

ITM Power is dedicated to sustainable sourcing in compliance with all applicable laws. We have published a Code of Conduct for Business Partners which we require all our suppliers to align with. This sets out our ethical expectations and responsibilities in regard to sourcing, and gives supplier guidance on how to align to our values.

### **Responsible Platinum Group Metal (PGM) Sourcing**

ITM Power endeavours to responsibly and ethically source, trade, process, move and recycle Platinum Group Metals. We expect our suppliers to be committed to business integrity, to ensure the sourcing and process method is conflict free in status. The EU Conflict Minerals Regulation applies to four minerals of high concern for human rights abuses: tin, tantalum, tungsten and gold. ITM Power does not buy these raw materials to manufacture our electrolyzers. While ITM Power has no trading operations in conflict-affected and high-risk areas, metals purchased by ITM Power may in some instances originate from such areas.

ITM Power's approach when sourcing Platinum Group Metals from conflict affected areas is outlined in the exclusion list below. ITM will not tolerate:

- Suppliers who enable any forms of torture, cruel or degrading treatment, forced or compulsory labour, child labour, other gross human rights violations such as sexual violence, war crimes or other violations of international humanitarian law, crimes against humanity or genocide
- Suppliers who provide direct or indirect support to non-state armed groups or to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders
- Solicitation of bribery and corruption to conceal the origin of minerals, to misrepresent taxes, fees and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport and export
- Any form of financial crime such as participating and/or facilitating money laundering, tax evasion, terrorist financing and other illegal activities resulting from, or connected to, the extraction, trade, handling, transport, or export of minerals derived from illegal taxation or extortion at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers

### **ITM Power delivers these commitments by:**

- Conducting all applicable due diligence on all suppliers who supply ITM Power with Platinum Group Metals
- Reviewing suppliers' practices to ensure compliance with ITM Power's Policy
- Maintaining records of all transactions and due diligence completed
- Engaging with suppliers, and stakeholders in the jurisdictions in which we operate, to improve and track performance as a safeguard to preventing or mitigating risks
- Providing regular relevant training to all workers involved with the trading, sourcing, handling, and movement of Platinum Group Metals

**ITM Power reserves the right to suspend or terminate an agreement with any supplier that does not comply with this code.**