

## **Responsible Mineral Supply Chain Management Policy**

Recognising that risks of significant adverse impacts may be associated with purchasing of mineral resources from conflict-affected and high-risk areas and that we have the responsibility to respect human rights and not contribute to adverse impacts to society, Tianqi Lithium is committed to implementing rigorous management of lithium material supply chains in accordance with the requirements of the *Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains* (Chinese Guidance) published by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) and the *OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected High-Risk Areas, Edition 3 issued by the OECD* (OECD Guidance). We promise to adopt and widely disseminate the following policy for responsible sourcing of minerals from conflict-affected and high-risk areas, and to incorporate them into the contracts and/or agreements concluded with suppliers. This policy provides a basic reference for conflict-sensitive procurement activities and supplier risk awareness from mining to end-users. We promise to refrain from engaging in any activities that would contribute to the financing of conflicts and to comply with relevant UN sanctions resolutions or, where applicable, domestic laws for implementing such resolutions.

### **Regarding serious abuses associated with the extraction, transportation or trading of minerals:**

1. While sourcing from or operating in high-risk areas, we will neither tolerate nor by any means profit from, contribute to, assist with or facilitate the commission by any party of
  - i) Any forms of torture, cruel, inhuman, and degrading treatment;
  - ii) Any forms of forced or compulsory labour, which means work or service which is exacted from any person under the menace of penalty and for which the said person has not offered himself or herself voluntarily;
  - iii) The worst forms of child labour;
  - iv) Other gross human rights violations and abuses such as widespread sexual violence;
  - v) War crimes, or other serious violations of the international humanitarian law, or crimes against humanity or genocide.

### **Regarding risk management of serious abuses:**

2. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party committing serious abuses as defined in paragraph 1.

### **Regarding direct or indirect support to non-state armed groups:**

3. We will not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. "Direct or indirect support" to non-state armed groups through the extraction, transport, trade, handling or export of minerals includes, but is 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

i. Illegally control mine sites or otherwise control transportation routes, points where minerals are traded, and upstream actors in the supply chain; and/or

ii. Illegally tax or extort money or mineral resources at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or

iii. Illegally tax or extort money or mineral resources at points of access to mine sites, along transportation routes or at points where minerals are traded; and/or

**Regarding risk management of direct or indirect support to non-state armed groups:**

4. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing direct or indirect support to non-state armed groups as defined in paragraph 3.

**Regarding public or private security forces:**

5. We agree to eliminate, or in accordance with paragraph 10, direct or indirect support to public or private security forces who illegally control mine sites, transportation routes, 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; or illegally tax or extort intermediaries, export companies, or international traders.

6. We recognize that the role of public or private security forces at the mine sites and/or surrounding areas and/or along transportation routes should be solely to maintain the rule of law, including safeguarding human rights, providing security to mine workers, equipment, and facilities, and protecting the mine sites or transportation routes from interference with legitimate extraction and trade.

7. Where we or any company in our supply chain contract public or private security forces, we promise to or will require that such security forces be engaged in accordance with internationally recognised standards. In particular, we will 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 gross human rights abuses will not be hired.

8. We will support efforts, or take steps, to engage with central or local authorities, international organizations, and civil society organizations to contribute to workable solutions on how transparency, proportionality, and accountability in payments made to public security forces for the provision of security could be improved.

9. We will support efforts, or take steps, to engage with central or local authorities, international organizations, and civil society organizations to avoid or minimize the negative impact of the presence of public or private security forces at mining sites on vulnerable groups, particularly on the miners of individual workshops. On this occasion, minerals in the supply chain are extracted through small-scale workshops or small-scale mining.

**Regarding risk management of public or private security forces:**

10. In accordance with the specific position of the company in the supply chain, we will immediately devise, adopt, and implement a risk management plan with upstream suppliers and other stakeholders to prevent or mitigate the risk of direct or indirect support to public or private security forces, as identified in paragraph 5, where we identify that such a reasonable risk exists. In such cases, we will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation within six months from the adoption of the risk management plan. Where we identify a reasonable risk of activities inconsistent with paragraph 8, we will respond in the same vein.

**Regarding bribery and fraudulent misrepresentation of the origin of minerals:**

11. We will not offer directly or indirectly, promise, give, or demand any bribes, and will resist the solicitation of bribes to conceal or disguise the origin of minerals, to misrepresent taxes, fees, and royalties paid to governments for the purposes of mineral extraction, trade, handling, transport, and export, or failing to follow relevant international standards and conventions for anticorruption.

**Regarding money laundering:**

12. We will support efforts, or take steps, to contribute to the effective elimination of money laundering where we identify a reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of minerals derived from the illegal taxation or extortion of minerals at points of access to mine sites, along transportation routes or at points where minerals are traded by upstream suppliers.

**Regarding the payment of taxes, fees, and royalties to governments:**

13. We will ensure that all taxes, fees, and royalties related to mineral extraction, trade, and export from high-risk areas are paid to governments and, in accordance with the company's position in the supply chain, we promise to disclose such payments in accordance with internationally recognised transparency standards.

**Regarding risk management of bribery and fraudulent misrepresentation of origin of minerals, money-laundering and payment of taxes, fees, and royalties to governments:**

14. In accordance with the specific position of the company in the supply chain, we promise to engage with suppliers, central or local governmental authorities, international organizations, civil society, and affected third parties, as appropriate, to improve and track performance with a view to preventing or mitigating risks of adverse impacts through measureable steps taken in reasonable timescales. We will suspend or discontinue engagement with upstream suppliers after failed attempts at mitigation of 6 months.

15. While sourcing from, or operating in high-risk areas, we will not profit from, assist with, or facilitate or source from, or be linked to, any party providing life threatening occupational health and safety conditions to direct and/or indirect employees and/or any person present on the party's operations.

16. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party providing life threatening occupational health and safety conditions as defined in paragraph 15.

17. While sourcing from, or operating in high-risk areas, we will not employ, profit from, assist with, or facilitate, or source from, or be linked to, any party employing, profiting from, assisting with, or facilitating the employment of children under the minimum working age which is legally prescribed by the host country laws and regulations. If there is no relevant host country law or regulation, the minimum working age shall be 16 years.

18. We will immediately suspend or discontinue engagement with upstream suppliers where we identify a reasonable risk that they are sourcing from, or linked to, any party employing children as defined in paragraph 17.