

EOS ENERGY ENTERPRISES

SUPPLIER CODE OF CONDUCT

Eos Energy Enterprises, Inc. and its affiliates, Eos Energy Storage LLC and HI-POWER, LLC (collectively, “Eos”) are on a mission to accelerate the shift to clean energy with positively ingenious solutions transforming how the world stores power. To achieve this goal, we count on our network of suppliers and business partners across the globe to commit to and uphold our high standards of integrity, values and operating principles.

This Eos Supplier Code of Conduct, formalized in 2021, and as may be amended from time to time (this “**Supplier Code**”), outlines Eos’ expectations and guidelines with respect to responsible sourcing, including our commitments to human rights, the environment, health and safety, business ethics and the development of a diverse and sustainable supply chain. This Supplier Code contains principles shaped by the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization, and the Ten Principles of the UN Global Compact.

Eos requires its suppliers and business partners to comply with this Supplier Code. For the purposes of this Supplier Code, the term “Suppliers” means business partners and any third party that provides goods or services to Eos, including, but not limited to, our direct and indirect suppliers, co-manufacturers and co-packers, labor providers, logistic providers, distributors and licensees. Sub-contractors of Suppliers are also expected to adhere to the Supplier Code. We expect our Suppliers to communicate these expectations throughout their supply chain by adopting efficient management systems, policies, procedures and training to uphold the standards and expectations set forth in this Supplier Code within their own business operations.

We require our Suppliers to abide by all applicable national, state and local laws/regulations in the markets where they operate; however, where local laws or standards differ from this Supplier Code, we expect our Suppliers to comply with the more stringent standards and principles referred to herein and provide notice to Eos of any discrepancy. By its acceptance or fulfillment of any purchase order for goods or services from Eos, the Supplier acknowledges its acceptance of the Supplier Code and its agreement to comply with its requirements.

BUSINESS ETHICS

Eos is committed to conducting business ethically and lawfully in countries where we operate across our supply chain. Consequently, we expect our Suppliers to demonstrate a strong commitment to ethical behavior. Suppliers shall conduct their business in accordance with the highest ethical standards and to have controls in place that prohibit and detect the misuse of company assets, corruption, bribery, improper gifts, extortion, embezzlement, and conflicts of interest.

Suppliers are expected to avoid all conflicts of interest or even situations giving the appearance of a potential conflict of interest. Suppliers are expected to provide notification to all affected parties in the event that an actual or potential conflict of interest arises.

Suppliers’ business dealings must be fair, legal and honest. Suppliers are expected to be world class competitively and win business through excellence and no other means. Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent, or future pricing information with competitors and must refrain from participating in a cartel. Suppliers shall accurately reflect all of their business dealings in their books and records and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements, but in no case less than what would be reasonably expected to comply with best accounting standards.

Suppliers shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including, but not limited to, the Foreign Corrupt Practices Act (FCPA) and all applicable international anti-corruption conventions. If Suppliers extend any business courtesies to our employees, they will do so infrequently, and any courtesies should be of modest value. Eos employees will not accept any business consideration of greater than modest value with consideration given to the setting and culture to not cause offense or a “loss of face” publicly.

To the extent that Suppliers legitimately receive, possess or have access to any of Eos’s confidential information, they should not disclose any such information to any other person without our advance written consent. Notwithstanding the foregoing, Suppliers shall execute Eos’ standard non-disclosure agreement prior to receiving any confidential information.

To the extent that Suppliers transports goods for Eos into the United States, they shall comply with the C-TPAT (Customs-Trade Partnership Against Terrorism) security procedures on the U.S. Customs website at www.cbp.gov (or other website established for such purpose by the U.S. government) as well as all other applicable import laws and regulations.

HUMAN RIGHTS

Eos is committed to respecting international human rights principles. Our Suppliers must share the commitments to human rights listed below:

- Treat employees with dignity and respect without exception.
- Never discriminate in any form, whether based upon gender, race, national or ethnic origin, place of residence, religion, language, sexual orientation, physical ability, veteran, or any other status protected by law. Create and maintain an equal opportunity environment based on qualifications, experience, and performance, while ensuring diversity is enhanced.
- Never retaliate in any way against anyone who makes a report in good faith to their employer or to competent public authorities regarding concerns about non-compliance with company policy, procedure or applicable law, or about other unethical behavior.
- Never employ forced (work done against a person's will), prison labor, indentured labor (e.g., labor in exchange for resolution of a legal obligation), exploited bonded labor (e.g., labor in exchange for debt relief), or other prohibited labor or engage in any form of modern slavery, including human trafficking.
- Comply with local minimum age and maximum hours laws and never employ prohibited child labor.
- Operate in full compliance with all applicable laws or collective bargaining agreements regarding wage, overtime pay and mandated benefits.
- Maintain a work environment and living conditions (if applicable), that are free of hazards that may cause accidents and/or injuries and compliant with applicable health and safety laws. Empower employees to stop work without fear of retaliation if they come across unacceptable health and safety conditions.
- Allow freedom of association (choosing to participate in or not labor unions without fear of retaliation, intimidation or harassment) and promote consultation and cooperation with employees and their representatives in matters of mutual concern (including collective bargaining).
- Respect the right to privacy of employees, customers and other third parties. Only collect, use, retain or disclose personal data when needed to operate effectively and in compliance with the law. Implement measures to safeguard personal data.
- Support all mechanisms to raise a concern and promote organizational justice through effective reporting avenues, prompt resolution of concerns, fair discipline and transparent accountability, no retaliation against anyone, and continuous assessment of the effectiveness of company processes.
- Identify and monitor potential human rights impacts in the industry relating to diversity, local communities, security and the environment.
- Exercise reasonable oversight over third parties performing at your request to ensure they comply with all of the above requirements.

TRADE COMPLIANCE

Eos recognizes that our ability to import and export products, services, software and technology across the globe is a privilege, not a right. Our ability to comply with relevant trade laws sets parameters we must ensure our Suppliers follow:

- Suppliers may not source any goods or services for Eos from any entity known to be headquartered in, or owned or controlled by a national of Cuba, Iran, North Korea, Syria, Crimea Region of Ukraine, or of any other sanctioned country, or any individual or entity identified on an applicable denied or restricted party list.
- Suppliers are prohibited from providing Eos with goods originating from, transiting or shipping through any country subject to trade sanctions including without limitation Cuba, Iran, North Korea, Syria, or Crimea Region of Ukraine.
- Suppliers must comply with all applicable laws and regulations regarding conflict minerals which include, without limitation, tin, tungsten, tantalum and gold. Additionally, suppliers should establish a policy to reasonably assure that the tin, tungsten, tantalum and gold which may be contained in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of serious

human rights abuses. Suppliers should exercise, as may be directed by law, due diligence on the source and chain of custody of these minerals and therefore at a minimum require the same from their next tier suppliers.

ENVIRONMENTAL STEWARDSHIP

Protecting the environment is a core value for Eos and as a result we expect our Suppliers to have mechanisms in place for protecting and enhancing the environment in which they live and work.

Suppliers must comply with all applicable environmental rules, regulations and standards in the areas in which they operate, and must adhere to Eos standards when operating on our facilities.

Suppliers should promote the safe and environmentally conscious development, manufacture, transport, use and disposal of their products and services.

Suppliers must endeavor to conserve natural resources and energy, reduce or eliminate waste and the use of hazardous substances and minimize impact on biodiversity, climate change and water scarcity.

REPORTING, NOTIFICATION, INFORMATION & OVERSIGHT

Suppliers must promptly notify Eos of any failure to comply with this Supplier Code, including but not limited to the provisions addressing modern slavery, human trafficking, and other human rights, or any illegal or unethical activity related to our business. Notices or other concerns related to this Supplier Code should be sent to supplierconcerns@eose.com.

We reserve the right to request from our Suppliers information about the management of relevant issues outlined in the Supplier Code. We reserve the right to verify compliance with this Supplier Code through internal and external assessment mechanisms, such as self-assessment questionnaires and on-site independent third-party audits. Such audits may inspect Suppliers' facilities, operations, books and records, and Supplier-provided housing, and may include confidential worker interviews. If non-compliances are observed or otherwise documented, the Supplier will be required to take corrective actions. If Suppliers fail to implement the recommended corrective action plans and do not remedy any act of non-compliance in a timely manner, Eos may, in its sole discretion and without any liability or further obligation to Suppliers, suspend purchases, refuse to take delivery under any purchase order and return any goods or services from the Supplier until the corrective actions have been implemented, or may terminate its business relationship with the Supplier in addition to any other rights or remedies available to Eos.

We also reserve the right to request that Suppliers disclose information that may pertain to geographical location of facilities that produce any item supplied to Eos, origin of raw materials produced within their facilities and environmental performance indicators such as greenhouse gas emissions.

Management of our Supplier Code is the responsibility of Eos' Chief Operating Officer who reports into the Chief Executive Officer.

Ultimate oversight for the Supplier Code resides with our Board of Directors and our Executive Committee (inclusive of the CEO and the CEO's direct reports) who are briefed on an annual and bi-annual basis, respectively.