

### MINERAL POLICY

Morrow is on a mission to safeguard our planet and our way of life for future generations. Every day we devote ourselves to delivering the most sustainable battery cells in the world. We know that in order to do so we need to deliver outstanding business performance as well as excel in environmental and social stewardship. This mineral policy offers guidance in our work and communicates our commitment.

#### General

Morrow strives to only source minerals and materials that have been mined and traded in such a way that they have not contributed to human rights abuses, labour rights abuses, caused environmental damage or provided funding for conflicts.

Morrow is determined to comply with regulatory and customer requirements as well as key international guidelines regarding the prohibition and restriction of substances, including hazardous substances and minerals from conflict prone areas. We shall ensure that materials provided to Morrow are following requirements covered under the scope of all relevant regulations at the time of delivery and report if additional relevant knowledge regarding the material emerges upon delivery. We expect the highest standards on the environment as well as human rights and decent work to be upheld across the supply chain.

All of Morrow's suppliers need to exercise due diligence and uphold a system of control and transparency over their supply chain, including and especially companies in the mining and mining related sectors, which traditionally have been supply chains particularly prone to social and environmental risk. This includes expectations to establishing a chain of custody and upholding a traceability system that allows for the identification of upstream actors and provides an understanding of which mining sites materials emerge from and where they are further processed before reaching Morrow's production site.

Mining companies that form part of Morrow's supply chain must operate according to the highest social and environmental standards and mining operators must be able to document this through the Initiative for Responsible Mining Assurance (IRMA) certification or similar national or international standards. Alternatively, an ability to comprehensively document high levels of social and environmental standards through auditing procedures may, in exceptional cases, also be acceptable.

#### Conflict-affected and high-risk areas

Conflict-affected and high-risk areas typically have the presence of armed conflict, widespread violence or there are other risks of harm to people. Armed conflict may, as defined by the OECD, take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies and civil wars. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. These areas are often characterised by widespread human rights abuses and violations of national or international law.

Morrow seeks to identify and eliminate minerals from conflict affected and high-risk areas in our supply chain. Morrow maintains a focus on the formally labelled conflict minerals tin, tantalum, tungsten and gold (3TGs), but is also highly mindful of other minerals, such as cobalt, that may stem from conflict-affected areas.

Morrow expects suppliers to provide the company with detailed information if there is a risk that minerals may stem from conflict-affected and high-risk areas. The OECD conflict reporting template offers useful guidance on relevant information, alongside the information requirements listed in Morrow's Supplier contract.

Morrow takes note that particular regions in otherwise stable countries may, to some degree, be high-risk areas. This includes mining and refining regions such as the Xinjiang province in China or the disputed Western Sahara territory that formally is part of Morocco. Upholding a system of control and transparency over minerals that may stem from these types of areas is particularly important and we expect conflict-affected and high-risk areas in otherwise stable countries to be flagged in suppliers' dialogue with Morrow.

### **Environmental impact and biodiversity loss**

Morrow is gravely concerned by the high biodiversity loss rates that may be attributed to some land-based mining practices, including nickel mining. Current standards and practices may not be sufficient to guard against negative local environmental impact, including biodiversity loss. Morrow seeks to collaborate and work with partners that aim to further enhance the way mining projects are implemented and explore ways to further strengthen conservation and restoration practices in this sector.

Morrow wants to see a just global burden sharing as net-zero industries expands and more minerals are required. Mining practices need to be expanded across the globe, and not only in countries that traditionally have formed part of the global south. More ambitious environmental approaches are called for in a range of mining locations, including in the Nordic region, in Europe and globally.

### **Deep-sea mining**

Morrow has currently no plans to source minerals from deep-sea mining and will not engage in this sector unless it can be proven that deep-sea mining can be conducted sustainably. Morrow's position is a precautionary one: More knowledge is needed on the potential negative impact that deep-sea mining may have on marine biodiversity and ecosystems. Morrow also notes that as of yet there is an absence of well-established and proven impact-avoidance and mitigation techniques and this further bars Morrow from engaging in the sector.

### **Other relevant Morrow policies and documents**

This policy should be consulted in conjunction with Morrow's Environmental policy, Morrow's Human rights and decent work policy as well as Morrow's Supplier and subcontractor declaration.