



2024 Responsible Minerals Assurance Process (RMAP) Assessment

Supply Chain Due Diligence Report

1. COMPANY INFORMATION

This report summarizes Arcadium Lithium’s compliance with the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI) at its Bessemer City, North Carolina manufacturing site and Fénix, Argentina manufacturing site (collectively, “Audit Sites”) from an assessment period of 31 October 2023 to 1 November 2024 (the “Assessment Period”).

Arcadium Lithium plc was formed from the merger of equals between Allkem Limited and Livent Corporation on 4 January 2024. On 6 March 2025, Rio Tinto acquired Arcadium Lithium.

In this document, Arcadium Lithium plc and its subsidiaries are referred to as “Arcadium Lithium” or “the Company.” Likewise, the words “we”, “us” and “our” are also used to refer to Arcadium Lithium.

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Public location of this report: <https://arcadiumlithium.com/corporate-governance/>

For more information on Arcadium Lithium, please visit: <https://arcadiumlithium.com/>

2. RMAP ASSESSMENT SUMMARY

The minerals within the scope of this assessment are Lithium Carbonate, Sodium Carbonate (Soda Ash) and Calcium Oxide (Quicklime), which are key raw materials in the Lithium Hydroxide production chain.

Bessemer City, North Carolina, United States

The Bessemer City site was established in 1954 and is one of Arcadium Lithium’s largest and most diverse manufacturing facilities, where we produce Lithium Hydroxide, Butyllithium, Specialty Organics, High-Purity Lithium Metal, and several other inorganic products. It is also where our primary research, development, and innovation facilities are located. The location Customer Identification Numbers (CID) are CID004749 and CID004750.

The site underwent the RMAP audit from 3 December 2024 to 6 December 2024, which is valid for one year. The audit was conducted by Arche Advisors.

Fénix, Argentina

The Fénix site, established in 1996, is at the Salar del Hombre Muerto in Catamarca, Argentina, located 1,300 kilometers northwest of Buenos Aires, high in the Andes mountains at an elevation of approximately 4,000 meters above sea level. It is here where we extract lithium from brine and convert it to Lithium Carbonate. The location CID numbers are CID004747 and CID004748.

The site underwent the RMAP audit from 9 December 2024 to 12 December 2024, which is valid for one year. The audit was conducted by Arche Advisors.

The above sites were audited for the first time and the results confirmed the sites to be in compliance with the RMAP practices. The Arcadium Lithium team is diligently addressing any identified non-conformances. These issues are being managed under Corrective Action Plan 1 (CAP 1), with a targeted completion within the defined 90-day timeframe from the report.

3. SUPPLY CHAIN POLICY

Responsible Sourcing of Minerals Policy

To mitigate the risk of potential adverse impacts to human rights, which directly or indirectly finance or benefit armed groups and/or involve other serious human rights abuses in Conflict-Affected and High-Risk Areas (“CAHRA”), the Company developed a Responsible Sourcing of Minerals Policy (the “RSM Policy”). The global policy was developed in alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“OECD Guidance”). It covers the risks identified in Annex II of the OECD Guidance. The Company is committed to addressing any identified risks. The policy was thoroughly reviewed by internal stakeholders and approved by our Chief Operations Officer.

The policy has been communicated to relevant suppliers and employees and is available on the company website at <https://arcadiumlithium.com/>.

4. MANAGEMENT SYSTEMS

4.1 Management Structure

The company follows through on its commitments in the RSM Policy and has developed an internal procedure for the identification of risks in minerals supply chains with the following aspects:

- The **Global Risk Management and Trade Compliance Specialist** is accountable for conducting comprehensive risk assessments across mineral supply chains to ensure compliance. This role involves analyzing potential risks related to sourcing, trade, and transportation of minerals, with a particular focus on factors such as human rights violations. In addition to conducting risk assessments, the specialist plays a critical role in monitoring and interpreting alerts from third party screening tools designed to identify risks associated with suppliers and customers. This includes reviewing potential sanctions lists, embargoes, and adverse media reports, and escalating issues as appropriate.
- The **Global Regulatory Manager** oversees Arcadium Lithium’s due diligence program, which includes supervision of a third-party screening tool and risk assessments. Should any due diligence red flags or Annex II risks be identified during the screening or risk assessment processes, the Global Regulatory Manager promptly complies with the escalation policy defined in the relevant procedures, which includes executive leadership review.

- **Global Procurement** plays a crucial role in the due diligence process by ensuring compliance with the supplier onboarding procedure. This procedure requires screening potential suppliers via a third-party due diligence software before engagement, and completing a detailed review of all documentation submitted by the potential supplier, including a responsible sourcing questionnaire, before awarding contracts or purchase orders. The process seeks to ensure that suppliers meet the Company's expectations outlined in the Company's Supplier Code of Conduct, thereby mitigating potential risks associated with non-compliance.

4.2 Internal Systems of Control

- **Chain of custody controls:** Our facilities follow procedures to ensure the chain of custody of the subject minerals is not tampered with and is verifiable through the supply chain. The relevant operations teams verify that all materials received match the corresponding purchase order, material type, supplier, and quantity before being entered into our system. This materials control system enables us to trace each material used in production back to its origin.
- **Engagement with suppliers:** Arcadium Lithium employs a strategic approach to supplier engagement that emphasizes collaboration and transparency. We maintain open lines of communication and conduct meetings with our suppliers at predefined intervals, tailored to each supplier category as part of our supplier performance management program. In August 2024, we introduced our RSM Policy, which was communicated to all relevant upstream suppliers. This proactive initiative underscores our commitment to ethical sourcing practices and reinforces our expectations for responsible minerals procurement across our supply chain.
- **Grievance mechanism:** Additionally, our Ethics and Compliance grievance mechanism is available to our stakeholders, allowing us to collect and address grievances from interested parties. This mechanism is designed to facilitate open communication and ensure that concerns are heard and acted upon. Each grievance is logged and prioritized based on its nature and severity, enabling us to respond effectively.

The mechanism is open to the public, enabling stakeholders, including shareholders, suppliers, and communities – to express their concerns about various issues related to minerals extraction, trade, and handling. This accessibility fosters transparency and dialogue, ensuring voices from diverse perspectives are heard and considered. Stakeholders can submit grievances through our [Ethics Response Line](#), which is publicly accessible on the Arcadium Lithium Contact Us page at https://arcadiumlithium.com/contact_us/, and other avenues, as described in our [Code of Ethics and Business Conduct](#).

4.3 Record Keeping System

The Company's Records Retention Policy requires that all records relating to due diligence, supplier screening, and chain of custody be maintained for at least 5 years and that they be properly used and safely stored in our online company database.

4.4 Employee Training

All employees receive training on the Code of Ethics and Business Conduct, ensuring a shared understanding of our core values and ethical standards. In addition, key employees undergo training that covers areas such as supplier due diligence, including onboarding and screening, as well as compliance

with policies on modern slavery, anti-corruption, bribery, money laundering, and harassment. Training sessions cover crucial topics like how to identify signs of forced labor and how to raise concerns, including reporting mechanisms and resources available. Additionally, the training emphasizes the importance of ethical decision-making and accountability in everyday operations.

To ensure relevance, training materials are tailored to real-world scenarios and case studies, enabling employees to apply their knowledge to practical situations they may encounter. Arcadium Lithium also provides ongoing training updates to reflect any changes in regulations or company policies, fostering a culture of compliance and integrity throughout the organization.

To reinforce our commitment to responsible sourcing, key staff completes due diligence training annually. Additionally, should there be updates to the program, supplementary training will be provided as necessary to ensure ongoing compliance and awareness.

5. RISK IDENTIFICATION

The company has a robust process to identify and mitigate risks in the supply chain.

- **Supplier Onboarding:** The Company has a robust supplier onboarding process that includes the screening of the potential supplier against sanction lists, watchlists, enforcement actions, legal or regulatory issues and adverse media, among other aspects. The Company's Global Regulatory Manager reviews high-risk alerts and receives support from the Legal team when needed. Each potential supplier is required to complete a vendor data collection form, which includes information about the supplier, its beneficial owners, and a responsible sourcing questionnaire addressing labor practices and human rights. This form is reviewed by the Global Procurement team, and any inconsistencies, errors, or incomplete information are communicated to the suppliers for correction. If risks are identified in a supplier's response, the Company engages further with the supplier to clarify and address any concerns as needed.
- **Risk Assessment:** To mitigate risks associated with the Company's RSM Policy, the Company has established a procedure for Identifying and Assessing Risks in Mineral Supply Chains. This procedure outlines a systematic approach for assessing the sourcing of minerals and validating the existence of risk. The process begins with an initial assessment. This assessment aims to determine if the subject minerals originate from or transit through a CAHRA, or if suppliers are sourcing minerals from these areas. Any identified risks are categorized as red flags prompting further review in subsequent steps. The company uses the following resources to determine CAHRA: Dodd-Frank Act criteria; EU CAHRA List; Fragile States Index Heat Map; and the Heidelberg Global Conflict Barometer.
- **Risk Mitigation:** Arcadium Lithium is committed to ensuring that all suppliers comply with the RSM Policy. The Company reserves the right to verify compliance at any time, and if we identify any issues, we will take appropriate steps to address them. This could include actions such as suspending or ending our relationship with a supplier, if necessary. If the presence of OECD Guidance Annex II Risks is validated, we will review the situation and decide on the best course of action, which may include (1) development of an action plan with continued sourcing; (2) temporary suspension of sourcing; or (3) termination of the supplier relationship.

6. CONCLUSION

Arcadium Lithium did not identify any risks with relevant supplies of minerals during the Assessment Period.

We take steps to reasonably ensure that our processes identify and mitigate risks as identified in our RSM Policy and OECD Guidance. These efforts are critical to ensure that Arcadium Lithium does not contribute to or support human rights abuses or other unethical practices through our sourcing activities.