

# 2022 MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

LIVENT LITHIUM UK LIMITED

The companies in which Livent Corporation directly and indirectly owns investments are separate legal entities. In this Statement “Livent UK” is sometimes used for convenience where references are made to Livent Lithium UK Limited. Likewise, the words “we”, “us” and “our” are also used to refer to Livent Corporation and its subsidiaries in general where no useful purpose is served by identifying the particular entity or entities, including Livent UK. These terms may also refer to those who work for Livent Corporation or its subsidiaries. “Subsidiaries” as used in this Statement refer to entities over which Livent Corporation either directly or indirectly has control.

# 1: INTRODUCTION

As Livent Lithium UK Limited (“**Livent UK**”), the Livent Group and Livent Corporation grow our operations responsibly in service of a cleaner, healthier, and more sustainable world, we seek to uphold high standards for our employees, our operations, and our supply chains. As such, we remain firmly committed to ensuring that there is no place for modern slavery<sup>1</sup> in Livent’s business or supply chains. As described in this Statement, fair treatment and respect for all employees and suppliers are values which Livent takes very seriously.

Our 2022 Slavery and Human Trafficking Statement outlines Livent’s policies and performance with regard to combatting modern slavery, including progress updates from our previous statements (which are available [online](#) in their entirety, and in paper form upon written request).

Demonstrating the seriousness of our commitment, Livent’s cross-functional working group comprises representatives from senior management, procurement, finance, legal, human resources, and sustainability teams who participate in implementing Livent Corporation’s ongoing programme to assist Livent UK in mitigating risk of modern slavery. The policies and practices described in this Statement are regularly reviewed.

This Statement applies to the operations and suppliers of Livent UK, unless otherwise specified. This Statement is also available in paper form upon written request.

*1: As defined in Section 54 of the UK’s Modern Slavery Act 2015, “modern slavery” includes, but is not limited to, slavery, servitude, forced or compulsory labour, exploitation of children, and human trafficking.*

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# 2: ABOUT LIVENT LITHIUM UK LIMITED AND LIVENT CORPORATION

Livent UK is part of the Livent Group. Livent Group companies, under the parent company Livent Corporation, operate fully integrated lithium production and processing supply chains across four continents, employing an estimated total of 1,350 people, and have a proven history of producing performance lithium compounds, as well as a rich heritage of innovation.

Livent UK manufactures Organolithiums and Lithium Chloride, employing approximately 70 people in the United Kingdom. Livent Group companies produce critical components that power modern life and enable green innovation across numerous industries, including rechargeable batteries for electric vehicles (EVs), renewable energy storage solutions, portable consumer electronics, and power tools.

Livent Group products are also used in the manufacturing of synthetic rubber for “green” tyres, footwear and medical devices; light-weight metal alloys for airplanes, rockets and spacecraft; essential pharmaceuticals and agricultural chemicals; air purification systems; and a broad spectrum of industrial greases, building materials and chemical intermediaries.

Livent Corporation is incorporated under the laws of the state of Delaware in the United States of America and has its head office in Philadelphia, Pennsylvania. Livent Corporation is listed for trading on the New York Stock Exchange (NYSE: LTHM). For more information about the Livent Corporation, please visit our website at [www.livent.com](http://www.livent.com).

## OUR PURPOSE

We harness lithium technology to power people’s lives for a cleaner, healthier and more sustainable world.

## OUR CORE VALUES

**Safety First:** We seek to put safety at the forefront of everything we do. Simply put: the safety of everyone is everyone’s responsibility.

**Thrive With Customers:** Customers are at the heart of everything we do. By listening to and learning from them, we work together to build better lithium technologies.

**Be Responsible:** We aim to act ethically and honestly to advance responsible and sustainable practices in all aspects of our business.

**Celebrate Differences:** We celebrate our differences in perspective, background and expertise, empowering our employees to be authentic and transparent. By encouraging employees to bring their own selves to work, we make Livent more dynamic.

**Constantly Innovate:** We help move the world forward and strive to constantly innovate through agile thinking, our material science expertise and an intimate understanding of our core element: lithium.

# 3. OUR POLICIES AND PRACTICES

Livent Corporation has carefully developed, and all Livent Group companies, including Livent UK, are subject to, a comprehensive set of policies to address the risk of modern slavery in our operations and supply chains. These policies are publicly available on the Livent Corporation website and include:

- [Modern Slavery Policy](#)
- [Code of Ethics and Business Conduct](#)
- [Human Rights Policy](#)
- [Supplier Code of Conduct](#)
- [Supplier Sustainability Policy](#)

These policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent modern slavery anywhere in our supply chains.

Livent Corporation, Livent UK's parent company, is further subject to the rules and regulations of the New York Stock Exchange, the U.S. Securities and Exchange Commission, the U.S. Department of Justice, and other U.S. federal and state agencies.

Livent Corporation's policies and procedures for corporate social responsibility have been designed with the objective that Livent Corporation may, in the future, be certified as having met the requirements of the ISO 26000 Social Responsibility framework.

## **Code of Ethics and Business Conduct**

All Livent Group employees are required to acknowledge and agree to the Code of Ethics and Business Conduct on joining the company and again annually. The Code of Ethics establishes a "zero tolerance" approach to ethical violations, clearly states Livent's opposition to "any form of harmful child labour and forced or compulsory labour," and lays out our expectation that suppliers conduct themselves in an ethical and responsible manner consistent with Livent's standards.

## **Human Rights Policy**

The Livent Corporation Human Rights Policy states the Group's policy with regards to the protection of human rights. The Policy applies to all staff. It sets forth Livent Corporation's commitment to respecting human rights and complying with laws, rules, and regulations governing human rights in the countries in which we operate. This includes specific provisions addressing non-discrimination, child, forced/bonded labour, freedom to associate and collectively bargain, health and safety, working conditions, fair wages and compensation, migrant workers, and no harsh or inhuman treatment/harassment.

## **Supplier Code of Conduct**

The Supplier Code of Conduct sets out Livent Corporation's expectations for suppliers and their subsidiaries and subcontractors with respect to key issues, including human rights. This includes expectations that all work is freely chosen and without the use of forced or compulsory labour. This Supplier Code of Conduct also makes clear that Livent UK chooses not to work with suppliers who Livent UK believes do not meet our standards.

Compliance with the Supplier Code of Conduct is mandatory in our contractual terms, and we explicitly discuss the Supplier Code of Conduct with suppliers on an ongoing basis.<sup>2</sup>

Also, our standard terms and conditions provide that our suppliers who are subject to them have the responsibility to ensure that their employees and subcontractors are trained in, and comply with, the Livent Corporation "Anti-Slavery Policy" and applicable anti-slavery and human trafficking laws.

*2: In 2019, we developed a Modern Slavery clause for incorporation in contracts going forward. In 2023, we updated our terms and conditions for goods and services to include specific language regarding anti-slavery and human trafficking. For more information, see Section 5 of this statement.*

## Supplier Sustainability Policy

To further advance our efforts, Livent Corporation adopted a new Supplier Sustainability Policy in October 2021. The Supplier Sustainability Policy incorporates underlying principles of the UK Modern Slavery Act 2015, as well as the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, among other internationally-recognised best practices and standards.

The policy emphasises to suppliers the human rights and labour expectations contained within the Livent Corporation Code of Ethics and Business Conduct, the Supplier Code of Conduct, the Human Rights Policy, and our Modern Slavery Policy.

# 4. ASSESSING MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

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Livent UK's supply chains principally relate to the provision of services and raw materials. Livent UK assesses that the risk of modern slavery in our supply chains is limited. While risk is limited, we have taken significant steps to further protect against modern slavery, particularly in regions where risk is highest, including by setting clear expectations for all organisations supplying goods and/or services to our business. To help assess relative risk, we actively consult the Global Slavery Index and other reference materials.

For example, through Livent UK's [Supplier Code of Conduct](#) and other supply chain initiatives and processes, we advance our commitment to sourcing components and materials from companies that share our values: human dignity, business integrity, and environmental responsibility. Our policies and practices are elaborated in detail in section five of this Statement.

Livent Corporation's 2022 global procurement spend, inclusive of capital projects, totalled approximately USD \$1.257 billion. Of this total, approximately GBP £13.8 million was expended by Livent UK, working across more than 262 suppliers globally, some of whom may have further suppliers and/or third-party service providers.

While risk in the majority of our supply chain is assessed to be limited, we have diligently

focused efforts where the risk of modern slavery is believed to be the greatest.

The majority of Livent UK's external payments were made to suppliers in the United Kingdom, Germany, and Spain. These suppliers are subject to well-established wage and work-force laws, including for UK suppliers the UK Modern Slavery Act 2015.

The majority of Livent UK's supply chain expenditures are for provision of raw materials, chemicals, utilities and services. The most substantial expenditure by far is lithium metal purchased from Livent Corporation. Livent Corporation's raw lithium inputs are first extracted from brine salars in Argentina, then further processed in North Carolina (USA) before the lithium metal is then purchased by Livent UK.

Livent UK also obtains a small proportion of lithium metal inputs from a publicly traded supplier located in China, which is subject to oversight from the Chinese government. Recognising the potential for higher risk of labour rights violations in China, we have investigated to confirm, to the best of our knowledge, that this supplier is not located in or sourcing from the Xinjiang Uyghur Autonomous region of China.

We are aware that certain Livent UK suppliers source from multiple regions, including the United States and the Middle East.

# 5. MITIGATING RISKS IN OUR SUPPLY CHAIN

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To identify and mitigate modern slavery risks in Livent UK's operations and supply chains, we have implemented systems and controls within our UK facility and also incorporate Livent Corporation policies and practices to take meaningful action that are designed to protect against exposure to modern slavery.

## **Steps taken or advanced, and goals achieved, in 2022 include:**

### **Extended Livent UK Gap Assessment to further strengthen supply chain transparency and compliance**

When it was first implemented in 2021, the Livent UK Gap Assessment included an internal review and supply chain mapping exercise. During this exercise, Livent UK evaluated each sector risk, country risk, transaction risk, and business partner risk, including direct (i.e. "Tier-1") suppliers and, in part, beyond. The review also included assessment of training programs.

Our Gap Assessment in 2021 led to a mapping of our supply chains for lithium metal, hexane, heptane, cyclohexane, toluene, n-Butylchloride, S-Butylchloride, and mineral oil from initial mining or manufacturing, distribution to Livent UK, production at our UK facility and then final distribution to our customers. We assessed each supplier against a map of modern slavery risk by geography, and then categorised them as low, medium, or high risk.

In 2022, Livent UK extended the Gap Assessment to include external review and data submission by both all direct suppliers and all key high-risk service providers. All new vendors have been added and assessed. Also in 2022, Livent strengthened follow-up procedures, conversations, and investigations with suppliers who provided partial or incomplete information during the Gap Assessment.

### **Improved on efforts to ensure compliance with the modern slavery clause in our UK procurement contracts**

In 2022, we required suppliers to:

- Ensure compliance with all applicable modern slavery laws and take steps to meet international standards around modern slavery
- Confirm they have not been convicted or investigated for modern slavery offences
- Take reasonable steps to ensure they, their subcontractors, and others in their supply chains have adequate procedures to prevent and address modern slavery
- Grant Livent UK the right to audit them and their subcontractors for compliance against our requirements
- On request, provide a copy of any modern slavery statement they are required to prepare under any relevant modern slavery reporting framework.

### **Continued employee training and education**

In 2022, Livent UK ensured there was training about modern slavery for all employees involved in the supply chain and procurement process at the time of the training. Raising awareness of modern slavery, and with it, respect and dignity for all persons and labour, remains a priority for Livent UK and the broader Livent Corporation.

## **Increased supplier due diligence and data collection**

In 2021, we asked our Tier-1 suppliers to complete a specific modern slavery questionnaire. These Tier-1 suppliers were asked numerous direct and indirect questions relating to the issue of modern slavery and the steps that they had taken to combat it. In 2022, the responses were reviewed and assessed for any indicative red flags. This includes evaluating a sample of suppliers against relevant sections of the Livent Corporation Supplier Code of Conduct, Supplier Sustainability Policy, Code of Ethics and Business Conduct, Human Rights Policy, and Modern Slavery Policy.

In 2022, Livent UK also carried out expanded supplier due diligence assessments for potential new suppliers, using Livent Corporation procedures and requiring completion of a "Vendor Data Collection Form" and a "Supplier Prequalification Form" (in the case of raw materials suppliers) under which the potential new supplier confirms that it does not engage in modern slavery.

New supplier due diligence is carried out by Livent Corporation and Livent UK procurement personnel before any potential new supplier is approved for use by Livent Corporation or Livent UK. If these forms are not provided or completed in a satisfactory manner, the potential new supplier is not engaged further.

When evaluating potential new suppliers as part of our due diligence, we are conscious of the need to be aware of any signs of modern slavery and would elevate any concerns to appropriate company leadership and other relevant authorities.

We are using, and continuing to advance, a process for evaluating the potential for modern slavery in our supply chains, including a consideration of the location, sector and business relationship of suppliers (with a higher risk assigned to suppliers in developing economies and/or those located in countries identified as high risk by third party sources), and the material or services being supplied (with a higher risk assigned to services that are manual labour intensive).

These processes also include the use of a third-party software solution that screens all vendors and suppliers of Livent Corporation and Livent UK against over 800 government lists to check whether the vendor or supplier is blocked, denied, sanctioned or otherwise restricted by leading government authorities around the World.

**Evaluated key performance indicators (KPIs) that assist in assessing the effectiveness of actions to prevent and address modern slavery**

We protect whistle blowers and encourage the confidential submission of possible violations of our Supplier Code of Conduct, including through our ethics complaint/whistle bower hotline. Likewise, suppliers and their own employees may contact us through a dedicated email communication channel at [Livent.Supplier.Communication@livent.com](mailto:Livent.Supplier.Communication@livent.com) to report any concerns regarding modern slavery. ***Livent received no modern slavery complaints in 2021 or 2022 through the company's ethics hotline complaints processes or otherwise.***

Additional KPIs for environmental, safety, and governance measures are incorporated within a supplier scorecard. This scorecard is completed by suppliers twice per year (Control of Major Accident Hazards ([COMAH](#)) - HSE Regulatory Review).

Evaluation of KPIs includes:

- Tracking the number of discretionary supplier audits that have taken place
- Reviewing the completion of questionnaires and documentation that has been submitted by suppliers
- Tracking the number of suppliers that have either been contacted or excluded due to modern slavery concerns
- Verifying the inclusion of Livent UK's modern slavery clause in supplier contracts
- Tracking employee training completion rates
- Questioning Livent employees regarding the substance of the training that they have received on modern slavery and general awareness of Livent Corporation's policies

**IN 2023, LIVENT CORPORATION WILL FURTHER STRENGTHEN ITS EFFORTS, INCLUDING:**

**Continually screen our vendors and suppliers for risk of modern slavery:**

- Enhancing the Vendor Data Collection Form and adding new questions, for example to require vendors to confirm they are not providing Livent with any products mined, produced or manufactured with prohibited forms of labour.
- Requesting that all high-risk suppliers re-submit the pre-qualification questionnaire on an annual basis.
- Documenting and standardising global procedures.
- Auditing at least two high-risk direct suppliers.
- Reducing the volume of materials or services purchased from high-risk countries or suppliers.
- Developing additional training materials and measurement of training impact.

**Update our terms and conditions to include specific language regarding modern slavery**

In early 2023, our terms and conditions for goods and services were updated in English to include specific language regarding anti-slavery and human trafficking (available [here](#)). We are currently updating for other languages and, when each one is updated, we will make it available on our [Supplier page](#).



# 6. EMPLOYEE TRAINING & EDUCATION

Livent Corporation and Livent UK are committed to providing training to their respective staff with the objective of ensuring employees possess an effective understanding of the risks of modern slavery in Livent's operations and supply chains.

All new members of staff within the Livent Group are required to complete Livent's "Protecting Human Rights in the Supply Chain" training. All Livent employees are expected to complete annual training on Livent Corporation's "Code of Ethics and Business Conduct." Additionally, in 2022, we launched the following training courses related to the topic of modern slavery:

- "Preventing Global Modern Slavery"
- "Dignity and Respect in the Global Workplace"

These courses were assigned to all employees globally. Completion was tracked and tied to performance.

In 2022, every staff member of Livent UK and all members of the Livent Global Procurement team involved in Livent's UK supply chain successfully completed mandatory interactive training on the UK's Modern Slavery Act 2015 via an e-learning platform, which set a required score to pass its final exam.

In addition, all members of the Livent UK procurement team and all members of the Livent Corporation Global Procurement team that are involved in the UK supply chain are required to review the video, "Modern Slavery Act: Protecting Human Rights." This

video aids in employee understanding of what modern slavery constitutes and helps employees identify modern slavery risks and warning signs.

To further bolster Livent's education and understanding of modern slavery, the site director of Livent UK completed an external training course on supply chain mapping entitled "Supply Chain Mapping and Modern Slavery" through the Supply Chain School UK. The knowledge gained through this course continues to be instrumental for the company's supply chain mapping efforts.

Livent UK's initiatives to raise employee awareness of modern slavery also include:

- Providing posters, wallet-size cards, and electronic displays that outline modern slavery in accessible language and providing a UK helpline number for victims and/or to report suspicions of modern slavery.
- Placement of prominent workplace posters in break rooms, copy rooms, and other high traffic locations.
- Distribution of wallet-size cards that provide tips on spotting modern slavery. These cards are designed to be easy-to-carry, to take to suppliers, and to distribute to any suspected victim of modern slavery, as needed.
- Rotating electronic displays on TV monitors in select office areas.

# 7. OUR COMMITMENT TO SUSTAINABILITY INCLUDES COMBATTING MODERN SLAVERY

Livent Corporation is committed to sourcing components and materials from companies that share its values regarding respect for human rights, integrity, and environmental responsibility. Livent Corporation is a member of the United Nations Global Compact (UNGC) and continues to support the Ten Principles of the UNGC on human rights, labour, environment, and anti-corruption.

Since becoming a public company in October 2018, Livent Corporation has worked to develop a sustainability strategy that emphasises attention to, and care for, human rights - as described in Livent Corporation's annual Sustainability Reports (available [here](#)). Livent Corporation's 2022 Sustainability Report will be published in July 2023.

In February 2021, Livent Corporation announced new sustainability goals that reaffirmed its commitment to advancing social progress and human rights across its operations and supply chain. From a Social Responsibility perspective, Livent Corporation pledged to

verify and enforce supplier compliance with its Supplier Code of Conduct and responsible labour practices, as measured against various KPIs for supplier selection, monitoring, and performance.

In 2022, Livent Corporation received its third [Gold Sustainability](#) rating from EcoVadis, a global sustainability ratings provider.<sup>3</sup> EcoVadis assesses sustainability performance across four main categories: Environment, Labour & Human Rights, Ethics and Sustainable Procurement. A [Gold Sustainability](#) rating indicates that the Livent Corporation is in the top 5% of all companies that were evaluated within its industry group.

As a member of the Livent Group, Livent UK will follow Livent Corporation's policies.

This Statement is made pursuant to section 54(1) of the UK's Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2022.

*3: The EcoVadis assessment is based on leading standards, such as the Global Reporting Initiative, UNGC, and ISO 26000. EcoVadis assessments are supervised by an international scientific committee. EcoVadis rates performance by assessing a company's policies, actions, and results. It also takes into consideration inputs from third-party professionals and external stakeholders. EcoVadis characterises modern slavery as low wages, excessive working hours, unsafe conditions, bonded labour contracts, and trafficking.*



SIGNED BY DIRECTOR on 16 June 2023  
following approval by Board of Directors of  
Livent Lithium UK Limited on 16 June 2023