

Tianqi Lithium Corporation Responsible Minerals Procurement Policy

Chapter 1 Purpose

Article 1 In order to implement the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd Edition) (hereinafter referred to as the OECD Guidance) issued by the Organisation for Economic Co-operation and Development (OECD), and the China Mineral Supply Chain Due Diligence Guidelines (2nd Edition) (hereinafter referred to as the China Guidelines) issued by the China Chamber of Commerce for Import and Export of Minerals, Metals and Chemicals (CCC MC), Tianqi Lithium Corporation formulates the Responsible Mineral Procurement Policy. The Company commits to strictly implementing this policy and incorporating it into the supplier management and procurement activities of mineral resources such as lithium materials.

Chapter 2 Application Scope

Article 2 This policy applies to all employees, senior management, board members, suppliers and relevant partners of Tianqi Lithium Corporation (hereinafter referred to as the “Company”, “Company” or “We”) and its domestic and overseas affiliates and subsidiaries.

Article 3 To support the continuous improvement of the Company’s responsible mineral due diligence management system, all suppliers shall strictly comply with this policy and commit that all products provided to the Company are derived from legal procurement.

Chapter 3 Policy Content

Section 1 Regarding Serious Abuses Associated with the Extraction, Transport or Trade of Minerals

Article 4 While sourcing from, or operating in, conflict-affected and 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:

- 1.any form of torture, cruel, inhuman or degrading treatment;
- 2.any form of forced or compulsory labor, which means work or service which is extracted from any person under the menace of penalty and for which said person has not offered himself voluntarily;
- 3.the worst forms of child labor;
- 4.other gross human rights violations and abuses such as widespread sexual violence;
- 5.war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide.

Section 2 Regarding Direct or Indirect Support to Non-State Armed Groups

Article 5 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:

1. procuring minerals from, making payments to or otherwise providing logistical assistance or equipment to, non-state armed groups or their affiliates;
2. illegally control mine sites or otherwise control transportation routes, points where minerals are traded and upstream actors in the supply chain;
3. illegally tax or extort money or minerals at points of access to mine sites, along transportation routes or at points where minerals are traded;
4. illegally tax or extort intermediaries, export companies or international traders.

Section 3 Regarding Public or Private Security Forces

Article 6 We agree to eliminate 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 point 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.

Article 7 We recognise that the role of public or private security forces at the mine sites and surrounding areas, 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 site or transportation routes from interference with legitimate extraction and trade.

Article 8 Where we or any company in our supply chain contract public or private security forces, we commit to or we will require that such security forces will be engaged in accordance with the Voluntary Principles on Security and Human Rights. 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.

Article 9 We will support efforts, or take steps, to engage with central or local authorities, international organisations and civil society organisations 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.

Article 10 We will support efforts, or take steps, to engage with local authorities, international organisations and civil society organisations to avoid or minimise the exposure of vulnerable groups, in particular, artisanal miners where minerals in the supply chain are extracted through artisanal or small-scale mining, to adverse impacts associated with the presence of security forces, public or private, on mine sites.

Section 4 Regarding Bribery and Fraudulent Misrepresentation of the Origin of Minerals

Article 11 We will not offer, 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.

Section 5 Regarding Money Laundering

Article 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 or such conduct involves 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.

Section 6 Regarding the Payment of Taxes, Fees and Royalties Due to Governments

Article 13 We shall ensure that all legal taxes, fees, and royalties related to the mining, trading and export of minerals in high-risk areas are paid to the government. We also commit to disclosing such payments in accordance with internationally recognized transparency standards based on the enterprise position in the supply chain.

Section 7 Regarding Occupational Health and Safety

Article 14 When procuring or producing in high-risk areas, we shall not profit from, assist, or facilitate any party that provides a life-threatening occupational health and safety environment for its direct and/or indirect employees and/or any personnel present at its production sites, nor shall we procure from such a party or have any association with it.

Section 8 Regarding Child Labor

Article 15 When conducting procurement or business activities in high-risk areas, we shall not employ, profit from, assist, or facilitate the employment of children who are below the minimum working age specified by the laws or regulations of the host country, nor shall we procure from any party that engages in such employment or have any association with such a party. If there are no relevant laws or regulations in the host country, the minimum working age shall be 16 years old.

Section 9 Regarding Environmental Protection

Article 16 We require all supply chain enterprises to strictly comply with local environmental laws and regulations as well as internationally recognized environmental standards, and to minimize negative impacts on the ecological environment. We prohibit any form of illegal discharge, dumping or incineration of waste, and prohibit destructive operations in ecologically sensitive areas. Enterprises are also required to strengthen the management of hazardous chemicals and harmful substances.

Chapter 4 Risk Management

Article 17 If we have reasonable grounds to believe that upstream suppliers exist the following behaviors:

1. Serious violations related to mineral mining, transportation or trading;
2. Directly or indirectly supporting non-state armed groups or public/private security forces;
3. Bribery, fraudulent misrepresentation of mineral origin or money laundering;
4. Major hidden dangers in occupational health and safety that threaten lives;
5. Employment of child labor;
6. Serious violations of environmental protection laws and regulations or occurrence of major environmental pollution incidents;

We will immediately suspend cooperation with such suppliers.

Article 18 Based on the supplier's position in the supply chain, we adopt the management process of "Identification—Evaluation—Rectification—Disposal".

Step 1: Establish a normalized risk identification mechanism to conduct regular or irregular risk inspections on suppliers, including but not limited to risk signals in aspects such as environment, labor, human rights and business ethics, so as to identify potential high-risk suppliers.

Step 2: For high-risk situations with reasonable suspicion, we will first conduct due diligence and risk assessment; if necessary, we will entrust authoritative institutions to conduct third-party investigations and risk assessments;

Step 3: If risks are confirmed, we will formulate and implement rectification plans with suppliers and relevant parties, and grant a maximum rectification period of six months in principle;

Step 4: If the supplier fails to achieve effective improvement within the above period, we will suspend or terminate cooperation with the relevant supplier as the situation requires.

Chapter 5 Supplementary Provisions

Matters not covered in this policy shall be governed by the relevant national laws, regulations and the Company's articles of association. In the event that there is any conflict with the laws and regulations promulgated by the state in the future or the revised articles of association of the Company, the relevant provisions of the state laws, regulations and the articles of association of the Company shall prevail.

Annex 1 Code of Conduct for Responsible Mineral Suppliers

Chapter 1 Labor and Human Rights

1.1. Prohibition of Child Labor: Suppliers must employ workers who meet the minimum legal age specified by local laws. Apprenticeship programs in legal workplaces that comply with laws and regulations are permitted.

1.2. Forced or Compulsory Labor: Suppliers shall not use any form of forced or compulsory labor (such as forced, bonded, contractual, or involuntary prison labor); employment must be voluntary.

1.3. Working Hours: Suppliers shall comply with international conventions and local laws and regulations regarding working hours. Except in emergency or exceptional circumstances, the total weekly working hours, including overtime, shall not exceed 60 hours. The weekly working hours shall not exceed the maximum limit stipulated by local laws. Employees shall be entitled to at least one day of rest in every seven-day.

1.4. Wages and Fringe Benefits: Suppliers shall provide employees with reasonable wages and fringe benefits in accordance with local and national laws and regulations, including those related to minimum wages, overtime hours, and other compensations. The wages of all employees shall not be lower than the statutory minimum wage.

1.5. Non-Discrimination: Suppliers shall not discriminate against any individuals in recruitment and employment based on factors such as race, religious belief, age, nationality, sexual orientation, gender, gender identity and expression, marital status, pregnancy, political affiliation, disability, or other similar factors. Employees or applicants shall not be required to undergo discriminatory medical examinations.

1.6. Freedom of Association: To the extent permitted by law, suppliers shall not interfere with, obstruct or prohibit employees from forming or joining various organizations, electing representatives, participating in collective bargaining or engaging in various legal activities.

Chapter 2 Health and Safety

2.1. Occupational Safety: Suppliers shall identify, assess, and eliminate safety hazards through reasonable engineering design, process control and preventive maintenance. They shall provide employees with work-related and appropriate personal protective equipment, along with relevant training and guidance.

2.2 Emergency Management: Suppliers shall identify and assess emergencies and critical incidents, and minimize their impacts through the implementation of emergency plans and response procedures, including: emergency reporting, employee notification and evacuation procedures, employee training and drills, appropriate fire detection and extinguishing equipment, adequate exit facilities and recovery plans. Such plans and procedures shall minimize harm to personnel, the environment and property.

2.3 Work-Related Injuries and Illnesses: Suppliers shall establish appropriate procedures and systems to prevent, manage, track and report work-related injuries and illnesses, including the following provisions: encouraging employees to report incidents; classifying and recording cases of injuries and illnesses; providing necessary medical services; investigating cases and taking corrective measures to eliminate impacts; and assisting employees in returning to work.

2.4 Living Conditions: Suppliers shall provide employees with clean restroom facilities, drinking water and clean facilities for food preparation, storage and dining. Employee dormitories provided by suppliers or labor agencies shall be kept clean and safe, with appropriate emergency exits, hot water for bathing, adequate heating and ventilation, and reasonable access to private spaces.

2.5 Communication of Health and Safety Information: Suppliers shall provide employees with appropriate health and safety training. Information related to health and safety shall be posted in prominent position at the workplace.

2.6 Machine Protecting: Suppliers shall conduct safety hazard assessments on production equipment and other machinery, and provide physical safeguards, interlocking devices and barriers for machinery that may cause employee injuries, with proper maintenance.

Chapter 3 Environment

3.1. Suppliers shall comply with all laws and regulations related to environmental protection.

3.2. Pollution Prevention and Resource Conservation: All types of resource consumption and pollution (including water and energy) shall be reduced and eliminated at the source or through practices (such as improving production, maintenance and facility processes, replacing materials, conserving resources, and recycling and reusing materials).

3.3. Hazardous Substances: Suppliers shall identify and control chemical substances and other materials that may pose dangers when released into the environment, ensuring that these substances are safely handled, transported, stored, used, recycled or reused, and handled

3.4. Suppliers shall protect the lives and health of their employees, neighbors, and the public affected by the inherent risks of their processes and products.

3.5. Control and Treatment of Wastewater and Solid Waste: Wastewater and solid waste generated by suppliers in their operations, industrial processing and facility cleaning shall be monitored, controlled and treated as required before discharge or disposal.

3.6. Gas Emissions: Waste gases generated during operations, such as volatile organic chemicals, corrosive gases, particulates, ozone-depleting chemicals and combustion by-products, shall be identified, monitored, controlled and treated in accordance with relevant requirements before emission.

3.7. Suppliers shall utilize resources efficiently, adopt energy-saving and environment-friendly technologies, and reduce solid waste as well as emissions to air, water, and soil.

Chapter 4 Code of Ethics

4.1. Business Integrity: Suppliers shall adopt a zero-tolerance policy, prohibiting any form of bribery, corruption, extortion and embezzlement. All business transactions shall ensure transparency and be accurately reflected in the business accounts and records of the participants. Oversight and reinforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

4.2. Information Disclosure: Suppliers shall disclose information regarding business activities, organizational structure, financial status, labor, health and safety, and the environment in accordance with applicable regulations and major industry practices.

4.3. Identity Protection and Non-Retaliation Policy: Suppliers shall establish an anonymous complaint mechanism to ensure the confidentiality and anonymity of whistleblowers and prohibit retaliatory actions.

4.4. Protection of Intellectual Property: Suppliers shall respect intellectual property rights and protect the security of customer information.

4.5. Anti-Monopoly and Anti-Unfair Competition: Suppliers shall comply with all applicable national and international anti-monopoly and trade control regulations. Partners shall not engage in monopolistic or unfair competitive practices alone or in collusion with other partners.

4.6. Responsible Mineral Procurement: Suppliers shall comply with the requirements of the China Guidelines and the OECD Guidelines, take corresponding measures to prevent risks, and truthfully report the actual situation and outcomes to stakeholders.

Chapter 5 Corporate Governance

5.1. Management Responsibilities and Obligations: Suppliers shall establish a Corporate Social Responsibility (CSR) department or similar position, which reports directly to the executive management and assumes the responsibility and authority to manage the enterprise's social and environmental compliance requirements.

5.2. Risk Assessment and Management: Suppliers shall formulate and maintain relevant systems to identify business-related risks such as labor rights and human rights, health and safety, environment, business ethics and legal compliance, and implement appropriate procedures and control measures to mitigate the identified risks.

5.3. Information Communication: Suppliers shall have processes to clearly and accurately communicate relevant information such as their performance, practices, policies and expectations to employees, sub-suppliers and customers.

5.4. Corrective Action Processes: Suppliers shall have processes to promptly implement corrective actions for deficiencies or violations identified through internal and external audits, evaluations, inspections, investigations or reviews.

We look forward to your commitment and working together to contribute to the sustainable development of the corporate supply chain.

If any violations or high-risk behaviors are found on the part of suppliers or Tianqi Lithium, reports can be made through channels such as phone, email, and mail.

Appeal Phone: +86 028 8515 1231

Appeal Email: Procurement@tianqilithium.com

Appeal Address: Tianqi Lithium Headquarters, 166 Hongliang West 1st Street, Tianfu New Area, Chengdu City, Sichuan Province, China.

Annex 2 Acknowledgment Letter

Acknowledgment Letter

We acknowledge receipt of your Company's Responsible Mineral Sourcing Policy, Code of Conduct for Responsible Mineral Suppliers, Responsible Supply Chain Appeal Management Procedure, and other relevant documents (hereinafter referred to as the "Relevant Documents"). After internal review, our Company formally responds to our compliance and implementation status as follows:

Our Company fully recognizes that when conducting mineral mining, trading, processing and export operations globally, especially in high-risk areas, we must strictly adhere to international conventions, local laws and regulations, and industry norms, and earnestly fulfill corporate social responsibilities. Respecting human rights is a core value of our Company. We firmly oppose conflicts, human rights violations, and other issues arising from mineral resource procurement, and ensure that no link in the supply chain becomes a source of potential risks.

To effectively fulfill the above commitments, our Company solemnly promises to strictly comply with the requirements of the Relevant Documents. The specific measures as follows:

1. Strengthen compliance management: Strictly implement the Responsible Mineral Sourcing Policy, standardize due diligence processes, and enhance risk assessment and control throughout the entire supply chain lifecycle;
2. Deepen responsibility implementation: Fully implement the Code of Conduct for Responsible Mineral Suppliers, and fulfill the main responsibilities in terms of labor rights safeguarding, environmental protection and harmonious community development;
3. Smooth communication channels: Establish a collaborative mechanism for internal and external appeal feedback to ensure timely information exchange and proper handling of supply chain-related issues.

Our company will ensure that the requirements of the Relevant Documents are effectively implemented in actual operations. We look forward to working with your Company to jointly build a transparent, compliant and sustainable mineral supply chain system.

Hereby reply.

We wish you every success in your business!

Full name of the Company: (seal with official stamp)

Contact Person: _____

Date: _____