

ESS TECH, INC.

CONFLICT MINERALS POLICY

(Adopted March 31, 2023)

ESS Tech, Inc. (“ESS”) is fully dedicated to conducting its business with respect for human rights and in compliance with applicable laws. ESS recognizes that profits from certain mining operations of conflict minerals found in the Democratic Republic of the Congo (the “DRC”) and adjoining countries may provide financial support to armed groups that commit violence and human rights violations. Conflict minerals include columbite-tantalite (tantalum), cassiterite (tin), wolframite (tungsten) and gold, (collectively, “3T&G”) and any of their derivatives. In addition, federal law requires public companies such as ESS to annually disclose specified information about the origin of the conflict minerals in the products it manufactures or contracts to manufacture to the extent those conflict minerals are necessary to the products’ functionality or production.

For this reason, ESS has established a program that is in alignment with the Organization for Economic Co-operation and Development *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas*. ESS encourages its suppliers to adopt similar policies and management systems with respect to conflict minerals and to drive those efforts throughout their supply chain.

To establish a baseline for responsible sourcing, ESS has partnered with its suppliers on ensuring open lines of communication with respect to the following:

1. Working with their own suppliers to identify the true source of any conflict minerals in supplied products or materials (i.e., country of origin, smelter or refiner and conflict-free status of any conflict minerals).
2. Cooperating on all due diligence inquiries with respect to conflict minerals (i.e., providing reasonable documentation of supplier due diligence, compliance procedures and support of any origin information).
3. Encouraging their own direct and indirect suppliers to adopt policies and procedures that are consistent with this policy.

To conclude, ESS will continue to use this policy to establish and maintain relationships with suppliers that share its values regarding legal compliance, transparency, human rights, and ethics.