



6 February 2024

RE: EUROPEAN BATTERY REGULATION

Dear Customer,

The European Union has adopted new laws regarding all forms of batteries, including portable batteries of general use. The European Battery Regulation (which replaces the European Battery Directive – 2006/66/EC) came into effect on 17 August 2023, updates EU law and introduces several new concepts, such as supply chain due diligence, performance standards, and restrictions of certain metals.

Energizer has been engaged in the legislative process since it began in 2019 and will remain engaged through the remaining administrative processes. We are knowledgeable of the content of the Regulation and confident that all Energizer products will meet applicable requirements within the periods of time set forth in the regulation. Below please find a summary of the more impactful requirements.

Recycling Collection Targets

The Regulation establishes new recycling targets. Energizer has participated in battery extended producer responsibility recycling programs since their inception in the 1990s. The established targets are:

12/31/2023: 45%
12/31/2027: 63%
12/31/2030: 73%

Performance Standards

Article 9 of the Batteries Regulation assigns the European Commission the task of establishing performance standards within 48 months (August 2027). After the standards are established, manufacturers will have 24 months to conform to the standards. Energizer, with other members of the industry through the trade association, is engaged with the European Commission to help create performance standards that ensure the highest performing products are available to European consumers.

CE Marking

The European Battery Regulation requires battery manufacturers of portable batteries of general use to apply the CE mark to the battery label, or if that is not possible due to size constraints, to the packaging, by 17 August 2024. Energizer will be compliant with this requirement in one of several ways. First, many



Energizer batteries will have the CE mark imprinted on the label on or before 17 August 2024. In situations where that is not possible due to size constraints, packaging will be marked and the batteries will be accompanied by a CE declaration in external packaging containing the CE mark.

Capacity Marking/Minimum Average Duration

By August 2026, the European Commission must make a decision on implementation of Capacity Markings for rechargeable batteries and Minimum Average Duration markings for primary batteries. Once that decision is made, manufacturers have 18 months to implement. Energizer is well-positioned to comply with whatever requirements the European Commission decides to implement.

Lead Restrictions

The Regulation restricts the use of lead in batteries to lower than 100 parts per million. This restriction applies to all portable batteries of general use (carbon zinc, alkaline, lithium) within one year of the adoption of the Regulation (18.8.2024) except zinc air batteries, which must be on compliance within five years of adoption of the Regulation (18.8.2028). Energizer alkaline, lithium, and silver oxide batteries are already in compliance and the company has a path to compliance for carbon zinc and zinc air, so there should be no disruption to customers.

Energizer is excited to work with our colleagues, suppliers, and customers to do our part to implement the European Battery Regulation. If you have any questions regarding the Regulation's requirements or implementation, please contact your Energizer relationship manager.

Sincerely,

A handwritten signature in black ink, appearing to read "K. J. Rejent", written in a cursive style.

Kevin J. Rejent

Associate General Counsel – Regulatory & Government Affairs