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## I. PURPOSE

At Exide Technologies, we are strongly committed to human rights and employees' rights. We are committed to promoting and protecting human and labor rights in all our operations maintaining a work environment free from modern slavery in our operations and those of our business partners. We recognize the importance of eradicating child labor, forced labor, and human trafficking, and we are committed to implementing practices that prevent these violations throughout our organization and in our supply chain.

This Policy establishes our baseline principles and the steps we take to help ensure modern slavery and human trafficking do not occur in our business and our supply chain. It provides a framework for compliance and effective risk management under our Code of Conduct, Supplier Code of Conduct and United Nations Declaration of Human Rights. Where an applicable law, rule, regulation, or contractual obligation requires a higher standard, we will follow the requirements of that law, rule, regulation or contract.

We support the principles established under the United Nations Declaration of Human Rights, the Ten Principles of United Nation Global Compact and are committed to conducting business in a way that respects the rights and the dignity of people and prevents adverse human rights impacts.

We support freedom of workers to terminate employment, freedom of movement. We prohibit any threat of violence, harassment and intimidation, prohibit the use of recruitment fees paid by workers, prohibit discrimination in employment, and prohibit the confiscation of workers' original identification documents.


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## II. OVERALL OBJECTIVE

Achieve zero violations concerning forced labor, child labor, and human trafficking within our organization.

## III. DEFINITIONS

- A) Child Labor: Work performed by children below the minimum legal age for employment as defined by national law, or work that, by its nature or the conditions in which it is carried out, is harmful to the physical, mental, or moral well-being of children, impacting their development and education.
- B) Forced Labor: Work that is performed involuntarily and under threat of any penalty. It includes situations where individuals are coerced to work through violence, intimidation, undue debt, retention of identity documents, or any other forms of coercion.
- C) Human Trafficking: The recruitment, transportation, transfer, harboring, or receipt of persons by means of threat, force, or other forms of coercion for the purpose of exploitation.
- D) Supply Chain: The network of entities involved, directly or indirectly, in providing products and services to our organization. This includes suppliers, subcontractors, and other business partners.
- E) Victim: An individual who has suffered physical, mental, emotional, or economic harm as a result of being subjected to forced labor, child labor, or human trafficking.
- F) Remediation: Corrective actions taken to address and rectify a policy violation. This may include the restoration of rights, compensation to victims, and procedural changes to prevent future infractions.

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## IV. SCOPE

This policy applies to all employees, contractors, suppliers, and any other stakeholders operating within Exide’s value chain regardless of geographic location.

All members of our organization must act according to the highest ethical and legal standards, with managers playing a key role in overseeing and ensuring compliance with this policy.

## V. AUTHORITY AND RESPONSIBILITY

- i) **Steering Committee: Policy Approval and Review:**  
Approves the policy and reviews its effectiveness annually.  
Ensures that the necessary resources are available for the effective implementation of the policy.
- ii) **Chief Executive Officer (CEO): Strategic Implementation:**  
Oversees the implementation of the policy at the organizational level.  
Reports to the board of directors on policy compliance and improvement strategies.
- iii) **Group Compliance Committee: Development and Oversight:**  
Develops the necessary strategies and procedures to implement the policy.  
Monitors and evaluates policy compliance throughout the organization.  
Receives and reviews reported instances of potential non-compliance with this policy.  
Maintains the confidential reporting channel and ensures that all complaints are investigated promptly and effectively.
- iv) **Department Managers: Operational Responsibility:**  
Implement the policy within their areas of responsibility.  
Ensure that all employees under their supervision complete mandatory training.  
Conduct regular risk assessments and apply corrective measures when necessary.  
Report on compliance and violations to the Group Compliance Committee.

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v) Human Resources:

- Training and Complaints Management:

Develops and implements training programs for employees and managers.  
Provides support to victims of forced labor and human trafficking in coordination with external organizations.

- Hiring practices:

Implements recruitment and hiring processes to safeguard this policy through verification practices and statements.

vi) Internal Audit: Assessment and Verification:

Conducts regular risks assessments to identify areas of risks and potential non-compliances.  
Documents its findings in audit reports that are submitted to executive management and the Global Compliance Committee chair.

vii) Employees: Compliance and Reporting:

Comply with the policy and participate in the required training sessions.  
Report any suspected policy violations using the established channels.  
Act in accordance with the organization's ethical principles in all work activities.

viii) Suppliers and other stakeholders: Adherence to Standards:


Comply with the standards established by the Supplier Code of Conduct  
Cooperate with any investigations related to violations (Supplier Code of Conduct).

## **VI. POLICY, PROCEDURES AND REPORTING**

### **VI.I. PRINCIPLES AND COMMITMENTS**

i) Non-Discrimination and Equal Opportunities

Exide Technologies guarantees equal opportunities and prohibits any form of discrimination in its labor practices.

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ii) Prohibition of Child Labor

We commit not to employ underage individuals in our operations.

We will comply with all national and international laws and regulations regarding the minimum age for employment. In addition, work under the age of 18 is forbidden in our company.

Only exceptional situations in some roles as trainees or college placements are allowed for employees under 18 years old, and always respecting the local law and the educational needs. This exception needs to be approved explicitly by the HR Country Manager.

iii) Prohibition of Forced Labor

We strictly prohibit any form of forced or compulsory labor in our operations and supply chain.

We will ensure that all employees work voluntarily and have freedom of movement.

iv) Prevention of Human Trafficking

We will implement measures to identify and prevent any form of human trafficking in our operations and our supply chain.


We will collaborate with relevant authorities and organizations to combat human trafficking.

Any exception to this policy is fully forbidden.

**VI.II. PREVENTION STRATEGIES AND IMPLEMENTATION**

i) Risk Assessment

Managers must conduct regular assessments to identify and mitigate potential risks in their areas of responsibility involving the relevant Stakeholders in the conduct of all Risk Assessments.

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ii) Training and awareness

All employees, especially managers, will receive awareness-raising on labor rights and our standards against forced labor, child labor and prevention of human trafficking. Implement internal awareness campaigns to reinforce the importance of this policy and the consequences of non-compliance will be developed.

Exide will communicate this Policy to key Stakeholders, including:

1. Employees, including managers, supervisors and other personnel with oversight of the Supply Chain;
2. The Supplier Code of Conduct will be communicated to the Suppliers (included in our Contracts / Purchase Orders / General Terms and Conditions) and
3. Job brokers, recruiters and employment agencies, if used by the Company.

It will also be published on the Company's website and made available to relevant Stakeholders.

iii) Hiring practices

We have comprehensive recruitment and onboarding processes in place, which include verifying the eligibility of all employees to work in a given jurisdiction.


HR will complete the verification form in the appendix to this policy during the on-boarding process for each new employee. HR will ensure that the employee completes the document honestly and verifying the intent of this policy.

HR will maintain accurate and up-to-date records of all employees.

**VI.III. HANDLING DETECTED CASES AND COMPLIANCE**

i) Audits and Monitoring:

Identified areas of risk may be subject to internal audits as part of the annual internal audit plan. The Group Compliance Committee (GCC) or executive management may request Internal Audit to perform ad-hoc reviews to address emerging risks that differ from those identified during the annual risk assessment.

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ii) Key Performance Indicators (KPIs):

The Group Compliance Committee shall establish and review on a quarterly basis the key performance indicator (KPIs) relating to compliance with the policy and communicate them annually to the Steering Committee.

iii) Reporting Mechanisms:

We have established a confidential reporting system for employees and external parties to report any violations of this policy without fear of retaliation ([Exide Technologies S.A.S Whistleblower System | Home \(whistleblowersoftware.com\)](#)).


All reports will be promptly and thoroughly investigated, and corrective actions will be taken as necessary.

**VI.IV. CONSEQUENCES**

- Employees and Managers: Violation of this policy by our employees and managers will result in disciplinary action, in accordance with national labor laws, ranging from warnings to dismissal, depending on the severity of the violation.

**VI.V. REMEDIATION PROCEDURES**

- Corrective Action Plans: Managers must develop and implement corrective action plans in response to identified violations.  
To the extent that the responsible business enterprise is unwilling or unable to provide such repair, then Exide may elect to do so itself in coordination with other entities, including:
  - a. companies using the responsible commercial enterprise; and
  - b. local government, NGOs and other stakeholders.

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- Support for Victims: Exide will provide resources and assistance to victims of forced or child labor, in collaboration with relevant organizations. Remediation for victims will include protocols for appropriate immediate action to eliminate labor trafficking and child labor and resources for reasonable and appropriate services to victims designed to compensate for the harm experienced. In addition, Exide may take steps to ensure that the victim is removed from the workplace and her family is assisted to access appropriate services and viable alternatives.

## **VII. REVIEW AND CONTINUOUS IMPROVEMENT**

The policy will be reviewed annually by the Ethics and Group Compliance Committee to evaluate its effectiveness and make necessary adjustments. We are committed to continuously improving our practices and procedures to meet the highest standards of human and labor rights.


Data on policy compliance will be collected and analyzed, and progress reports will be published annually.

## **VIII. SUPPLIERS AND OTHER STAKEHOLDERS IN THE VALUE CHAIN (OSVC)**

We expect third parties along our global value chain to support human rights and encourage third parties to adopt standards consistent with the principles set out in the United Nations Declaration of Human Rights, and we do so in our Supplier Code of Conduct.

The Selection Criteria for Suppliers is described in the Sustainable Procurement Policy, supported by Supplier Self Assessments (including CSR section).



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## IX. TRANSITION


This Policy will be immediately applicable to Exide’s own operations.

The implementation of this Policy’s requirements towards Exide’s value chain will be done progressively, focusing in priority on areas identified as high risk pursuant to the risk assessment conducted pursuant to section VI.II(i) and taking into account planned contractual renewals for existing contractors or suppliers.

### -- CONCLUSION --

Exide reaffirms its commitment to eradicating child labor, forced labor, and human trafficking. This policy is an integral part of our business strategy and reflects our core values of integrity, respect, and social responsibility.

**-- END --**

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## Appendix: Declaration and Signature Checklist for Employees

I, [employee's full name], have read and understood our organization's policies and standards related to child labor, forced labor, and human trafficking. By signing this document, I declare the following:

1. Age Verification:
  - I confirm that I am at least 18 years of age.
  - I attest that my employment is not being forced by any person or entity.

2. Verification of Legal Documents:

As part of this process, I provide the following documentation (check as appropriate):

Official National Identity Card or Passport	
Birth Certificate:	
Driver's License:	

3. I will comply with established standards and procedures:
  - I am aware of our organization's specific policies to prevent and address child labor, forced labor, and human trafficking.
  - I agree to follow these standards and report any concerns or non-compliances.
4. I will participate in trainings and awareness programs:
  - I will attend training sessions provided by the company to better understand these topics.
  - I will actively contribute to creating a safe and ethical work environment.

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Employee Signature: \_\_\_\_\_ (Signature and date)

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RH Review:                      Date \_\_\_\_\_ Signature: \_\_\_\_\_



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**16.0X Policy on the Prevention of Child Labor, Forced Labor, and Human Trafficking**

**Global Policies and Procedures**

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**Document owner**

Name:	Function
Sharon Cottam	VP Human Resources

**Approval for correct format / visual / System integration**

Name:	Function	Date	Signature or Electronic Approval
Cristina de Celis	Management System Leader	22-Oct-24	EA

**Approval for content and implementation**

Name:	Function	Date	Signature or Electronic Approval
Sharon Cottam	VP Human Resources	22-Oct-24	EA
Nuria López	HR Global Projects	22-Oct-24	EA

**REVISION**

CHANGE LEVEL	SECTION	REVISION	REASON FOR CHANGE
22 October 2024	All	Creation	Creation

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