

SUPPLIER CODE OF CONDUCT

GUIDELINES AND EXPECTATIONS FOR SUPPLIER PARTNERS

Exide Technologies is committed to the highest standards of product quality and business integrity in dealings with Suppliers, ensuring that business is conducted honestly and ethically, and in strict compliance with laws, rules, and regulations applicable to the countries in which Exide and its suppliers operate. Further, Exide Technologies places strong emphasis on ensuring that the working conditions across our supply chain support the health and safety of all workers, that they are treated with respect and dignity, and that manufacturing processes are conducted in an environmentally and socially responsible manner.

To ensure that Exide's relationships with Suppliers meet and support these expectations, Exide requires that suppliers embrace and support Exide's Supplier Code of Conduct and seek to conform to the standards documented below. Acknowledgement and commitment to comply with these standards will be deemed to occur when the Supplier ships products or components or provides services to Exide. Failure to comply with these standards may result in Supplier disqualification.

For the Code to be successful, suppliers must regard this Code as a total supply chain initiative and work with their suppliers to implement and maintain the same standards of business integrity.

LABOR

Suppliers are committed to uphold the human rights of workers and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. Suppliers shall employ workers who are legally authorized to work in their location/facility and are responsible for validating employees' eligibility to work status through appropriate documentation.

FREELY CHOSEN EMPLOYMENT

Forced, bonded (including debt bondage) or indentured labor or involuntary prison labor; slavery or trafficking (or engaging in severe forms of human trafficking) of persons shall not be used. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction or fraud for the purposes of exploitation. All work must be voluntary. Workers must not be required to surrender any government-issued identification, passports or work permits as a condition of employment.

Suppliers are prohibited from destroying, concealing, confiscating, or otherwise denying employees' access to identity or immigration documents. Excessive fees are unacceptable, and all fees charged to workers must be disclosed, including recruiting fees.

UNDERAGE LABOR

Suppliers shall ensure that no underage labor has been used in the production or distribution of their goods or services. A child is any person under the minimum employment age according to the laws of the facility's country, or, in the absence of law, under the minimum age for completing required education.

WORKING HOURS

Workweeks are not to exceed the maximum set by local law. We expect our Suppliers to limit working hours to 60 hours per week including overtime (which shall always be voluntary), with at least one day off every seven days.

WAGES AND BENEFITS

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. Deduction from wages as a disciplinary measure shall not be permitted.

HUMANE TREATMENT

All workers must be treated humanely and any threats or use of sexual harassment, sexual abuse, the procurement of commercial sex acts, physical punishment, threats of violence, mental or physical coercion, or verbal abuse of workers is strictly forbidden. Disciplinary policies and procedures in support of these requirements shall be clearly defined and documented and communicated to workers.

ANTI-DISCRIMINATION

Suppliers must be committed to establishing workplaces that are free from harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership or marital status in hiring and employment practices such as promotions, rewards, and access to training. In addition, workers or potential workers should not be subjected to medical tests that could be used in a discriminatory manner. All employment decisions must be based on the individual's ability to do the job.

FREEDOM OF ASSOCIATION

Suppliers shall respect the rights of workers to associate or not to associate with any group, in accordance with all applicable laws and regulations.

FAIR RECRUITMENT

Suppliers must ensure ethical recruitment practices and the protection of migrant workers. Specifically, suppliers:

- Shall not engage in fraudulent or misleading recruitment practices.
- Shall not use recruiters who violate labor laws in the country where recruitment occurs.

MIGRANT WORKER PROTECTIONS

Suppliers must ensure ethical recruitment practices and the protection of migrant workers. Specifically, suppliers:

- Shall provide return transportation to any employee who is not a national of the country where the work is performed, subject to limited exceptions.
- Where required, shall provide housing that complies with the host country's safety or housing regulations.
- Shall provide a written employment agreement clearly outlining the terms and conditions of employment

USE OF PRIVATE AND PUBLIC SECURITY SERVICES

Where suppliers contract public or private security forces, they must engage such security forces in accordance with the Voluntary Principles on Security and Human Rights. Exide suppliers are to maintain sufficient vetting, training and control systems to ensure that the security services suppliers uphold the human rights of both workers and members of the Public with whom they come in to contact during the execution of these services.

HEALTH AND SAFETY

Suppliers shall proactively manage health and safety risks to support the provision of an incident-free environment where occupational injuries and illnesses at work are prevented. Suppliers must implement appropriate management systems and controls that identify hazards and assess, and control risk related to their specific industry.

All these practices must comply with the legal standards. All Supplier workers must receive regular training on health and safety issues, as required by law, in a language that is understood by the relevant workers. In addition, if the activities are carried out at Exide locations or on behalf of Exide they must receive training and information on the specific risks of Exide and its activities, emergency procedures, and Exide's safety and environmental regulations.

Suppliers must adopt emergency plans that cover fires, spills and other incidents that will involve an evacuation, for all sites that manufacture products or services for Exide Technologies, including emergency management equipment, communication plans and updated contact lists. Suppliers must also ensure the provision of fire safety standards, basic training in first aid and emergency care, as well as the proper handling and disposal of hazardous materials. All Supplier workplaces must be adequately ventilated in hot climates and where chemicals and solvents are used. Workplaces should also be warm enough for cold climates. Adequate lighting and noise protection shall be provided in the workplace

Production and other machinery must comply with the appropriate and shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained. To do this, Suppliers must maintain a record program for equipment maintenance.

ENVIRONMENTAL

In manufacturing operations, adverse effects on the community, environment, and natural resources are to be minimized while safeguarding the health and safety of the public.

ENVIRONMENTAL PERMITS AND REPORTING

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be followed.

HAZARDOUS MATERIALS

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

WASTEWATER AND SOLID WASTE

Wastewater and solid waste generated from operations, industrial processes, and sanitation facilities are to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.

AIR EMISSIONS

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals, and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge.

DECARBONISATION, ENERGY CONSUMPTION AND GREENHOUSE GAS EMISSIONS

Exide requires that suppliers make continuous efforts to identify and implement strategies that support decarbonization including establishing companywide greenhouse gas reduction goals and identification of opportunities to improve energy efficiency, minimize their energy consumption and to shift their energy mix away from fossil fuels.

Suppliers are required to develop systems to track, document and report-out on energy consumption and all relevant greenhouse gas emissions against the set goals.

IMPACT ON COMMUNITIES AND ECO SYSTEMS

When planning their activities suppliers must consider the impact on the local communities and undertake a risk analysis in relation to air, water, or soil pollution, deforestation, adverse impacts upon biodiversity and the improper handling of hazardous waste, or groundwater extraction in areas of water scarcity.

Exide requires suppliers and their subcontractors to take into consideration the respect of the human rights of local communities affected by their activities.

This is to include land rights as well as the respect for the need for sustainable water supplies, safe drinking water, and protection of both ecosystems and communities through proper sanitation.

Exide suppliers are expected to oppose the destruction of cultural and ritual sites and the unlawful eviction and deprivation of land, forests, and waters.

IMPORT/EXPORT COMPLIANCE

Suppliers will comply with all applicable laws and regulations in connection with the labeling and transfer of products, services, equipment, information or knowledge across borders. Suppliers are responsible for understanding how export control laws apply and for conforming to these laws in connection with their supply of products and/or services to Exide.

ETHICS

In order to meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

BUSINESS INTEGRITY

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy towards all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes). All business dealings should be transparently performed and accurately reflected on Participant's business book and records. Suppliers are required to ensure that adequate monitoring is deployed to ensure compliance to both the defined procedures and relevant anti-corruption laws.

ANTI-TRUST

The supplier and its employees must avoid any conduct that violates anti-trust laws.

Suppliers are forbidden to participate in formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/ control markets. They must not exchange current, recent, or future pricing information with competitors.

Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition.

DISCLOSURE OF INFORMATION

Information regarding business activities, structure, financial status and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentations of conditions or practices in the supply chain are unacceptable.

INTELLECTUAL PROPERTY

Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights and complies with the appropriate laws and regulations.

PROTECTION OF IDENTITY

Programs that ensure the confidentiality and protection of supplier and employee whistleblower are to be maintained.

PRIVACY

Suppliers must comply with the relevant privacy and security of information laws and regulatory requirements related to the collection, storage, processing, transmission and sharing of personal data.

NON-RETALIATION

Suppliers must establish, maintain and communicate a process to enable their employees to raise any concerns without fear of retaliation.

CONFLICT OF INTEREST

Suppliers must not enter into transactions with Exide employees that may create an actual or perceived conflict of interest. Suppliers must not give or offer to give gifts (other than of nominal value) or favors (such as entertainment) other than customary business courtesies to Exide employees.

RESPONSIBLE SOURCING OF MINERALS & COMPLIANCE WITH THE EU BATTERY REGULATION

Exide Technologies is committed to comply with Section 1502 of the U.S. Dodd-Frank Act (Conflict Minerals), EU Regulation 2017/821 (Conflict Minerals) and EU Regulation 2023/1542 (European Battery Regulation), and to ensure that its supply chain is free from metals that have contributed to human rights abuses and armed conflicts. Exide Technologies expects its suppliers to acknowledge the importance of responsible sourcing and environmental stewardship and comply with all applicable laws and regulations concerning the sourcing of minerals.

CONFLICT AND EXTENDED MINERALS

If suppliers provide materials or goods containing tin, tantalum, tungsten, gold (3TG), columbite-tantalite (coltan), cassiterite, wolframite or their derivatives, other raw materials determined by US or EU authorities to be financing armed conflicts, copper, mica, cobalt, natural graphite, lithium or nickel, such suppliers shall:

- Implement a due diligence process aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- Ensure that the procurement of these minerals does not directly or indirectly finance armed conflict or contribute to human rights abuses;
- Upon request, disclose the origin of the minerals and provide information on smelters and refiners used in the supply chain;
- Use industry-standard reporting tools such as the Conflict Minerals Reporting Template (CMRT) and the Extended Minerals Reporting Template (EMRT); and
- Communicate these expectations to their own suppliers and ensure compliance throughout the supply chain.

EUROPEAN BATTERY REGULATION COMPLIANCE

If suppliers provide materials and goods falling under EU Regulation 2023/1542 (European Battery Regulation), such suppliers shall:

- Comply with the due diligence, traceability, and reporting obligations outlined in such regulation;
- Provide accurate and complete data on the sourcing, processing, and environmental impact of battery materials;
- Support Exide Technologies in fulfilling regulatory obligations, including documentation for market surveillance and sustainability reporting; and
- Continuously improve its sourcing practices to align with evolving regulatory and sustainability standards. –

MONITORING / CONTINUOUS IMPROVEMENT

Suppliers must maintain documentation to demonstrate compliance with this Code and agree to audits or assessments by Exide or its representatives. Suppliers are expected to continuously improve their practices in alignment with the Code.

REPORTING VIOLATIONS

Violations of Exide’s Supplier Code of Conduct may be reported confidentially. If an individual has knowledge that any of these Supplier standards have been violated or may be violated, please report the issue by using the following options:

Telephone	+45 80830606. Exide Access code: 9312
Online submission	https://whistleblowersoftware.com/secure/961b430b-dc9d-4f6c-a7a5-bd5ab945f3a6
QR Code	

Reports may be made anonymously.

This document is not intended to, nor does it create any third-party rights