



Conflict Minerals Policy

Global Policy
Conflict Minerals
Effective Date: May 28, 2015
Last Revision: May 28, 2015

Section 1: Purpose of this Policy

It is Energizer’s goal to ensure all tin, tantalum, tungsten and gold (3TG) minerals used in our products are “DRC conflict free”.

Section 2: Policy Owner and Statement of Responsibility

This policy is owned by the Conflict Minerals Team Leader. It is the responsibility of this individual to implement, review annually and revise this policy as needed.

Name	Title	Phone	Email
Carin Stuart	Conflict Minerals Team Leader	440-835-7859	carina.stuart@energizer.com

Section 3: Policy Contents – Outlines Energizer’s Sourcing Policy as it Relates to Conflict Minerals (Tin, Tungsten, Tantalum and Gold)

To support the goal of DRC Conflict Free, Energizer will:

- Participate as a member of the Electronic Industry Citizenship Coalition (EICC) Extractives Work Group and Due Diligence Work Group;
- Develop a program to trace the origin of 3TG minerals in our supply chain using the EICC reporting template;
- Exercise due diligence using the Organization for Economic Co-operation and Development (OECD) procedures;
- Work to ensure that no 3TG minerals that support conflict in the DRC region are used in our supply chain; and
- Require our suppliers to make similar responsible sourcing decisions and collaborate with us in our due diligence efforts.

1. Scope of Concern

To ensure Energizer’s policy on responsibly sourcing 3TG is carried out by the business.

Accountability: Conflict Minerals Team consisting of Procurement, Legal (SEC) and Regulatory representatives.

Tasks: Review supply chain sourcing for origin of 3TG for all Energizer products to ensure if the minerals are sourced by the covered countries (Congo and the surrounding nations) they are sourced from an audited conflict-free smelter.



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2. Identification

Promptly determine scope of sourcing problem

Accountability: Regulatory

Tasks:

- Identify all suppliers that source non-conflict free smelters from the covered countries
- Work with procurement to resolve responsible sourcing concerns regarding sourcing from non-conflict free smelters in the covered countries

3. Decision

Reach decision for handling issue if it is found a supplier is sourcing from a non-conflict free smelter in the covered countries.

Accountability: Regulatory, Legal and Procurement

Alternatives:

- No Action
- Request supplier change their supply chain to no longer include the smelter of concern
- Request the supplier to work with the smelter of concern to enter into a formal audit with the Conflict Free Smelter Initiative(CFSI)
- Change suppliers

4. Recommendations

Make recommendation to Procurement on action to be taken with the supplier.

Accountability: Regulatory

5. Regulatory Filings

Accountability: Legal

Filings: Annual filing with SEC



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6. Communication

To inform the executive team of the findings of the annual supplier review for source of all 3TG in Energizer products.

Accountability: Legal with input from Conflict Minerals Team Leader and Procurement

7. Record Keeping

Accountability: Regulatory and Legal

Tasks:

- Maintain records of supplier responses to the origin of 3TG on the CFSI template
- Maintain record of supplier in-scope methodology
- Submit and maintain the Conflict Minerals Form SD to the SEC annually

Section 4: Related Policies

Policy Name	Policy Number
Procurement sustainable policy	

Section 5: Revision History

The policy owner will review and update this policy as necessary at least once every fiscal year.

Revision Number	Effective Date	Owner	Description of Change
Version 1	May 2016	Kathy Rehmer	Initial Document

Section 6: Required Approval

Signature on File _____