowledges the risk that the following products manufactured and distributed by the company may contain conflict minerals and cobalt as defined by Section 1502 of the Dodd Frank Wall Street Reform and Consumer Protection Act: round cell alkaline batteries, round cell carbon zinc batteries, lighting, and chargers. To address this risk, Energizer, across all its regions and subsidiaries, supports the industry-wide goal of identifying, reducing and hopefully eliminating the use of 3TG conflict minerals and cobalt originating from the DRC and surrounding countries to the extent believed to be financing or benefiting groups committing human rights violations. As part of this commitment, Energizer works with suppliers to educate them on conflict minerals and conducts due diligence annually and publicly reports on its use of the



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3TGs. Further details on Energizer's commitments and actions undertaken can be found in the company [Conflict Minerals Sourcing Policy](#) and [Supplier Code of Conduct](#).

## Section 5: Labor Rights

### 1. Diversity, Inclusion and Belonging

Energizer values the diversity of our colleagues as established in our [Affirmative Action and Equal Opportunity Policy](#). To promote a diverse, inclusive, and equitable workplace, Energizer conducts its recruitment, hiring, compensation, advancement, and training without regard to race, religion, color, national origin, sexual orientation, sex, veteran's status, age, gender identity, disability, familial status, pregnancy, or any other trait protected by law in the US or other jurisdictions where we have operations.

### 2. Respectful Workplace

Every colleague should be treated with respect and treat others with respect. Energizer is committed to providing an environment free of harassment, bullying, discrimination, and violence. Insensitive comments, actions, gestures, jokes or symbols, as well as displaying derogatory, obscene and demeaning messages will not be tolerated. Energizer does not tolerate harassment of any kind, including sexual harassment. Violent physical contact or threats of violence are never permitted.

Energizer's policy is to make reasonable accommodations for known physical and mental limitations of qualified individuals with disabilities if those accommodations are needed to perform their jobs. Colleagues who take an approved leave of absence will not be retaliated against in any way. No colleague may be discriminated against for exercising or receiving their rights under their benefit plans.

More details are included in the Energizer [Code of Conduct](#).

### 3. Wages and Benefits

Energizer supports its workers' material well-being. Energizer and its Partners shall set wages and overtime, and provide benefits, in compliance with all applicable laws and industry standards. Workers shall be paid at least the minimum legal wage, a wage that meets local industry standards, or a living wage according to local living standards, whichever is greater.

### 4. Working Hours and Time Off

Energizer provides working hours and paid time off for its colleagues in accordance with the applicable laws and regulations and strives to offer flexible working hours and remote or hybrid working arrangements wherever possible to accommodate the needs of all colleagues.



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## 5. Migrant Labor

Energizer respects the human rights and dignity of domestic and international migrant workers and seeks to treat and compensate them fairly, without discrimination. We are committed to a zero-cost recruitment policy. Migrant workers will not be charged any recruitment fees or related costs for their employment. The Company will cover all recruitment-related expenses, whether incurred in the origin or receiving country. No monetary or non-monetary deposits will be collected from migrant workers during the hiring process. The company also expects its suppliers and partners to uphold the same standards.

## Section 6: Occupational Health, Safety and Wellbeing

It is our policy that every effort will be used to protect our colleagues from accidents, injuries and/or occupational disease while on the job. We expect all colleagues to accept the concern and the responsibility for accident prevention. Full cooperation with our safety program makes our workplace safer, healthier, and injury-free.

### 1. Safe and Healthy Workplace

Energizer is committed to prioritizing the health and safety of its workers across all facilities and operations and strictly adheres to OSHA standards or the applicable standards of the country in which any of Energizer's facilities are located. You can find our Health and Safety Policy [here](#).

### 2. Wellbeing

Energizer strives to promote the wellbeing of colleagues by regular engagement and action incorporating colleague feedback. The company guarantees the provision of resources for the mental, physical, social and financial wellbeing of colleagues.

## Section 7: Training

New Energizer colleagues receive training on the company's Code of Conduct, in which Energizer's support for upholding human rights is enshrined in the language of the country where they are based. In addition, new colleagues receive training on safety, and non-discrimination, and supporting policies, as well as periodic refreshers, and a copy of the location-specific Colleague Handbook, wherever available.



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## Section 8: Oversight and Monitoring

While the Head of Sustainability is responsible for the day-to-day application of the policy and its periodic revisions and updates, the Board through its Human Capital Committee is responsible overseeing the Policy’s implementation in all aspects of Energizer’s work.

Energizer recognizes that ensuring compliance in our facilities and the entire supply chain requires vigilance and careful monitoring. Energizer has a formal Supply Chain Risk Management system, according to which all suppliers and contractors doing business with Energizer must agree to our Supplier Code of Conduct. Suppliers and contractors are subject to periodic audits to ensure continued compliance with our Supplier Code of Conduct.

### Grievances

Energizer expects colleagues to report all misconduct and/or failures to comply with the Policy and offers a number of ways to do so if a colleague is not comfortable speaking directly with their manager:

- The Energizer Helpline available 24/7 at [www.energizerhelpline.com](http://www.energizerhelpline.com) or via a local phone number
- The Head of Ethics & Compliance at [energizercompliance@energizer.com](mailto:energizercompliance@energizer.com)
- The Legal Department
- Each Colleague’s HR Business Partner

Energizer takes all reports and questions of potential misconduct seriously and commits to handling concerns promptly, fairly and as confidentially as possible, which includes a thorough investigation. Any violations of the Policy will be subject to disciplinary action up to and including termination of employment, contract, or supplier contract.

Energizer does not tolerate retaliation against anyone who, in good faith, raises a concern or participates in an investigation. All colleagues, including managers, who retaliate against someone because they raised a complaint or participated in an investigation, will face disciplinary action.

## Section 9: Revision History

Revision Number	Effective Date	Owner	Description of Change
	03/9/2022	Lauren Bruning	Initial Document
Revision 1	12/10/2023	Lauren Bruning	General Updates
Revision 2	10/3/2024	Lauren Bruning	Updates to migrant labor