

For ITM Power, integrity throughout our business is vital. We believe that acting responsibly is a fundamental basis in the way we do business and for creating long-term value to us and to our business partners. This entails being a responsible employer, having a high standard of integrity in our business relationships and acting with care for the societies and environments in which we operate.

We are accountable to future generations and hold ourselves – and our business partners – to the highest standards of integrity and responsibility.

The Code of Conduct for ITM Power's Business Partners provides the foundation for our expectations including contactors, vendors, service providers, agents and contingent labour, their employees, and their suppliers.

We strive to work with business partners who contribute to sustainable development and are economically, environmentally, and socially responsible; and we expect our business partners to undertake reasonable efforts to encourage their own suppliers and sub-contractors to comply with the principles of this Code of Conduct for ITM Power's Business Partners.

We will develop and strengthen relationships with business partners who can demonstrate compliance with and are committed to the principles set out below.

As a minimum all business partners should:

Business Integrity

- Comply with all applicable laws and regulations;
- Not tolerate unethical practice;
- Support fair competition;
- Ensure that conflicts of interest are identified and avoided.

Health, Safety, & Security

- Have a systematic approach to Health, Safety and Security designed to ensure compliance with all applicable Health & Safety laws and regulations;
- Seek to continuously improve Health & Safety performance by encouraging the workforce and any suppliers to report any accident, injury, illness, or unsafe condition immediately, and stop work that could be unsafe, so that appropriate action can be taken.

Sustainability, Environmental Responsibility, & Social Performance

- Be committed to sustainable development and protecting the environment in compliance with all applicable environmental laws and regulations;
- Use energy and natural resources efficiently;
- Continually look for ways to minimize waste, emissions and discharge of their operations, products and services;
- Design and manufacture products with an increasingly sustainable life cycle;
- Respect their neighbours and contribute to the societies in which they operate;
- Manage the social impacts of their activities carefully and enhance the benefits to local communities;
- Engage with stakeholders, employees, business partners and local communities and seek to listen and respond to them honestly and responsibly.

Human Rights & Modern Slavery

Respect the human rights and dignity of all people and meet the responsibilities of business set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labour Organisation (ILO) including ensuring:

- No use of child labour;
- No use of forced, prison or compulsory labour;
- No restriction of free movement of employees such as holding workers identification documents, passports or work permits as a condition of employment;
- No payment of recruitment fees by workers;
- Wages and benefits are provided that meet or exceed the national legal standards, and consider signing up to paying the Living Wage, or becoming an accredited Living Wage employer.
- Compliance with all applicable laws and regulations on working hours; and
- A safe, secure and healthy workplace is provided.

Non-discrimination, Grievance Processes, & Freedom of Association

Provide a workplace which:

- Is free from harassment, intimidation, inhumane treatment and discrimination based on race, ethnicity, religion, national origin, disability, age, sexual orientation, gender or marital status;
- Complies with all applicable laws and regulations on freedom of association and collective bargaining.

Bribery, corruption, & money laundering

- Promote transparency in the conduct and administration of business and should not tolerate, permit or engage in any form of corrupt or unethical practices, including extortion, fraud or bribery whether direct or indirect;
- Have in place effective processes and procedures to proactively prevent money laundering, including the act of hiding illegal funds (especially those with possible links to terrorism or criminal activity) or giving such funds apparent legitimacy.

International Trade Law

- Comply with applicable international trade laws. Classifying in advance, with appropriate labelling, documentation, licenses and approvals completed, all products intended for import or export, including the transfer or sharing of restricted software, technical data, or technology;
- Ensure that business is conducted in a manner that does not violate UN, EU, UK or US trade sanctions and to inform ITM Power plc should they ever become subject to international trade sanctions.

Protecting Confidential & Personal Information

Have effective protocols in place for securing and protecting ITM Power's information including:

- Respecting the proprietary and intellectual property rights of ITM Power.
- Having information classification protocols and adopting industry best practices, on sharing, protecting and securing information.
- Observing all data privacy legal requirements on the collection, processing and transfer of ITM Power personal data.
- Reporting any suspected or actual information security incidents that impact ITM Power information or systems to ITM Power as soon as practicably possible.

Competition Compliance

- Promote vigorous, open, honest, and fair competition and conduct business in accordance with all applicable anti-competition or anti-trust laws and regulations.
- Prohibit any actions that falsify or distort free competition or market access and not be involved in any anti-competitive understandings or agreements including improper exchange of competitive information, price fixing, bid rigging or improper market allocation.

Platinum Group Metals

ITM Power is committed to responsibly sourcing all our platinum group metals. We expect our suppliers to:

- Provide back-to-origin transparency for all materials supplied containing platinum group metals;
- Abide by the ITM Power PLC Platinum Group Metal (PGM) Supply Chain Policy Statement, which is available on our website, and sets out our commitments in the procurement and processing of platinum group metals.

Audit & Termination of Agreements

- ITM Power reserves the right to verify a supplier's compliance with this code. Where a supplier review or audit identifies areas of non-compliance, the supplier must implement time-bound corrective actions to lead to compliance.
- ITM Power reserves the right to terminate an agreement with any supplier that does not comply with this code.

Speak Up!

- Promote a "speak-up" culture that does not tolerate retaliation.
- Provide your employees, your suppliers and your business partners with a dedicated whistle-blowing mechanism where they can log a grievance if they see something that is unsafe, unethical or potentially harmful involving either your or ITM Power's businesses or activities.

If you have any concerns regarding ITM Power's compliance with Health and Safety or you spot something which you believe could potentially be dangerous or unethical, please contact us at compliance@itm-power.com