

## CONFLICT MINERALS POLICY

As a global company, Fluence aims to conduct its business in a way that upholds human rights, including the work that we engage in with external partners from all over the world. To help ensure compliance in our supply chain, our suppliers must sign our [“Code of Conduct for Fluence Business Partners and Third-Party Intermediaries,”](#) which sets forth contractual obligations and emphasizes our expectation that our suppliers will maintain compliance in their own supply chain and adhere to all applicable laws and regulations. Additionally, Fluence is committed to working toward avoiding the use, within our supply chain, of minerals from conflict-affected and high-risk areas which are affected by the risks defined in Annex 2 of the OECD Due Diligence Guidance.

Fluence is concerned with credible reports that document the link between the global minerals trade and the financing of armed groups around the world, and especially in the Democratic Republic of Congo and adjoining countries (DRC region). We are also concerned with plausible claims that categorize conflict minerals such as Tin, Tantalum, Tungsten, and Gold (3TG) further the battery-grade minerals such as Cobalt, Lithium, Copper, Graphite, Nickel, Bauxite/Alumina/Aluminum, and Manganese, as minerals that could be tied to human rights violations occurring during mining, refining, and sourcing processes.

In addition to adopting a zero-tolerance policy for non-compliance with applicable laws and regulations, Fluence is committed to promoting our Conflict Mineral Policy, which contributes to our culture of operating in an ethical manner and upholding human rights. Though we are an energy storage solutions business, we have an enterprise-wide process to assist in determining the use, source, and origin of the relevant minerals in our supply chain (Supply Chain Due Diligence). Such processes include Responsible Minerals Assurance Process (RMAP), which is part of the Responsible Minerals Initiative (former Conflict Free Sourcing Initiative). We work closely with our suppliers to support us in carrying out these processes. In alignment with recent regulatory updates Fluence further extends its commitment to include conflict minerals and battery-grade minerals listed above as requiring responsible sourcing and due diligence. This helps ensure compliance with evolving global sustainability requirements and reinforces our dedication to ethical supply chain practices.

We engage with suppliers through the following measures:

- We require our suppliers to source materials from suppliers who also source responsibly, including from legitimate, conflict-free mines around the world, especially in the DRC region;
- We require all our 3TG, Cobalt, Lithium, Copper, Graphite, Nickel, Bauxite/Alumina/Aluminium, and Manganese suppliers to conduct periodic due diligence and provide proper verification of the country of origin and source of the materials used in the products supplied to Fluence; and

- We support initiatives to verify smelters and refiners that are conflict-free, and expect our suppliers to utilize any such conflict-free smelter/refiner programs that are available.

If you have any inquiries or require further clarification regarding our Conflict Minerals Policy, please contact us via email at [conflictminerals@fluenceenergy.com](mailto:conflictminerals@fluenceenergy.com).



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