

ENERGIZER STATEMENT REGARDING SLAVERY AND HUMAN TRAFFICKING
PURSUANT TO THE CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT

Energizer's efforts regarding the prevention of slavery and human trafficking in its supply chain are part of a broader policy which requires Energizer's suppliers to act responsibly and ethically regarding the environment, labor, working conditions and business practices. This policy requiring responsible, ethical and lawful practices by Energizer suppliers is embodied in the Energizer Holdings, Inc. Supplier Code of Conduct (SCOC) which can be found [here](#). The SCOC is an integral part of a supplier's business relationship with Energizer.

Specifically with respect to slavery and human trafficking, the Code of Conduct requires suppliers to affirm that they do not "engage in slavery or in human trafficking of any kind, including but not limited to the recruitment, harboring, transportation, solicitation, provision or acquisition of persons for labor or services through the use of force, fraud or coercion." Energizer engages in the following measures to address slavery and human trafficking in its supply chain:

1. **Verification**. Energizer has performed assessments of many of its potential suppliers to identify any issues with its suppliers' ability to achieve compliance with the SCOC. Energizer performs this multi-part assessment internally as part of its authorization process. In addition, the SCOC is either executed as a stand-alone agreement with a supplier, or is incorporated into the terms and conditions of purchase orders or supplier agreements. Thus, suppliers who do business with Energizer verify that they will conform to the requirements of the SCOC.
2. **Auditing**. In addition to the verification process, Energizer reserves the right to conduct both announced and unannounced audits of the internal operations of our suppliers to ensure their continuing compliance with the requirements of the SCOC, including the prohibition against engaging in slavery and human trafficking. This auditing program includes audits of personnel recruitment sources which are also required to comply with the SCOC. Energizer continues to develop monitoring systems to assess compliance by its suppliers.
3. **Certification by Suppliers**. The SCOC is either executed as a stand-alone agreement with suppliers, or it is incorporated into the terms and conditions of purchase orders and supplier agreements. In addition to requiring compliance with Energizer's prohibitions against forced labor, the SCOC requires Energizer suppliers to comply with international standards prohibiting the use of forced labor. The SCOC extends this prohibition against forced labor beyond the immediate supplier by requiring the supplier to demand compliance from its subcontractors and suppliers with the conditions of the SCOC.
4. **Accountability Standards**. Under the SCOC, Energizer may either terminate the business relationship with a supplier failing to meet requirements, or it may

implement a corrective action plan. If a corrective action plan is advised, but the supplier fails to undertake it, Energizer may suspend orders and terminate production. The SCOC is incorporated into the terms and conditions of Energizer supplier agreements.

5. Training. Energizer trains colleagues in its Global Purchasing department on the requirements of the SCOC. The SCOC is published annually to all global colleagues and new Purchasing colleagues are trained in the requirements of the SCOC.

Energizer remains committed to this important issue, and continues to develop monitoring systems to assess compliance by its suppliers with the prohibition against slavery and human trafficking of any kind.