DOING RIGHT, EVERY DAY

CODE OF CONDUCT

Energizer Holdings, Inc.

A MESSAGE FROM OUR CEO

Energizer Colleagues,

At Energizer, doing right is more than a slogan. It's how we operate. We succeed as one team by treating each other with respect, acting with integrity, and having the courage to speak up and do the right thing when it matters most. Delivering strong results matters, and we are committed to achieving them the right way.

That commitment is at the heart of our Code of Conduct.

We all play a role in shaping our culture through the choices we make every day, in how we work with our customers, partners and with each other. Those choices enable us to live out our purpose while building trust, protecting our reputation and supporting our long-term success.

Our Code of Conduct provides clear guidance, but it can't cover every situation. That's where good judgment comes in. We're each responsible for understanding the Code, applying it in our daily work and speaking up when something doesn't feel right. In all parts of the organization, we support open, honest dialogue and take concerns seriously.

Thank you for your commitment to one another and to living and embracing our culture.
By doing right every day, we continue to build a stronger Energizer.

Sincerely,

Mark LaVigne
President and Chief Executive Officer



"We measure success by what we achieve *and* how we achieve it. We are committed to doing things the right way — always."

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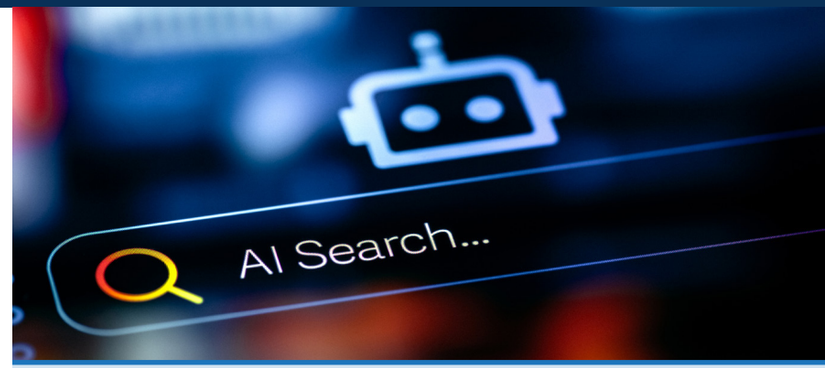
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DoRi: Your Code of Conduct Assistant

Meet DoRi, an AI-powered tool that helps you quickly find guidance in this Code of Conduct.

DoRi is short for ***Do Right***. It uses the content of the Code to point you to relevant information when you have questions about expectations, risks, or how to handle a situation. DoRi is a starting point. It does not replace your judgment or the resources listed in this Code. If you need advice, have questions, or want to report a concern, please reach out to any of the contacts listed in this Code.

You can try DoRi by scanning the QR code or by selecting the DoRi link in the navigation bar.

WHY DOING RIGHT MATTERS

ENERGIZER'S CULTURE STATEMENT

At Energizer, our culture is the foundation for all that we do.

From manufacturing quality products to meeting our customer's needs, our culture shapes how we work hard, play by the rules, and do right every day, while respect every colleague and partner who makes up our team. Our shared commitment to this culture helps us lead in the markets where we operate and ensures our brands remain globally known and respected. The principles on the right explain what our culture looks like in action and how each of us is expected to contribute across our teams and our work.



We Win Together

We relentlessly pursue our goals. We celebrate and move to the next challenge. We act with urgency because windows of opportunity close quickly. We are focused on results.

While Serving Each Other

We care for others' success as much as we do our own. We challenge respectfully to drive better outcomes and work collectively across functions, levels and geographies to achieve our goals.

With a Willingness to Act Boldly

We push forward rather than leaning back. We take chances, have a bias for action and go all in to achieve our goals. Even if we fail, we fail together. We are transparent, we learn from it, and are better for it. We are fearlessly determined.

All While Doing Right

We bring out the best in each other to bring the best to our consumers and customers. We are vulnerable and trust each other with our imperfections. By being respectful and open, our diverse perspectives amplify what we can achieve. Doing the right thing is all we know.

WHY DOING RIGHT MATTERS

OUR STANDARDS FOR DOING RIGHT

At Energizer, doing right is not an abstract idea. It is how we show up, make decisions, and treat one another every day. Our culture is grounded in acting with integrity, accountability, and respect, even when the right path is not the easiest one. This Code of Conduct exists to help bring that culture to life.

The Code is a practical guide to support sound judgment and responsible decision-making across our global organization. It outlines the standards we are expected to follow when working with one another, serving our customers, engaging business partners, and representing Energizer in the communities where we operate. While laws and regulations matter, simply complying with the law is not enough. Doing right often means choosing the course of action that best reflects our commitment to ethical conduct.

This Code works together with Energizer policies, procedures, and training to provide guidance for how we do business. Where more detailed requirements exist, those resources should be used alongside the Code to help guide decisions. When the right course of action is unclear, the Code also points to additional guidance designed to help you think through ethical decisions and determine next steps.

Doing right is not about having all the answers. It's about making thoughtful choices, asking questions and speaking up when something doesn't feel right.

Because Energizer operates around the world, our colleagues may face different laws, customs and business practices. While local requirements may vary, our commitment to doing right does not. This Code sets a consistent global standard that applies regardless of role, location or level of seniority.



Who Must Follow Our Code

This Code applies to all Energizer colleagues, officers and members of the Board of Directors. The Code has been adopted by the Board of Directors and reflects our shared responsibility for protecting Energizer's people, reputation and long-term success.

Each of us is responsible for understanding the Code, following it in our daily work and seeking guidance when we are unsure how it applies. Completing required ethics and compliance training is part of that responsibility and helps ensure we are prepared to navigate evolving risks and expectations.

Energizer expects its business partners, including suppliers, service providers, distributors and other third parties acting on our behalf, to act ethically and comply with applicable laws and our Supplier Code of Conduct. Colleagues who work with third parties are responsible for promoting these expectations, raising concerns and holding our business partners accountable to the standards set forth in the Supplier Code of Conduct.

Our Shared Responsibilities

Doing right every day means we each share responsibility to:

Act with integrity by behaving honestly fairly, and in good faith in everything we do.

Know and follow the rules by complying with the law, this Code and company policies, and completing required training.

Use good judgment and seek guidance by asking questions and using available resources when we are unsure.

Speak up and escalate concerns promptly if something does not seem right and support a non-retaliatory speak-up culture.

Be accountable for our actions by protecting company assets and information and cooperating fully with audits and investigations.

Raising concerns is not only encouraged, it is an expectation and a responsibility. Energizer does not tolerate retaliation against anyone who asks a question, reports a concern or participates in an investigation in good faith. Violations of the Code may result in disciplinary action, up to and including termination, consistent with applicable laws and company policies.



Additional Responsibilities for Leaders and Managers

Leaders at Energizer, including managers at all levels, have an added responsibility to shape and sustain our ethical culture. This includes:

Lead by example and model ethical decision-making in daily actions.

Set clear expectations and reinforce that how results are achieved matters.

Help team members understand the Code and the behaviors expected of them.

Promote a positive environment where colleagues feel safe asking questions and raising concerns without fear of retaliation.

Respond to and escalate concerns promptly and apply standards fairly and consistently.

Because managers are often the first point of contact for questions or concerns, they are expected to listen, take concerns seriously and act promptly and responsibly.

Our ethical culture is strengthened, or weakened, by what leaders and managers do every day. Leadership means being accountable not only for what we achieve, but for how we achieve it.



HOW WE MAKE THE RIGHT DECISIONS

COMPLIANCE WITH RELEVANT LAWS

Doing right means following the law.

Part of how we work is knowing and following the laws and regulations that apply to what we do. Energizer operations and colleagues are subject to the laws of the countries and jurisdictions in which we operate. We are expected to be aware of and comply with applicable laws and regulations, and to never intentionally violate them.

Violating applicable laws or regulations, this Code of Conduct, or company policies—or encouraging others to do so—exposes Energizer to risk, including reputational, financial and operational risk. Such conduct may result in disciplinary action, up to and including termination of employment. Violations of the law may also result in legal proceedings and civil or criminal penalties, which in some circumstances may affect individuals personally, in addition to creating adverse consequences for Energizer.

Colleagues should remain alert to changes in laws or new legal requirements that may affect their work. If local laws or regulations appear to conflict with this Code, or if something is unclear, colleagues should seek guidance from the Legal team or Global Ethics & Compliance before taking action.

KNOWLEDGE CHECK

select true or false

If a customer says “this is how it’s done here,” you can follow the local approach when you are not sure what the law requires.

True *or* False

HOW WE MAKE THE RIGHT DECISIONS

DO RIGHT DECISION TOOL

Doing right does not always come with a simple answer. In the course of our work, we may face situations where expectations feel unclear, where there is pressure to move quickly, or where something is technically allowed but still does not feel right.

The Do Right Decision Tool is designed to help you pause, reflect, and make decisions that align with our standards and culture–especially in situations that fall into gray areas. It is a practical way to think through choices before acting and to decide when to seek guidance or speak up.

Pause: Common Warning Signs ▶

When to Use the Do Right Decision Tool

Use this tool whenever you:

- Are unsure whether a decision aligns with our standards
- Feel pressure to compromise what feels right
- Encounter a situation that is legal but uncomfortable
- Need help deciding whether to ask a question or raise a concern

You are not expected to navigate difficult decisions alone. Reach out to your manager, another leader, Human Resources, Legal, Global Ethics & Compliance, or use the available reporting channels. Asking questions and raising concerns is a sign of good judgment and integrity.

*Test your decision making skills with the interactive chart below by selecting **Yes** or **No**, or download the full Do Right Decision Tool by clicking the PDF icon.*

Ask Yourself:

YES	Is it lawful and consistent with the Code and our policies?	NO
YES	Does it align with how we are expected to do business?	NO
YES	Did you consider the potential impact your actions could have on others?	NO
YES	Would this look acceptable to someone outside the company?	NO
YES	Does this decision support doing right every day?	NO

WHAT TO DO WHEN SOMETHING DOESN'T FEEL RIGHT

Speak up, ask questions, and raise concerns so we can do the right thing together.

Speak Up. Do Right.
Where to Ask a Question or Raise a Concern
What Happens After You Speak Up
No Retaliation



WHAT TO DO WHEN SOMETHING DOESN'T FEEL RIGHT

SPEAK UP. DO RIGHT.

Reporting concerns takes courage, and it matters. Speaking up helps Energizer address issues early and protect our colleagues, our business and our reputation. If a situation feels unclear, uncomfortable or inconsistent with our culture or standards, that is reason enough to ask a question or raise a concern. You do not need proof, certainty or all the answers.

Speaking up is a responsibility we all share. Energizer expects colleagues to raise questions and concerns, and leaders and managers to foster open, honest communication on their teams. Failing to report known misconduct can itself violate this Code. Nothing in this Code excuses an individual's own misconduct. However, when someone self-reports their own wrongdoing, that fact will be taken into consideration in determining an appropriate response.

Concerns must be raised in good faith, honestly and with the intent to do right, even if the concern later turns out not to be a violation. Honest reporting does not require being correct; it requires believing the information you are sharing is accurate. Energizer does not tolerate knowingly making false accusations, providing untruthful information, or interfering with or refusing to cooperate in a review or investigation.

KNOWLEDGE CHECK
select true or false

If the misconduct does not have anything to do with your job area, you do not need to report it.

True *or* False



We DO RIGHT When We:

- Raise concerns early, even without all the facts.
- Ask questions and seek guidance when something does not feel right.
- Use available reporting options and escalate concerns if needed.
- Never discourage or retaliate against someone who speaks up.
- Cooperate fully and honestly in reviews and investigations.

WHAT TO DO WHEN SOMETHING DOESN'T FEEL RIGHT

WHERE TO ASK A QUESTION OR RAISE A CONCERN

There are many ways to ask a question or raise a concern. In many cases, you may choose to start by talking with your manager. If you are not comfortable doing so, or if your concern is not addressed, you are encouraged to use another reporting option. Choose the option you are most comfortable using. Whichever option you choose, your confidentiality will be respected and retaliation will not be permitted.

To contact Global Ethics & Compliance, email us at energizercompliance@energizer.com.

Managers and Human Resources: If a Code of Conduct issue is reported to you, you are required to notify Global Ethics & Compliance so cases can be tracked and the Code applied consistently across the business. You may also submit the issue using the Open Door Report form available on the Energizer HelpLine website.



Energizer HelpLine
Speak Up. Do Right.

You can ask questions or report concerns using the Energizer HelpLine 24 hours/day, 7 days/week, in multiple languages, and anonymously where allowed by your country's laws.

www.EnergizerHelpLine.com

(U.S.) 1-877-521-5625
For additional country-specific phone numbers visit: EnergizerHelpLine.com

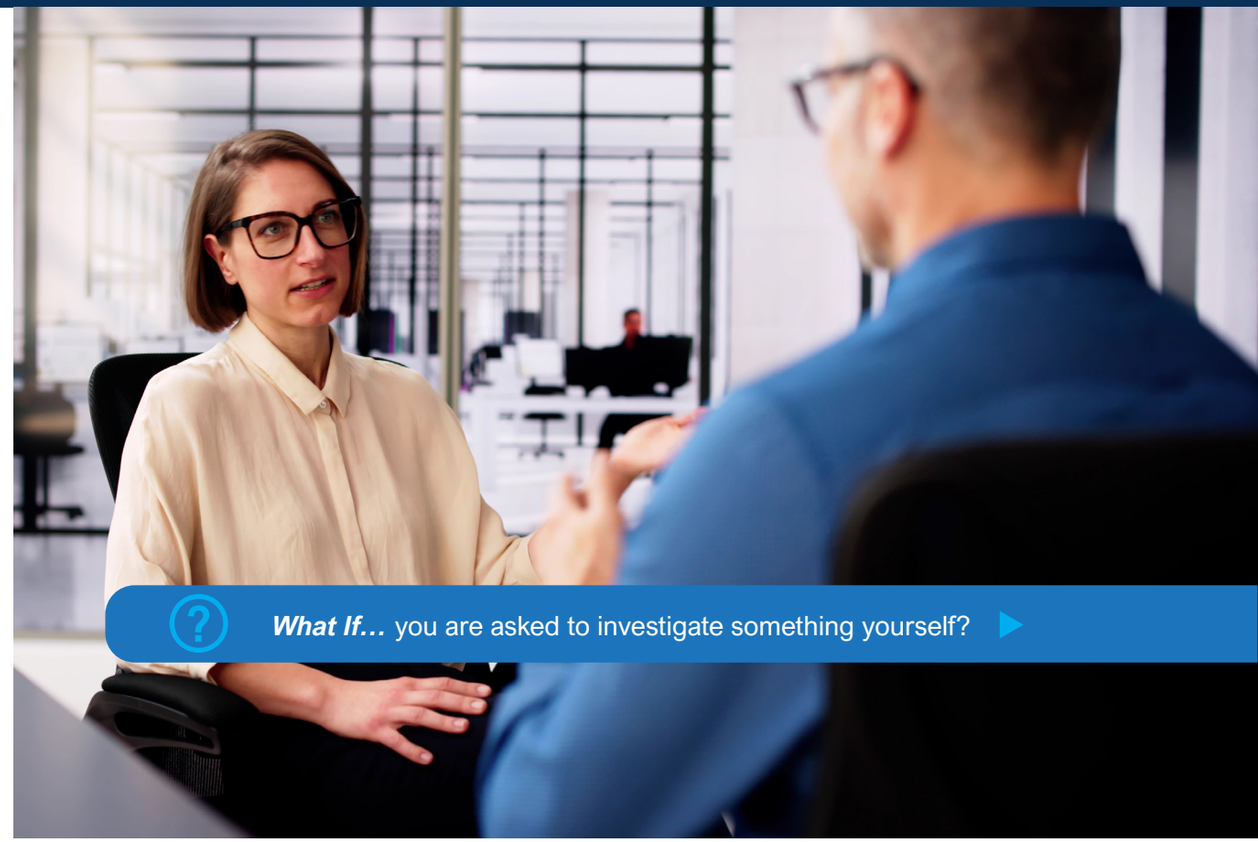
EnergizerHelpLine@energizer.intergrityline.com

WHAT TO DO WHEN SOMETHING DOESN'T FEEL RIGHT

WHAT HAPPENS AFTER YOU SPEAK UP

Energizer takes all questions and reports of potential misconduct seriously. We handle concerns promptly, fairly, and as confidentially as possible. When appropriate, this includes a review or investigation conducted by the appropriate team.

If an investigation is conducted and you are involved, you are expected to cooperate fully and provide truthful information. Do not investigate a concern on your own—Energizer has colleagues responsible for conducting investigations. Nothing in this Code is intended to prevent you from reporting a possible violation of law to a government agency or from cooperating in a government investigation. If you have questions about government investigations, contact the Legal team.



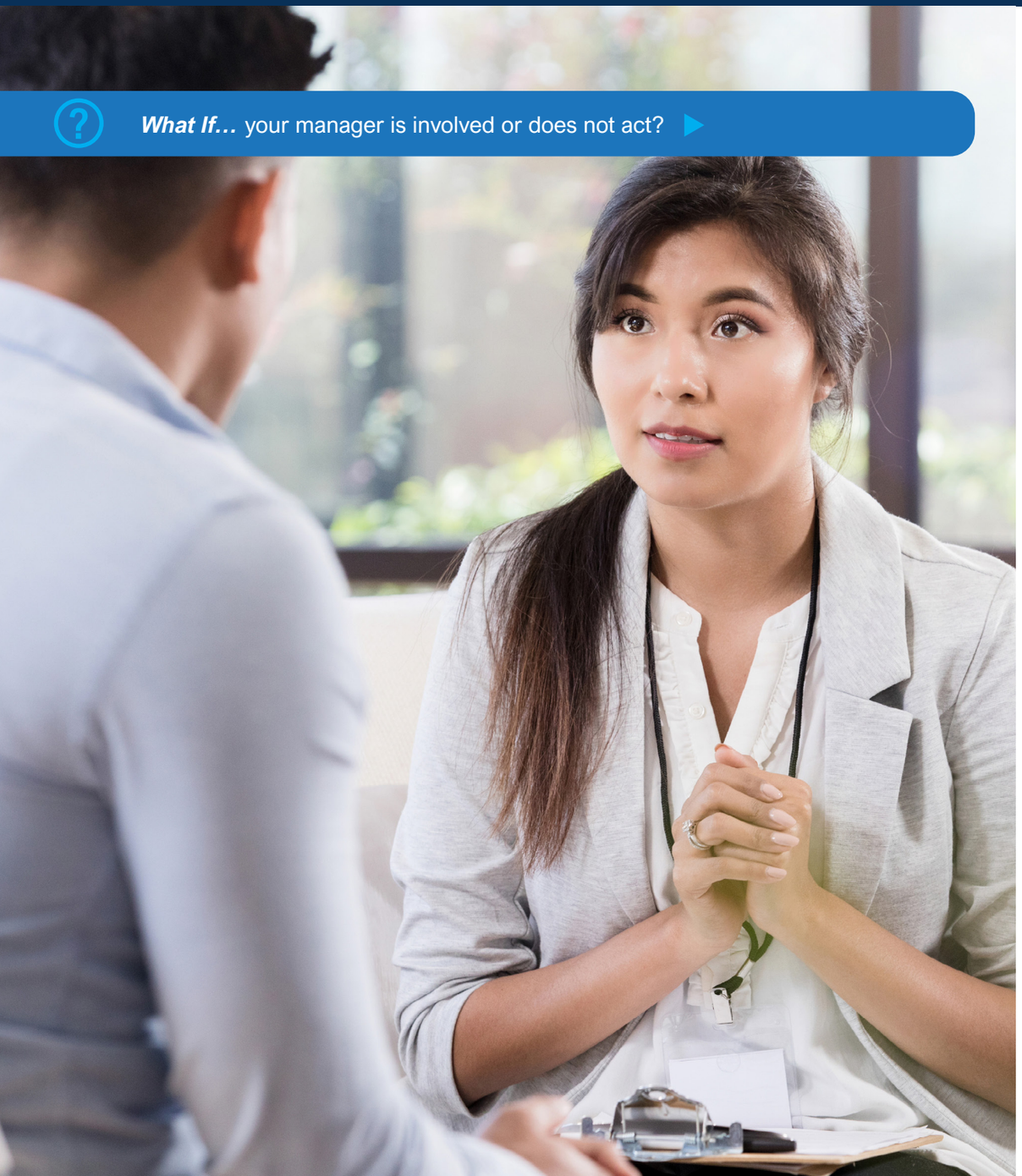
How We Handle Questions or Concerns

Receive
We receive and document the question or concern.

Review
Questions and concerns are reviewed consistently and objectively and addressed through guidance or, when needed, a review or investigation.

Resolve
We provide guidance or reach a conclusion based on what we learn, and where relevant, communicate the outcome.

Take Action
We implement improvements where appropriate and monitor to prevent retaliation.



What If… your manager is involved or does not act?

WHAT TO DO WHEN SOMETHING DOESN'T FEEL RIGHT

NO RETALIATION

Energizer does not tolerate retaliation against anyone who, in good faith, asks a question, raises a concern, or participates in a review or investigation. Retaliation is a violation of this Code and will result in disciplinary action. This applies to all colleagues, including managers. If you believe you or someone else has experienced retaliation, raise a concern immediately through any reporting options.

Retaliation is any negative action taken because someone spoke up, such as threats, harassment, demotion or termination.

What If… you are not sure something is a violation?

KNOWLEDGE CHECK

select true or false

Excluding a colleague from meetings or taking away key tasks after they raise a concern is not retaliation if their job title did not change.

True *or* **False**

DOING RIGHT FOR EACH OTHER

We do right by acting with respect, care and responsibility.

Respect for Others
Safety, Product Safety and Environment
Substance Abuse



DOING RIGHT FOR EACH OTHER

RESPECT FOR OTHERS

We win together by treating every colleague with dignity and respect.

Energizer is committed to an environment free of harassment, bullying, discrimination, violence and retaliation. Weapons are never allowed in any Energizer office or manufacturing plant. Violent physical contact or threats of violence are never permitted.

We may not always think the same way or agree, but we must always show respect and never create a hostile or offensive work environment. Insensitive comments, gestures, jokes or symbols, and any derogatory, obscene or demeaning messages will not be accepted. Using company email, instant messaging system, other Energizer assets or social media to spread these types of messages is prohibited.



We DO RIGHT When We:

- Treat others with professionalism.
- Communicate respectfully in person and online.
- Speak up when behavior does not align with our standards.

Energizer does not tolerate harassment of any kind, including sexual harassment. Any requests for sexual favors or other unwelcome verbal or physical conduct of a sexual nature will be subject to disciplinary action, up to and including termination and notification of law enforcement where necessary.

Energizer provides equal opportunity for all colleagues, where work and advancement are based on merit. This means that hiring, assignments, promotions, discipline or other personnel actions are administered without regard to race, color, ancestry, national origin, creed, religion, age, gender, gender identity, sexual orientation, veteran status, physical or mental disability, or any other trait protected by applicable law.

Energizer's policy is to make reasonable accommodations for known physical and mental limitations of qualified individuals with disabilities if those accommodations are needed to perform their jobs. Colleagues who take an approved leave of absence will not be retaliated against. No colleague may be discriminated against for exercising or receiving their rights under their benefit plans.



What If… you see behavior that feels disrespectful but you're not sure what to do?



DOING RIGHT FOR EACH OTHER

SAFETY, PRODUCT SAFETY AND ENVIRONMENT

We serve each other by creating a safe workplace, protecting our products and caring for the environment.

Energizer works to ensure a safe, healthy and sanitary work environment at all of our facilities and offices around the globe. Colleagues are required to follow all occupational health and safety laws and regulations. Any unsafe or hazardous conditions should be reported immediately to a supervisor, the Safety, Health, Environmental (SHEA) Team, the Energizer HelpLine, or Global Ethics & Compliance so the situation can be corrected.

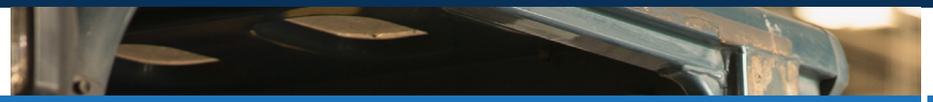


We DO RIGHT When We:

- Put safety first and look out for one another.
- Follow safety, environmental and product-safety requirements.
- Take prompt action by reporting hazards, incidents or product-safety risks.

The same commitment applies to environmental compliance. Colleagues must follow all applicable environmental laws, regulations, permits and internal environmental practices, and raise concerns when activities may pose environmental risks.

Energizer is also committed to the safety of our products. Any action or condition that could put our product safety standards at risk must be reported right away to a supervisor, facility management or Global Ethics & Compliance.



What If... a machine guard isn't seating correctly during start-up. Some teammates say it's "been like that" and keep working. What should be done?





We DO RIGHT When We:

- Come to work fit for duty and able to perform our responsibilities safely.
- Speak up promptly if impairment could put people or the business at risk.
- Seek help when needed and support a safe, respectful workplace.

DOING RIGHT FOR EACH OTHER

SUBSTANCE ABUSE

We serve each other by coming to work fit for duty and protecting the safety of those around us.

Energizer strives to maintain a workplace that is free from the illegal use, possession, sale, or distribution of alcohol or controlled substances. Legal or illegal substances must not be used in a manner that impairs an individual's ability to perform assigned duties safely, responsibly and effectively.

Alcohol may be served or permitted at certain Energizer sponsored events where approved. In those situations, colleagues are expected to consume alcohol responsibly. Reporting to work, performing work duties, or operating equipment while impaired—whether by alcohol, illegal drugs or misuse of legal substances—is not permitted.

Energizer reserves the right to require drug or alcohol testing when there is reasonable suspicion that a colleague may be under the influence. Colleagues who use prescription or nonprescription medications that may impair alertness or judgment, or who observe behavior suggesting impairment that could jeopardize the safety of others or Energizer's business interests, must report the concern immediately.

Colleagues who experience issues related to alcohol or drug use are encouraged to seek assistance through the Employee Assistance Program. Additional information is available on the company intranet.

What If… you notice a colleague who appears impaired while operating equipment or performing safety-sensitive tasks?

DOING RIGHT IN OUR WORK

We act with integrity in our business relationships.

Anti-Corruption
Gifts and Hospitality
Competitors
Third Parties



DOING RIGHT IN OUR WORK

ANTI-CORRUPTION

We act boldly by keeping our business decisions free from improper influence.

Energizer colleagues are never allowed to give or accept bribes of any kind. We follow all anti-corruption and anti-bribery laws around the world, including the U.S. Foreign Corrupt Practices Act (FCPA), which applies wherever we do business. These laws prohibit giving anything of value to a government official, including cash, cash equivalents (gift cards), expensive meals or hospitality, trips, access to vacation homes, jobs or other benefits.

Commercial bribery is also prohibited. This means no one may give or accept anything of value to improperly influence a business decision with a customer, supplier, distributor or other third party.



We DO RIGHT When We:

- Refuse any offer, request, or expectation of a bribe, kickback or facilitation payment.
- Take extra care when interacting with government officials or higher-risk third parties.
- Report any request for an improper payment immediately.

What If... your shipment is delayed by a new customs agent, and someone tells the customs broker to “do whatever it takes” to move it through?

Facilitation or grease payments, commonly understood as small amounts of money paid to government officials to speed up routine or non-discretionary activities, are illegal in many countries and violate Energizer’s policies. In very limited emergency situations where someone’s life is in danger, such a payment may be permissible only with prior approval from the General Counsel and Head of Global Ethics & Compliance. These payments must be properly recorded in our accounting systems.

The bottom line is that colleagues are not allowed to give anything of value to government officials or to anyone else to improperly influence a business decision. We may also be held responsible for improper payments made by third parties acting for Energizer, so it is important to work only with partners who follow our standards.

Pause: Working with Higher-Risk Third Parties

It is not always simple to determine who a government official is as some companies may be partially owned by the government. If you are not sure, contact Global Ethics & Compliance at energizercompliance@energizer.com.

DOING RIGHT IN OUR WORK

GIFTS AND HOSPITALITY

We serve each other by keeping our business relationships fair and transparent.

Energizer's Gifts and Hospitality Policy provides guidance on when it is appropriate to give or receive gifts or hospitality with third parties. While building relationships is part of how we do business, gifts or hospitality must never be used or seen as being used to influence a business decision. Gifts or hospitality should always be reasonable, modest, and connected to a legitimate business purpose. Failure to follow this policy is a violation of the Code.





We DO RIGHT When We:

- Give and receive only modest, appropriate gifts.
- Avoid anything that could influence, or appear to influence, a business decision.
- Ask Global Ethics & Compliance when we are unsure what is allowed.

Important Guidelines:

- Do not give or accept gifts totaling more than $200 USD per entity annually.
- Never give or accept cash or cash equivalents (including gift cards).
- Procurement and Supply Chain colleagues may not give or accept any gifts.
- Do not accept travel or lodging from third parties.

What If... a supplier sends you a gift basket during contract negotiations?

DOING RIGHT IN OUR WORK

COMPETITORS

We do right by competing fairly and honoring open, honest markets.

Competition laws, also known as antitrust laws, are designed to create fair and honest competition in the marketplace. Our success should be based on our product, pricing and promotions. Energizer will compete vigorously and legally.

Competition laws are complex and differ by country, but the general rule is that Energizer colleagues are prohibited from working with competitors, directly or indirectly, to set any part of the prices charged to our customers and ultimately to consumers. Direct communication with competitors should be avoided and if they occur, notify the Legal team.

Never do the following with competitors:

- Discuss prices, sales plans, promotions or volumes
- Agree to divide markets, customers, territories, shelf space or advertisement space
- Agree to limit production or sales or not to do business with specific customers or suppliers
- Agree not to hire each other's colleagues

Colleagues need to be careful when communicating indirectly with competitors. Retailers, distributors, or trade associations must not be used to pass information between competitors.

Gathering competitive information and business data is an appropriate practice, but must be done legally and in compliance with Energizer's policies which includes documenting where and when you obtained the competitive information.



What If... a distributor shares a non-public document showing a competitor's future price increase, and your colleague suggests sending it to the whole team so everyone can review?

We DO RIGHT When We:

- Compete based on the quality and value of our products.
- Avoid discussions or data exchanges with competitors about pricing, sales, customers or strategy.
- Use only lawful and publicly available sources when reviewing competitor information.

DOING RIGHT IN OUR WORK

THIRD PARTIES

We win together by choosing partners who share our commitment to deliver results the right way.

Energizer hires a substantial number of third parties to perform services for us and supply goods to us, such as customs-brokers, third party manufacturers, raw material suppliers and human resource vendors. Energizer also engages with distributors who sell our products in countries across the globe.

It is important to understand that we cannot assign our responsibility for compliance to third parties. Ultimately, Energizer is still responsible for the actions of its third parties.

Pause: Corruption Red Flags

To ensure these third parties work with the integrity we expect from our own colleagues, we must:

- Conduct all required due diligence before engaging a third party.
- Use contracts that clearly communicate our compliance expectations.
- Provide oversight to ensure the third party follows our standards.
- Remove system access promptly when the third party no longer works for us.

What If… you identify a red flag during diligence or notice that a third party's behavior changes after work has begun?



We DO RIGHT When We:

- Take steps to understand potential risks before we begin working together.
- Set clear expectations so third parties understand our standards.
- Stay alert to signs that a third party may not be meeting our standards and raise concerns promptly.

DOING RIGHT IN OUR WORK

We use our resources responsibly in how we manage company assets and personal interests.

Appropriate Use of Company Resources
Political Contributions and Activities
Conflicts of Interest



DOING RIGHT IN OUR WORK

APPROPRIATE USE OF COMPANY RESOURCES

We do right by using Energizer resources responsibly.

It is a violation of the Code of Conduct to "pad" or lie on expense reports or reimbursements or create fake contracts for goods and services the company never received.

Colleagues are never allowed to use the company's IT resources (e.g., computers, internet access, instant messaging) to post, store, transmit, download, upload or distribute any kind of threatening or maliciously false, slanderous or obscene materials (e.g., pornography). Colleagues who inappropriately use company resources could face disciplinary action up to and including termination.

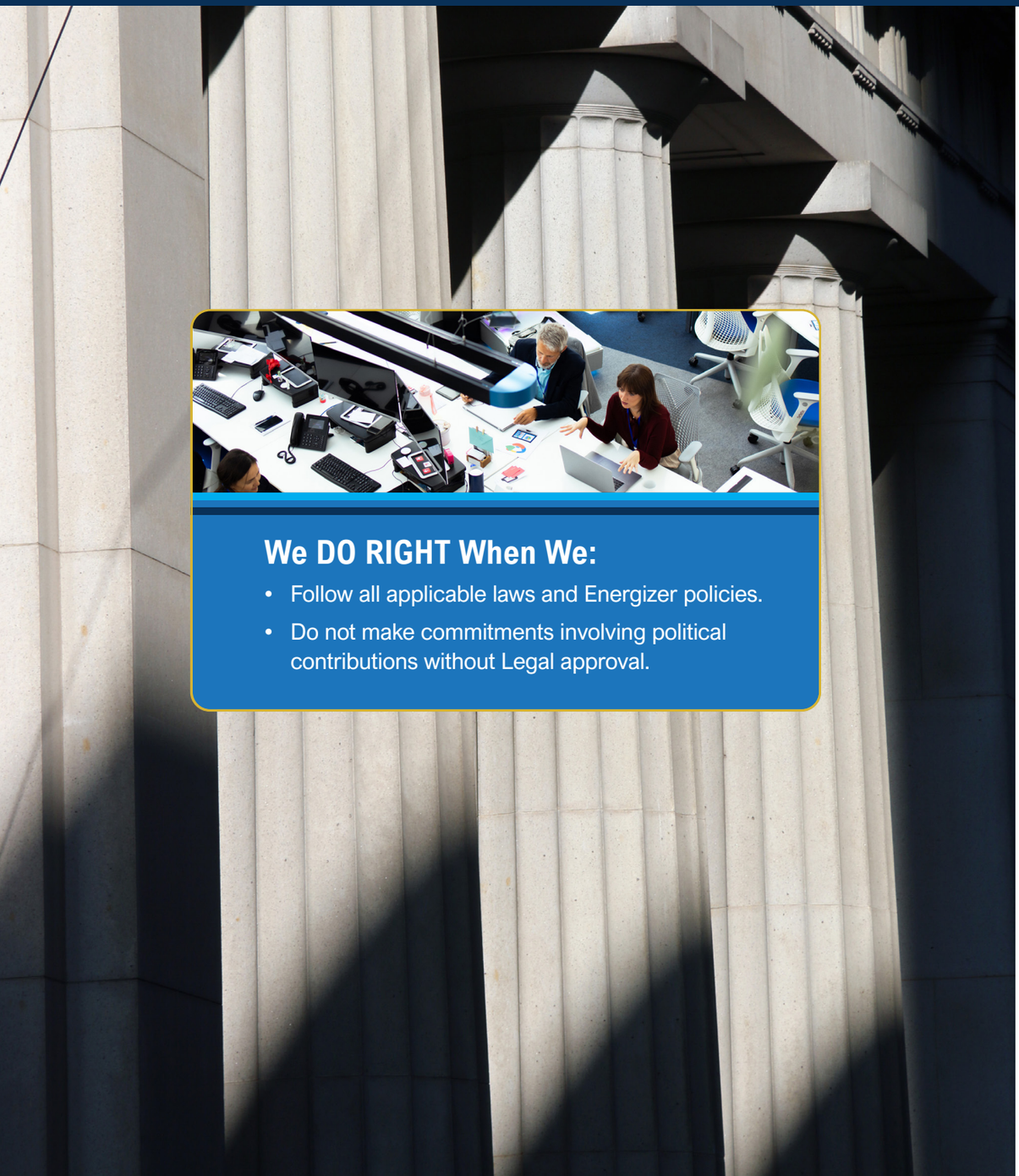
Personal use of company equipment and systems must be limited and should not interfere with work duties. These resources are owned by Energizer, who has the right to periodically access, monitor or even disclose the contents of anything on its electronic resources (including emails, social media use, instant messaging services, documents, SharePoint or internet activity, and voicemails).

What If… you learn that a colleague created a fake receipt to justify a reimbursement?



We DO RIGHT When We:

- Use Energizer resources responsibly and with good judgment.
- Submit accurate and honest expenses and records.
- Use IT systems appropriately and avoid any inappropriate or harmful content.



We DO RIGHT When We:

- Follow all applicable laws and Energizer policies.
- Do not make commitments involving political contributions without Legal approval.

DOING RIGHT IN OUR WORK

POLITICAL CONTRIBUTIONS AND ACTIVITIES

We do right by using good judgment when political activity intersects with our work.

Laws of certain jurisdictions prohibit the use of company funds, assets, services or facilities on behalf of a political party or candidate.

Generally, Energizer does not allow any direct payment of corporate funds to any political party, candidate or campaign. However, any payment must be permitted under applicable law and approved in writing and in advance by the General Counsel.

Energizer's Political Contributions Policy is not intended to discourage or prohibit colleagues from voluntarily making personal political contributions, participating in the political process on their own time and at their own expense, expressing their personal views on legislative matters, or engaging in any other lawful political activities.

KNOWLEDGE CHECK

select true or false

Colleagues may participate in political activities in their personal capacity, on their own time and at their own expense.

True *or* False

DOING RIGHT IN OUR WORK

CONFLICTS OF INTEREST

We serve each other by putting Energizer's interests ahead of personal interests.

Energizer colleagues must avoid real or perceived conflicts of interest. A conflict of interest happens when a colleague or Board member's personal interests are not in line with Energizer's best interests.

Conflicts can exist when you or a family member receive personal benefits resulting from your position with the company, or if you influence Energizer to hire a family member or friend, either as a colleague or contractor—without disclosing your relationship with them.

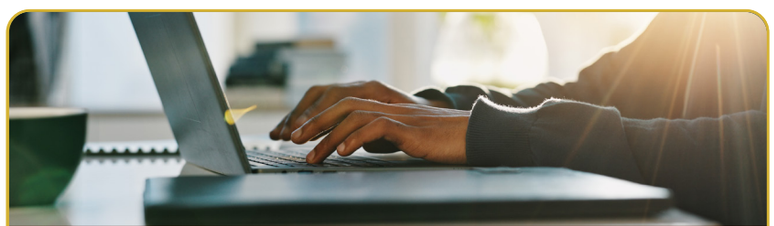
During the course of employment, colleagues should not engage in work that directly competes with Energizer or benefits competing businesses. Colleagues may not use company property for personal gain or to run their own personal business. Colleagues who are married, living together, related, or in a romantic or sexual relationship are not allowed to be in a direct-reporting relationship at work. Colleagues may not work two full-time jobs at the same time or work for a competitor.

Pause: Common Conflicts of Interest ▶

What If... a colleague hires a family member to do a project without disclosing the relationship and pays them with a corporate credit card?

During the course of employment, colleagues should not engage in work that directly competes with Energizer or benefits competing businesses. Colleagues must disclose potential conflicts to their HR business partner or to Global Ethics & Compliance at energizercompliance@energizer.com.

Potential conflicts can often be managed appropriately when they are disclosed. When unsure, speaking up and asking for guidance is the right step.



We DO RIGHT When We:

- Speak up early when a situation could create a real or perceived conflict.
- Avoid using our roles or access to benefit ourselves, friends or family.
- Disclose any outside work, relationships or situations that could affect impartial decision-making.

DOING RIGHT IN OUR WORK

We safeguard our information in how we manage and communicate it.

Intellectual Property and Confidential Information
Data Privacy and Information Security
Artificial Intelligence
Communication with External Parties





We DO RIGHT When We:

- Protect confidential and proprietary information at all times.
- Use NDAs and secure tools before sharing information externally.
- Report possible brand misuse or infringements to the Legal team.

DOING RIGHT IN OUR WORK

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

We act boldly by protecting our ideas, technology, and confidential information.

Protecting information about how we make our products as well as the ideas, technology and innovations that we create for the company is vital. We protect our intellectual property through use of trademarks, trade secrets and patents. But we also rely on colleagues to ensure that information is kept confidential.

- Before you share Energizer confidential information with someone outside the company, make sure the disclosure is necessary and that you have a non-disclosure agreement (NDA) in place.
- Vigorously protect the brand by reporting all infringements and look-alikes to the Legal team.
- Never share non-public company confidential information with anyone outside the company, including on social media.

We must also recognize that our responsibility to protect confidential and proprietary information exists both during and after our employment at the company. However, nothing in the Code restricts or prohibits the disclosure of confidential and/or proprietary information under, and in accordance with, whistleblower protections afforded by applicable law or regulation.

DOING RIGHT IN OUR WORK

DATA PRIVACY AND INFORMATION SECURITY

We serve each other by protecting personal data and keeping information secure.

In addition to protecting company information, Energizer also safeguards colleague, customer and supplier data. Information security is every colleague's responsibility.



We DO RIGHT When We:

- Protect personal information and use it only for approved purposes.
- Use secure systems and tools when handling or sharing sensitive data.
- Report suspicious activity or potential security incidents right away.

Energizer uses appropriate and up-to-date security safeguards, and colleagues must follow all information security and privacy policies and practices including but not limited to:

- Do not share your user IDs or passwords with anyone. If you have specialized access, make sure at least one other person has the same access so they can perform those tasks in your absence.
- Do not click on links or open attachments in emails from an unknown source.
- Do not give out any private information (company, colleague, supplier or customer) to a caller.
- Do not access sensitive information on your computer or discuss sensitive information by phone in a public setting (e.g., airplane or commuter train).
- Protect all sensitive information that is in your possession.
- When sharing sensitive data with external parties, use the appropriate tools to encrypt the data.

Energizer is committed to complying with all International Data Privacy Laws. Colleagues should only collect and process personal information needed to run the business. It is critical that we protect colleague sensitive data and use it only for the purposes for which it was obtained. Failure to adequately protect sensitive data can lead to disciplinary action, up to and including termination and involvement of law enforcement as necessary. If you have questions about Privacy and Data Protection, consult with the Legal team or contact privacy@energizer.com.

What If... a colleague shares her login ID and password so someone can handle their work while they are on vacation?

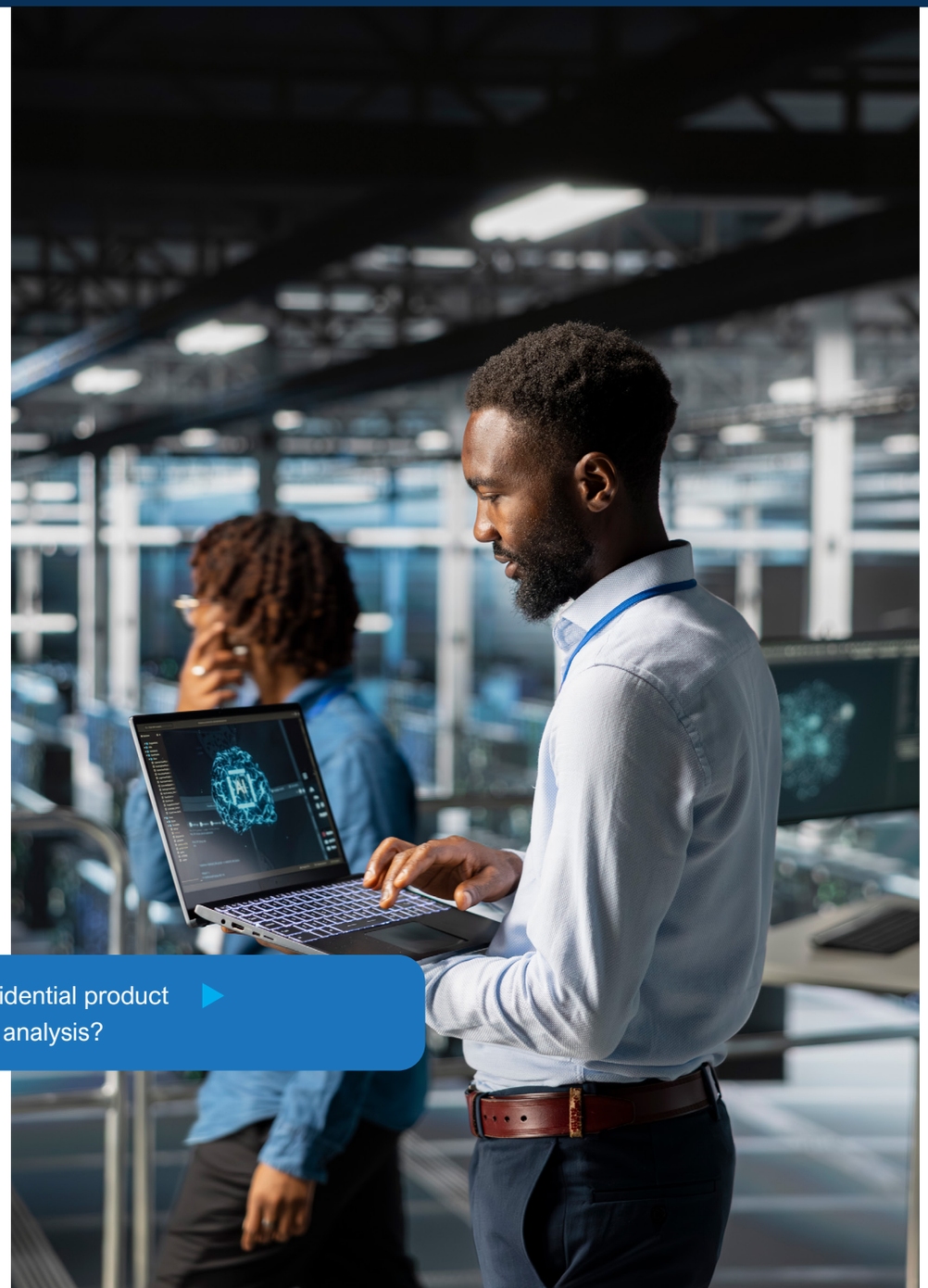


DOING RIGHT IN OUR WORK

ARTIFICIAL INTELLIGENCE

We do right by using artificial intelligence in responsible ways.

Artificial intelligence ("AI") can support innovation and efficiency at Energizer, but it must be used carefully. Colleagues must protect confidential information when using AI tools, rely only on tools approved by Energizer and use good judgment when reviewing AI-generated outputs. Good judgment means checking AI outputs for accuracy, fairness, relevance, and alignment with company policies before using or sharing them. AI should support, not replace, sound human decision-making.



What If... a colleague wants to upload confidential product data into an external AI tool to speed up an analysis?



We DO RIGHT When We:

- Use only approved AI tools and follow guidance on appropriate use.
- Protect confidential and personal information when working with AI systems.
- Raise concerns if AI results appear inaccurate, biased, or inconsistent with our culture.

KNOWLEDGE CHECK

select true or false

AI-generated outputs may be used or shared without review if they come from an Energizer-approved AI tool.

True or False



DOING RIGHT IN OUR WORK

COMMUNICATION WITH EXTERNAL PARTIES

We win together by sharing information externally in a clear and consistent way.

Energizer communicates with external parties in a responsible, accurate and coordinated manner. External requests for information from the media, government regulators, or industry and trade groups should be directed to the appropriate Communications, Legal or Compliance contacts. Communications with the investment community such as investors, shareholders, financial analysts, and others who evaluate Energizer's performance carry additional regulatory obligations and must be handled by Investor Relations or Legal.

Colleagues must not disclose confidential or nonpublic information to anyone outside Energizer unless authorized to do so. This includes information about our products, operations, finances, colleagues, customers, suppliers or business partners. When using personal social media, colleagues should avoid implying that they are speaking for Energizer unless they have been authorized to do so.



We DO RIGHT When We:

- Share information externally only when authorized.
- Refer external inquiries to the appropriate Energizer teams.
- Use approved channels for investor and analyst communications.

KNOWLEDGE CHECK

select true or false

Because it's your personal social media, you may speak on behalf of Energizer as long as you don't share confidential information.

True *or* False

DOING RIGHT IN OUR WORK

We meet our regulatory obligations in how we conduct and report on our business.

Financial Reporting
Anti-Money Laundering
Insider Trading
Global Trade
Truth in Advertising



DOING RIGHT IN OUR WORK

FINANCIAL REPORTING

We do right by upholding accuracy in our reporting and safeguarding material information.

Energizer is a publicly traded company on the New York Stock Exchange. As such, Energizer must comply with all applicable financial reporting rules and regulations, including those of the U.S. Securities and Exchange Commission (SEC), which means that all of our financial information is presented accurately, honestly and completely, and in compliance with generally accepted accounting principles and Energizer's financial policies. Colleagues who fail to ensure compliance with these rules will face disciplinary action. Criminal penalties for both the individual colleague and the company itself may also result.

Energizer is committed to following its disclosure and record retention policies, which means that colleagues should never fraudulently destroy documents or alter financial records that may be required for any internal or government investigation. Colleagues are expected to cooperate appropriately with audits and investigations by providing accurate information and preserving relevant records.

What If… you are asked to sign off on a report before you've had a chance to confirm the numbers?



We DO RIGHT When We:

- Record financial information carefully and make sure entries are accurate and complete.
- Ask questions when something in a financial report does not look right or does not make sense.
- Speak up immediately if we see or suspect inaccurate reporting, altered records or missing documentation.



We DO RIGHT When We:

- Stay alert to unusual or unexplained payment requests or financial activity.
- Confirm that transactions have a clear and legitimate business purpose.
- Report suspicious or potentially improper transactions immediately.

DOING RIGHT IN OUR WORK

ANTI-MONEY LAUNDERING

We act boldly by ensuring our financial transactions are legitimate and transparent.

Money laundering involves hiding or disguising the source of funds connected to illegal activity. Energizer does not participate in or assist with any activity that could conceal the true origin, ownership or purpose of payments. Colleagues should be alert to unusual or unexplained financial requests, such as unexpected changes in payment instructions, routing payments through unrelated accounts, or transactions that do not align with the goods or services provided.

Any financial activity that seems unusual, unclear, or inconsistent with normal business practices must be paused and reported to Finance, Legal, or Global Ethics & Compliance.

KNOWLEDGE CHECK

select true or false

If a payment request seems unusual or unclear, it is acceptable to process it as long as it comes from a known business partner.

True *or* False

DOING RIGHT IN OUR WORK

INSIDER TRADING

We win together by handling material, nonpublic information responsibly and lawfully.

Energizer colleagues and Board members comply with insider trading laws. This means if you have material information about Energizer or another company that is not generally known or available to the public, you cannot buy, sell or trade in stock of the company to which the information relates. Equally important, you cannot give non-public information to somebody else so that they can buy, sell or trade that company's stock.

Material Information is any information that an investor would reasonably consider important to making investment decisions.

Energizer's Insider Trading Policy also prohibits the transfer of funds into or out of Energizer stock equivalent funds in Energizer's benefit plans while in possession or aware of material non-public information, or engaging in any other transaction involving Energizer securities that suggests the misuse of information that is unavailable to the general public, including speculative trading, hedging or pledging transactions.

What If… a colleague learns from a supplier contact that the supplier is close to finalizing an acquisition, and the colleague purchases stock in the supplier before the news becomes public?



We DO RIGHT When We:

- Keep material, non-public information confidential and never use it for personal gain.
- Consult Legal when uncertain about the timing or appropriateness of a securities transaction.
- Avoid sharing non-public information with others, including friends or family members.

Questions pertaining to the sale or purchase of stocks or bonds under circumstances that may involve non-public information, the timing of a purchase or sale of securities, or any other aspect of applicable securities laws, should be directed to the Legal team. More detailed information regarding compliance with securities laws is contained in our Insider Trading Policy.

Non-public Information could include potential acquisition targets, new projects or other significant events related to Energizer or one of our suppliers or distributors.

Any colleague or Director who joins Energizer already owning substantial ownership or stock in a customer, supplier or competitor of Energizer must notify Energizer's General Counsel. They must also remove themselves from any discussion or voting regarding Energizer's relationship with that company.

DOING RIGHT IN OUR WORK

GLOBAL TRADE

We act boldly by meeting trade requirements wherever we do business.

Moving our products from production facilities to customers and consumers requires compliance with a wide range of international trade regulations. To comply with local import and export laws and regulations, Energizer conducts due diligence to ensure that all necessary documentation, duties, fees, denied-party screening, and licenses are properly filed and maintained in accordance with U.S. laws and regulations. Violating import and export rules can lead to severe fines and penalties for both the company and the individual. Colleagues should engage Energizer's Global Trade Compliance and Global Regulatory teams to assist with the execution of these activities.

As a U.S.-based company, Energizer ensures compliance with U.S. trade-sanction laws by not engaging with U.S.-sanctioned countries, designated foreign nationals or entities. Energizer also does not participate in or support requests to engage in illegal boycott activities of foreign countries. As we conduct business across borders, all colleagues must remain aware of and compliant with all U.S. and local trade regulations and laws and must follow Energizer's Global Trade Compliance policies, standards, and procedures.

Any possible non-compliance with U.S. or local trade regulations, including import, export, sanctions or anti-boycott laws, and any request to participate in a boycott must be reported immediately to Global Trade Compliance, Global Ethics & Compliance, or the Legal team.

What If… a customer asks that goods be shipped to an unfamiliar third party, and routing suggests the product may be diverted to a restricted country?



We DO RIGHT When We:

- Follow all applicable trade, sanctions, and anti-boycott requirements.
- Ask Global Trade Compliance or Legal when requirements are unclear.
- Report suspected trade violations or boycott-related requests right away.

DOING RIGHT IN OUR WORK

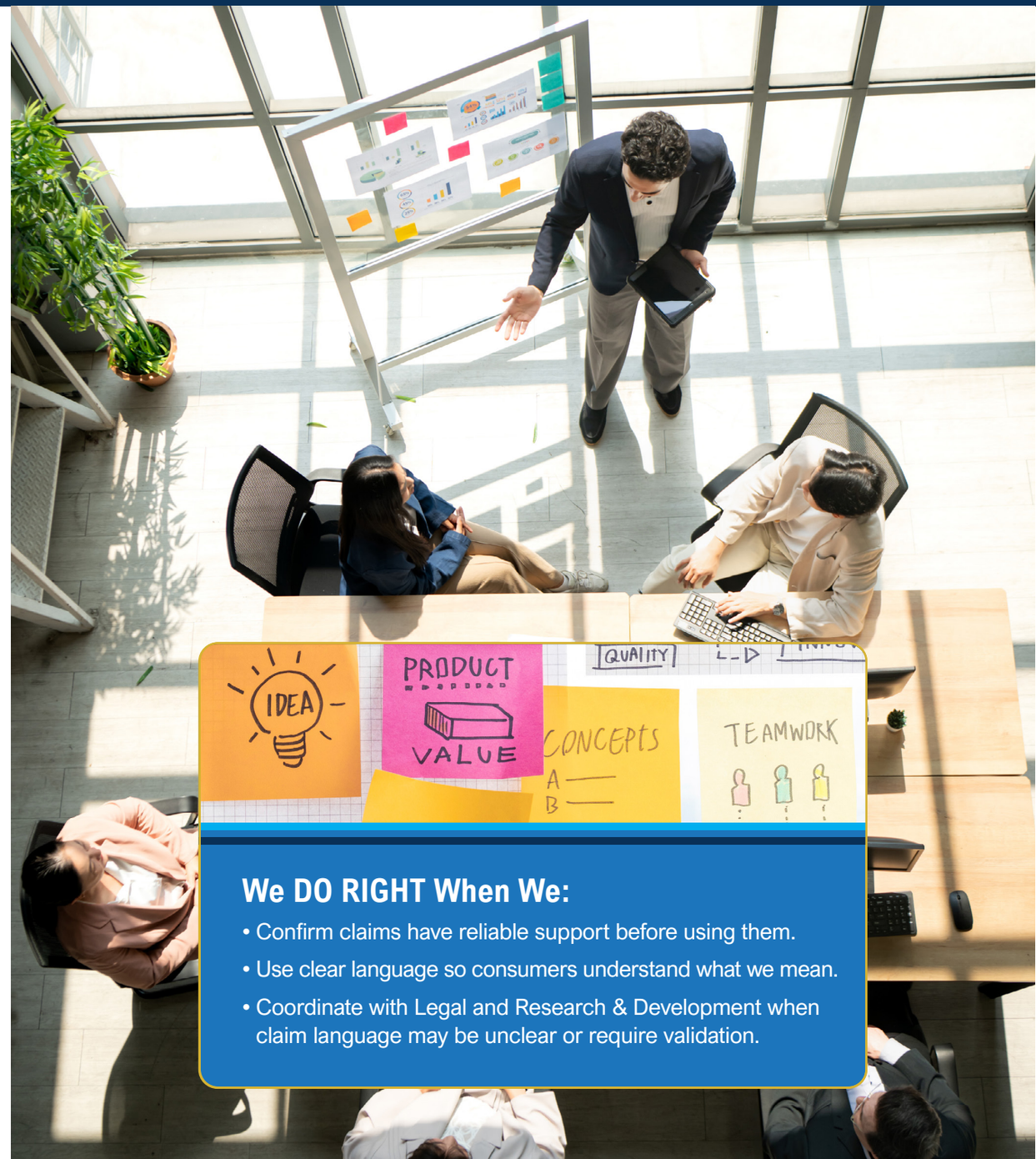
TRUTH IN ADVERTISING

We serve each other by communicating about our products with clarity and care.

When marketing or selling our products, we work to ensure that our communications are truthful, understandable and consistent with applicable laws. We avoid overstating or misrepresenting the quality of our brands, products, packaging, pricing or promotions. We also avoid using statements in advertising or on packaging that are untrue or could mislead consumers.

Any claims about our products or brands must be supported by correct information and receive the appropriate legal approvals before use. This includes claims used in advertising, packaging, digital content and social media. When discussing Energizer products on social media, colleagues should disclose their affiliation with the company. All communications should reflect our commitment to clarity, fairness and responsible marketing.

What If… a colleague wants to use a claim that seems impressive, but the support for it is unclear?



We DO RIGHT When We:

- Confirm claims have reliable support before using them.
- Use clear language so consumers understand what we mean.
- Coordinate with Legal and Research & Development when claim language may be unclear or require validation.

DOING RIGHT IN THE WORLD

We do right by considering the impact of our actions.

Community Involvement and Charity
Environmental Sustainability
Supply Chain Responsibility



DOING RIGHT IN THE WORLD

COMMUNITY INVOLVEMENT AND CHARITY

We serve each other by strengthening the communities where we live and work.

Energizer supports efforts that make a positive difference in our communities. Colleagues are encouraged to participate in volunteer and charitable activities in ways that reflect our culture and commitment to service. We take care to ensure that charitable requests or in-kind support are appropriate, and official documentation must be provided for a request to be considered. When representing Energizer in the community, or when using Energizer resources for charitable activities, colleagues must obtain approval from Global Ethics & Compliance or the Legal team.





We DO RIGHT When We:

- Keep charitable involvement free of conflicts of interest.
- Ask for official documentation to evaluate a charitable request.
- Seek approval before using Energizer's name, logo or resources for charitable purposes.

What If… after a severe storm, a community group asks Energizer for in-kind donations but cannot explain how the items will be distributed?

DOING RIGHT IN THE WORLD

ENVIRONMENTAL SUSTAINABILITY

We act boldly by caring for the environment and reducing our impact.

Energizer is committed to responsible environmental stewardship. Colleagues are expected to follow environmental procedures that support safe operations, reduce waste, conserve resources and protect our surroundings. Environmental risks or unsafe conditions should be reported right away so they can be addressed.



We DO RIGHT When We:

- Stay aware of the environmental impact of our actions, even in small daily choices.
- Follow safe handling and disposal practices for materials, batteries and chemical products.
- Speak up if we see opportunities to improve environmental practices in our processes and facilities.

KNOWLEDGE CHECK

select true or false

If a chemical spill is cleaned up and no one is hurt, it still needs to be reported.

True *or* False



What If… a colleague places recyclable materials in general trash because it is more convenient?



We DO RIGHT When We:

- Perform our due diligence on suppliers.
- Stay alert for red flags.
- Raise concerns promptly to Procurement and Global Ethics & Compliance.

DOING RIGHT IN THE WORLD

SUPPLY CHAIN RESPONSIBILITY

We win together by partnering with suppliers who share our commitment to ethical trading.

Energizer is committed to recognizing human rights on a global basis. We have established certain standards that are designed to protect human rights and also expect our suppliers and business partners to follow these standards, which include protection against child labor, forced labor and human trafficking. Energizer expects suppliers and business partners to operate ethically, support fair labor practices, protect the environment and uphold health and safety standards.

Colleagues should conduct appropriate due diligence and raise concerns about supplier practices that may not align with our expectations, culture or applicable law.

What If… a supplier avoids answering questions about how its workers are recruited?

ADDITIONAL INFORMATION

WAIVERS AND MODIFICATIONS

Energizer will waive application of the policies set forth in this Code only where circumstances warrant granting a waiver based on the best interests of Energizer and its shareholders. Any waiver pertaining to a colleague must be approved by the General Counsel and by the Chief Executive Officer. Waivers of the Code for directors and executive officers may be made only by those members of the Board of Directors not involved in the possible waiver and must be promptly disclosed as required by law or regulation.

Energizer reserves the right to modify this Code at any time. Material changes to the Code must be approved by the Audit Committee of the Board of Directors and publicly disclosed, in accordance with applicable laws and regulations.



ADDITIONAL INFORMATION

HELPFUL RESOURCES

Energizer provides a range of resources to help you ask questions, raise concerns and better understand your responsibilities under this Code. Whether you need guidance, want to report a concern, or are looking for specific policy information, these resources are available to support you.

Questions or Concerns

If you have a question or want to raise a concern, you may contact any of the following resources:

Energizer HelpLine:
www.EnergizerHelpLine.com

Global Ethics & Compliance Team:
energizercompliance@energizer.com

Data Privacy Team:
privacy@energizer.com

Global Trade Compliance Team:
tradecompliance@energizer.com

Corporate Communications:
corporatecommunications@energizer.com



Key Policies

The following policies provide additional guidance on common risk areas and expectations. These policies are available on the company intranet.

- Global Anti-Corruption Policy
- Global Antitrust and Competition Policy
- Global AI Acceptable Use Policy
- Global Conflict of Interest Policy
- Global Data Protection Policy
- Global External Communications Policy
- Global Gifts & Hospitality Policy
- Global IT Acceptable Use Policy
- Global Non-Discrimination & Anti-Harassment Policy
- Global Non-Retaliation Policy
- Global Records & Information Mgmt. Policy
- Global Securities Trading Policy
- Global Social Media Policy
- Global Speak Up Policy
- Global Trade Policy
- Global Workplace Violence Prevention Policy

Revised June 2026