

Social Compliance Program

Overview

At Bloom, we endeavor to protect the health, safety and rights of our employees, the communities and environment in which we operate, as well as the lives and communities of workers along our supply chains.

We only work with business partners who share our values and agree that our shared success is based on acting ethically and lawfully.

We have developed a cross-functional team to establish policy, processes, and procedures designed to further our social responsibility and ensure our business partner's compliance with our Global Business Partner Standards (our "Social Compliance Program.")

Global Business Partner Standards

Bloom's Global Business Partner Standards ("Standards") provide guidance to our business partners to support the growth of our business in a lawful, ethical, and sustainable manner. Key elements include:

Anti-Corruption

Bloom's business partners are strictly forbidden from directly or indirectly (through third parties) offering or giving a bribe, corrupt payment, or anything of value, to (1) obtain or retain business, government services or permits or (2) influence government action (or inaction), any government policy, or legislative outcome, even if bribes or payments are common or "customary" in the market or location in which our partners are doing business.

Complying with Trade Controls & Customs Regulations

Business partners are expected to have compliance programs that are designed to ensure their operations comply with (1) applicable laws governing the import and export of goods, services, software, technology, or technical data and (2) applicable economic sanctions, trade embargoes, and money laundering restrictions imposed by the United States government and other jurisdictions in which the business partners operate.

Employment Laws

Business partners are expected to comply with all applicable employment laws, including laws governing minimum wages, overtime compensation, meals periods, permitted leaves, and pay periods. Business partners must follow all applicable local laws, regulations, and standards concerning working conditions for all workers.

Human Rights

Business partners are expected (1) to comply with all applicable legal requirements related to human rights and (2) to treat all of their workers with dignity and respect. Any approach taken by a business partner to human rights should be consistent with the UN Guiding Principles on Business and Human Rights and Universal Declaration of Human Rights (UDHR).

Forced Labor, Human Trafficking and Slavery

Business partners may not produce goods or services for Bloom using forced, bonded, indentured, involuntary convict, animal or compulsory labor, and business partners are expected to evaluate and mitigate, to the extent possible, risks of forced labor, human trafficking, and slavery within their own supply chains.

Child Labor Laws

Business partners are expected to comply with the International Labour Organization (ILO) Minimum Age Convention. They must ensure that all workers are of legal working age and that no child labor has been practiced.

Working Hours and Rest Period

Business partners are expected to comply with all local laws, regulations, and standards concerning working hours and rest periods.

Discrimination, Harassment, and Harsh or Inhumane Treatment

Business partners are expected to provide a workplace free from threats of violence, coercion, sexual exploitation, and harassment, including sexual, verbal, and psychological harassment or abuse.

Conflict Minerals

Business partners who sell products to Bloom shall determine whether those products contain any conflict minerals and if so, must determine whether these minerals directly or indirectly finance or benefit armed groups that are perpetrators of human rights abuses in the Democratic Republic of Congo or any bordering country, and report the results to Bloom.

Safety, Health, and Environmental Programs

Business partners must be committed to the health, safety and wellness of their employees by integrating safety throughout their respective operations through policies, procedures, and ongoing training.

Implementation of the Social Compliance Program

Bloom is committed to applying the Standards to itself and to working with business partners to drive compliance throughout the supply chain. Business partners are required to comply with the Standards and all applicable laws in the countries in which they operate. In addition, Bloom performs due diligence and ongoing monitoring of certain business partners.

Due Diligence

Bloom performs risk-based due diligence on new business partners. Due diligence may include risk assessments, sanctions and watchlist screening, adverse media reviews, and review of completed due diligence questionnaires by business partners.

Ongoing Monitoring

Bloom monitors business partner performance and adherence to contractual obligations. In addition, Bloom regularly screens:

- All business partners against the Office of Foreign Assets Control (OFAC) watch lists;
- Some business partners for compliance with our conflict minerals and human rights programs; and
- Some business partners by evaluating, monitoring, and tracking their respective supply chain locations, policies, and practices to ensure their compliance with our requirements prohibiting forced labor.

Bloom reviews the results of screening and questionnaire responses provided by business partners and takes corrective action when necessary. Corrective action may include additional monitoring, training or termination of the relationship.

Sustainability

We also recognize that sustainability starts with us, and we must lead by example. We continuously evolve our sustainability strategy by identifying key trends in the energy space, understanding internal and external risks across the spectrum of our activities, and advancing the programs and policies best suited to manage those risks. We monitor new developments in the regulatory and voluntary space to ensure that our company is responsive to existing and emerging requirements with regards to policies, disclosures and programmatic action.

Please view our [Sustainability Report](#) for more information.

Continuous Improvement

We regularly evaluate our Social Compliance Program, including our processes and scope, so that we can adapt to the changing nature of our supply chain. We leverage industry-wide initiatives and evaluate alternative product or facility certification schemes in an effort to streamline auditing efforts across product industries, and ultimately reduce supplier burden. We also participate in industry organizations to stay up to date of emerging trends and issues. Finally, we maintain regular engagement with suppliers to keep them informed about our program requirements and developments, as well as provide trainings for our company supply chain teams to ensure that expectations are consistent and any updates to the program are disclosed, understood, and carried out.

Confidential Reporting

If a business partner has any questions about the Standards, is unsure about how to handle a particular situation, or suspects that any Bloom personnel or any of its representatives

has violated the Standards or applicable law, the business partner is asked to consult the following resources:

- Bloom supervisor or manager (provided he/she is not suspected of a violation);
- Bloom Human Resources (humanresources@bloomenergy.com);
- General Counsel and Chief Compliance Officer (compliance@bloomenergy.com);
- Bloom Helpline (bloomenergy.ethicspoint.com); or
- Bloom Audit Committee (audit_committee@bloomenergy.com).

If a business partner knows of or suspects there has been an actual or potential violation of the Standards or applicable law, the business partner is expected to promptly inform Bloom whether or not the concern involves the business partner making such report. Anonymous reports are accepted, subject to local legal restrictions. Please note that the laws of some countries restrict Helpline reports on specific subjects. However, should a business partner wish to report an issue that our Helpline cannot accept because of applicable law, the Bloom Helpline operator will provide an alternative reporting option.

Additional Resources

- Bloomenergy.com
- [Global Business Partner Standards](#)
- [Code of Business Conduct and Ethics](#)
- [Bloom Sustainability Report](#)