



# Supplier Code of Conduct

Version 1.0

Effective date: May 1, 2024

# 1. Background

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*Electric Hydrogen manufactures, delivers and commissions the world's most powerful electrolyzers for critical industries to produce the lowest cost green hydrogen. The company's complete solution includes all system components required to turn water and electricity into green hydrogen, including power conversion, gas processing, water treatment and thermal management. Electric Hydrogen exists to help critical industries advance their climate objectives by making green hydrogen an economic inevitability. We count on our suppliers to help us fulfill our mission and deliver quality products to our customers, while adhering to rigorous labor, environmental, safety, and ethical standards.*

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**1.1. Compliance with law and supplier requirements.** Electric Hydrogen's suppliers must operate in accordance with all applicable laws and regulations, while providing safe and responsible business practices. Electric Hydrogen requires all suppliers, and sub-suppliers, to conduct themselves in such a way that reflects Electric Hydrogen's Supplier Code of Conduct.

## 2. Labor and Human Rights

**2.1. Anti-discrimination and anti-harassment.** Supplier shall not discriminate against any worker based on age, ethnicity, gender, disability, or any other status protected by applicable national or local law. Supplier shall actively support an inclusive workplace free of harassment and abuse, and ensure that workers have an effective mechanism to report grievances without fear of retaliation.

**2.2. Wages and working hours.** Supplier shall provide workers with adequate pay and benefits that meet or exceed any minimum wage requirements or other applicable laws. Supplier shall follow all applicable laws and regulations with respect to working hours and days of rest, and all overtime must be voluntary.

**2.3. Prevention of forced and child labor.** Supplier shall ensure that all work is voluntary and does not use child labor. Supplier shall not use or permit any form of forced, bonded, indentured, or coerced/involuntary labor. Supplier shall not employ workers who are below the applicable minimum legal age for employment, or below the applicable age for completion of compulsory education, whichever is greatest.

**2.4. Freedom of association and collective bargaining.** Supplier shall permit workers to freely associate and join, or abstain from, any organization of their choice, and bargain collectively, without retaliation, coercion, or harassment.

**2.5. Diversity and accessibility.** At Electric Hydrogen, we aspire to become an industry benchmark for diversity, equity, inclusion, and accessibility initiatives. We search for suppliers that share these values and expect them to support our goals for diversity in the supply chain.

## 3. Environmental Responsibility

**3.1. Environmental permits and reporting.** Supplier shall obtain, keep current, and abide by all required environmental permits and reporting requirements as applicable.

**3.2. Hazardous and restricted substance management.** Supplier shall identify and actively manage any hazardous chemicals and restricted substances that pose a hazard to the environment or human health. Such substances shall be securely documented, managed, and disposed of by Supplier in accordance with applicable laws.

**3.3. Water and wastewater management.** Supplier shall monitor water sources, use, and discharge, seeking opportunities to conserve water and control water contamination. All wastewater and stormwater shall be tracked and managed in such a way that complies with applicable laws and standards.

**3.4. Air emissions management.** Supplier shall actively manage and work to minimize the air emissions produced by its operations which pose a hazard to the environment or human health. All air emissions shall be tracked and managed in such a way that complies with applicable laws and standards.

**3.5. Solid waste management.** Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. All solid waste (hazardous and non-hazardous) shall be tracked and managed in such a way that complies with applicable laws and standards.

**3.6. Resource and energy efficiency.** Supplier shall actively manage and work to minimize the energy and resource consumption of its operations. Supplier shall set targets, document, and seek to reduce consumption of all substances or natural resources in such a way as to improve energy efficiency and reduce environmental impacts, including greenhouse gas emissions.

## 4. Health and Safety

**4.1. Occupational health safety.** Supplier shall comply with all applicable occupational health and safety laws and regulations, and provide workers with safe and sanitary working environments. Supplier shall manage all occupational health and safety hazards via monitoring, communication, training of workers, engineering controls, personal protective equipment, and any other method that reduces or eliminates risk to Workers.

**4.2. Emergency preparedness and response.** Supplier shall identify and plan for potential emergencies. For each identified potential emergency, Supplier shall prepare workers to respond quickly and appropriately in such a way that minimizes bodily injury, environmental impact, and property damage.

**4.3. Incident management.** Supplier shall maintain a system by which workers can report health and safety incidents, as well as near-misses. Supplier shall make best efforts to use such reports to improve its health and safety practices.

## 5. Ethics

**5.1. Anti-bribery and anti-corruption.** Supplier shall comply with all applicable anti-bribery and anti-corruption laws, including but not limited to relevant acts such as the U.S. Foreign Corrupt Practices Act (FCPA). Supplier shall uphold standards of fair competition and disclose conflicts of interest. Suppliers must not offer or accept any gift or anything else of value to obtain improper advantages.

**5.2. Trade and sanctions.** Supplier shall comply with all applicable trade laws and regulations, including sanctions and embargoes.

**5.3. Responsible sourcing, anti-money laundering, and countering the financing of terrorism.** Suppliers shall exercise due diligence to track and monitor human rights and associated environmental risks linked to the extraction, transport, and use of raw materials. Supplier shall comply with the legal regulations concerning the prevention of money laundering. Supplier shall comply with laws concerning trade in conflict minerals and other natural resources, to avoid directly or indirectly contributing to the funding of armed groups.

**5.4. Protection of intellectual property, data privacy, and security.** Supplier shall protect all, including Electric Hydrogen's and its clients', intellectual property, private data, and sensitive information. Supplier shall immediately report and seek to mitigate the impact of any failed protection of the above.

**5.5. Management Systems.** Supplier shall adopt or establish a management system to carry out all above responsibilities. The management system will comply with all applicable laws and regulations, conform to the responsibilities set out in the Supplier Code of Conduct, actively identify risks and opportunities for improvement, and document performance relating to the expectations set out in this Code.

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