

TIANQI LITHIUM

Modern Slavery Statement

2023



This Modern Slavery Statement (“Statement”) has been prepared by Tianqi Lithium Energy Australia Pty Ltd (“TLEA”), and on behalf of its wholly owned subsidiaries, to meet the requirements of the Australian Government’s *Modern Slavery Act 2018* (Cth) for the reporting year ending 31 December 2023 (“FY2023”).

This Statement outlines the steps and actions taken to mitigate the risk of modern slavery occurring within TLEA’s operations, supply chains and its wholly owned subsidiaries.

The modern slavery risks and actions taken by joint ventures or entities that TLEA does not operate are not included in this Statement.

In preparing this Statement TLEA would like to acknowledge the Traditional Owners of the land on which it operates and on which it works. TLEA recognises their connection to land, waters, and culture, and pay our respects to their Elders past, present and emerging.

All feedback is valued. Please forward any comments on this Statement or requests for additional information to compliance@tianqilithium.com.

This Statement was approved by the TLEA Board on 13 June 2024

Signed,



Raj Surendran
Chief Executive Officer

TIANQI LITHIUM

INTRODUCTION

This is TLEA's first Modern Slavery Statement. It outlines the approach towards the identification, management, and mitigation of the specific risks of modern slavery in our operations and supply chain. TLEA's intention is to use this mechanism of annual reporting to drive continual improvement and to reduce its risk of impact.



TLEA acknowledges that:

- Close to 50 million people globally are subject to some form of modern slavery, which is an increase of nearly 10 million from the 2018 estimates;
- There are in excess of 27.6 million people in situations of forced labour on any given day, 3.5 people for every thousand people in the world with women and girls making up 11.8 million of this total and more than 3.3 million of all those in forced labour are children;
- Collectively approximately US\$193 billion per year is generated in the global private economy from forced labour alone;
- 15.1 million people in Asia and the Pacific region are 'enslaved' (55 per cent of all people enslaved);
- 15,000 people in Australia are enslaved.

Exploitations that constitute modern slavery include human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, the worst forms of child labour, and deceptive recruiting for labour or services.

Human rights have been identified as a material risk by us and our key stakeholders, and TLEA is supportive of the Australian Government's *Modern Slavery Act 2018* (Cth) ("Act"), and is continuously working to identify, mitigate, and where possible, eliminate modern slavery risks within its operations and wider supply chain. This Statement has been prepared by TLEA in accordance with the Act and sets out the actions taken in financial year 2023 to address the potential risks of modern slavery in the various levels of its operations and supply chain. TLEA is confident that the foundations and processes put in place and planned will guide the company in identifying and addressing any future modern slavery risks.

TLEA recognises that the private sector has a significant role to play and is uniquely placed to drive change in the global market. As a leader in the local community, TLEA is pleased to continue to play its part in driving change across the industry it operates within, and in the region more broadly. Furthermore, TLEA is committed to improving and reporting its progress through the submission of annual modern slavery statements, and is resolute in working with its vendors and industry partners to assist with combatting this global issue.

ABOUT TLEA

TLEA is incorporated in the United Kingdom (Company No. 08960607), and is registered in Australia ARBN 649 234 211 and ABN 24 862 057 747. TLEA is a global Joint Venture (“JV”) formed between Tianqi Lithium Corporation (“TLC”) USCC 91510900206360802D (51%), a Chinese mining and manufacturing company based in Sichuan, China and IGO Limited (“IGO”) ACN 092 788 304 (49%) (though its subsidiary IGO Lithium Holdings Pty Ltd ACN 633 371 249), an ASX 100 listed company focussed on delivering products critical to the global clean energy transition.

The JV is the 51% owner of the Greenbushes Lithium Mine (“Greenbushes”) and the 100% owner-operator of the Kwinana Lithium Hydroxide Plant (“Kwinana Plant”). Collectively, the operations deliver Lithium Hydroxide Monohydrate.

Greenbushes is the world’s leading lithium minerals (Spodumene) concentrate producer. It mines and processes (concentrates), the highest ore reserve grade of any hard rock lithium mine globally, in the southwest of Western Australia.

TLEA has invested more than one billion Australian dollars to construct the Kwinana Plant. The refinery manufactures lithium hydroxide monohydrate from spodumene concentrate sourced exclusively from Greenbushes located 250 kilometres south of Kwinana.

At full capacity, the Kwinana Plant will produce 24,000 tonnes of battery grade lithium hydroxide per annum and is optimally positioned to partner with international customers to support the long-term sustainable development of lithium-ion battery technologies for use in the electric vehicle and energy storage industries.

TLEA is headquartered in Perth, Western Australia, and through its subsidiaries, operates and owns 100% of the Kwinana Plant. Tianqi Lithium Australia Pty Ltd ACN 622 764 381 (“TLA”) is TLEA’s subsidiary, and

Tianqi Lithium Kwinana Pty Ltd ACN 612 05 364 (“TLK”) is Tianqi Lithium Australia Pty Ltd’s subsidiary that operates the Kwinana Plant.

Winfield Holdings Pty Ltd ACN 160 456 164 is an incorporated joint venture between TLEA (51%) and Albemarle Corporation (49%), whose primary asset is the Greenbushes lithium operations in Western Australia – operated by Talison Group Companies.

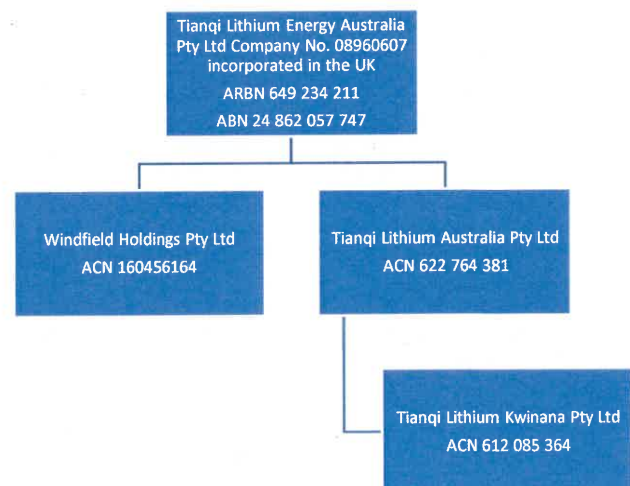


Figure 1 TLEA corporate structure

SCOPE OF THIS REPORT

Windfield Holdings Pty Ltd is jointly owned by TLEA and Albemarle and operates independently under its own board and has generated its own Modern Slavery report. As such, this Statement covers TLEA and its wholly owned subsidiaries of TLA and TLK. These three businesses essentially operate together seamlessly, with functions which revolve around the Lithium Hydroxide monohydrate refining.

The Act requires entities based, or operating, in Australia, which have an annual consolidated revenue of more than \$100 million, to report annually on the risks of modern slavery in their operations and supply chains, and actions to address those risks. Whilst the revenue from the refinery is significantly below this threshold, the dividends to TLEA from Windfield Holdings Pty Ltd pushes TLEA above this threshold.



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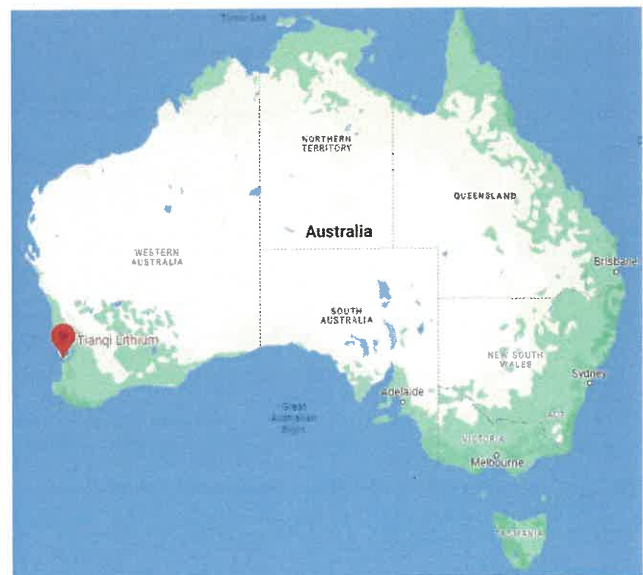
OUR OPERATIONS



KWINANA PLANT

TLEA has developed the Kwinana Plant, south of Perth in Western Australia, to produce lithium hydroxide of the highest quality. Lithium hydroxide is a lithium compound derived from spodumene, a lithium-bearing mineral. TLEA's spodumene is locally sourced from Talison's Greenbushes mine, located 250km south-west of Kwinana. Lithium hydroxide is used in the production of cathode material for lithium-ion electric vehicle batteries and energy storage system industries.

The Kwinana Plant was the first lithium hydroxide plant outside of China, and the largest of its kind in the world. The Kwinana Plant currently has one production train with plans for a second train that together will produce 48,000 tonnes of battery grade lithium hydroxide per annum. The lithium hydroxide will be exported overseas.



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OUR EMPLOYEES

TLEA has two main sites of business. An office in the Perth CBD and a refinery located in Kwinana. In these sites, over 300 Western Australians work together to manufacture Lithium Hydroxide Monohydrate. As part of the plant's construction, over 900 construction jobs were created.

TLEA has a fair, transparent and consistent process for attracting, recruiting, onboarding and engaging people who have the right skills, knowledge, behaviours and experience to meet the needs of the business. Selection is based solely on merit and without discrimination or prejudice.

TLEA ensures that salaries paid to employees and contractors meet all legislative requirements and thresholds, and that any salaries and benefits are in accordance with local market rates and expectations. TLEA also works closely with visa holders and ensure any required compliance of visa conditions are met.

EMPLOYEES

Over the 2023 financial year, the total number of employees rose from 242 to 312. Whilst most of the workforce is employed under the TLK entity, the executive team, some of the management, support staff and advisory staff are employed under the TLA entity.

CONTRACTORS

Historically, a significant proportion of the TLEA team was made up of external contractors. TLEA has worked effectively to reduce this proportion. Over the financial year, TLEA had almost halved the

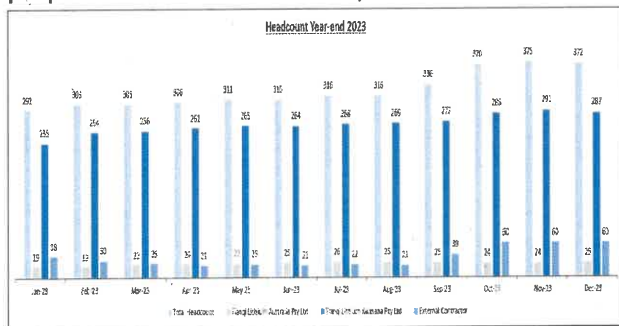


Figure 2 Headcount 2023

contractor headcount from 38 to 21. In the last quarter this increased to 60, the increase being related to a project.

DIRECT TLA EMPLOYEES IN DECEMBER 2023

25

DIRECT TLK EMPLOYEES IN DECEMBER 2023

287

CONTRACTORS IN DECEMBER 2023

60



OUR SUPPLY CHAIN

The success of TLEA's core business is supported by its supply chain, covering a range of products and services. In 2023, TLEA had an annual spend of \$350M from 547 vendors. A summary of the spread of expenditure is provided in the diagrams below.

Processing	Major Projects	Delivery	Support Services
<ul style="list-style-type: none"> ▪ Labour hire ▪ Grinding media ▪ Reagents • Utilities • Spodumene • Finished product 	<ul style="list-style-type: none"> ▪ Engineering ▪ Construction contractors ▪ Earthmoving contractors • Plant and equipment 	<ul style="list-style-type: none"> ▪ Shipping ▪ Haulage ▪ Port ▪ Stevedoring services 	<ul style="list-style-type: none"> ▪ Shipping ▪ Haulage ▪ Port ▪ Stevedoring services

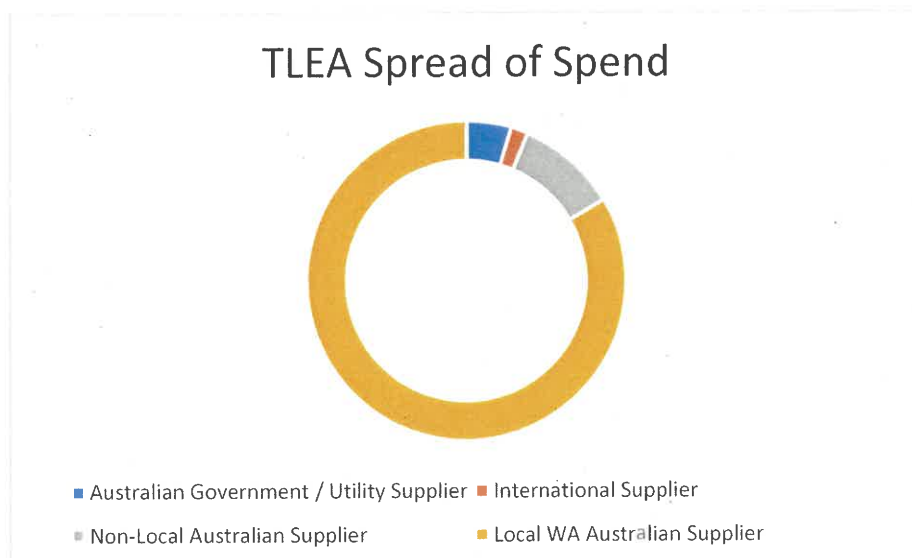


Figure 3 TLEA Spread of spend

OUR SUPPLY CHAIN MODERN SLAVERY RISK

TLEA recognises the inherent modern slavery risks that are present within the EV battery supply chain, particularly in geographical locations where serious exploitation of people are prevalent. TLEA acknowledges that its position in the industry may

inadvertently increase modern slavery risks without proper governance. It is TLEA's intent to engage with vendors and suppliers that are committed to operating in an ethical manner that promotes

fairness and free competition in its respective industries.

TLEA's core business in lithium production and its focus on development of assets in Western Australia requires awareness of the inherent risks in its operations and supply chains. As a result, TLEA has undertaken a critical analysis of its operations and supply chain and identified the main areas that may contribute or give rise to modern slavery. TLEA recognises that lithium hydroxide processing and exports may be indirectly connected to geographical areas that are known to be of high-risk. Additionally, TLEA understands the inherent risk that stems from the use of contractors and international vendors, where visibility from the outset is limited.

TLEA's current approach to assessing the supply chain risks is based on product, sector, geographical risks and its ability to influence. The assessment incorporates its total annual spend, nature of industry and location data, and providing a high-level snapshot of its vendors' risk profile.

TLEA developed and implemented a modern slavery procedure. From a supply chain perspective, this revolves around utilising TLEA's power and influence to facilitate a change through:

1. The use of a modern slavery questionnaire that is used to identify opportunities for improvement; and
2. Working with suppliers to address any gaps and improve.

ABILITY TO INFLUENCE

TLEA believes that its ability to affect change is through those whom it may be able to influence, because of its size, as a customer. As such, at this stage TLEA is applying its modern slavery procedure to those suppliers with an annual expected spend of greater than AUD \$250,000.

GEOGRAPHIC RISK

TLEA understands the global footprint of its supply chain and recognises that certain geographic regions may carry elevated risks. With this understanding, TLEA has sent its modern slavery questionnaire to all its key international suppliers.

Over 98 percent of TLEA's vendors are in Australia. Of the total spend, 60 percent is with a related party. The rest of the spend is largely products and services from countries with low prevalence of modern slavery. The geographical spread is provided in the map below:

Expenditure by Country



PRODUCT AND SERVICES RISKS

Certain industries and product types are more exposed to modern slavery risks than others. TLEA has assessed the products and services that it procures and have ensured that its modern slavery procedure is applied to the suppliers of the following products and services:

- Shipping
- Textiles and PPE
- Electronics
- Mining and
- Solar panels

Future plans include a more comprehensive assessment to efficiently stratify its business vendors, which will allow TLEA to identify areas and practices that may contribute to modern slavery risks.

ENTITY RISKS

TLEA commits to building and maintaining a reputation for integrity, honesty, and fair dealing in all its relationships and business dealings, and leads to apply its values to its business, joint venture partners, and supply chain partners. It acknowledges that certain types of entities are higher risk from a modern slavery perspective.

Whilst its normal procurement process considers this, it is not yet a particular aspect of its current modern slavery procedure. Future plans include a review of this.

OUR MODERN SLAVERY SYSTEM / APPROACH

GOVERNANCE AND MANAGEMENT

The TLEA Board of Directors (“Board”) has the ultimate responsibility for TLEA’s management on human rights risks, including the risks of modern slavery. The Board is supported by the management team, who oversee policies, management systems, performance, reporting, and compliance related to health, safety, environment, community, and human rights.

The management team is responsible for upholding policies and implementing management controls that relate to human rights and modern slavery. The management team’s focus has been on the development and implementation of a system for the identification and management of modern slavery risk.

expectations and requirements for personnel and associates, setting out the responsibilities and expectations to comply with applicable laws, rules and regulations, and to engage and promote honest and ethical conduct. TLEA is committed to treating its people fairly and protecting the rights of its employees.

Anti-Bribery and Corruption Policy: this policy sets out TLEA’s commitment to maintaining a high standard of integrity and to operating fairly, honestly, and legally, to ensure that TLEA complies with international regulations in relation to anti-corruption and bribery. Additionally, TLEA makes a full commitment to ensure that it has an open and transparent management approach to avoid exposing it to potential conflicts of interest and maintaining a high standard of ethical conduct in all business dealings.

POLICIES AND PROCEDURES

TLEA’s approach to managing human rights and modern slavery risks is supported by a framework of policies and procedures that have been reviewed and developed considering TLEA’s commitment to mitigate the risks.

Future plans include the development and implementation of modern slavery training. TLEA’s policies and procedures consist of the following:

Code of Business Conduct and Ethics: this policy outlines TLEA’s ethical business conduct

Human Rights Policy: this policy underpins TLEA’s support of human rights that is consistent with the United Nations Universal Declaration of Human Rights, based on principles of dignity, equality, and mutual respect, regardless of a person’s gender, race, nationality, religion or economic status.

Modern Slavery Policy: this policy underpins TLEA’s approach to ensure that modern slavery is not taking place in its own business or in its supply chain, and to comply with its obligations under the

Act. This policy is supported by a Modern Slavery Procedure.

Procurement Policy: this policy seeks to ensure that there is consistency in TLEA's approach towards procuring goods and services and that it considers the promotion of fairness and free competition, that it operates in an ethical manner, and seeks to achieve the maximum benefit through best practices.

TLEA's procurement, contractor and vendor procedures provide internal governance relating to the contracting of goods and/or services from external parties.

Whistle-blower Policy: this policy sets out the reportable conduct and encourages people to report any actual or suspected instances of illegal, unethical, fraudulent or undesirable conduct.

REPORTING

As part of its internal governance, TLEA has developed a reporting mechanism for personnel and associates, including joint venture partners, contractors, and representatives at all levels, to

speaking up if any grievances arise in respect of, but not limited to, modern slavery concerns. TLEA will appropriately evaluate all reported conduct and consider and implement the appropriate corrective actions. The Board will be advised of all reported conduct and investigations that take place, including the rationale regarding the outcome of investigations.

CONTRACTUAL REQUIREMENTS

TLEA has developed modern slavery contract clauses, which have been included within its conditions of contracts. These clauses form part of TLEA's corporate social responsibilities approach, that sets an expectation that TLEA and its vendors actively manage their modern slavery risks within their operation and supply chain.

EFFICACY OF ACTIONS

TLEA assesses the efficacy of actions through tracking reports made on modern slavery in its supply chain. Future plans include the use of audits.



2023 PREVENTION AND MITIGATION HIGHLIGHTS

TIANQI LITHIUM



Undertook a modern slavery gap analysis



Reviewed and updated our Modern Slavery Policy

Developed and implemented a Modern Slavery Procedure



Analysed our vendors to flag our modern slavery risk



Developed and implemented a modern slavery questionnaire (sent to over 100 vendors)



Zero reports of modern slavery



MODERN SLAVERY ACTION PLAN

2024 ACTION PLAN

TLEA has identified the following key actions to improve the company's management of modern slavery risk within the operations and supply chains. This action plan is fluid and will be continuously adapted as the company continues to develop its actions.

PROGRESSION

The progression of TLEA's action plan will be guided by establishing and measuring its performance and benchmarking it against industry standards and investor expectations, and collaborating with industry partners to share knowledge and identify gaps.

VENDOR SCREENING

Update pre-qualification processes to flag high risk vendors according to product type, sector classification, geography and spend.

RISK DETECTION

Continue to assess the risks and performance of vendors within supply chain to prioritise high risk vendors.

VENDOR ENGAGEMENT

Have more engagements with high-risk vendors to determine the extent to which modern slavery risks are adequately managed.

VENDOR REMEDIATION

Where further action is required, development of vendor remediation plans to assist with the effective remediation.

DOCUMENTATION REVIEW

Contract, policy, and procedure documentation will be regularly reviewed and assessed to identify areas for improvement. procurement and contracting processes.

AWARENESS TRAINING

Commence ongoing training to ensure procurement, supply and commercial teams are equipped with the knowledge and skills to identify high risk vendors and engage with them where appropriate.

CONSULTATION PROCESS WITH CONTROLLED ENTITIES

TLEA's entities share many of the same personnel and resources, such as its legal, finance, corporate, procurement and Information Technology teams. There has been consultation and collaboration with the Board, Executive team and relevant personnel within each of the entities in the preparation of this Statement. Commitments and expectations have also been communicated and explained in relation to modern slavery risk.

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