

# MODERN SLAVERY STATEMENT

SEPTEMBER 2023

## 1. Introduction

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- 1.1. The ITM Power group (“ITM Power” or the “Group”) is committed to ensuring there is transparency in our approach to tackling modern slavery in our supply chain. We are continuously looking to improve our processes and practices to combat slavery and human trafficking in our business and supply chain.
- 1.2. We have zero tolerance to slavery and human trafficking. We do not knowingly work with companies or individuals that infringe the law or endanger our reputation. We expect the same high standards from our suppliers.
- 1.3. Although ITM Power is not required to issue a slavery and human trafficking statement under Section 54 of the Modern Slavery Act 2015, ITM Power has elected to publish this statement voluntarily to underline our commitment to ethical conduct.

## 2. About ITM Power

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- 2.1. ITM Power is a manufacturer of PEM electrolyzers, which generate hydrogen from water and electricity. ITM Power also provides after sales services in relation to equipment. ITM Power’s parent company is ITM Power PLC which has its head office in Sheffield, United Kingdom.
- 2.2. The Group operates primarily in the UK, as well as operating in Europe, Australia and the United States.

## 3. Managing risk as an employer

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- 3.1. As an equal opportunities employer, ITM Power is committed to creating and sustaining a non discriminatory and respectful working environment for all our employees. Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.
- 3.2. ITM Power is committed to complying with all applicable employment and health and safety legislation in every jurisdiction in which it operates and pays all employees at least the applicable real living wage in the countries in which we operate.
- 3.3. The ITM Power Code of Ethics and Behaviours sets out the standards that we expect from all our people. This documents the Group’s commitment to always acting in accordance with laws and regulations, and to trading fairly.
- 3.4. All of our employees, secondees and consultants are encouraged to “Speak Up” and to report any concerns they have to the ITM Power compliance team. This is managed via an externally managed service to give our people an anonymous way of reporting concerns.

## 4. Managing modern slavery risk in our supply chain

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- 4.1. ITM Power seek relationships with suppliers who are willing to match our high standards in respect of quality, trading practices, health and safety, environmental protection and human rights. We regard our suppliers as essential partners in our drive to continuous improvement, in respect of both ethical standards and our wider commercial objectives.
- 4.2. ITM Power's supply chain is complex and ITM Power has a large number of suppliers, many of whom are themselves distributors for other suppliers. Our due diligence on suppliers by necessity relies on information we receive from our suppliers, which in turn may rely on the information those suppliers receive from their own supply chain.
- 4.3. The steps that ITM Power has taken to manage supply chain risks associated with modern slavery and human trafficking include:
  - 4.3.1. Ensuring that all new suppliers commit to the ITM Power Business Partner Code of Conduct, which includes an obligation on our suppliers to ensure respect for human rights and dignity of all people and zero tolerance of child or forced labour;
  - 4.3.2. Oversight of our Supplier Approval Criteria, which require any new suppliers larger than micro small enterprises to have (and evidence to us) an ethics policy around human rights and modern slavery. This is a requirement to be eligible for selection as an accredited supplier to ITM Power;
  - 4.3.3. ITM Power's standard terms and conditions of business makes adherence to all applicable laws and to the ITM Power Business Partner Code of Conduct a contractual requirement of doing business with ITM Power<sup>1</sup>; and
  - 4.3.4. Publishing a Platinum Group Metals ("PGM") Supply Chain Policy Statement, to which all new PGM suppliers are required to subscribe and which sets minimum ethical standards (including standards relating to prevention of slavery and human trafficking).

## 5. Further steps

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- 5.1. We intend to carry out the following steps as part of our continuing commitment to tackling slavery and human trafficking within our supply chain:
  - 5.1.1. Strengthening checks on our legacy suppliers to ensure that they all adhere and agree to the Business Partner Code of Conduct as a condition of continuing to supply ITM Power;
  - 5.1.2. Publishing another statement for the financial year ending on 30 April 2024, (whether this is voluntary or mandatory), on or about the date of the publication of the annual report covering the same period; and
  - 5.1.3. We are continuing to improve our monitoring and reporting systems to allow the development and regular reporting of KPI's relating to Modern Slavery management.

## 6. Important links

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- 6.1. ITM Power's Code of Ethics, business Partner Code of Conduct and PGM Supply Chain Policy Statement can each be found at: [itm-power.com/sustainability](https://itm-power.com/sustainability)

This is a voluntary slavery and human trafficking statement for the financial year ending 30 April 2023. It was approved by the ITM Power Board of Directors on 29 September 2023.