

## Policy Statement

---

# Responsible Sourcing of Minerals Policy

**Last reviewed**  
29/01/2026

**Policy Owner**  
Senior Director, Supply  
Chain Operations

**Policy Approver**  
Managing Director, Lithium

### Purpose

The purpose of this policy is to mitigate the risk of potential adverse impacts to human rights by suppliers of Arcadium Lithium plc's (a wholly owned subsidiary of Rio Tinto plc, "Rio Tinto Lithium"), during the extraction, sale, transport, and/or export of minerals.

### Scope

The Responsible Sourcing of Minerals Policy is applicable to all Rio Tinto Lithium suppliers of lithium carbonate.

### Definitions

In the context of this policy, the term 'minerals' means lithium carbonate.

### Commitment

Rio Tinto Lithium is committed to conducting business in an honest and ethical manner and in full compliance with applicable laws and regulations.

At Rio Tinto Lithium, we follow the Organisation of Economic Co-operation and Development Due Diligence Guidance (**OECD Guidance**) for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (**CAHRAs**) when practicing third-party due diligence, by identifying, assessing, responding to, mitigating, supporting independent audits and reporting on our supply chain due diligence risks.

Rio Tinto Lithium commits to:

- Exercise due diligence by assessing our operations, supply chain activities, and relevant suppliers against international standards for business and human rights. These standards include the OECD Guidance's for Responsible Supply Chains of Minerals from CAHRAs, and the Responsible Minerals Initiative's (**RMI's**) Responsible Minerals Assurance Process (**RMAP**) Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals. We will also undergo third-party verification of our Environmental, Social, and Governance (**ESG**) practices and encourage our suppliers to do the same.
  - This process, as further described in Rio Tinto Lithium's annual RMAP Due Diligence Report, which is publicly available on the company website, and in the Procedure for Identifying and Assessing Risks in Mineral Supply Chains, includes (1) annual supplier assessments to identify potential links to CAHRAs using recognized international resources

and applicable sanctions lists; (2) enhanced due diligence where risks are identified; and (3) appropriate risk management actions, including risk mitigation with continued sourcing, temporary suspension, or termination of supplier relationship. A management review of the effectiveness of this process is conducted by the Corporate Import and Export Compliance Committee at least twice each year.

- Provide, and expect our suppliers to cooperate in providing, due diligence information to confirm that minerals in our supply chain do not contribute to illegal armed groups, human rights' violations, bribery, and/or financial wrongdoing.
- Aim to establish long-term relationships with our immediate suppliers.
- Undergo reasonable third-party assessment(s) to verify the conflict-free status of our minerals supply chain.
- Sourcing sustainable and responsible minerals, using commercially reasonable efforts.
- Support efforts, and/or take steps, to engage with central or local authorities, stakeholders, international organizations, and civil society organizations to contribute to workable solutions:
  - To avoid or minimize the exposure of vulnerable groups, in particular, artisanal miners;
  - To develop a risk mitigation plan, with concrete actions, that tracks activities to closure to prevent and/or mitigate risks of adverse impacts through measurable steps taken in a mutually acceptable timeline;
- Disclose payments in accordance with the principles set forth under the Extractive Industry Transparency Initiative (**EITI**) in countries that actively participate in the initiative and from which Rio Tinto Lithium extracts lithium minerals, and encourage any suppliers in our supply chain, subject to EITI, do the same.
- Improve transparency, and accountability in payments made to public security forces for the provision of security, where we or any company in our supply chain contracts public or private security forces.
- 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 human rights' abuses will not be hired in any part of our supply chain.
- Comply with Section 1502 of the Dodd Frank Act, which aims to prevent the use of minerals containing tin, tantalum, tungsten and gold ("3TGs") that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries.

We expect that relevant suppliers of minerals doing business with Rio Tinto Lithium share these commitments.

### **Responsible Sourcing Issues**

Rio Tinto Lithium will not tolerate, profit from, contribute to, assist with, or facilitate the commission by any party in our supply chain of:

- Any forms of torture, cruel, inhuman and/or degrading treatment;
- Any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty, and for which said person has not offered themselves voluntarily;

- Child labor, including the worst forms of child labor<sup>1</sup>;
- Human rights violations and abuses, including any form of sexual violence;
- War crimes or other serious violations of international humanitarian law, including crimes against humanity or genocide;
- Direct or indirect support to non-state armed groups, public or private security forces, or their affiliates, including, but 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:
  - Illegally control mine sites or otherwise control transportation routes, points where minerals are traded 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;
  - Illegally tax or extort intermediaries, export companies or international traders;
  - Do not act in accordance with the Voluntary Principles on Security and Human Rights;
- Bribes, corruption, fraudulent misrepresentation of the origin of minerals and money laundering; and
- Non-payment of taxes, fees and royalties related to mineral extraction, trade and export from conflict-affected and high-risk areas owed to governments.

### **Supplier Expectations**

We expect our suppliers to conduct themselves in an ethical and responsible manner that supports the protection of and respect for human dignity in their workplaces and is consistent with Rio Tinto Lithium's policies.

Relevant Rio Tinto Lithium suppliers should:

- Commit to and comply with this policy, our Supplier Code of Conduct and our Supplier Sustainability Policy.
- Communicate the contents of this Responsible Sourcing of Minerals Policy to their suppliers of minerals (if applicable), and require them to observe similar standards, and verify adherence throughout their supply chain.
- Conduct their operations in a socially and environmentally responsible way.
- Conduct screenings of their suppliers, including verification of individuals and entities that hold direct or indirect ownership stakes in the supplier against sanctions lists.
- Work closely with Rio Tinto Lithium with the design and implementation of improvement plans (where necessary).
- Immediately report to Rio Tinto Lithium any changes in their supply chain of minerals, including changes in transportation routes.
- Commit to being or becoming "conflict-free" (which means the supplier does not source conflict

---

<sup>1</sup> As defined in the ILO Convention No. 182 on the Worst Forms of Child Labor (1999) Article 3.

minerals<sup>2</sup>) and to sourcing 3TGs only from conflict-free smelters.

### **Violations or Grievances**

Rio Tinto Lithium reserves the right to verify compliance with this Responsible Sourcing of Minerals Policy and take appropriate actions in the event of non-compliance, which may include (but is not limited to) immediate suspension or termination of engagement or the immediate development and adoption of a risk management plan. If the risk management plan does not take effect within six months of implementation, we will temporarily suspend or terminate the relationship with the supplier.

Any violations or concerns/grievances about our policy or due diligence system should be reported through the ethics reporting system.

### **Implementation and Training**

To ensure effective implementation and adherence to this policy, training sessions will be provided to relevant personnel.

Suppliers of minerals will be required to review and requested to acknowledge this policy.

### **Appendix**

- Arcadium Lithium RMAP Due Diligence Report
- Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs)
- Procedure for Identifying and Assessing Risks in Mineral Supply Chains
- Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP) Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals
- The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- The Way We Work – Rio Tinto's Code of Conduct
- Voluntary Principles on Security and Human Rights

---

<sup>2</sup> As of the Issue Date of this Responsible Sourcing of Minerals Policy, the term "Conflict Mineral" includes the metals tantalum, tin, tungsten, and gold, which are the extracts of the minerals cassiterite, columbite-tantalite and wolframite, respectively.

Document control			
Approved by	Barbara Fochtman – Managing Director, Lithium		
Version control			
Version No.	2	Initial version issued	August 2024
Date approved:	29/01/2026		
Version Detail:	Rev. 0 – Initial Release Rev. 1 – Scope and Definitions updated Rev. 2 – Entity updates in all sections of the policy. The following sections were updated to address RMI audit findings: Commitment, Responsible Sourcing Issues, Violations or Grievances, Appendix		