



Modern Slavery Statement

Albemarle Wodgina Pty Ltd 2023

This statement covers the activities of Albemarle Wodgina Pty Ltd (ACN 630 509 303) (**AWPL**) and its owned and controlled entities during the year ending 31 December 2023 (**reporting period**). This is the second year in which AWPL has been a reporting entity and this is AWPL's second modern slavery statement.

References in this statement to 'we', 'our' and 'us' are references to AWPL and each of its owned and controlled entities.

This modern slavery statement is submitted under the *Modern Slavery Act 2018* (Cth) (**Act**) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of AWPL on 20 May 2024.

About us

At AWPL, we respect the human rights of those affected by our business activities. We operate in accordance with an entrenched set of core values, commitments in our [Human Rights Policy](#), and related standards that apply across the broader Albemarle corporate group,¹ which includes Albemarle Corporation (**Albemarle**) and each of the entities that it controls (together, the **Albemarle Group**). Our core values are care, curiosity, collaboration, humility, accountability, and integrity. Respecting the human rights of our employees, workers in our supply chain, members of our communities and other stakeholders represents our core values in action.

Our structure

AWPL is a company incorporated in Australia and our registered office is in Sydney, Australia.

AWPL is a subsidiary of Albemarle, which is headquartered in Charlotte, North Carolina. Albemarle is a leading global developer, manufacturer, and marketer of highly engineered specialty chemicals, with it and its subsidiaries holding leading positions in lithium, bromine, and refining catalysts.

AWPL's only owned or controlled entity is MARBL Lithium Operations Pty Ltd (ACN 637 077 608), in which AWPL holds 50% of the shares and which is not itself a reporting entity.²

Our operations

Our operations are solely in Western Australia, where AWPL is a participant in the MARBL Lithium Joint Venture with Mineral Resources Limited (**MinRes**). AWPL holds a 50%³ interest in the MARBL Lithium Joint Venture (**MARBL JV**). The joint venture is for the exploitation, development, processing, production and on-selling of lithium ore and other chemicals produced from mining undertaken at the Wodgina hard rock lithium mine in Western Australia (**Wodgina**).

During the reporting period, AWPL also engaged in lithium refining activities at trains 1 and 2 of the Kemerton refinery facility (**Kemerton**) and relied upon (as at 31 December 2023) 755 employees of Albemarle Lithium Pty Ltd ACN 618 095 471 (**ALPL**) to support those operations.

¹ <https://www.albemarle.com/direct/policies>.

² On 18 October 2023, AWPL and MinRes completed the restructure of the MARBL JV, which resulted in the reduction of AWPL's interest in the MARBL JV and MARBL Lithium Operations Pty Ltd to 50%. Prior to completion of the restructure, AWPL had a 60% interest in the MARBL JV and held 60% of the shares in MARBL Lithium Operations Pty Ltd.

³ As above.

ALPL was not a reporting entity for the purposes of the Act during the reporting period.

Our supply chain

AWPL's activities are limited to the ownership and operation of Wodgina and Kemerton.

Wodgina

In respect of operations at Wodgina, the MARBL JV has entered into agreements for the supply of mining, crushing, logistics and shipping coordination services with MinRes and its subsidiaries. AWPL does not directly control expenditure under these contracts or procurement decisions, but has obtained comfort on a holistic level by the rigorous procurement processes undertaken by MinRes, which are described in their [2023 Modern Slavery Statement](#).

MinRes procures goods and services across its mining services, iron ore, lithium, and energy businesses to support its workshops, mining operations and corporate offices. This includes, but is not limited to, construction and engineering services, environmental services, geographical and geological services, site services, technology and communication services, labour and machinery hire and logistics and transport services. 94% of MinRes' expenditure on goods and services at Wodgina in the reporting period was attributable to Australian based suppliers. The proportions of MinRes' significant spend across major categories of goods and services for Wodgina are:

Category	% of spend (CY 2023)
Operational parts and supplies	27%
Machinery, vehicles, and equipment	21%
Logistics and transport services	12%
Services	11%
Fuel and Energy	11%
Hire	5%
Travel and Accommodation	2%
Site Village Supplies	2%

Kemerton

Prior to the restructure of the MARBL JV in October 2023, AWPL held a 60% interest in Kemerton, as part of its interest in the MARBL JV. As part of the restructure, AWPL acquired MinRes' 40% interest in Kemerton, resulting in 100% ownership by AWPL.

For the significant portion of the year during which it was owned by the MARBL JV, operational control of Kemerton was contracted by the MARBL JV to ALPL.

Procurement to the Kemerton operation includes, but is not limited to engineering services, site services, labour and logistics and transport services. The main types of expenditure procured in relation to Kemerton during the reporting period are:

Category	% of spend (CY 2023)
Waste and tailing management	16%
Engineering, temporary labour, recruitment, and corporate services	16%
Construction services	12%
Utilities and energy expenditures	11%
Raw Materials	8%

During the reporting period, we worked with 473 suppliers. 95% of our tier 1 suppliers were in Australia, with 5% from a limited number of countries including United States, China, Hong Kong, South Africa, Germany, and Singapore. Our expenditure in other jurisdictions account for 2% of the total expenditure in the reporting year.

Modern slavery risks

We recognise that modern slavery is a human rights risk in our industry. As part of our overarching commitment to respect the human rights of our stakeholders and to avoid human rights abuses, consistent with the UN Guiding Principles on Business and Human Rights, we strive to mitigate risks of contributing to modern slavery through our operations and supply chains.

Risk assessment methodology.

During the reporting period, we undertook assessments of our operations and supply chains to identify the modern slavery risk present in each. We utilised a risk assessment methodology which considers several indicators of modern slavery risks including sector and industry, the type of products and services, geographical location, and specific entity risk. These risk factors are based on the risk indicators and information published by a broad range of authoritative sources, including but not limited to:

- the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities;
- the Walk Free Foundation's [Global Slavery Index 2023](#);
- International Labour Organization (Global Estimates of Modern Slavery: Forced Labour and Forced Marriage 2022);
- Australian Council of Superannuation Investors' 'Modern Slavery Risks, Rights & Responsibilities' report 2019;
- Heidelberg Institute for International Conflict Research Conflict Barometer;
- Transparency International's Corruption Perceptions Index; and
- The Fund for Peace Fragile States Index.

Our risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks and remains substantially unchanged since the previous reporting period. Our risk profile is summarised in the table below.

Risk profile.

Risk	Description of risk
Sector / Industry	<p>AWPL obtains goods and services across several different industries and sectors, including mining, project construction and development, logistics, electronics, energy and transport. While these industries and sectors are known to present a higher risk of forced labour exploitation, we consider that these risks are partly mitigated for AWPL given we operate solely in Australia and directly source many of the related services from other Australian entities – primarily, from our joint venture partner MinRes.</p> <p>MinRes is an Australian-based diversified resources company, with extensive operations in lithium, iron ore, energy, and mining services across Western Australia. MinRes operates in accordance with several modern slavery-related compliance policies and procedures which are intended to manage modern slavery risk in its own operations and supply chains.</p> <p>Strong labour practices and policy environment are two of the levers to reduce the risk of modern slavery practices. While mining industry risks are often situated in ancillary services, MinRes is uniquely placed to have increased visibility over cleaning, construction and catering services due to MinRes' insourcing model in its Australian operations.</p>

<p>Product / Service</p>	<p><i>Overview</i></p> <p>As noted in the 'our supply chain' section above, a majority of MinRes' spend is on operational parts and supplies (27%), machinery, vehicles and equipment (21%) and Services (11%). These categories include a number of higher risk products and services including electrical equipment, PPE and clothing, raw materials, construction services, hospitality services and security services.</p> <p>The types of expenditure incurred by AWPL at Kemerton is concentrated in waste and tailing management and services (16%), engineering, temporary labour, recruitment and corporate services expenditures (16%), construction services (12%), Utilities and energy expenditures (11%) and raw materials (8%), and some of these expenditures present higher risks of modern slavery such as forced labour.</p> <p>While we recognise this risk, we consider it is substantially mitigated in AWPL's operations given we directly procure many of these services from Australian-based entities who are also required to comply with our existing policies and procedures, which includes a number of expectations with respect to modern slavery and human rights-related matters.</p> <p><i>Raw materials</i></p> <p>Some raw and manufactured materials present a modern slavery risk due to the countries from which these materials are sourced. The main materials that AWPL acquires include gas, sodium hydroxide, sulphuric acid, lime and limestone. All of our tier 1 suppliers of raw materials are Australian companies, and the products are predominantly produced in Australia, therefore presenting a lower modern slavery risk.</p> <p>To address risks in our limited sourcing of materials from outside of Australia, we conducted modern slavery-focused due diligence on all our tier 1 and tier 2 raw materials suppliers, as well as one packaging supplier based in China. This research identified no significant red flags of modern slavery related to AWPL's supply chains.</p> <p><i>Shipping</i></p> <p>We also recognise that global and domestic shipping and logistics services can present increased risk of modern slavery practices. While these services form part of the business activities of the broader Albemarle Group, these primarily occur in our downstream operations and therefore have a limited impact on our direct operations and supply chains. Nevertheless, any entity within the Albemarle Group who engages in related shipping and logistics services (or engages other companies to carry out these services) is also required to undertake such activities in accordance with Albemarle's Code of Conduct for Business Partners, which incorporates human rights standards and prohibitions on forced labour and other forms of modern slavery.</p>
<p>Geographic</p>	<p>We consider that there is a minimal geographic risk in AWPL's operations and supply chains as all our direct operations are in Australia which has strong legislative frameworks in place to address modern slavery-related risk, including extensive employment laws to ensure that workers are subject to good working conditions.</p> <p>During the reporting period, AWPL engaged with a few suppliers from China, Hong Kong, Singapore and South Africa which have an increased prevalence of modern slavery and therefore present a higher risk. Our total expenditure in these regions is extremely low, at just 0.9% of AWPL's overall expenditure at Kemerton and related to spare parts, engineering design and packaging. As noted above, we conducted modern slavery-focused due diligence on these suppliers, which did not identify any significant red flags.</p>

Actions to assess and address risk

We understand the importance of working collaboratively with our employees, suppliers and the broader industry to combat modern slavery. That is why during the reporting period we adopted a risk-based approach to addressing modern slavery risks in our operations and supply chains. This risk-based approach involves continued supply chain mapping, due diligence, adherence to a high standard of performance emphasised through strong corporate policies, training, and supplier engagement.

Due diligence

As noted above, we continued to undertake risk assessments during the reporting period to identify key modern slavery risks within our operations and supply chains. Globally, Albemarle has commenced an in-depth assessment of forced labour, child labour and other human rights risks in the company's extended supply chains. Albemarle conducted risk-based supply chain mapping of production inputs in its three Global Business Units.

In 2023 Albemarle finalized its modern slavery due diligence global procedure, further standardizing the approach on how we define high-risk locations, materials and services, collect supply chain mapping information, and conduct due diligence of suppliers. The mapping and due diligence efforts continued to advance during 2023 and will extend into 2024 and beyond in order to achieve an appropriate and up-to-date understanding of Albemarle's suppliers globally, and to mitigate modern slavery risks present in their operations and.

For AWPL, our ongoing due diligence efforts to date have not identified any high-risk direct ("first-tier") suppliers to AWPL. Regarding AWPL's extended supply chain, we identified that 47 of the more than 800 indirect ("second-tier") suppliers of goods to MinRes in respect of operations at Wodgina, which present elevated risk of modern slavery. These suppliers are subject to MinRes' risk screening and onboarding processes as described in their [2023 Modern Slavery Statement](#).

Where Albemarle identifies suppliers with elevated modern slavery risks, we are committed to making appropriate risk-based inquiries to further assess and mitigate risks, such as through due diligence to identify indicators of forced labour, red flags of sourcing from conflict-affected or high-risk areas (CAHRAs), and other human rights-related issues. To the extent that our ongoing reviews identify high-risk suppliers, Albemarle is committed to asking them to complete a detailed supplier questionnaire and undergo audits by a qualified social auditing firm where appropriate.

Governance and accountability framework

AWPL adheres to a set of core values that recognises our responsibilities to all stakeholders. These values are largely set out in the Code of Conduct (outlined further below), which is the overarching mechanism governing the corporate behaviour of all entities in the Albemarle Group. At the group level, the importance of good corporate governance and ethical business practices to ensure the successful management of Albemarle's business in an honest, transparent, and accountable manner is key. The Albemarle Board of Directors exercises overall governance of the group ethics and compliance and sustainability programs and their alignment to the Albemarle Way of Excellence.

Albemarle also has a dedicated internal working group responsible for considering and managing human rights issues including modern slavery risks within our global operations and supply chain. This group is formed by members of the Ethics and Compliance, Sustainability and Procurement teams and assisted by consultants with specialist expertise in human rights and compliance. The VP of Ethics and Compliance regularly reports to the Audit & Finance Committee of Albemarle's Board of Directors, generally highlighting risks identified as the most significant and reviewing the company's methods of risk assessment and risk mitigation strategies, which include human rights and modern slavery-related initiatives. To facilitate such oversight, we use sustainability factors when assessing impact, and likelihood of risks in the company's Enterprise Risk Management (ERM) framework.

Policies and procedures

As a subsidiary of Albemarle, we operate in accordance with the broader [policies and procedures](#) which apply across the Albemarle Group, including:

- [Code of Conduct](#) which sets out a number of broader expectations and procedures that all entities in the Albemarle Group must comply with, including a prohibition on using child and forced labour, human trafficking or any other action that may adversely affect the labour or human rights of workers

(including any forms of modern slavery, unfair discrimination or inhumane treatment of workers). All employees, officers and directors are expected to comply with this code and all suppliers, contractors, agents, distributors and any others acting on any Albemarle entity's behalf are expected to be familiar with it.

- [Human Rights Policy](#) which sets out the company's commitment to respect the human rights of its stakeholders, including through requiring compliance with wage and employment-related laws and prohibiting the use of forced labour, child labour and human trafficking. This policy includes requirements to:
 - take prompt steps to investigate and remediate any issues, including terminating supplier relationships where appropriate, if we identify credible information or indicators of human rights violations by suppliers; and
 - conduct due diligence as appropriate on Business Partners that present heightened risks of corruption or other compliance risks to ensure that we conduct business only with suitable and reputable Business Partners.
- [Global Labour Policy](#) which sets out the Albemarle Group's labour related policy position, including minimum standards concerning employee engagement, compensation, development and management. This also reinforces Albemarle's position with respect to the prohibition of forced labour and child labour.
- [Responsible Sourcing Policy](#) which sets out Albemarle's commitment to the highest standards of social and environmental responsibility, conducting business ethically and in a manner consistent with our Core Values.
- Albemarle has a dedicated Investigation Policy and Investigation Procedure in place to govern how concerns under the above policies may be raised and incidents reported and investigated, including through the use of an [Integrity Helpline](#). The Integrity Helpline is a 24/7 service which provides a forum for our employees, contractors, employees of our vendors and other stakeholders to submit concerns or grievances confidentially and anonymously through an independent company. All concerns that are submitted through the helpline are triaged by the Global Ethics & Compliance team for review. Alternatively, employees are able to submit concerns directly to the Global Ethics & Compliance team.

Compliance with these policies and procedures ensures that we have strong frameworks to enable us to assess and address modern slavery risks in partnership with all suppliers that we engage.

Training

All Albemarle employees, including employees in Australia, are required to undertake Code of Conduct training, and in-depth targeted compliance training is provided to employees according to potential ethics and compliance risks they may face. Employees involved in procurement and sales are required to undertake targeted function, ethics, compliance, and system-related training specific to their roles.

Contracts and supplier engagement

We are committed to responsibly sourcing all goods and services to ensure that all suppliers we engage are socially, legally and ethically responsible and treat all those who work for them fairly and with dignity. Across the Albemarle Group, we communicate our expectations to all vendors, contractors, sales representatives and any other third-party doing business with Albemarle through our Code of Conduct for Business Partners and in contractual obligations or appropriate purchase terms. These obligations include:

- not to use forced or involuntary labour, including prison labour, indentured labour, bonded labour or slave labour;
- communicate expectations for responsible sourcing with their suppliers;
- take action to prevent and, where necessary, mitigate and remediate adverse human rights impacts that are directly connected to their operations and relationships;
- undertake appropriate due diligence on raw materials in their supply chains and abide by all applicable laws and regulations related to conflict minerals;

- undertake appropriate measures to prevent any conflict minerals entering their supply chains, and notify Albemarle in writing if any minerals supplied to Albemarle are not conflict-free; and
- provide all necessary information to enable Albemarle to complete its own inquiries and due diligence on the origin of raw materials.

All sub-contractors engaged on Albemarle's behalf are also expected to comply with the processes and requirements in the Code of Conduct for Business Partners.

Progress against CY2023 action items

CY2023 action item	CY2023 Progress
Implementing a dedicated modern slavery due diligence procedure to facilitate ongoing supply chain mapping and due diligence aligned with key principles of OECD Guidance and related Responsible Minerals Initiative (RMI) standards.	Procedure was finalized in 2023 and was rolled-out through the company's policy database, briefings for Global Ethics and Compliance team members, ongoing due diligence inquiries, and ongoing stakeholder engagement.
Incorporating modern slavery standards into an overarching responsible sourcing policy, which will cover a range of topics related to human rights and environmental matters;	Responsible Sourcing policy was published and incorporates modern slavery standards, reinforcing Albemarle's commitment to respecting the human rights of stakeholders throughout our supply chains.
Enhancing annual Code of Conduct training to specifically cover Albemarle's Human Rights Policy, and scenarios to further raise awareness of modern slavery risks in supply chains and red flags of sourcing from CAHRAs.	2023 annual Code of Conduct training specifically addressed Albemarle's Human Rights policy and scenarios focused on supply chain risks, including modern slavery and sourcing from CAHRAs. Code training was assigned and completed by all Albemarle employees globally.
Enhancing Albemarle's Code of Conduct for Business Partners and standard contract clauses to address modern slavery obligations in greater detail.	Input regarding updates obtained from stakeholders. On track to finalize and roll-out in 2024.
Monitoring and reporting on additional key performance indicators such as the percentage of employees who have completed specialized training on modern slavery risks and the number of suppliers screened under Albemarle's enhanced modern slavery due diligence process, against which we can further assess the effectiveness of these activities.	Percentage of employees who completed training on modern slavery topics is tracked as part of Albemarle's Code training process. Analytics on suppliers covered by due diligence is a focus for 2024.

Assessing our effectiveness

We monitor our performance against a number of key performance indicators. Albemarle monitors allegations reported through its global Integrity Helpline and matters reviewed pursuant to the company's investigation procedures, and tracks allegations/incidents involving any serious human rights issues such as modern slavery. These monitoring processes have not identified any such incidents in connection with AWPL. Albemarle also tracks completion of employee training. Albemarle's governance framework (described above) ensures that such information is regularly considered by management to inform continuous improvement.

We also regularly review relevant policies to ensure that they sufficiently address the modern slavery risk present in the operations and supply chains of the broader Albemarle Group. All policies are managed in a central policy management database, with tailored and documented review dates and identified policy owners.

In addition, Albemarle is engaged with the Initiative for Responsible Mining Assurance (IRMA) audit program, which uses an internationally recognized standard developed in consultation with a wide range of stakeholders to assess mine sites for their environmental and social impacts and related management systems. IRMA's audit standard includes critical criteria related to human rights and modern slavery. On June 20, 2023, Albemarle's production site in the Atacama Salar, Chile, became the first lithium mine in the world to complete an independent audit and publish an [IRMA report](#). Albemarle uses the IRMA

certification process to identify areas for improvement not only at these individual sites, but also to inform continuous improvement of Albemarle's global human rights and modern slavery-related initiatives.

Looking forward

We will continue to review and consider the steps we take to assess and address the risks of modern slavery in our operations and supply chains.

In the next reporting period, we will focus on:

- implementing our modern slavery due diligence procedure, including through further stakeholder engagement, and expanded coverage of due diligence inquiries.
- developing a dedicated modern slavery online training to be assigned to employees exposed to activities that present an increased human rights and modern slavery risk.
- enhance analytics around modern slavery risk and percentage of suppliers that were subject to due diligence, allowing ongoing monitoring of risks; and
- Rollout updates to Albemarle's Code of Conduct for Business Partners and standard contract clauses to address modern slavery obligations in greater detail.

Consultation

AWPL consulted with its subsidiary MARBL Lithium Operations Pty Ltd in the development of this statement by providing a copy of this statement to the board of that company for review and offering it the opportunity to comment on the document. We have also consulted with our JV partner and key supplier, MinRes, in relation to the supplies at Wodgina.

As a subsidiary of Albemarle, AWPL's approach to modern slavery is largely comprised of overarching policies, systems and processes that are designed to be consistently applied across the Albemarle Group.

During the reporting period, there was consistent consultation and collaboration between the Board of AWPL and the Ethics and Compliance team.

Prior to being put to the Board of AWPL for review and approval, this statement was reviewed by AWPL legal and procurement teams.

This statement was approved by the Board of AWPL in its capacity as the principal governing body of AWPL on 20 May 2024.

This statement is signed by Samantha Giannasi in their capacity as Director of AWPL on 21 May 2024.



Director of Albemarle Wodgina Pty Ltd
21 May 2024

Statement Annexure

Mandatory criteria

This statement complies with the mandatory criteria for a modern slavery statement outlined in section 16 of the *Modern Slavery Act 2018* (Cth). The below table indicates where each requirement is addressed in this statement.

Requirement	Page Number
(a) Identify the reporting entity.	1
(b) Describe the structure, operations and supply chains of the reporting entity.	1
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3
(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	4
(e) Describe how the reporting entity assesses the effectiveness of such actions.	7
(f) Describe the process of consultation on the development of the statement with any entities that the reporting entity owns or controls (if a joint statement has been made under section 14, also describe the process of consultation with the entity giving the statement).	8
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	8