



# MODERN SLAVERY STATEMENT

for financial year ending September 30, 2024

## 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, the UK Modern Slavery Act 2015, and the Canada Act on Fighting Against Forced Labour and Child Labour in Supply Chain. It covers all Energizer companies except for Centralsul Ltda., which was acquired in May 2024 and will be included in the 2025 statement. The specific Australian, Canadian, and United Kingdom Energizer companies covered by this statement for the fiscal year ending September 30, 2024 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, Canadian, and United Kingdom Reporting Entities

This statement is jointly made by the following entities in Australia, Canada, and the United Kingdom under the Energizer group of companies:

- **Australian Reporting Entity:** Energizer Australia Pty Ltd (ACN 003 539 026);
- **Canadian Reporting Entity:** Energizer Canada Inc. (RAE 830387-8); and
- **UK Reporting Entities:** Energizer Trading Limited (CRN 02078560); Energizer Auto UK Limited (CRN 02362589); Energizer Brands UK Limited (CRN 10306582); Energizer Europe Limited (CRN 11246130); Energizer Group Limited (CRN 03937798); and Energizer UK Limited (CRN 09584890).

These Australian, Canadian, 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 and the other 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 approximately 30 locations and distribute our products in more than 100 countries.

As of September 30, 2024, we had approximately 5,600 employees located across 34 countries, including approximately 1,700 employees based in North America, 1,890 employees in Asia Pacific, 1,320 employees in Europe, the Middle East and Africa, and 700 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®, NEVR-DULL®, and Nu Finish®. 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 [2024 Annual Report](#) and [2024 Sustainability Report](#).

## Our Standards

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

[Energizer Code of Conduct](#)

[Energizer Supplier Code of Conduct](#)

[Energizer Supplier Purchase Order Terms and Conditions](#)

[Energizer Holdings Policies](#)

## Our Risks

Energizer is aware that risks of modern slavery exist in the operations and supply chains of most global companies, including ours. As a component of our health and safety program, we carry out risk assessments for our facility-owned sites and visited six of them during the reporting period. Additionally, certain facility-owned sites undergo periodic social compliance audits conducted by third party organizations. These reviews help us improve our processes for managing modern slavery risks.

Also, leveraging the results of our 2023 modern slavery risk assessment, conducted with external expert support, we gained greater insight into the relevant risks within Energizer's supply chain. Based on supplier location and industry, the assessment informs our supplier due diligence strategy. The primary modern slavery risks 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. Oversight of the implementation of our Corporate Social Policy is overseen by the Board of Directors, through its Human Capital Committee, and is a crucial part of our governance structure.

Energizer continues to take 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 comply with our Supplier Code of Conduct, or more stringent policy if requested, and certify that forced labor was not used by them or any of their

suppliers at any stage of merchandise production or services performed. 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 acknowledgement 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.

In 2024, we updated our Supplier Code of Conduct to include a zero-cost recruitment policy. Suppliers must not require workers to pay any fees for their employment. If any fees are discovered to have been paid by workers, the supplier is obligated to reimburse them.

- 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, as described in our [2023 Conflict Minerals Report](#).
- Employing auditing organizations, such as Intertek and SGS, to assess compliance in certain aspects of our operations and those of our suppliers.
- Conducting training 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.

## Assessing Effectiveness

We recognize that measuring the effectiveness of our actions to identify and address modern slavery risks in our operations and supply chain is an ongoing and evolving process.

We measure the effectiveness of our actions by, among other things, tracking compliance training completion and proficiency, monitoring compliance with internal standards, participating in third-party audit assessments, assessing ethical culture, and analyzing data and trends on reports and questions received through the Energizer HelpLine. In fiscal year 2024, there were no reports of human trafficking or modern slavery within our operations or supply chain.

## 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, Canadian, and United Kingdom Reporting Entities listed on page 2.

/s/ Karen Benson

Associate General Counsel, Global Ethics & Compliance

Energizer Holdings, Inc.

March 18, 2025

This statement was approved by the Board of Directors of Energizer International Group B.V. by way of resolution on March 17, 2025.

/s/ Kathryn Dugan

Director A

Energizer International Group B.V.

March 17, 2025