



CODE OF CONDUCT





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MESSAGE FROM THE CEO

At **Allkem** we have a vision to create a sustainable, large scale, global lithium chemicals business to power the future. It is an exciting time to be involved in an industry that will lead the change to a sustainable energy future.

Our vision will only be achieved where we all demonstrate behaviours that are consistent with our core values and the expectations of our key stakeholders.

The key behaviours that we are all expected to demonstrate in our day to day roles are set out in this Code of Conduct. It applies to all directors, officers, employees, contractors and service providers, regardless of their role or location within Allkem. We all have a shared responsibility to make our company a great place to work and create a culture of trust and care for one another.

I encourage you all to read this Code of Conduct and model your behaviours at work on the expectations set out within it. I believe Allkem will be a leader in the lithium chemicals industry, and our people will lead the way in terms of demonstrating appropriate behaviours whatever the challenges ahead.

Thank you for your support.

Martín Pérez de Solay
Managing Director & CEO

1. INTRODUCTION

At Allkem we are committed to conducting our business activities fairly, honestly and with integrity in compliance with applicable laws. It is the responsibility of all our people to ensure ethical conduct is recognised and valued throughout Allkem.

This Code of Conduct **(Code)** sets out our expectations of appropriate conduct by you in a variety of contexts and outlines the minimum standard of behaviour we expect. These behaviours are underpinned by the Allkem Values and reflect the expectations of our customers, investors, regulators, and the community.

This Code brings together key elements of our corporate policies, procedures and standards which collectively outline our expectations about how you will behave and conduct yourself when working for, or with, Allkem. Compliance with this Code and our policies, standards and procedures is a condition of working for, or with, Allkem.



2. PURPOSE, VISION AND VALUES

PURPOSE

Producing core materials that are fundamental for decarbonisation.

VISION

To be a top three global lithium chemicals producer.

VALUES

We are committed to conducting our business activities in accordance with the following values and behaviours which underpin our work culture and how we work together to achieve our Vision:



Respect

We foster trusted relationships with our collaborators, the different communities, and our business partners.



Inclusion

We promote a working environment where everyone is treated with respect and differences are celebrated and considered.



Empowerment

We encourage all our collaborators to live to their fullest potential and to be proud of the role they play.



Commitment

We keep our promises, reinforcing our reputation as trustworthy and qualified partners.



Integrity

We are consistent with our core values in all our tasks and in our interactions with others.

3. COMPLYING WITH THIS CODE

Who must comply

Compliance with this Code is mandatory for every individual working for, or engaged by, Allkem at any level or grade, wherever located, including all:

- our directors, officers, executives, managers, employees and other personnel (Employees);
- third party representatives who interact with others on our behalf; and
- our contractors and suppliers (Contractors),

(collectively referred to in this Code as **you**).

Contractors may also follow their own code of conduct where the relevant standard of behaviour is the same as, or more onerous than, this Code.

References in this Code to **Allkem, we, us** or **our** are to Allkem Limited and each of its subsidiaries worldwide (including subsidiaries which are joint venture companies).

In this Code a reference to an Allkem policy includes its associated standards and procedures.

The role of our leaders to assist compliance

We know the standard we walk by is the standard we accept. That's why, **if you are responsible for managing Allkem Employees and Contractors, it is important you act as a role-model** of our Values by:

- ensuring the effective implementation, promotion and support of this Code in your areas of responsibility;
- ensuring your team members understand and comply with the requirements of this Code and receive appropriate training in respect of it;
- embedding our Code into day-to-day activities and existing processes;
- fostering an inclusive culture where everyone feels comfortable to ask questions or speak up without fear of retribution;
- reporting any ethical issue or suspected contravention of this Code; and
- taking appropriate and proportionate permitted disciplinary action against any member of your team who contravenes this Code.





4. STANDARDS OF BEHAVIOUR

General Standards

You must at **all times** act:

- **in accordance with Allkem's Values;**
- **honestly, ethically and responsibly, and with high standards of personal integrity;** and
- **in accordance with all applicable laws and regulatory requirements** of the jurisdictions in which we operate (and if the requirements of this Code differ from the requirements of those applicable laws, you must act in accordance with the more onerous requirement). You should be aware that the laws in the places where you may work for, or with, Allkem may differ and you may be subject to the laws of more than one place at the same time.

PRINCIPLE 1: Health & Safety

A safe workplace

You should be able to go to work without fear of injury or illness. **We are committed to protecting the health and safety of all Employees, Contractors and others involved in our business operations.** We are also committed to providing a workplace which enables Allkem Employees and Contractors to perform their duties effectively without presenting a risk to themselves or others. Further detail is set out in our [Health and Safety Policy](#).

You must always act in a manner which complies with that policy.

PRINCIPLE 2: Environment

Caring for the Environment

We are committed to conducting our activities in an environmentally responsible manner by understanding and minimising the potential impacts of our operations on the environment. Further detail is set out in our [Environmental Policy](#).

You must always act in a manner which complies with that policy.





PRINCIPLE 3: Diversity & Inclusion

Treat others with fairness and respect

Bullying, harassment or discrimination of any kind towards others is never acceptable, and we will not tolerate them occurring, in our business or by those we do business with. We know that our differences related to the colour of the skin, gender, age, nationality, political or religious beliefs or how we self-identify, does not affect our ability to do our job.

We strive to attract and retain quality people to enhance a culture that celebrates diversity, empowers personnel and promotes integrity in all activities. The principal criteria for selection and promotion of people to work within the Company is their overall relative prospect of adding value to the Company and enhancing the probability of achievement of the Company's objectives. Further detail is set out in our [Diversity Policy](#).

You must always act in a manner which complies with that policy and, in particular, you must at all times treat fellow Allkem Employees and Contractors with respect and not engage in bullying, harassment or discrimination of any kind.



PRINCIPLE 4: Human Rights

Respect for the human rights of all people

We support and respect the protection of human rights across all our operations and associated activities. **We place particular emphasis on the evaluation of labour rights and labour conditions in our operations and our supply chain, and report on these annually.** We work to ensure that these principles and rights are respected for our employees and all those who work in our supply chain or are impacted by our operations. Further detail is set out in our [Human Rights Policy](#).

You must always act in a manner which complies with that policy.

PRINCIPLE 5: Communities

Improving the wellbeing of the communities in which we operate

Our shared value philosophy seeks to deliver sustained long-term value for both the local communities in which we operate and our operations. **We believe that we have an obligation to support and contribute to communities (both socially and economically) in the regions in which we operate** – with the aim to minimise adverse impacts and enhance positive impacts from our business operations.

Allkem is committed to creating value for our stakeholders in a manner that encourages high standards of empathy, respect, transparency, and ethics in everything we do. We take proactive steps to achieve sustainable development in connection with our operations.

Further detail is set out in our [Sustainable Development Policy](#) and [Community Policy](#).

You must always act in a manner which complies with those policies.

PRINCIPLE 6: Anti-Bribery and Corruption

We prohibit bribery and corruption in all our activities

Bribery and corruption are never acceptable, and we will not tolerate them occurring, in our business or by those we do business with.

Whenever you are acting for or on behalf of Allkem you must never offer, solicit, give or accept a benefit as an inducement or reward for an improper act. You must never give or accept gifts or hospitality to obtain an improper advantage, or as an inducement or reward for something given in return.

Allkem is committed to maintaining accurate and complete books and records for all financial transactions and to ensuring accurate and transparent financial reporting. All expenditure must be supported by documents that completely, accurately and properly describe such expenditure and the reason for the expenditure must be specifically recorded.

Further details are set out in our [Anti-Bribery and Corruption Policy](#) and [Anti-Bribery and Corruption Standard](#). You must comply with those documents.





PRINCIPLE 7: Conflicts of Interest

Acting in Allkem's best interests

You should not engage in activities (including holding or dealing in assets) that involve, or could appear to involve, a conflict between your personal interests and the interests of Allkem. Such circumstances could compromise or appear to compromise your ability to make impartial business decisions.

We cannot avoid all circumstances in which a conflict of interest may arise, but we can take steps to ensure we always act objectively and without bias. We do this by disclosing and managing potential or existing conflicts of interest. Further details are set out in the [Conflict of Interest Standard](#).

You must comply with that standard including, if you are faced with a conflict of interest, reporting it to your manager.

PRINCIPLE 8: Data Privacy and Cybersecurity

Protecting personal information

We have significant obligations under privacy legislation and other applicable laws to protect the privacy of individuals. **We protect the data entrusted to us by handling it properly**, using it only for the intended and authorized purposes, and always considering the full rights of the data owner.

We take these obligations and the protection of personal information seriously. **We are committed to increasing cybersecurity** awareness at Allkem and to taking appropriate measures to protect our technology, systems and digital assets, including the information we hold, from cybersecurity breaches.

Further information can be found in the **Privacy Policy, Privacy Manual** and the [Information Security Policy](#).

You must always act in a manner which complies with those documents.



PRINCIPLE 9: Confidential Information

Protecting confidential information

While working for or with us, you may have access to or become aware of confidential information about Allkem. This includes any information which is not generally available to the public concerning our activities, strategies, results or plans. Information owned by or concerning a third party that has been provided to Allkem or to which Allkem has been given access, may also be confidential.

If you have access to confidential information you must:

- **maintain the confidentiality of that information and not disclose it outside Allkem without proper authorisation;**
- **only access that information for, or in connection with, your role and responsibilities within Allkem;**
- **ensure that the information is only used for authorised purposes and is protected from theft, unauthorised or inappropriate use (including for personal gain) and unauthorised disclosure; and**
- **report any loss or unauthorised disclosure of such information promptly to your manager.**

You must also be aware of and comply with the confidentiality obligations set out in your employment or engagement agreement with us. Those agreements usually provide that your confidentiality obligations continue to apply to you after your employment or engagement with us ceases.

If you are unsure whether information is of a confidential nature or what your obligations are with respect to information to which you have access, speak to your manager or a member of the Allkem Legal Department.

PRINCIPLE 10: Trading in Allkem Shares

No share trading whilst in the possession of inside information

It is unlawful to deal in the shares of a company while in possession of “inside information”. This is known as “insider trading” and is a serious offence under the Australian Corporations Act and equivalent international laws.

INSIDE INFORMATION is information about a company that is not generally available to the public and which a reasonable person would expect to have a material effect on the price of a company’s shares. Inside information can include information about sales, earnings or other important financial information, significant transactions, changes in key personnel or the entry into a new market.

If you have access to or become aware of inside information relating to Allkem, it is unlawful for you to buy, sell or otherwise deal in Allkem’s shares. It is also unlawful in those circumstances to communicate such information to anyone else who may deal in our shares.

The penalties for insider trading are severe and can include imprisonment.

Our [Trading Policy](#) provides further details in relation to the trading of Allkem’s securities. You must comply with that policy.

PRINCIPLE 11: Communications and Disclosures

Apply regulations about sharing information

As Allkem is a publicly listed company it has extensive obligations in relation to disclosure of information about the company and its operations. We are required to disclose information **in a timely, accurate, consistent, complete and fair manner** so investors can make informed decisions about investing in our shares.

We have adopted a [Disclosure Policy](#) to assist in compliance with these obligations.

The policy also sets out who can disclose information to the public about, and speak publicly on behalf of, Allkem including with respect to communications with stock exchanges, regulatory bodies, media organisations, stock brokers, financial analysts, investors or other members of the public. If you receive a request for information about Allkem and you are not authorised by the policy to respond to the request you should promptly refer it to your manager or Allkem's Investor Relations and Corporate Affairs Manager.

You must always act in a manner which complies with that policy.

Allkem has social media accounts which it uses to share information from time to time about the company and its operations. Those accounts are managed by Allkem's Investor Relations team. **When using your personal social media accounts, you should refrain from disseminating information about Allkem (including photos).**

PRINCIPLE 12: Allkem Assets

Protecting and using Allkem assets responsibly

While working for or with us, you may be able to access and use our information systems, intellectual property, equipment, services and other assets. You must do so in an ethical and secure manner and in accordance with the obligations set out in your employment or engagement agreement, all Allkem policies (including this Code) and all applicable laws. Allkem assets are to be used for **Allkem business only and not for any private or other purpose.**

The use of Allkem assets off Allkem's premises is prohibited without approval. The use of mobile phones and laptops off Allkem's premises for Allkem business is deemed to be approved unless you are otherwise informed. If approval is (or is deemed to be) granted, you must take responsibility for maintaining, replacing, and safeguarding the assets and following any special directions or conditions that apply. **Assets covered by these requirements include physical and non-physical property, such as equipment, inventory, technology, money, intellectual property and Company information and data.**

If you use Allkem assets other than in accordance with the foregoing, you could face disciplinary and/or legal action.



PRINCIPLE 13: Competition

Comply with the laws that regulate anti-competitive behaviour

Most jurisdictions in which we operate have competition laws designed to protect against anti-competitive behaviour. **These laws are designed to stop practices that restrain trade or restrict free and fair competition**, such as price fixing, cartels, market sharing, bid rigging or abuse of a dominant market position.

Breach of competition laws can result in serious consequences for Allkem, our employees and other individuals who may be involved. Penalties can include significant fines and imprisonment. Businesses and/or consumers who are damaged by unlawful conduct may be able to sue to recover damages.

Allkem does not, and you must not at any time, engage in anti-competitive behaviour in contravention of applicable competition laws. In all dealings with Allkem's competitors, joint venture partners, customers and suppliers you must conduct yourself fairly, ethically, honestly, and respectfully, in a manner that does not breach applicable competition laws.

Without limiting your obligations:

- **you must not misrepresent our products, services or prices and must not make false claims about those of our competitors; and**
- **purchasing decisions must be based on such commercially competitive factors as quality, price, reputation and reliability.**

For further information please speak with a member of the Allkem Legal Department or the Allkem Compliance Department.



5. ADDITIONAL STANDARDS FOR OUR DIRECTORS

Directors have additional obligations under law, in addition to the standards outlined above. Accordingly, **if you are an Allkem director:**

- you must act honestly, in good faith and in the best interests of Allkem as a whole;
- you have a duty to use due care and diligence in fulfilling the functions of office and exercising the powers attached to that office;
- you must use the powers of office for a proper purpose, in the best interests of Allkem as a whole;
- your primary responsibility is to Allkem's shareholders as a whole but you should, where appropriate, have regard for the interests of all stakeholders of Allkem;
- you must not make improper use of information acquired as a director or take improper advantage of your position of director; and
- you must not allow personal interests, or the interests of any associated person or company, to conflict with the interests of Allkem.

6. NON-COMPLIANCE WITH THIS CODE

SPEAKING UP

If you become aware of behaviour which is or may be a breach of this Code, you have a responsibility to speak up. Speaking up about that behaviour can be tough but ignoring it may only serve to make the problem worse.

QUICK TEST

If you are in doubt about whether you should speak up, **ask yourself** whether the behaviour:



Safety

could directly or indirectly endanger you or others or cause them physical or mental harm?



Law

Is lawful and consistent with our policies?



Conscience

does it feel “right” and fit with my personal values and those of the company? If it feels wrong, then it probably is wrong.



Media

how would I feel if the behaviour appeared in the media?



Community

is it fair to our stakeholders?

RAISING A CONCERN

You don't need to be directly affected by a non-compliance issue to raise it, and there are several ways you can do so.

Allkem's Whistleblower Policy contains detailed information about raising concerns. 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 under the Whistleblower Policy include the directors, the Chief Legal Officer, the Company Secretary, another officer or senior manager of Allkem and the Ethics Line (openly or anonymously).

Further detail is contained in the [Whistleblower Policy](#).

You may also choose to raise a concern with your manager or a member of the Human Resources Department. However doing so in this manner may not afford you the same protections prescribed by law as you may have for disclosures made in accordance with the Whistleblower Policy.

We know that speaking up takes both courage and integrity, and we respect this by treating your concern sensitively and committing to investigate where appropriate. **All reports will be treated confidentially, and you will be protected from any form of retaliation** or disadvantage arising from disclosing in good faith an actual or possible contravention of this Code.

Material contraventions of this Code will be reported to the Board.

CONSEQUENCES OF CONTRAVENTION

Contraventions of this Code may result in disciplinary action including reprimands, formal warnings, demotions or termination of your employment or engagement. Legal action may also be taken.



7. COMMUNICATION & TRAINING

This Code is available via the Company's intranet and on the Company's external website at www.alkem.co.

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

If you have a query about this Code or need further information, please contact your manager, Human Resources, the Legal Department or the Compliance Department.

8. MONITORING AND REVIEW

This Code will be reviewed periodically to ensure that it is operating effectively and to identify if any changes are required. Suggestions for improvements or amendment to the Code can be made at any time.

Approved by the Allkem Board
December 1st 2022

