

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 operates. Further, Exide Technologies is committed to ensuring that work conditions of the supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible.

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.

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, as permitted by and in accordance with all applicable laws and regulations.

SUPPLIERS:

- Must not engage in fraudulent or misleading recruitment practices.
- Must not employ recruiters that violate the labor laws of the country where the recruitment takes place.
- Must provide return transportation to an employee who is not a national of the country where the work is to take place, subject to limited exceptions.
- Must where required provide housing that complies with the host country's safety or housing laws, or a written work document.

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 are prevented. Suppliers must implement management systems and controls that identify hazards and assess, and control risk related to their specific industry. Suppliers must also provide potable drinking water and adequate restrooms; fire exits and essential fire safety equipment; emergency aid kits and access to emergency response including environmental, fire, and medical; adequate heat and ventilation; reasonable entry and exit privileges.

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.

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.

CONFLICT MINERALS

Exide **Technologies** is committed to ensuring that **its** supply chain is free from metals that have contributed to human rights abuses and armed conflicts, whether directly or indirectly (“Conflict Minerals”) sourced from the Democratic Republic of Congo and certain adjoining countries (“Covered Countries”). Exide expects its Suppliers to comply with the following: providing timely responses to information requests on the source and origin of Conflict Minerals in Suppliers’ materials and goods supplied to Exide; providing all documentation, declarations or certificates reasonably requested with regards to Supplier’s own supply chain to determine the chain custody and origin of any Conflict Minerals; maintaining a policy that prohibits the use of Conflict Minerals that originate from Covered Countries and making these requirements apply to its direct suppliers and sub-tier suppliers and requiring them to do the same with lower tiers of suppliers; taking measures to purchase parts, components or materials from direct suppliers and sub-tier suppliers who source minerals for their products from smelters or refiners validated as not being sourced from Covered Countries.

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.

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REVISION			
CHANGE LEVEL	SECTION	REVISION	REASON
3 Nov 2020	All	Initial Release	Creation
13 April 2021	All	Format only (QF)	New Exide branding, integration of KK (Corp social resp) and AD (Compliance) as approvers for future changes
15 February 2024	Labor Environmental Reporting Violations	Included an additional section of "Use of private and public security services." Included "Decarbonization, energy consumption and greenhouse gas emissions" and "Impact on Communities and Eco systems." Data update.	Required as output from BMW assessment
19 July 2024	Anti-Trust All	Anti-Trust chapter included General grammatical improvements	BMW customer request General grammatical review

Note: changes from previous edition are highlighted in grey in order to be immediately visible.