

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. To help ensure compliance in our supply chain, our vendors must sign our the “Code of Conduct for Fluence’s Suppliers and Third-Party Intermediaries,” which sets forth contractual obligations and emphasizes our expectation that our suppliers will promote compliance in their own supply chain as well as adhere to any applicable laws and regulations.

Fluence is concerned with credible reports that document the linkage 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 specifically categorize Cobalt and Lithium as minerals that could be tied to human rights violations occurring during mining and refining processes.

In addition to adopting a zero-tolerance policy towards non-compliance of applicable laws and regulations, Fluence is committed to promoting an ethical Conflicts Mineral Policy, which contributes to our culture of operating in an ethical manner and upholding human rights. Specifically, regarding conflict minerals 3TG (Tin, Tantalum, Tungsten, and Gold) we support government and industry efforts to eliminate human rights abuses that may occur during sourcing. 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 all these steps. Our engagement of suppliers includes the following:

- We require our suppliers to source materials from suppliers who also source responsibly, including from legitimate, conflict-free mines in the DRC region;
- We require all our 3TG, Cobalt, and Lithium (3TG+Co+Li) 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.

Lastly, 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. In case of any questions, please send us an e-mail at conflictminerals@fluenceenergy.com.

A handwritten signature in black ink, appearing to read "Julian Nebreda". The signature is written in a cursive style and is enclosed within a large, hand-drawn oval.

Julian Nebreda
President & Chief Executive Officer, Fluence