

Global Supply Chain and Procurement

## Responsible Sourcing of Minerals Policy

**Policy Owner:**

Director, Supply Chain and  
Procurement Operations

**Policy Approver:**

Chief Operations Officer

**Issue Date:**

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### Purpose

The purpose of this policy is to mitigate the risk of potential adverse impacts to human rights by Arcadium Lithium plc's ("Arcadium Lithium") suppliers during the extraction, sale, transport, and/or export of minerals.

### Scope

The Responsible Sourcing of Minerals Policy is applicable to all Arcadium Lithium suppliers of minerals including, but not limited to, lithium carbonate, sodium carbonate (Soda Ash) and calcium oxide (Quicklime).

### Definitions

In the context of this policy, the term 'minerals', includes but is not limited to, lithium carbonate, sodium carbonate (soda ash) and calcium oxide (quicklime).

### Commitment

Arcadium Lithium is committed to conducting business in an honest and ethical manner and in full compliance with applicable laws and regulations.

At Arcadium Lithium, we follow the Organisation of Economic Cooperation and Development Due Diligence (**OECD**) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (**CAHRA**) when practicing third-party due diligence, by identifying, assessing, responding to, mitigating, supporting independent audits and reporting on our supply chain due diligence risks.

Arcadium Lithium commits to:

- Exercise due diligence with relevant suppliers consistent with international business and human rights standards and undergo third-party verification of our Environmental, Social, and Governance (**ESG**) practices and encourages our suppliers to do the same.
- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm that minerals in our supply chain do not contribute to illegal armed groups, human rights' violations, bribery, and/or financial wrongdoing.
- Aim to establish long-term relationships with our immediate suppliers.
- Undergo reasonable third-party assessment(s) to verify the conflict-free status of our minerals supply chain.

- Sourcing sustainable and responsible minerals, using commercially reasonable efforts.
- Support efforts, and/or take steps, to engage with central or local authorities, stakeholders, international organizations, and civil society organizations to contribute to workable solutions:
  - To avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners;
  - To develop a risk mitigation plan, with concrete actions, that tracks activities to closure to prevent and/or mitigate risks of adverse impacts through measurable steps taken in a mutually acceptable timeline;
- Disclose payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (**EITI**) in countries that actively participate in the initiative and from which Arcadium Lithium extracts lithium minerals, and encourage any suppliers in our supply chain, subject to EITI, do the same.
- Improve transparency, and accountability in payments made to public security forces for the provision of security, where we or any company in our supply chain contracts public or private security forces.
- Support or take steps to adopt screening policies to ensure that individuals or units of security forces that are known to have been responsible for human rights' abuses will not be hired in any part of our supply chain.
- Comply with Section 1502 of the Dodd Frank Act, which aims to prevent the use of minerals containing tin, tantalum, tungsten and gold ("3TGs") that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries.

We expect that relevant suppliers of minerals doing business with Arcadium Lithium to share these commitments.

### **Responsible Sourcing Issues**

Arcadium Lithium will not tolerate, profit from, contribute to, assist with, or facilitate the commission by any party in our supply chain of:

- Any forms of torture, cruel, inhuman and/or degrading treatment;
- Any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty, and for which said person has not offered themselves voluntarily;
- Child labor;
- Human rights violations and abuses, including any form of sexual violence;
- War crimes or other serious violations of international humanitarian law, including crimes against humanity or genocide;

- Direct or indirect support to non-state armed groups, public or private security forces, or their affiliates, including, but not limited to, procuring minerals from, making payments to, or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates who:
  - Illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;
  - Illegally tax or extort money or minerals at points of access to mine sites, along transportation routes, or at points where minerals are traded;
  - Illegally tax or extort intermediaries, export companies or international traders;
  - Do not act in accordance with the Voluntary Principles on Security and Human Rights;
- Bribes, corruption, fraudulent misrepresentation of the origin of minerals and money laundering; and
- Non-payment of taxes, fees and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas owed to governments.

### **Supplier Expectations**

We expect our suppliers to conduct themselves in an ethical and responsible manner that supports the protection of and respect for human dignity in their workplaces and is consistent with Arcadium Lithium's policies.

Relevant Arcadium Lithium suppliers should:

- Commit to and comply with this policy, our Supplier Code of Conduct and our Supplier Sustainability Policy.
- Communicate the contents of this Responsible Sourcing of Minerals Policy to their suppliers of minerals (if applicable), and require them to observe similar standards, and verify adherence throughout their supply chain.
- Conduct their operations in a socially and environmentally responsible way.
- Conduct screenings of their suppliers, including verification of individuals and entities that hold direct or indirect ownership stakes in the supplier against sanctions lists.
- Work closely with Arcadium Lithium with the design and implementation of improvement plans (where necessary).
- Immediately report to Arcadium Lithium any changes in their supply chain of minerals, including changes in transportation routes.
- Commit to being or becoming "conflict-free" (which means the supplier does not source

conflict minerals<sup>1</sup>) and to sourcing 3TGs only from conflict-free smelters.

### **Violations or Grievances**

Arcadium Lithium reserves the right to verify compliance with this Responsible Sourcing of Minerals Policy and take appropriate actions in the event of non-compliance, which may include (but is not limited to) suspension or termination of engagement.

Any violations or concerns/grievances about our policy or due diligence system should be reported through Arcadium Lithium Ethics reporting systems.

### **Implementation and Training**

To ensure effective implementation and adherence to this policy, training sessions will be provided to relevant personnel.

Suppliers of minerals will be required to review and requested to acknowledge this policy.

### **Appendix**

- Arcadium Lithium Code of Ethics and Business Conduct
- Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- Voluntary Principles on Security and Human Rights

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<sup>1</sup> As of the Issue Date of this Responsible Sourcing of Minerals Policy, the term "Conflict Mineral" includes the metals tantalum, tin, tungsten, and gold, which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively.