

## Conflict Minerals Policy

EXIDE TECHNOLOGIES is committed to responsible sourcing and supply chain management practices that align with international standards and legal requirements regarding conflict minerals and metals.

We recognize the importance of ethical and sustainable business operations and are dedicated to ensuring that our products do not contain conflict minerals or metals<sup>1</sup> sourced from regions that finance armed conflict, human rights abuses, or environmental harm,<sup>2</sup> or conflict-affected and high-risk areas,<sup>3</sup> as stipulated by the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”),<sup>4</sup> Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas (“Regulation 2017/821”),<sup>5</sup> and other applicable laws and their respective implementing acts (as amended from time to time).

### Scope

This Conflict Minerals Policy applies to all EXIDE TECHNOLOGIES employees, contractors, suppliers, and partners involved in the procurement and use of minerals and metals in our products.

### Objectives and Commitment

We pledge to:

1. Refrain from sourcing minerals that directly or indirectly contribute to armed conflict or human rights abuses, in accordance with the Dodd-Frank Act, or minerals and metals

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<sup>1</sup> (i) Gold, (ii) columbite-tantalite (coltan), cassiterite, wolframite or their derivatives, (iii) any other mineral or its derivatives determined by the U.S. Secretary of State to be financing conflict in the Democratic Republic of the Congo or an adjoining country, (iv) tin, tungsten or tantalum (whether ores or concentrates), and (v) metals containing or consisting of tin, tantalum, tungsten or gold listed in Part B of Annex I of Regulation (EU) 2017/821.

<sup>2</sup> The Democratic Republic of the Congo and any country that shares an internationally recognized border with the Democratic Republic of the Congo.

<sup>3</sup> Any area (i) in a state of armed conflict or fragile post-conflict or (ii) witnessing weak or non-existent governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.

<sup>4</sup> [https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/file/hr4173\\_enrolledbill.pdf](https://www.cftc.gov/sites/default/files/idc/groups/public/@swaps/documents/file/hr4173_enrolledbill.pdf).

<sup>5</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32017R0821>.

minerals and metals originating from conflict-affected and high-risk areas within the meaning of Regulation 2017/821.

2. Conduct due diligence to identify and assess the sources of minerals and metals used in our products, as required by regulatory standards.
3. Collaborate with our suppliers to establish responsible mineral and metal sourcing practices that comply with relevant legal and industry guidelines.
4. Promote transparency and traceability within our supply chain, consistent with international regulations.
5. Give preference to suppliers on the list of global responsible smelters and refiners established by the European Commission (if and when such list is established, and as amended from time to time) pursuant to Art. 9(1) of Regulation 2017/821.

## Compliance Responsibility

The implementation, monitoring, and enforcement of this Conflict Minerals Policy in accordance with legal requirements is a joint responsibility of EXIDE TECHNOLOGIES' Procurement, Legal, Sustainability, Quality Management, Finance and Internal Audit Teams.

## Supplier Requirements

We expect our suppliers to:

1. Conduct due diligence on the source and chain of custody of minerals and metals used in the production of materials supplied to EXIDE TECHNOLOGIES, as mandated by the Dodd-Frank Act, Regulation 2017/821 and other applicable laws.
2. Adhere to industry-recognized due diligence standards, such as the OECD Due Diligence Guidance for Responsible Supply Chains, in accordance with legal obligations.
3. Provide EXIDE TECHNOLOGIES with information and certifications regarding the origin of minerals in their supply chain as required by applicable regulations.

## Audit and Reporting

EXIDE TECHNOLOGIES reserves the right to audit supplier facilities to verify compliance with this policy, consistent with legal requirements. Suppliers are required to maintain records and cooperate with any such audits, in accordance with applicable laws.

We will report periodically on our progress toward ensuring conflict-free supply chains and will provide relevant information to our customers and stakeholders as required by the Dodd-Frank Act, Regulation 2017/821 and other applicable regulations.

## Non-Compliance Consequences

Suppliers found to be in violation of this policy may face corrective actions, including potential termination of the business relationship, in compliance with legal requirements.

## Continuous Improvement

EXIDE TECHNOLOGIES is committed to ongoing improvement in our efforts to responsibly source minerals and metals, and will periodically review and update this policy as needed to remain compliant with changing legal and regulatory requirements.

## Contact Information

For questions or concerns regarding this Conflict Minerals Policy, please contact [conflictminerals@exidegroup.com](mailto:conflictminerals@exidegroup.com).

Gennevilliers, February 28, 2024



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