



## Policy on Responsible Sourcing of Minerals

In August 2012, the United States Securities and Exchange Commission adopted final rules implementing Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act concerning disclosure by public companies regarding the use of conflict minerals in manufactured products (the “SEC Rules”).

The SEC Rules require an annual disclosure to the extent that tin, tungsten, tantalum, gold, or their derivatives (“3TG” or “conflict minerals”) are necessary to the functionality or production of a product that is manufactured or contracted for manufacture. The SEC Rules incorporate and leverage the Organization for Economic Cooperation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its supplements (the “OECD Guidance”).

The mining and trade of 3TG originating in the Democratic Republic of the Congo (“DRC”) and certain surrounding countries has gained international attention for the role that such activities may play in financing deadly armed groups in the region. While Bloom Energy does not purchase ore or unrefined conflict minerals directly from mines, conflict minerals may enter our supply chain through the downstream purchase of materials from our suppliers. Because of this potential for association with conflict and human rights abuses, Bloom Energy seeks to source these conflict minerals responsibly and prevent armed groups from directly or indirectly benefiting from the sourcing of conflict minerals in the DRC region.

## Expectations

Bloom Energy is committed to doing business with integrity and we comply with applicable laws wherever we do business. As part of this commitment, our goal is to responsibly source conflict minerals so as not to support conflict or human rights abuses in the DRC region or any other high-risk areas of the world as determined by applicable laws and regulations. This position is consistent with the OECD Guidance and our Global Code of Business Conduct and Ethics.

Bloom Energy’s suppliers are expected to:

- have a policy in place to conduct responsible sourcing of conflict minerals within their own supply chain that conforms to the OECD Guidance;
- establish a due diligence framework and management system that conforms to the OECD Guidance;

- participate and cooperate in any inquiries or due diligence efforts we may perform, including:
  - (i) reporting to Bloom Energy if any 3TG is sourced for parts that are used in their products;
  - (ii) promptly and accurately completing the Responsible Minerals Initiative's Conflict Minerals Reporting Template; and
  - (iii) giving Bloom Energy copies of their policies and supporting information relating to conflict minerals as requested;
- suspend or discontinue engagement with up-stream suppliers who do not comply with our policy before a reasonable deadline;
- give Bloom Energy copies of their policies and supporting information as requested; assist Bloom Energy in its ongoing compliance and due diligence efforts to support the responsible sourcing of conflict minerals; and
- extend these expectations to their own up-stream suppliers.

Suppliers are encouraged to contact [supplier.compliance@bloomenergy.com](mailto:supplier.compliance@bloomenergy.com) to seek guidance on this Policy.

## Relevant Resources

- **[Bloom Energy Conflict Minerals Report](#)**
- **[Bloom Energy Global Business Partner Standards](#)**
- **[Bloom Energy Global Code of Business Conduct and Ethics](#)**
- **[Bloom Energy Helpline: bloomenergy.ethicspoint.com](https://bloomenergy.ethicspoint.com)**

**Adopted: May 2020**