

Arcadium Lithium

# 2024 Modern Slavery Statement

June 2025



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# About this Statement

This statement has been prepared by Arcadium Lithium plc ("Arcadium Lithium") to meet the requirements of the United Kingdom (UK) Modern Slavery Act 2015 ("**UK MSA**") and Australian Modern Slavery Act 2018 ("**Australian MSA**") for the calendar year ended 31 December 2024. The statement outlines the activities of Arcadium Lithium and the following reporting entities and periods:

- For the purposes of our reporting under the UK MSA, the reporting entity is Livent Lithium UK Limited ("**Livent UK**"), covering 1 January 2024 to 31 December 2024.
- For the purposes of our reporting under the Australian MSA, the reporting entities are Allkem Pty Ltd (ACN 112 589 910) and Galaxy Resources Pty Ltd (ACN 071 976 442) (collectively referred to as "**Allkem**"), covering 1 July 2023 to 31 December 2024.<sup>1</sup>

The words "Arcadium Lithium", "the Company", "we", "us" and "our" are also used to refer to Arcadium Lithium plc and its subsidiaries in general where no useful purpose is served by identifying the particular entity or entities. These terms may also refer to those who work for Arcadium Lithium plc or its subsidiaries. "Subsidiaries" as used in this Statement refer to entities over which Arcadium Lithium plc either directly or indirectly has control, including Livent Lithium UK Limited, Allkem Pty Ltd and Galaxy Resources Pty Ltd.

<sup>1</sup> This statement covers an extended reporting period resulting from the change in reporting period following the 4 January 2024 merger of Allkem Pty Ltd (formerly Allkem Limited) and Livent Corporation to become Arcadium Lithium plc.



# About Arcadium Lithium— Our structure, supply chains and operations

Arcadium Lithium is a leading global lithium chemicals producer with a diversified product offering and business-critical scale, including a lithium deposit base that is among the largest in the world.

Arcadium Lithium's primary products, namely battery-grade lithium hydroxide, lithium carbonate, spodumene concentrate, butyllithium and high purity lithium metal are critical inputs used in various performance applications.

## OUR STRUCTURE

Arcadium Lithium was formed from the merger of equals between Allkem Pty Ltd (formerly Allkem Limited) and Livent Corporation ("Livent") on 4 January 2024. As of 31 December 2024, the combined workforce of Arcadium Lithium totalled approximately 2,604 employees, reflecting full-time, part-time, temporary and contract workers.<sup>2</sup> On 6 March 2025, Rio Tinto acquired Arcadium Lithium.

Livent UK is a subsidiary of Arcadium Lithium with operations based in Bromborough, England. Allkem Pty Ltd and Galaxy Resources Pty Ltd are both Australian mining companies that are wholly owned subsidiaries of Arcadium Lithium. Allkem Pty Ltd is the parent company of Galaxy Resources Pty Ltd. Each of Allkem Pty Ltd and Galaxy Resources Pty Ltd own and control numerous subsidiary entities within Argentina, Australia and Canada.

## SUPPLY CHAINS

As a vertically integrated lithium producer, we source the majority of our lithium for use in the production of performance lithium compounds from our operations in Argentina. We also have a hard rock mining facility in Australia producing spodumene concentrate.<sup>3</sup>

The battery-grade lithium hydroxide in the U.S., China and Japan that we produce today uses lithium carbonate as feedstock. We use lithium chloride to produce lithium metal, a key feedstock in the production of butyllithium products in the U.S., the United Kingdom and China, as well as in the production of high purity lithium metal in the U.S. The spodumene we produce today is largely sold to customers for use as feedstock in the process of producing downstream performance lithium compounds.

Arcadium Lithium's supply chain activities are managed by a global and local team of procurement and supply chain specialists with expertise in risk management, procurement, supply management, operations management, logistics, and supply chain performance optimization. Given the nature and global reach of our operations, our supply chain is both extensive and diverse. Where we have operations and/or projects located in remote areas, we make efforts to procure as many goods and services as possible from the local communities and regions around our operations.

## 2024 SUPPLIER LOCATIONS

### Allkem

- |             |               |                  |
|-------------|---------------|------------------|
| ▪ Argentina | ▪ Hong Kong   | ▪ South Africa   |
| ▪ Australia | ▪ Ireland     | ▪ Spain          |
| ▪ Brazil    | ▪ Italy       | ▪ Sweden         |
| ▪ Canada    | ▪ Japan       | ▪ Switzerland    |
| ▪ Chile     | ▪ Mexico      | ▪ United Kingdom |
| ▪ China     | ▪ Netherlands | ▪ United States  |
| ▪ Colombia  | ▪ Norway      | ▪ Uruguay        |
| ▪ France    | ▪ Peru        |                  |
| ▪ Germany   | ▪ Singapore   |                  |

### Livent UK

- |           |           |                  |
|-----------|-----------|------------------|
| ▪ Belgium | ▪ Germany | ▪ United Kingdom |
| ▪ China   | ▪ Ireland | ▪ United States  |
| ▪ France  | ▪ Spain   |                  |

<sup>2</sup> Including approximately 112 employed in Australia and 76 employed in the UK, excluding contractors. For number of employees at Livent and Allkem prior to the 4 January 2024 merger, please refer to Arcadium Lithium's [2023 public reporting](#).  
<sup>3</sup> This facility will enter care & maintenance in the second half of calendar year 2025.

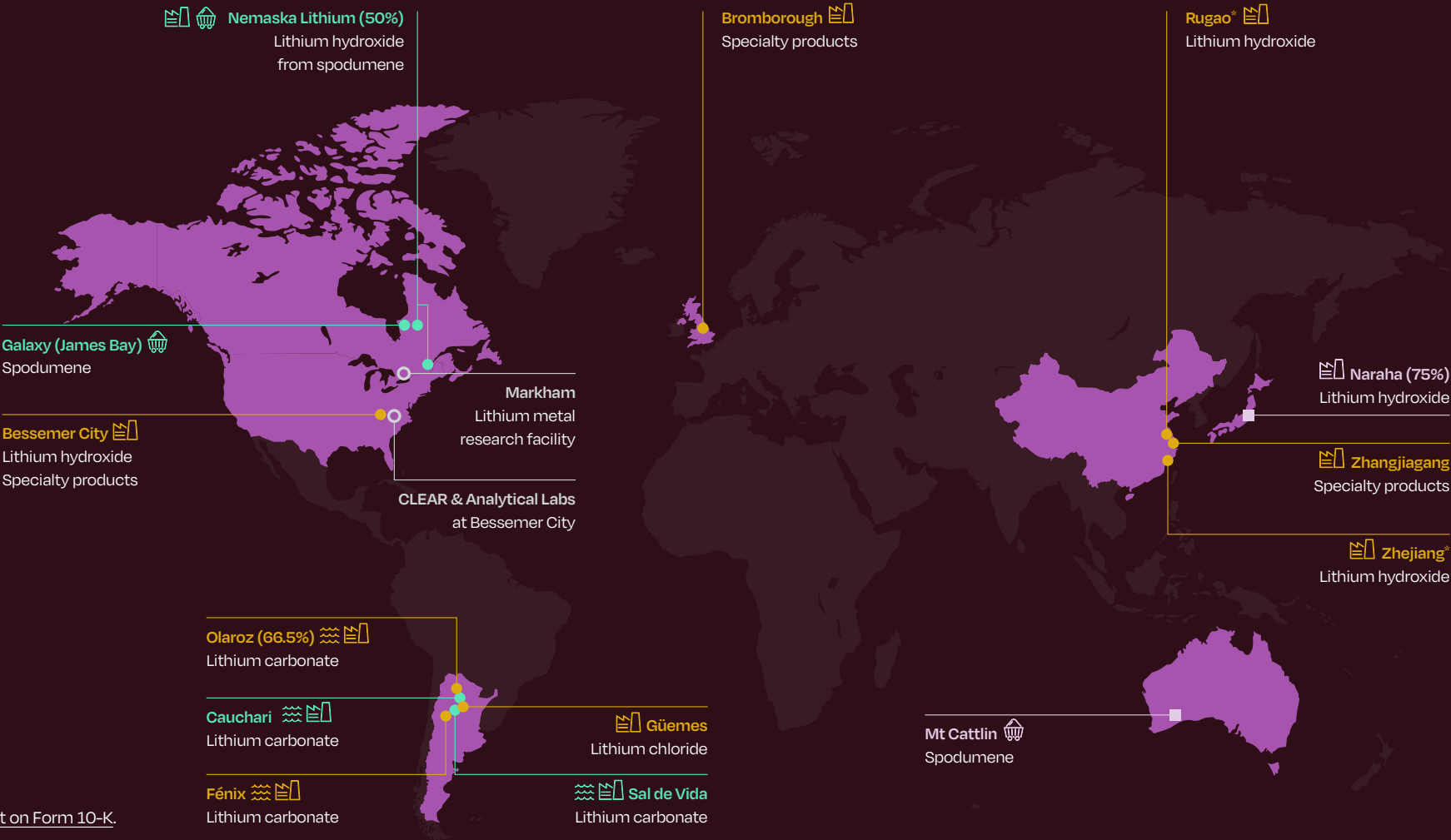
OPERATIONS & PROJECTS

Arcadium Lithium's combined operating assets and development projects span an expanded geographic footprint, including Argentina, Australia, Canada, China, Japan, the United Kingdom, and the United States. Our vertically integrated asset portfolio means that we can better support our customers' needs and provide increased transparency from our lithium chemical products, right through to our brine and hard rock lithium resources.

A truly global and integrated asset footprint

- Key
- Development asset
  - Operating asset
  - R&D Facility
  - Care & maintenance asset
  - Mining — hard-rock
  - Mining — brine
  - Processing facility

Read more about our business in our [2024 Annual Report on Form 10-K](#).



\* Sourcing partner  
Arcadium Lithium assets as of 31 December, 2024. Ownership is 100% basis unless otherwise stated.  
Livent UK's assets include: Butyllithium and lithium specialty products facility in Bromborough, England.

Allkem's assets include: Olaroz lithium facility in Jujuy Province, Argentina; Cauchari lithium brine project in Jujuy Province, Argentina; Sal de Vida lithium brine project in Catamarca Province, Argentina; Galaxy lithium spodumene project located in Québec, Canada; and Naraha lithium hydroxide facility in Naraha, Japan; and Mt Cattlin lithium spodumene mine in Ravensthorpe, Western Australia.



# Our values reflected in our policies

We firmly believe that respecting and advancing human rights is a global business best practice and a core element of business sustainability.

Our **Code of Ethics and Business Conduct**, **Human Rights Policy**, **Responsible Sourcing of Minerals Policy**, **Supplier Code of Conduct** and **Supplier Sustainability Policy** address a broad range of human and workplace rights in our global operations and supply chain to ensure fairness, promote ethical behaviour, dignity and respect.

Each of these is summarised in the following.<sup>4</sup>

## CODE OF ETHICS AND BUSINESS CONDUCT

The Arcadium Lithium Code of Ethics and Business Conduct (“Code of Ethics”) was established at the completion of the Allkem/Livent Corporation PLC merger on January 4, 2024, and applies to all employees, officers, directors, and contractors of Arcadium Lithium and its subsidiaries. The Code of Ethics establishes a “zero tolerance” approach to ethical violations, including “any form of harmful child labour and forced or compulsory labour,” and lays out our expectation that suppliers conduct themselves in an ethical and responsible manner consistent with our company standards.

Prior to January 4, 2024, the Allkem Code of Conduct and the Livent Code of Ethics and Business Conduct were in effect for the respective legacy entities.

## HUMAN RIGHTS POLICY

Arcadium Lithium’s Human Rights Policy applies to all employees, officers, directors, and contractors of Arcadium Lithium and its subsidiaries and states the Company’s policy regarding human rights. It outlines Arcadium Lithium’s commitment to respecting human rights and complying with laws, rules, and regulations governing human rights in the countries in which we operate. This includes specific provisions addressing non-discrimination, child labour, forced/ bonded labour, freedom to associate and collectively bargain, health and safety, working conditions, fair wages and compensation, migrant workers, and no harsh or inhuman treatment/harassment.

During 2024, the merged Arcadium Lithium entity underwent a process of standardising and updating global policies and procedures across the new group where required. Until the Arcadium Lithium Human Rights policy was published in September 2024, the Allkem Human Rights Policy and the Livent Human Rights Policy were in effect for the respective legacy entities.

## RESPONSIBLE SOURCING OF MINERALS POLICY

In 2024, the Company developed a Responsible Sourcing of Minerals Policy (the “RSM 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 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”). This policy applies to all Arcadium Lithium suppliers of minerals including, but not limited to, lithium carbonate, sodium carbonate and calcium oxide.

<sup>4</sup> Arcadium Lithium policies are available here: [arcadiumlithium.com/corporate-governance/](https://arcadiumlithium.com/corporate-governance/). Existing policies will remain in effect until further notice as Arcadium Lithium updates its global policies and procedures as part of its integration with Rio Tinto.

# SUPPLIER CODE OF CONDUCT AND SUPPLIER SUSTAINABILITY POLICY

During the reporting period, the following policies were in effect for the respective entities and suppliers. For more information, visit the Arcadium Lithium Suppliers page on our [website](#).

The Allkem Supplier Code of Conduct outlines the ethical and operational standards expected from suppliers working with Allkem, including compliance with all applicable laws and regulations and a strong focus is placed on human rights and labor practices. Additionally, suppliers are expected to demonstrate a commitment to sustainability and community engagement through responsible sourcing and meaningful contributions to the communities in which they operate and there is a zero-tolerance policy on bribery, corruption, and conflicts of interest.

The Livent Supplier Code of Conduct sets out Livent Corporation's expectations for suppliers and their subsidiaries and subcontractors with respect to key issues, including human rights. This includes expectations that all work is freely chosen and without the use of forced or compulsory labour. This Supplier Code of Conduct states that we will choose not to work with suppliers who we believe do not meet our standards.

The Livent Supplier Sustainability Policy establishes clear expectations for suppliers based on, or influenced by, leading global frameworks such as:

- The United Nations Global Compact Principles and United Nations Sustainable Development Goals (SDGs);
- United Nations Declaration on the Rights of Indigenous Peoples;
- The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work;
- Leading management systems, standards and reporting frameworks, including ISO 45001 (Occupational Health & Safety), ISO 9001 (Quality Management), ISO 14001 (Environmental Management), ISO 26000 (Social Responsibility), European and UK REACH, IATF 16949, GRI and SASB.

The Livent Supplier Sustainability Policy is applicable to all Livent suppliers, including manufacturers of raw materials, chemicals, packaging and equipment, as well as suppliers of information and services.

# GRIEVANCE MECHANISMS

As described in the Arcadium Lithium's Code of Ethics, the Company maintains an Ethics Response Line available at all times to all employees, customers, suppliers, and other individuals to report any concerns, including any potential human rights violations or concerns. Arcadium Lithium received no modern slavery complaints in 2024 through the company's ethics hotline complaints processes or otherwise.

It is our policy to protect whistle blowers and encourage the confidential submission of possible violations of our policies, including through our ethics complaint/whistle blower hotline, which may be reached as follows:

## Ethics Response Line

- **United States** 1-844-867-4128 (toll-free)
- **Argentina** 0800-444-1243
- **Australia** 1800-490-619
- **Canada** 833-679-2182
- **China** 400-661-2252
- **Hong Kong** 800-93-0359
- **United Kingdom** 0808-234-2896
- **Ireland** 800-930-359
- **Singapore** 800-492-2829
- **Japan** 0066-33-830-771
- **Switzerland** 0800-56-1065
- **Netherlands** 0800-020-1879
- **South Korea** 080-877-5416

## Ethicspoint Website

[arcadiumlithium.ethicspoint.com](http://arcadiumlithium.ethicspoint.com)

The Company Ethics Response Line service provides:

- 24-hour, 7-days-per-week continuous coverage
- Multilingual service — 100 languages
- Confidentiality and anonymity assurance for callers
- Trained staff to handle ethics cases.

It is Arcadium Lithium's policy and intent to investigate any reported violation of the Code of Ethics and Business Conduct, any other Arcadium Lithium policy or any applicable law that Arcadium Lithium becomes aware of, and to take appropriate action, as determined by Arcadium Lithium, based on the results of the investigation. Investigations into any reported violations are carried out under the direction of Arcadium Lithium's Ethics & Compliance Group.

Arcadium Lithium received no modern slavery complaints in 2024 through the company's ethics hotline complaints processes or otherwise.

# Steps taken to assess and mitigate risks of modern slavery

Arcadium Lithium utilizes a comprehensive, multistep approach to identify, assess, and mitigate risks in our 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 Global Regulatory team 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 labour 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.

Suppliers that are subject to the Company's contractual terms and conditions have the responsibility to:

- Confirm they have not been convicted or investigated for modern slavery offences,
- Take reasonable steps to ensure that their employees and subcontractors are trained in and comply with applicable anti-slavery and human trafficking laws,
- Grant Arcadium Lithium (or the applicable subsidiary) the right to audit them and their subcontractors for compliance against our requirements; and
- On request, provide a copy of any modern slavery statement they are required to prepare under any relevant modern slavery reporting framework.

## RISK ASSESSMENT

To mitigate risks associated with modern slavery, the Company annually assesses and monitors modern slavery risks through a structured 5-step approach:

1. Identifying and prioritizing suppliers
2. Mapping the supply chain
3. Assessing risks through geographic, sector and entity specific factors
4. Applying mitigation measures based on risk levels
5. Monitoring and reporting outcomes.

Arcadium Lithium's modern slavery risk assessment leverages internationally recognized resources, including Walk Free's *Global Slavery Index* and *Modern Slavery: Risks, Rights & Responsibilities* by KPMG.

## RISK MITIGATION AND REMEDIATION

Suppliers identified to be at higher risk of modern slavery will be flagged for an in-depth analysis using the company's third-party screening tool. Findings will undergo a review and escalation for appropriate and proportionate mitigation measures to be implemented, which may include a corrective action plan, an on-site social compliance audit, and/or termination. 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.





# Training

**All employees receive training on the Code of Ethics, ensuring a shared understanding of our core values and ethical standards.**

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.

Based on role and area of responsibilities, key employees undergo additional 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, and harassment. Training sessions cover crucial topics like how to identify signs of forced labour 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 strengthen our commitment to preventing modern slavery in our supply chain, employees in roles involving interactions with suppliers or service providers also receive specialized human rights training. This training provides them with the necessary tools to identify and report human rights abuses.

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# Evaluating our effectiveness & future focus

Arcadium Lithium remains dedicated to continuous improvement in our due diligence processes for identifying and managing risks of modern slavery in global operations and supply chains.

## 2024 ACHIEVEMENTS

Arcadium Lithium, including subsidiary companies Livent UK and Allkem Pty Ltd, actively engaged in integration activities to standardise global supply chain policies, procedures and performance metrics. This process included the successful implementation of a third-party software to assist with screening potential and current suppliers for certain risk factors including those associated with modern slavery.

Additionally, Arcadium Lithium established the following key performance indicators to seek to assess the effectiveness of actions taken to identify and mitigate risks of modern slavery in operations and supply chains.

Supplier Key Performance Indicator	2024 Result
Daily screening of active suppliers for risks related to Modern Slavery, Child Labor, or Human Trafficking	100% of suppliers screened
	0 suppliers flagged for high-risk alerts (out of over 6,300 suppliers)
Proactive, deep dive screening based on supplier risk profile evaluation (spend, country and sector)	201 suppliers
Training Key Performance Indicator	2024 Result
Respecting Human Rights: Modern Slavery e-module training	720 completions (93%)

## ONGOING EFFORTS

Arcadium Lithium recognizes the significance of a collaborative, cross-functional approach to addressing modern slavery. In preparing this statement, the Company consulted with global and local representatives and leaders across the following functions:

- Operations Centre of Excellence
- Procurement & Supply Chain
- Legal, Ethics & Compliance
- Global Communications and Sustainability.

In 2025 and beyond, we will continue to train and empower our employees to raise human rights concerns. For our suppliers and other third-party partners, we will continue to evaluate our portfolio to identify and mitigate Arcadium Lithium's risks. At the time this statement is being finalised, Arcadium Lithium is continuing to undergo integration as part of its acquisition by Rio Tinto. This process involves identifying and reviewing the most effective approaches to aligning global supply chain monitoring, risk assessment, and reporting practices.

This statement was approved by the boards of each of the reporting entities covered by this statement.



Amanda Hoskins

Signed by the Director on 19 June 2025 following approval by Board of Directors of Livent Lithium UK Limited on 19 June 2025.



Justin Chak

Signed in his capacity as a Director of each of Allkem Pty Ltd and Galaxy Resources Pty Ltd on 13 June 2025, following approval by both entities' Board of Directors on 11 June 2025 and 12 June 2025 respectively.



