

Sustainability department

Human Rights Policy

Policy Owner:

Human Resources Director

Policy Approver:

Chief Human Resources Officer

Issue Date:

September 2024

A. Purpose

Arcadium Lithium plc (“the Company”) is committed to the protection and advancement of human rights. The purpose of this Human Rights Policy is to embed the responsibility to respect human rights throughout our global business, build increased trust with our external stakeholders and follow international good business practices.

B. Scope

This policy applies to:

- The Company and its majority controlled and managed subsidiaries (all, “Arcadium Group”).
- All employees, officers, directors and contractors of these entities (to the extent applicable to their work for the Arcadium Group).

Responsibilities arising from this policy also apply to service providers who, through the obligations in their supply arrangements and our Code of Ethics and Business Conduct, are committed to meeting the standards and performance expectations defined by this policy and associated documentation.

The Company is also committed to working with our joint venture partners (or those that are not majority controlled by the Arcadium group) to promote the adoption and implementation of the principles of this policy.

C. Guiding Principles

We firmly believe that the protection and advancement of human rights is a global business best practice and a core element of business sustainability. We place particular emphasis on the evaluation of labor rights and labor conditions in our operations and our supply chain and report on these annually in our Modern Slavery Statements, as required by applicable regulators.

This Human Rights policy is guided by the following:

- The Universal Declaration on Human Rights
- The United Nations Global Compact Principles
- The United Nations Guiding Principles on Business and Human Rights.

- The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- The United Nations Declaration on the Rights of Indigenous Peoples

C. Human Rights Commitment and Policy Pillars

These guiding principles apply to how we treat our employees and the people who work in our value chain and/or are impacted by our operations and projects. This Human Rights Policy rests on the pillars listed below:

- **Non-Discrimination:** we value the diversity of our employees. We promote a working environment where differences are celebrated and considered and everyone is treated with respect, regardless to race, ethnicity, creed, gender, religion, national origin, age, disability, veteran status or sexual orientation.
- **Child, Forced/Bonded Labor:** we oppose any form of harmful child labor and forced or compulsory labor, and prohibit them in all our workplaces and our value chain.
- **Freedom to Associate/Collective Bargaining:** we respect our employees' right to join, form or not join a labor union without fear of reprisal, intimidation or harassment.
- **Health and Safety:** maintaining a safe and healthy work environment that promotes our employees' physical, mental and emotional well-being is integral to the operation of our business. Please also see our Environmental, Health and Safety Policy.
- **Working Conditions, including hours:** all staff is entitled to basic rights and reasonable accommodations at their place of work, and vacation and/or holiday leave, all in accordance with the regulations of the jurisdiction where they work.
- **Fair Wages/Compensation:** every employee has the right to fair, competitive and equitable compensation for work performed in compliance with the legally required minimum prevailing wages established in the jurisdiction where they work.
- **Migrant Workers:** we oppose any harmful conduct or unfair practices committed in violation of the human rights of migrant workers.
- **Anti-Harassment/Respect in the Workplace:** we strive to treat our employees with dignity, respect, and in accordance with our policy of maintaining a work environment free of all forms of harassment, whether sexual, physical, verbal and/or psychological.

D. Implementation, Communication and Training

We aim to achieve the commitments of this policy through:

- Maintaining a physically and psychologically safe work environment for our employees in accordance with the standards and policies established by the Arcadium Group, and the laws of the jurisdictions in which we operate.
- Integration of human rights considerations into our governance and management practices.

- Identification, management and remediation of human rights risks and impacts.
- Appropriate risk-based human rights due diligence across our supply chains and each stage in the project life cycle.
- Ensuring that proper reporting and grievance mechanisms have been established and communicated to all stakeholders to ensure that violations of this policy are identified and addressed in a reasonably prompt manner in compliance with all Arcadium Group procedures and the laws of the jurisdictions in which we operate
- Participation in regional and global programs to promote greater awareness and protection of human rights.
- Specific focus on the rights of First Nations and indigenous peoples in the regions in which we operate, as set out in our Community and Social Performance and Sustainable Development Policies.

We are committed to regular training of our employees on this policy, and on the risks that the business faces from any instances of human rights violations or modern slavery in its operations or supply chains, so that they know how to identify and report suspected violations.

The expectations underpinning this policy are communicated to all existing suppliers, contractors and other business partners when entering into new or renewed contracts.

We will seek to transparently report on our human rights management approach, risks and impacts, including through our annual Communication on Progress in accordance with the UN Global Compact and Modern Slavery Statements.

We will strive to ensure that adequate resources are provided to ensure the proper implementation and enforcement of this policy.

Revisions to this policy will be promptly communicated to those impacted by it.

E. Compliance

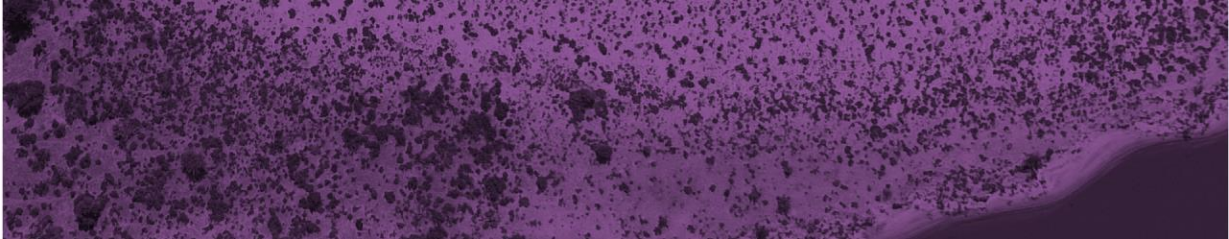
Any employee who violates this policy may face, after an appropriate investigation, disciplinary action, up to and including dismissal.

The Arcadium Group reserves the right to take appropriate actions against suppliers, contractors or other business partners who breach this policy.

F. Policy Review

This policy shall be reviewed and updated as necessary, at minimum every two (2) years. History of modifications and changes to this document are reflected in the table below. All changes, updates, revisions or comments should be documented and reflected in this table.

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Number:

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Details:

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Date:

MM/DD/YYYY

Approval:

Insert Name(s)