WSRW WESTERN SAHARA RESOURCE WATCH

Artikel2

S2H2+Bm Concept AB
Att: Mr. Magnus Pousette, Chief Executive Officer,
and Richard Löwnertz, Technical Director
Talenom Redovisning
AB Box 842 101 36
Stockholm, Sweden

Brussels, 28.10.2026

RE. REQUEST FOR CLARIFICATION REGARDING S2H2+BM'S PLANNED GREEN HYDROGEN PROJECT AND WESTERN SAHARA

Dear Mr. Pousette, Dear Mr. Löwnertz,

We are writing to you on behalf of Western Sahara Resource Watch (WSRW) and Artikel2. We refer to our letters of 20 December 2023 and 5 September 2025 concerning the geographical location of your planned green hydrogen project.[1] Except a clarification from your company on 21 December 2023, explaining that "We have not discussed anything about the location of the planned green hydrogen plant with anyone except for the Moroccan government, and will not do so until it is decided, signed and sealed", we have not received a response to either letter.

We are preparing an article examining your public, political statements on Western Sahara. Please find below a set of questions in that regard. Thank you for responding before 6 November 2026.

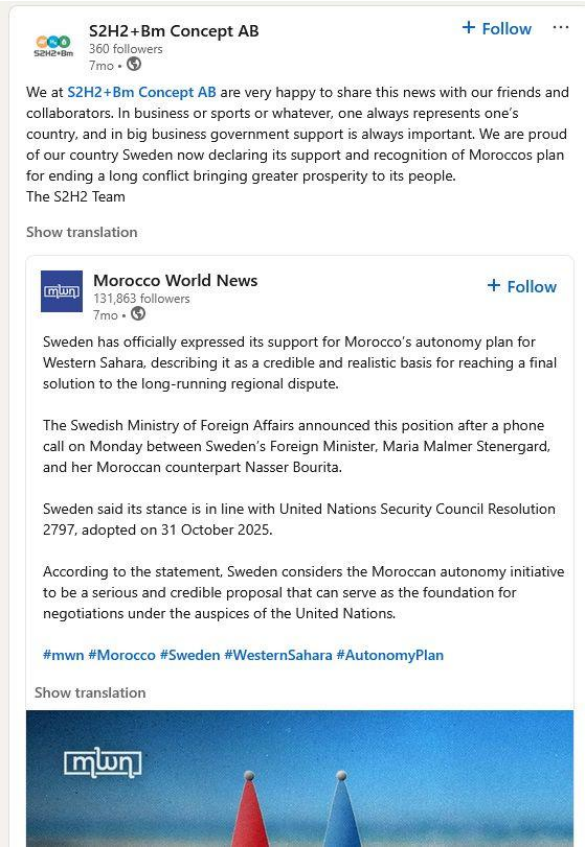
We note that your White Paper states on page 4 that S2H2+Bm's *"preferred development area is in southern Morocco, where solar resources, Atlantic seawater and industrial-port potential can support the integrated concept."*

As you may know, the term "southern Morocco" is used in different manners, depending on who is communicating.

The UN and international courts, including the Court of Justice of the European Union (CJEU), consistently affirm that Western Sahara is a non-self-governing territory separate and distinct from Morocco. Under international law, Morocco's territory therefore ends at the 27°40′N parallel, and "southern Morocco" can only refer to areas north of that line.

[1] WSRW letter to S2H2+Bm, 20.12.2023, https://vest-sahara.s3.amazonaws.com/wsrw/feature-images/File/1651/6585338a3c259_20231220WSRW-S2H2%2BBm.pdf
WSRW letter to S2H2+Bm, 5.9.2025, https://vest-sahara.s3.amazonaws.com/wsrw/feature-images/File/2644/6900f7455c0b4_20250905WSRW-S2H2%2BBmConceptAB.pdf

Moroccan authorities and their commercial partners, however, use the term to include Western Sahara, describing cities such as Dakhla, far south of that parallel, as part of “southern Morocco”.



Furthermore, we have observed S2H2+Bm’s public political positioning on social media. Your company's official statements[2], as well as executive commentary[3], expressed explicit enthusiasm for Morocco’s "autonomy proposal" for Western Sahara. Such political alignment reinforces two concerns: a) That S2H2+Bm intends to develop its technology infrastructure, industrial hubs, or community-scale applications inside occupied Western Sahara; b) That your company´s positioning reflects a lack of sensitivity to its human rights obligations.

It is difficult to read your statement in any other way than that your company hopes to see the autonomy plan lead to prosperity for the Moroccan people. We feel confident that your company would not express similar political statements of benefits to the peoples of other occupying states following their plans to annex the territories they maintain under illegal occupation. We fail to see how such a statement would be constructive if a situation happens whereby your company needs to enter into a dialogue with the Saharawi people. Your statement neither reflects the Swedish government's insistence that the right to self-determination applies.

The UN Guiding Principles on Business and Human Rights (UNGPs) establish that all businesses have a responsibility to respect internationally recognised human rights (Principle 11), including by conducting human rights due diligence to identify, prevent, mitigate and account for actual and potential adverse human rights impacts (Principles 17–18). This responsibility is particularly important in conflict-affected contexts, where the risk of involvement in serious human rights abuses may be heightened (Principles 7 and 23). Against this background, we are concerned that S2H2+Bm’s public endorsement of Morocco’s autonomy proposal, and its claim that the plan would bring “greater prosperity” to its people, appears to embrace the political position of the occupying power without addressing the rights, wishes or freely expressed consent of the Saharawi people.

[2] https://www.linkedin.com/posts/s2h2-bm_we-at-s2h2bm-concept-ab-are-very-happy-to-activity-7419440697188970496-Ep7n
[3] https://www.linkedin.com/posts/morocco-world-news_mwn-morocco-sweden-activity-7419329164551356416-DZX4

We also note the introduction of your community-scale SWEEASU concept on page 5 of the White Paper. The White Paper does not explicitly rule out the occupied territory for its deployment. It remains unclear to what extent this initiative, or the broader "Morocco pathway," involves territory outside Morocco's internationally recognised borders.

Given the active involvement of your industrial and financial partners - including Ramboll Sweden (which completed basic engineering for the demonstration plant), Nopal Renewable Energy (cooperating on the synthetic aviation fuel pathway), ABB (multi-year collaboration on DC architecture), Hyrizeon, and PeaceInvest and Infra Futura (both slated for the SWEEASU joint venture) - the lack of geographical transparency introduces serious risks for all corporate entities involved.

To ensure our public reporting accurately reflects your company's operational plans, corporate governance, and partner disclosures, we kindly request your response to the following questions:

1. Exact Project Geography: Can S2H2+Bm categorically clarify if its "preferred development area" in "southern Morocco", or any land allocation applied for under the "Moroccan Offer", is located north or south of the internationally recognised border between Morocco and Western Sahara (27°40'N)?
2. SWEEASU Geographic Scope: Is the SWEEASU community-scale deployment or its current feasibility studies slated to take place within the occupied territory of Western Sahara? If yes, what has been done to ensure that the project is carried out in line with the right to self-determination of the Saharawi people?
3. Partner Disclosures: Have your commercial, engineering, and financial partners - specifically Ramboll Sweden, Nopal Renewable Energy, ABB, Hyrizeon, PeaceInvest, and Infra Futura - been formally informed of the precise geographic locations of the "Morocco pathway" and SWEEASU initiatives? If any part of your company's plans are located in Western Sahara, has your company informed your partners whether or not the Saharawi people have consented to them?
4. How does S2H2+Bm reconcile its public endorsement of Morocco's autonomy proposal, including its statement that the plan would bring "greater prosperity" to its people, with its responsibility under the UNGP to respect internationally recognised human rights, including the Saharawi people's right to self-determination?
5. What assessment did your company make of the potential human rights implications of publicly endorsing a proposed political settlement that has not been accepted by the Saharawi people as an exercise of their right to self-determination?

Thank you for your attention to this matter. We look forward to your timely response.

Sincerely

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