

# ARCADIUM LITHIUM PLC

## CORPORATE DISCLOSURE POLICY

Adopted March 7, 2024

Arcadium Lithium plc (“we,” the “Company”, or correlative terms) is committed to fair and clear disclosure of information about the Company without advantage to any particular analyst or investor, in compliance with all applicable securities laws and regulations, including the rules and regulations of the Securities and Exchange Commission (“SEC”) and the stock exchanges on which the Company’s securities are listed.

The Company and its management believe it is in the Company’s best interest to maintain an open dialogue with our shareholders and the investment community regarding the Company’s historical and current performance and future prospects. The Company can best create shareholder value by publicly articulating its strategies, business strengths, and growth opportunities through an active and open dialogue, without selective disclosure to any individual or group of analysts or investors. At the same time we will continue to recognize and protect the Company’s confidentiality in the areas of key business and operating strategies.

This policy (the “Policy”) applies to all directors, officers and other employees of the Company and its subsidiaries.

### **Compliance**

The Company complies with all applicable securities laws and periodic reporting rules and regulations, including those of the SEC, NYSE and ASX. It is our practice to disclose material information about the Company publicly, not selectively, and to ensure that financial measures can be interpreted clearly in relation to Generally Accepted Accounting Principles (“GAAP”).

### **Compliance Guidelines**

The Company has established the following guidelines to ensure compliance with applicable laws and regulations, including SEC regulations (such as Regulation FD) which generally prohibits the selective disclosure of material non-public information and rules concerning the disclosure of non-GAAP financial measures, including Regulation G.

## **I. Disclosure Policy**

No person subject to this policy is authorized to communicate information about the Company that is material non-public information, except through Company-sanctioned public disclosure.

The Company recognizes that online social media (e.g., Facebook, X (formerly known as Twitter), Instagram, LinkedIn, etc.) is a significant means of communication. In addition to personal uses, social media is also used from time to time in connection with Company business activities. However, directors, officers and other employees are prohibited from engaging in social media activities for Company-related business, except with the express approval of an Authorized Representative (as defined below) or the General Counsel and

Secretary. Any approval will be subject to various conditions and parameters.

It is the Company's policy that material non-public information will not be conveyed to the public through social media but rather through the Company's authorized means of public dissemination.

## **II. Authorized Representatives of the Company**

- a. Persons authorized to communicate on behalf of the Company to analysts, securities market professionals, investors, and shareholders of the Company are limited to the Chief Executive Officer; the Chief Financial Officer; and employees in the Company's Investor Relations department (each, an "Authorized Representative").
- b. Other persons subject to this policy may communicate with analysts and investors as part of the Company's Investor Relations program, if an Authorized Representative will also be present.
- c. At no time will any person subject to this policy, with the exception of the designated Investor Relations manager(s), meet with any investor, analyst, or other member of the investment community without another Authorized Representative being present (the "two- person" rule).
- d. Except as specified under (a) and (b) above, persons subject to this policy are prohibited from communicating about any matter relating to the Company's businesses or industries with analysts, investors, shareholders, investment professionals, or intermediaries such as "expert network services" which provide information to investors. All questions on these matters are to be referred to the Investor Relations manager(s), or in his or her absence, another Authorized Representative.
- e. Certain designated personnel (such as the functional leads of commercial, marketing and procurement and designated members of their staff) may, in the ordinary course of their day-to-day activities for the Company, communicate about the business and related developments with customers, suppliers and industry publications (but not with business or investing professionals or publications). The subject matter disclosed to customers, suppliers and industry publications must be limited to factual information concerning the business of a nature that would be of interest to persons, such as customers and suppliers, other than in their capacities as investors or potential investors. When engaging in any such communications you must not disclose any material non-public information.
- f. Appropriate training will be provided to Authorized Representatives on compliance with this Policy, review of public statements regarding material information and procedures for disclosing non-public information.

## **III. Quarterly Earnings Release Conference Calls and Update**

- a. We will hold quarterly investor conference calls open to the public and media (in listen

only mode), and provide advance public notice about the call through a media release, by electronic distribution, and posting on First Call or other similar publication service and the Company website, [www.arcadiumlithium.com](http://www.arcadiumlithium.com). For quarterly conference calls, information on how to access the call or webcast, the date and the time for the call, together with the subject matter of the call, will be provided as described above, and posted on our website at least two weeks before the conference call.

- b. A playback of the conference call (or webcast) along with a transcript of the call will be provided on the Events & Presentations page of the website. These items will be clearly identified as historical documents a short time after they are first posted and removed from the website after 12 months.
- c. The Company generally seeks to provide updates on its annual guidance relative to the Company's financial targets on a quarterly basis and summarize this guidance in an Outlook Statement, which will be included in the aforementioned media release and posted on our website prior to the time of our quarterly conference call. All guidance, and changes to or affirmations of guidance, will be provided through public disclosure, such as media releases or conference calls or webcasts open to the public.
- d. We will not undertake any duty to update or reaffirm our guidance and Outlook Statement (except according to the aforementioned quarterly earnings release cadence), unless required by applicable law, and will disclaim any legal obligation to the contrary.

#### **IV. Presentations**

- a. We will use the safe harbor guidelines for forward-looking information as part of individual, group, and conference investor communications formats.
- b. The Company will participate in investor conferences sponsored by financial services firms and others. It is our practice to issue media releases in conjunction with the major presentations scheduled during the year, and to post those presentations on our website, [arcadiumlithium.com](http://arcadiumlithium.com), under the Presentations tab. These presentations will be clearly identified as historic documents 60 days after they are first posted and removed from the website after 12 months.
- c. Authorized Representatives may meet with individual investors, groups of investors, and in Company-sponsored facility tours. Similarly, we will participate in other public forums at which analysts or investors could be present, including industry seminars, trade shows, employee, retiree and annual shareholder meetings, and meetings with commercial partners that are shareholders. The Company will not disclose any material non-public information during these meetings. Similarly, if a presentation at a conference or other meeting with members of the investment community is not publicly accessible or publicized, no material non-public information will be disclosed at the conference or meeting. If any inadvertent disclosure of material non-public information concerning the Company is made during any such conferences or meetings, it will be promptly disclosed via media release.
- d. If approved by the Company's General Counsel and Secretary or his or her designee,

Authorized Representatives may selectively disclose material non-public information to Company fiduciaries, to persons who have signed confidentiality agreements, or to prospective investors in a registered public offering, in compliance with Regulation FD.

## **V. Financial Measure Reconciliations**

In accordance with the SEC's Regulation G and other applicable SEC rules, we will define all non-GAAP financial measures that we use in our quarterly earnings and guidance releases, conference calls and presentations clearly in such releases and presentations or, in the case of conference calls or other verbal communications of non-GAAP financial measures, on our website, [arcadiumlithium.com](http://arcadiumlithium.com), on the Investor Relations home page. In addition, all such earnings releases, presentations and web postings will include reconciliations of any such non-GAAP financial measures to their most directly comparable GAAP measure. Any such reconciliations will be posted to our website prior to or at the time of the disclosure.

## **VI. Ongoing Interaction with Investors**

At times Authorized Representatives may answer questions during telephone calls and in-person meetings with shareholders and the financial community. When we do answer such queries, there is no obligation to forward the information to others who have not specifically asked for it. When answering such queries, Authorized Representatives must not disclose any material non-public information. If any inadvertent disclosure of material non-public information concerning the Company is made during any such calls or meetings, it will be promptly disclosed via media release.

## **VII. Analyst Models and Reports**

Authorized Representatives will provide feedback on draft analyst reports or models only as to accuracy with regards to publicly disclosed facts.

## **VIII. Leaks or Rumors**

The Company does not comment on leaks or rumors.

## **IX. Quiet Period**

The Company will observe a formal "quiet period," during which it will be the Company's general policy that the Company does not comment on the financial outlook for the Company. The "quiet period" begins at the close of business on the last day of the quarter and is observed until the public earnings release for that quarter. During this time the Company will not participate in any meetings with investors, although Investor Relations can be made available to answer or clarify fact-based questions with historical information that has been previously disclosed by the Company and access to the Company's senior executives will generally be prohibited.

## **X. Dissemination of Information under Regulation FD**

Our policy is to ensure that all of our media releases and conference calls meet the requirements of Regulation FD for broad, non-exclusive dissemination of material non-public information. The aforementioned media releases (including our quarterly earnings releases) will be (1) filed with or furnished to the SEC on a Current Report on Form 8-K (or another appropriate public filing, such as an annual report on Form 10-K or a quarterly report on Form 10-Q) and/or (2) sent through an electronically distributed media release and posting on First Call or other similar publication service.

Any media releases that are intended to notify the public of upcoming presentations or conference calls must include details about how to access the presentation or call (i.e., through webcast or a toll-free telephone number) and should generally be distributed at least one week prior to the relevant presentation or call.

### **Further information**

All inquiries regarding the provisions or procedures of this Policy should be addressed to:

#### **Daniel Rosen**

Designated Investor Relations Associate Director

#### **Sara Ponessa**

General Counsel and Secretary