

April 15, 2025

GS Yuasa Energy Solutions, Inc.

To Our Valued Customers:

RE: Compliance with the European Battery Regulation for Industrial Lead-Acid Batteries.

If you have questions regarding the sale of our lead-acid batteries into the European Economic Area (EEA), please contact us to discuss how we support customers with this need.

Recently, the EU (European Union) enacted the “EU Battery Regulation (EU 2023/1542)” in August 2023, aiming to establish a harmonized framework for the sustainability and safety of batteries within the EU, anticipating an increase in battery usage. This regulation replaces the previous EU Battery Directive (2006/66/EC) and introduces new requirements for various types of batteries and battery-powered products.

GS Yuasa Energy Solutions, Inc. (GYES), as a wholly owned subsidiary of GS Yuasa Corporation, we will handle the declaration of conformity required from February 2024 and the conformity assessment and CE marking required from August 2024 for the industrial lead-acid batteries we sell in the Americas as follows:

Our Response to the EU Battery Regulation

The industrial lead-acid batteries GYES sells in the Americas are intended for use within the Americas. Therefore, we generally do not comply with the obligations of manufacturers stipulated in Article 38 of the regulation or the obligations of battery cell and module suppliers stipulated in Article 39.

Additionally, GYES generally does not comply with CE marking for the industrial lead-acid batteries we sell in the Americas. Please note that without CE marking, industrial lead-acid batteries cannot be placed on the market in the EEA.

Please contact us with questions and how we support customers that sell our lead-acid batteries into the EEA.



Creating the Future of Energy

(Note)

Regarding Article 38 "Obligations of Manufacturers" and Article 39 "Obligations of Battery Cell and Module Suppliers" of the EU Battery Regulation.

When selling products equipped with lead-acid batteries or lead-acid batteries as replacement modules for industrial lead-acid battery applications in the European Economic Area (EAA), you are the manufacturer as defined by this regulation. Please note that conformity assessment and declaration of conformity are the responsibilities of the manufacturer and importer. In addition, according to Article 44 of the Regulations, when these products are imported into the European Economic Area (EAA) using a product name or trademark other than ours, the manufacturer's obligations under these Regulations are imposed on the importer and distributor. Even if the battery (single cell) is imported using our product name and trademark, as stated in paragraph 1 above, in principle we do not act as a manufacturer under these Regulations. Similarly, in principle we do not provide the information and documents required as a battery cell and module supplier under Article 39.