

## **EOS ENERGY ENTERPRISES, INC. CONFLICT MINERALS POLICY**

Since our founding in 2008, Eos Energy Enterprises, Inc., and its subsidiaries and affiliates, including without limitation, Eos Energy Storage, LLC, and HI-POWER, LLC (collectively, the “Eos Group”) has been on a mission to accelerate the shift to clean energy with positively ingenious, safe, scalable, efficient, and sustainable solutions that transform how the world stores power. The Eos Group’s breakthrough zinc battery was designed to overcome the limitations of conventional lithium-ion technology. To achieve this goal, the Eos Group commits to managing the social and environmental impacts of our sourcing in a way that aligns with our missions.

This Eos Group Conflict Minerals Policy, effective as of April 27, 2022, and as may be amended from time to time (this “**Conflict Minerals Policy**”), outlines the Eos Group’s commitments and guidelines with respect to compliance with applicable laws and regulations that pertain to illegal mining, transportation, and trade of minerals (collectively, the “**Illegal Activities**”) in conflict-affected regions of the world.

This policy applies to all Eos Group employees, customers, intermediaries, suppliers, consultants, vendors, and service providers.

### **Background**

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”) requires U.S. listed companies to disclose whether they use “Conflict Minerals”, classified as tin (cassiterite), tungsten (wolframite), tantalum (columbite-tantalite) and gold, and whether these minerals originate in the Democratic Republic of the Congo (DRC) or an adjoining, or neighboring country that may source from mines controlled by non-government or unlawful military groups within the “Conflict Region”. The Eos Group is particularly concerned that such Illegal Activities may play a role in fueling armed conflict and violence in these regions. The Security Exchange Commission (“SEC”) Rule, the Conflict Minerals Rule, requires SEC registrants who manufacture or contract to manufacture products containing conflict minerals that are necessary to such products’ functionality or production to disclose the origin and status of the conflict minerals.

The Eos Group is committed to complying with all laws and regulations related to Conflict Minerals. Tracing materials back to their mine of origin is a complex endeavor but an important aspect of responsible sourcing. The Eos Group looks to industry guidelines to help establish its programs such as the Organization for Economic Co-operation and Development’s (“OECD”) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High Risk Areas, the joint Electronic Industry Citizen Coalition, and the Global e-Sustainability Initiative, which is taking action to address responsible sourcing through the development of the Conflict-Free Smelter program aiming to enable companies to source conflict-free minerals. Given the complexity of the Eos Group’s and its suppliers’ respective supply chains, it will take time for suppliers and sub-suppliers to verify the origin of conflict minerals. But using our supply chain due diligence process to drive accountability within the supply chain will further our goal of conflict-free sourcing.

## **Policy Provisions**

The Eos Group does not support the use of minerals that are illegally mined, transported, or traded. Our commitment includes:

- Developing policies and processes to avoid the use of Conflict Minerals in the Eos Group's operations.
- Not knowingly procuring Conflict Minerals that originate from facilities in a Conflict Region that are not certified as conflict free.
- Expecting all suppliers to inform the Eos Group of the presence of Conflict Minerals in their products and to provide the Eos Group with detailed information on the content and country of origin of these materials.
- Expecting all suppliers to develop policies and processes regarding the use of Conflict Minerals in their operations and that provide reasonable assurance of conflict-free sourcing claims.
- Expecting all suppliers to comply with third-party auditing of any of its supply chain and procurement processes that may be necessary to verify claims of conflict-free sourcing.
- Expecting all suppliers to cooperate with all due diligence requests required for the Eos Group's annual SEC disclosure, in compliance with the Dodd-Frank Act.

## **REPORTING, NOTIFICATION, INFORMATION & OVERSIGHT**

Management of the Eos Group's Conflict Minerals Policy is the responsibility of the General Counsel, who reports to the Chief Executive Officer.

Ultimate oversight for the Conflict Minerals Policy resides with the Eos Group's Board of Directors, specifically the Nominating and Corporate Governance Committee in connection with their oversight of topics materially related to ESG matters, and our Executive Committee (inclusive of the CEO and his direct reports).

To report any incidents of non-compliance or other concerns, please visit the Eos Group's whistleblower hotline for confidential, non-retaliation reporting:

<https://www.whistleblowerservices.com/EOSE>