

# ANTI-BRIBERY AND CORRUPTION POLICY

## 1. INTRODUCTION

Allkem prides itself on acting with integrity and honesty wherever we do business around the world. We greatly value our reputation for honesty and integrity, and it is essential that our employees, our other personnel and all those who represent Allkem (collectively **Representatives**) conduct our business in a manner which complies with the laws and standards of behaviour prescribed by the jurisdictions in which we operate.

This Anti-Bribery and Corruption Policy (**Policy**) sets out the anti-bribery and corruption commitments of Allkem and its subsidiaries (**Allkem Group**). The supporting Anti-Bribery and Corruption Standard sets out in practical terms how you should behave if you are confronted with bribery or corruption, as well as the requirements for maintaining accurate books, records and internal controls. Related requirements are also set out in the other supporting Standards set out at paragraph 5 below.

All Representatives must comply with this Policy and the associated Standards at all times and in all aspects of their work. Failure to comply with this Policy, the associated Standards and applicable laws will result in disciplinary action, which may include termination of employment or engagement with Allkem. Legal action may also ensue.

## 2. KEY TERMS

In this Policy, **bribery** means the giving or receiving of money or anything else of value as an inducement or reward for an improper act. **Corruption** is the misuse of public office or power for private gain. Bribery and corruption can take many forms, including inappropriate gifts and hospitality, travel, sponsorships, charitable or political donations and facilitation or 'grease' payments. **Public Officials** are individuals who hold positions or exercise functions in the public sector (or government or quasi government), labour unions, and the leaders and people who act on behalf of indigenous communities.

These and other key terms are explained in more detail in the Anti-Bribery and Corruption Standard.

## 3. ALLKEM'S COMMITMENT

The Allkem Group is committed to:

- conducting its business activities in accordance with the Allkem Values;
- a zero-tolerance approach to bribery and corruption. Bribery and corruption are never acceptable by or on behalf of Allkem and we will not tolerate them in our business or by those we do business with;
- acting fairly, honestly, openly and in an ethical manner in all our business dealings and relationships wherever we operate;
- upholding applicable national and international laws relevant to countering bribery and corruption wherever we operate;
- maintaining accurate and complete books and records for all financial transactions and to accurate and transparent financial reporting; and
- implementing and enforcing effective systems within Allkem, including mandatory training, to counter the risk of bribery and corruption and to comply with our other commitments set out above.

## 4. GOLDEN RULES

The following Golden Rules are intended to help you understand and remember your obligations under this Policy. You must comply with the Golden Rules whenever you are acting for or on behalf of the Allkem Group.

### Always

- Comply with this Policy, all related Standards and the law when acting on behalf of the Allkem Group.
- If you see something, say something.

### Anti-bribery and anti-corruption

- Never offer, solicit, give, or accept a bribe or benefit as an inducement or reward for an improper act. This applies to all business dealings and interactions within the public and private sectors.
- Always exercise particular caution when dealing with government and Public Officials (and their associates).
- Never make facilitation payments (unless your health, safety, liberty or property is threatened).

- Never make false, misleading or inaccurate records or entries in Allkem's books and records.

#### **Gift & Hospitality**

- Never give or accept gifts or hospitality to obtain an improper advantage, or as an inducement or reward for something given in return. This includes never giving or accepting gifts or hospitality to or from someone involved in a tender with a member of the Allkem Group. This applies to both business dealings and interactions with the private sector and the public sector.
- Only give gifts and hospitality in accordance with the Gift & Hospitality Standard. Obtain pre-approval before giving or receiving gifts or hospitality worth more than US\$50 to or from a Public Official. Enter any gifts or hospitality (regardless of their value) that you give to or receive from a Public Official in the Gift & Hospitality Register described in the Gift and Hospitality Standard. If you give or receive gifts or hospitality worth more than US\$200 per person to or from anyone in the private sector, obtain pre-approval and enter them in the Gift & Hospitality Register.

#### **Political and Charitable Donations**

- Never make political donations on behalf of Allkem.
- Obtain pre-approval before making charitable donations on behalf of Allkem.
- Only give donations in accordance with the Political and Charitable Donations Standard.

#### **Contracting with Third Parties**

- Undertake appropriate, risk-based due diligence on third parties with which a member of the Allkem Group intends to do business. Relevant due diligence procedures are set out in Allkem's Contracting with Third Parties Standard.

#### **Conflicts of Interest**

- Avoid conflicts of interest wherever possible.
- Do not take advantage of your position, or the property or information of Allkem or its customers, for personal gain or to cause detriment.
- When it is not possible to avoid a conflict of interest, immediately disclose the conflict in accordance with the Conflict of Interest Standard.
- Designated employees may be required to complete an annual Conflict of Interest declaration confirming that the employee is not aware of any conflict that may affect their employment.

### **5. SUPPORTING STANDARDS**

The Allkem Group has adopted a number of supporting standards which set out in more detail the expectations of our Representatives regarding the requirements of this Policy and the Golden Rules. These include the standards listed below, and others located on the Allkem Group intranet site, which must be complied with by all Representatives when acting for or on behalf of a member of the Allkem Group:

- [Anti-bribery and Corruption Standard](#) ;
- [Gift & Hospitality Standard](#);
- [Contracting with Third Parties Standard](#);
- [Political and Charitable Donations Standard](#) and
- [Conflict of Interest Standard](#).

### **6. APPLICATION**

This Policy and the supporting Standards apply to:

- Allkem Limited and all its subsidiaries and associated companies worldwide, including joint venture companies in which Allkem has a controlling interest;
- every individual working in or for the Allkem Group, at any level or grade, wherever located, including all employees (whether permanent, fixed-term or temporary), directors and officers; and

- third parties engaged by a member of the Allkem Group, including agents, distributors, service providers, consultants, advisers, contractors, introducers and finders, brokers and political lobbyists.

We have adopted the Policy and Standards to help us protect the persons and entities listed above from the risk of bribery and corruption and other conduct which would be in breach of those documents, and to maintain high legal and ethical standards, thereby protecting Allkem's reputation.

## **7. NON-COMPLIANCE**

### **Consequences of non-compliance**

Failure to comply with this Policy, relevant Standards and applicable laws will result in disciplinary action, which may include termination of employment. Allkem will not tolerate retaliation or victimisation against anyone for complying with, or refusing to breach, this Policy.

Failure to comply with anti-bribery and corruption laws is a criminal offence and may result in heavy fines for Allkem and for individuals involved in the contravention. Individuals may also receive jail sentences.

Allkem will, wherever possible, reserve the right to terminate contractual relationships with any third party who works with or for the Allkem Group if they breach this Policy and associated Standards, any anti-bribery or corruption laws or any applicable anti-bribery and corruption contractual provisions.

Where the local legal requirements and the requirement of this Policy or any of the associated Standards differ, the more onerous requirement must be complied with.

### **Reporting non-compliance**

Allkem's Whistleblower Policy contains detailed information about how to report non-compliance. It sets out the various ways in which concerns can be raised both internally and externally and the protections available to individuals doing so.

Persons or entities to whom concerns can be raised internally include the Chief Financial Officer, the Chief Legal Officer, the Company Secretary, the Compliance Officer, another officer or senior manager of Allkem and the Ethics Line (openly or anonymously).

Further detail is contained in the Whistleblower Policy.

## **7. COMMUNICATION & TRAINING**

This Policy is available via the Company's intranet and on the Company's external website at [www.allkem.co](http://www.allkem.co).

We hold periodic training sessions for Allkem directors, officers, employees and other personnel regarding compliance with this Policy.

If you have any questions about this Policy and how it applies to you, please speak with your manager, the Compliance Officer, the Chief Financial Officer or the Chief Legal Officer.

## **8. MONITORING AND REVIEW**

This Policy will be reviewed periodically to identify if any changes are required.

This Policy has been approved by the Board of Directors of Allkem Limited.

Martin Perez de Solay  
Managing Director and CEO

December, 2022