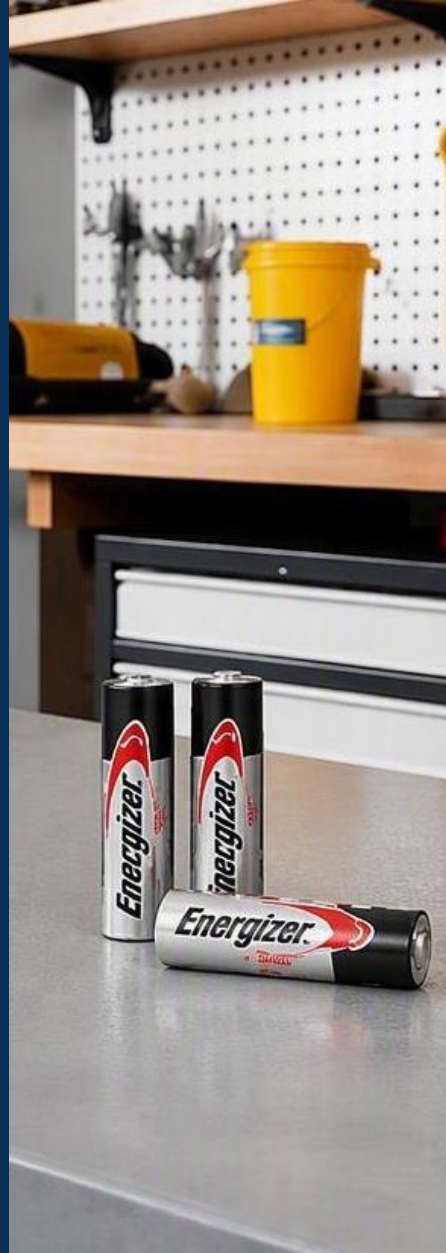




SUPPLIER CODE OF CONDUCT

Standards for our suppliers and business partners

SEPTEMBER 2026



BATTERIES



LIGHTS



AUTO CARE

LETTER FROM OUR EVP, SUPPLY CHAIN & OPERATIONS



Winning together starts with doing right.

Every day, in every partnership.

Dear Suppliers and Business Partners,

At Energizer Holdings, our culture is grounded in winning together, all while doing right. That means how we conduct business is just as important as the products we make and the results we achieve.

Our suppliers and business partners are essential to that commitment. Through our collaboration, we bring products to consumers around the world that make lives easier and more enjoyable and share a responsibility to do business ethically, safely, and in compliance with applicable laws.

This Supplier Code of Conduct outlines Energizer's expectations for suppliers and business partners. It reflects the standards we believe are necessary to support responsible business practices and strong, trusted relationships.

We ask for your commitment to these expectations and to working with us in a spirit of trust, transparency, accountability, and continuous improvement. Together, we can strengthen our supply chain, address challenges responsibly, and create long-term value for our customers, consumers, colleagues, shareholders, and the communities we serve.

Thank you for your partnership and for helping us uphold these commitments every day.

Sincerely,

Tom Bendl

Executive Vice President, Supply Chain & Operations



OVERVIEW

Purpose, scope, and how to use this Code

Energizer works with suppliers and other business partners around the world to bring trusted products to consumers. How that work gets done matters.

This Supplier Code of Conduct (“Code”) describes the standards Energizer expects suppliers and other business partners to meet. It applies to those that directly or indirectly provide, source, produce, distribute, market, sell, or otherwise support goods or services to, for, or on behalf of Energizer, including goods or services provided under license from or under a trademark of Energizer. Covered suppliers and business partners include contractors, consultants, agents, distributors, labor providers, freight forwarders, customs or import brokers, resellers, and other third parties, collectively referred to in this Code as “Suppliers.”

This Code establishes minimum expectations for doing business with Energizer. Suppliers must comply with applicable laws and regulations, as well as the requirements set forth in this Code. Where applicable law, contractual requirements, or this Code impose different standards, Suppliers must meet the more stringent standard to the extent permitted by applicable law.

We recognize that many Suppliers have their own codes of conduct, policies, procedures, management systems, and compliance programs. This Code is intended to complement, not replace, those efforts. Energizer does not expect Suppliers to adopt Energizer’s internal policies or use identical processes. Suppliers may use their own programs to support compliance with this Code, provided those programs are effective, appropriately documented, and achieve outcomes consistent with this Code’s requirements.

Suppliers must communicate standards consistent with this Code to the subcontractors, labor providers, recruiters, agents, lower-tier suppliers, and other business partners they use to support work for Energizer. Suppliers must use reasonable, risk-based measures to select, oversee, and promote compliance by those parties, and must address known or reasonably suspected noncompliance.

Our expectations are informed by internationally recognized principles and standards, including the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization's Core Conventions and Declaration on Fundamental Principles and Rights at Work, and applicable responsible-business conduct and supply chain due diligence standards. These principles are widely reflected in responsible sourcing standards used by companies across industries, and we encourage Suppliers to reflect them in their own policies, programs, and operations.

FIVE PILLARS

The Code is organized around five pillars of responsible business conduct:



Ethical Business Practices



People and Human Rights



Health and Safety



Environmental and Product Stewardship



Supply Chain Accountability

PILLAR 1



ETHICAL BUSINESS PRACTICES

Integrity, trade compliance, and conflicts of interest

Suppliers are expected to conduct business honestly, transparently, and in a manner that protects trust in Energizer, its products, and its business relationships.

Anti-Corruption and Bribery

Energizer is committed to conducting business with integrity. In connection with Energizer business or when acting for or on behalf of Energizer, Suppliers must not directly or indirectly offer, promise, authorize, give, request, solicit, accept, or receive bribes, kickbacks, facilitation payments, or anything of value intended to improperly influence a decision, obtain or retain business, secure an improper advantage, or reward improper performance.

This requirement applies to dealings with government officials, political parties or candidates, private companies, Energizer colleagues, and other third parties. Suppliers must comply with applicable anti-corruption laws and maintain risk-based policies, internal controls, training, and records appropriate to the nature and risk of their business.

Suppliers must conduct risk-based due diligence and oversight of third parties used for Energizer business. Payment practices must be transparent, commercially reasonable, accurately documented, and commensurate with legitimate services provided.

International Trade Compliance

Suppliers must comply with applicable trade laws, including import, export, sanctions, anti-boycott requirements, and supply chain security requirements. Suppliers must provide accurate, complete, and timely declarations and supporting documentation regarding the classification, valuation, country of origin, preferential origin, marking, tariff treatment, licensing status, end use, end user, and nature of goods, services, software, or technology, as applicable.

Suppliers must not misrepresent this information or take any action intended to evade trade restrictions, sanctions, or other legal requirements by using third parties, alternate shipping routes, or other arrangements. Suppliers must maintain adequate screening, escalation, and recordkeeping measures appropriate to the trade-compliance risks of their Energizer-related activities.

Gifts, Hospitality, and Conflicts of Interest

Suppliers must not offer or provide gifts, hospitality, travel, entertainment, employment opportunities, charitable contributions, sponsorships, discounts, personal benefits, or anything else of value that could improperly influence decisions involving Energizer or appear to influence an Energizer colleague's independent judgment.

Suppliers must promptly disclose to Energizer any actual or potential conflict of interest, including any situation that could appear to create a conflict, involving personal, financial, family, ownership, employment, or business interests that could affect, or reasonably appear to affect, the Supplier's relationship with Energizer. Suppliers must not use confidential information or an Energizer relationship for personal gain or an improper advantage.



ETHICAL BUSINESS PRACTICES

Fair competition, records, and responsible sourcing

Fair Competition

Suppliers must comply with applicable competition and antitrust laws and compete fairly and honestly. Suppliers must not engage in price fixing, bid rigging, market or customer allocation, improper sharing of competitively sensitive information, collusion, or other conduct that improperly restricts fair competition.

Suppliers must use particular care when interacting with competitors, trade associations, customers, distributors, or other third parties that may possess or receive competitively sensitive information. Any information shared with Energizer or obtained in connection with Energizer business must be obtained, used, protected, and disclosed lawfully.

Accurate Records and Information

Suppliers must maintain complete, accurate, timely, and sufficiently detailed books, records, and accounts relating to business involving Energizer. Suppliers must not create, approve, submit, or omit required information from any record, invoice, expense report, payment request, certification, declaration, time record, payroll record, or other business document that is false, misleading, inaccurate, or incomplete, or intended to conceal the true nature of a transaction.

Suppliers must maintain records for the period required by applicable law and applicable agreements and must preserve relevant records when reasonably requested by Energizer or when litigation, an investigation, an audit, or a regulatory inquiry is pending or reasonably anticipated.

Suppliers must maintain reasonable controls to prevent fraud, overbilling, duplicate billing, false certifications, improper expense claims, unauthorized bank-account changes, misappropriation of assets, and other dishonest conduct relating to Energizer business.

Responsible Sourcing of Minerals and Materials

Suppliers must comply with applicable laws and Energizer requirements related to the responsible sourcing of minerals and materials, including tantalum, tin, tungsten, gold, cobalt, mica, and their derivatives, where relevant to Energizer products, components, packaging, or materials. Suppliers must take reasonable, risk-based steps to determine whether covered minerals or other materials of concern are present in products, components, or materials supplied to Energizer, including items made by third parties.

If covered minerals or materials are present or may be present, Suppliers must exercise appropriate due diligence to identify the source and chain of custody and to help ensure that those minerals do not contribute to armed conflict, forced labor, child labor, human rights abuses, corruption, or other serious risks in conflict-affected or high-risk areas.

Suppliers must maintain relevant due diligence records and provide accurate, complete, and timely sourcing information and supporting documentation to Energizer upon reasonable request. Suppliers must cooperate with reasonable requests to investigate and address identified risks.



ETHICAL BUSINESS PRACTICES

Intellectual property, privacy, and information security

Intellectual Property and Brand Protection

Suppliers must protect Energizer intellectual property, confidential information, and brand assets, use them only for authorized business purposes and in accordance with Energizer's instructions and applicable agreements, and respect the intellectual property rights of others.

Products, materials, and services supplied to Energizer must not infringe third-party rights or include counterfeit, diverted, unauthorized, substituted, or otherwise infringing items. Suppliers must maintain risk-appropriate controls and promptly notify Energizer if such materials are identified or suspected in the Energizer supply chain.

Suppliers must maintain the necessary rights, licenses, approvals, and permissions for the products, materials, content, technology, and services they provide to Energizer.

Data Protection, Privacy, and Information Security

Suppliers must protect Energizer Data and comply with applicable data protection, privacy, cybersecurity, and information security laws. "Energizer Data" means Energizer confidential information and any personal data handled by a Supplier in connection with Energizer business.

Suppliers must:

- Treat Energizer Data as confidential and use it only for authorized business purposes.
- Handle Energizer Data only as instructed by Energizer and as permitted by applicable agreements and law.
- Limit access to individuals with a legitimate business need and appropriate confidentiality obligations.
- Maintain appropriate safeguards to protect Energizer Data from unauthorized access, use, disclosure, alteration, loss, destruction, or unavailability.
- Promptly notify Energizer of actual or suspected data breaches or cybersecurity incidents and cooperate with investigations, legal obligations, and data subject requests.
- Return or securely dispose of Energizer Data when no longer needed, unless retention is legally required.
- Ensure third parties handling Energizer Data are bound by written confidentiality, privacy, security, and incident-notification obligations at least as protective as the Supplier's.
- Use AI or other emerging technologies involving Energizer Data only with Energizer authorization and appropriate legal, security, privacy, IP, and human-oversight controls.

PILLAR 2



PEOPLE AND HUMAN RIGHTS

Fair treatment and responsible recruitment

Suppliers must respect the dignity, rights, and well-being of all workers and support fair, lawful, and humane working conditions. Suppliers must take reasonable steps to identify and address human rights risks connected to their operations and Energizer-related supply chains.

Non-Discrimination, Harassment, and Respectful Treatment

Suppliers must not engage in unlawful discrimination in any employment practice and must provide equal employment opportunities in accordance with applicable laws.

Suppliers must also provide workplaces free from harassment, abuse, violence, intimidation, coercion, corporal punishment, sexual harassment, and other inhumane treatment. Suppliers must treat workers with dignity, fairness, and respect and maintain accessible processes for reporting, investigating, and addressing concerns without retaliation.

Forced Labor, Human Trafficking, and Modern Slavery

Employment must be freely chosen. Suppliers must not use forced, bonded, indentured, prison, trafficked, slave, or other involuntary labor. Suppliers must not engage in human trafficking or use force, fraud, coercion, abuse of vulnerability, threats, or deception to recruit, transport, harbor, provide, obtain, employ, or retain workers.

Workers must not be required to surrender passports, government-issued identification, work permits, or other personal documents as a condition of employment, except for the limited time necessary to process legally required documentation and only if they retain timely, unrestricted access to them. Workers must not be subject to unreasonable restrictions on movement, communication, or access to basic necessities. Workers must be free to leave employment voluntarily, subject only to reasonable notice requirements permitted by applicable law.

Suppliers must promptly investigate credible signs of forced labor, human trafficking, or related concerns and take appropriate corrective action to protect affected workers.

Responsible Recruitment

Workers should not have to pay for a job. Suppliers must recruit workers responsibly, protect them from exploitation, and maintain adequate processes to ensure workers are not charged recruitment fees, related costs, or monetary or non-monetary deposits to obtain or maintain employment.

Suppliers must:

- Prohibit worker-paid recruitment fees, related costs, and deposits; promptly reimburse any such amounts; and cooperate with Energizer on a timely reimbursement plan when needed.
- Provide clear, accurate written information about employment terms before work begins, in a language and manner workers can understand.
- Ensure migrant workers receive the same rights, protections, and working conditions as other workers.
- Exercise appropriate, risk-based due diligence and oversight of labor recruiters, labor providers, and employment agencies acting on their behalf.
- Maintain records sufficient to demonstrate compliance with these requirements and promptly address identified noncompliance.

PILLAR 2



PEOPLE AND HUMAN RIGHTS

Working conditions, pay, and worker voice

Child Labor and Young Workers

Suppliers must employ only workers who meet the applicable legal minimum working age or are at least 15 years old, whichever is higher. Suppliers must maintain reliable age verification processes, including appropriate documentation or other reliable assessment methods where official documents are not available.

Suppliers must keep records supporting age verification and comply with applicable child labor laws, including requirements related to wages, working hours, overtime, education, night work, and working conditions. Suppliers must protect young workers from hazardous work or conditions that could harm their health, safety, education, or development.

If child labor is identified, Suppliers must take prompt corrective action and implement remediation measures that prioritize the best interests, safety, and well-being of the child. Suppliers must cooperate with Energizer regarding remediation affecting Energizer-related operations or supply chains.

Working Hours

Suppliers must comply with applicable laws governing working hours, overtime, rest periods, and days off. Working hours, including overtime, must not exceed legal limits. Suppliers must maintain accurate records of hours worked and provide required rest periods and time off. While overtime may be required, Suppliers must manage working hours responsibly in a manner that supports worker health, safety, and humane working conditions. Suppliers must provide at least one rest day off in every seven-day period except where a lawful, limited exception applies.

Wages and Benefits

Suppliers must pay workers accurately, transparently, and on time. Wages, overtime pay, and benefits must comply with applicable laws and meet at least the legal minimum wage or local industry standard, whichever is higher. Overtime must be compensated at a premium rate, as required by applicable law.

Suppliers must maintain accurate time and payroll records, must not use wage deductions as a disciplinary measure, and must provide workers with clear wage statements explaining wages earned, hours worked, overtime, bonuses, allowances, benefits, and deductions.

Freedom of Association and Collective Bargaining

Suppliers must respect workers' rights to lawfully and peacefully associate, organize, join or refrain from joining labor organizations, select representatives, and bargain collectively, consistent with applicable laws. Suppliers must not interfere with, discriminate against, retaliate against, or otherwise disadvantage workers because of their lawful exercise of these rights. Where these rights are restricted by law, Suppliers should allow lawful alternative means for workers to raise concerns and communicate with management.

Worker Voice and Non-Retaliation

Suppliers must provide accessible ways for workers and relevant stakeholders to raise concerns, including confidential reporting and, where permitted by law, anonymous reporting. Information about reporting channels and worker rights must be provided in a language and manner workers understand. Suppliers must promptly and fairly review concerns, take appropriate corrective action, and communicate updates when appropriate. Suppliers must not retaliate against anyone who, in good faith, raises a concern, seeks guidance, participates in an investigation, refuses unlawful conduct, or reports suspected misconduct.

PILLAR 3



HEALTH AND SAFETY

Safe workplaces, emergency readiness, and facilities

Suppliers must provide safe and healthy working and living conditions and take appropriate steps to prevent injury, illness, and unsafe conditions. Suppliers must maintain health-and-safety management processes appropriate to their operations, workforce, facilities, and risks.

Occupational Health and Safety

Suppliers must identify, assess, and manage workplace hazards, including by removing hazards where possible, using appropriate safety controls, and providing personal protective equipment. Suppliers must provide workers with health-and-safety information, training, supervision, and protective equipment appropriate to their role, risks, and work environment, in a language and manner they understand.

Suppliers must take appropriate measures to protect vulnerable workers, including pregnant or nursing workers, from hazardous working conditions.

Suppliers must investigate incidents and hazards and implement corrective actions to prevent recurrence. Workers must be able to report unsafe conditions and exercise stop-work authority where there is an imminent danger to health or safety, without retaliation.

Emergency Preparedness and Response

Suppliers must identify and assess potential emergency situations and maintain effective emergency preparedness and response procedures. Emergency exits, evacuation routes, fire protection systems, alarms, and emergency equipment must be clearly identified, accessible, unobstructed, inspected, tested, and properly maintained to support safe evacuation in a fire or other emergency. Appropriate emergency training and drills must be conducted periodically, as required by applicable law or appropriate to the risks of the facility.

Facilities, Drinking Water and Sanitation

Suppliers must provide workers with clean and sanitary facilities, safe drinking water, and hygienic restroom facilities in adequate numbers, with reasonable access throughout the workday and no unreasonable restrictions on use. Production areas and common spaces must have adequate ventilation, lighting, temperature controls where appropriate, and be maintained in clean, orderly, and safe condition in accordance with applicable laws.

Machine Safeguarding

Suppliers must ensure machinery and equipment are properly maintained, regularly inspected, and operated safely. Equipment must include appropriate safety features, machine guards, interlocks, emergency stops, lockout/tagout procedures, and other safety controls necessary to help prevent accidents and injuries. Workers operating, cleaning, maintaining, or repairing machinery must receive appropriate training, instruction, supervision, and protective equipment, as applicable to their role and the equipment involved.

PILLAR 3



HEALTH AND SAFETY

Worker housing, hygiene, and ergonomics

Dormitories and Worker Housing

Where worker housing is provided or arranged by a Supplier, facilities must be clean, safe, and maintained in a manner that supports worker health, safety, dignity, privacy, and freedom of movement.

Housing must provide:

- Adequate living space consistent with applicable legal requirements and local industry standards.
- Access to safe drinking water and clean, sanitary, and private toilet facilities in adequate numbers.
- Adequate ventilation, lighting, heating or cooling as appropriate, and safe electrical systems.
- Clearly identified emergency exits and evacuation routes, with evacuation information available to residents, including in sleeping areas.
- Appropriate fire safety measures, emergency lighting, and periodic drills.
- Reasonable security measures that do not restrict workers' freedom of movement or access to communication.

Hazardous or combustible production materials must not be stored in dormitories, sleeping areas, or buildings connected to sleeping quarters.

Industrial Hygiene

Suppliers must identify and manage chemical, biological, and physical hazards. Hazardous and combustible materials must be safely labeled, stored, handled, transported, and disposed of in accordance with applicable laws and appropriate safety practices. Suppliers must maintain access to relevant safety information, including safety data sheets, and provide workers with appropriate training.

Where hazards cannot be adequately controlled through engineering, substitution, engineering, or administrative measures, appropriate personal protective equipment and training must be provided to workers.

Ergonomics and Physically Demanding Work

Suppliers should design work processes to reduce ergonomic risks and help prevent injuries associated with repetitive tasks, heavy lifting, prolonged standing, or other physically demanding activities. Workstations, job design, and task organization should support worker health and safety.

PILLAR 4



ENVIRONMENTAL AND PRODUCT STEWARDSHIP

Environmental responsibility and resource stewardship

Suppliers must operate in an environmentally responsible manner, comply with applicable environmental laws, and support continuous improvement in environmental performance.

Suppliers should seek opportunities to reduce waste, promote reuse and recycling, prevent pollution, improve resource efficiency, reduce greenhouse-gas emissions, and demonstrate ongoing efforts to improve the environmental footprint of materials and products supplied to Energizer.

Suppliers must:

- Maintain environmental management processes appropriate to their operations and risk that support compliance with applicable environmental laws and required permits, licenses, registrations, and government authorizations.
- Maintain procedures to identify, investigate, correct, and, where required, notify appropriate authorities and Energizer of material environmental incidents or noncompliance.
- Use energy, water, packaging, raw materials, and other natural resources responsibly and seek measurable opportunities to reduce consumption, waste, and environmental impacts.
- Identify, handle, store, transport, and manage hazardous substances used in production in accordance with applicable environmental laws and appropriate safety practices.
- Comply with applicable requirements related to chemical restrictions, product content, labeling, handling, and disposal of hazardous substances and hazardous waste.
- Manage and dispose of non-hazardous waste generated from operations in accordance with applicable laws and seek to reduce, reuse, and recycle waste where feasible.
- Monitor, control, and where required, treat air emissions and wastewater generated from operations before release or discharge in accordance with applicable laws.
- Take reasonable measures to prevent contamination of stormwater runoff from supplier facilities.
- Maintain accurate environmental, product compliance, and sourcing information and provide such information to Energizer upon reasonable request.
- Provide complete and accurate information reasonably requested by Energizer to support product stewardship, chemical-management, environmental reporting, climate-related reporting, packaging, waste, or other legal or customer requirements.

PILLAR 5



SUPPLY CHAIN ACCOUNTABILITY

Responsibility, monitoring, reporting, and remedies

Supply Chain Responsibility

Suppliers must maintain governance, policies, training, internal controls, and management systems appropriate to their operations and risk to support compliance with this Code and applicable law. Suppliers must communicate standards consistent with this Code to their subcontractors, labor providers, recruiters, agents, lower-tier suppliers, and other business partners used for Energizer-related goods or services.

Suppliers must apply reasonable due diligence in selecting, contracting with, and overseeing those parties. Suppliers must take reasonable steps to identify, prevent, mitigate, and address actual or potential adverse impacts in their Energizer-related supply chains, including impacts relating to labor and human rights, health and safety, the environment, bribery, trade compliance, and product integrity.

Suppliers must comply with applicable supply chain transparency, human rights, modern slavery, conflict minerals, environmental, product stewardship, and related due diligence and disclosure laws.

Monitoring and Assessments

Energizer may assess compliance with this Code through questionnaires, self-assessments, document reviews, certifications, supplier meetings, site visits, audits, worker interviews, and other reasonable due diligence activities. Suppliers must cooperate with these activities and, upon reasonable notice or as otherwise agreed, provide Energizer and its authorized representatives access to relevant records, facilities, personnel, and workers, consistent with applicable laws.

Where requested by Energizer, Suppliers must:

- Maintain an active Sedex membership.
- Complete responsible sourcing assessments, including Sedex self-assessments.
- Participate in audits, with SMETA 4-Pillar preferred.
- Permit, where lawful and appropriate, private and confidential worker interviews without retaliation.
- Complete applicable corrective actions identified through assessments, audits, verification activities, investigations, or other due diligence.
- Provide records sufficient to demonstrate compliance with this Code and progress on or completion of corrective actions.

Reporting and Corrective Action

Suppliers must notify Energizer promptly if they learn of actual or suspected material noncompliance with this Code, whether at their own company or at any third party they use for Energizer-related goods or services. Suppliers must preserve relevant records, promptly investigate, and take appropriate action to contain, correct, and prevent recurrence of identified issues.

Energizer seeks to work with Suppliers to address identified issues and support continuous improvement. If Energizer determines that a Supplier has not met the requirements of this Code, Energizer may require the Supplier to implement an appropriate corrective action plan. Corrective action should be timely, documented, and proportionate to the nature and severity of the issue. Where an adverse impact on workers, communities, consumers, or other stakeholders has occurred, Suppliers must take or cooperate in effective remediation appropriate to the impact. If issues are not adequately addressed, Energizer may take appropriate action, including limiting, suspending, or terminating current or future business with the Supplier.

Nothing in this Code limits Energizer's rights or remedies under applicable agreements, policies, or law.



QUESTIONS AND REPORTING CONCERNS

How to seek guidance and raise concerns

Energizer encourages Suppliers, workers, and other stakeholders to seek guidance, raise questions, and report concerns related to business involving Energizer.

Questions about this Code

Questions about this Code may be directed to:

✉ Energizer's Global Ethics & Compliance team at energizercompliance@energizer.com

Reporting potential violations

Potential violations of applicable laws, this Code, or other misconduct involving Energizer business may be reported to:

✉ Energizer's Global Ethics & Compliance team at energizercompliance@energizer.com

🌐 Energizer HelpLine at www.EnergizerHelpLine.com, where country-specific phone numbers are also listed

📱 Energizer HelpLine (U.S.) at **1-877-521-5625**

Reports may be made confidentially and, where permitted by law, anonymously through the Energizer HelpLine.

Energizer prohibits retaliation against anyone who raises a concern, seeks guidance, reports suspected misconduct, refuses to engage in unlawful conduct, or participates in an investigation in good faith.