



Modern Slavery Statement

Albemarle Wodgina Pty Ltd and Albemarle Lithium Pty Ltd
2024

This joint modern slavery statement covers the activities of Albemarle Wodgina Pty Ltd (ACN 630 509 303) (**AWPL**) and Albemarle Lithium Pty Ltd (ACN 618 095 471) (**ALPL**) (as reporting entities) and their owned and controlled entities during the year ending 31 December 2024 (**reporting period**). This is the third year in which AWPL has been a reporting entity, and the first year in which ALPL has been a reporting entity.

References in this statement to 'we', 'our' and 'us' are references to AWPL and ALPL and each of their 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 Boards of AWPL and ALPL on 28 May 2025.

About us

At Albemarle, 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 and ALPL are both incorporated in Australia, with registered offices in Sydney, Australia and are both subsidiaries 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.

Our owned or controlled entities are:

- MARBL Lithium Operations Pty Ltd (ACN 637 077 608), in which AWPL holds 50% of the shares and which is the joint-venture manager for the MARBL Lithium Joint Venture (**MARBL JV**);
- Western Lithium Pty Ltd (ACN 631 748 617) (**Western Lithium**), in which ALPL holds 100% of the shares; and
- CMC Lithium Pty Ltd (ACN 615 736 135) (**CMC Lithium**) and Titus Minerals Pty Ltd (ACN 658 111 892) (**Titus**), in which Western Lithium holds 100% of the shares.

None of these entities are themselves reporting entities.

Our operations

Our operations are solely in Western Australia, where:

¹ <https://www.albemarle.com/global/en/ethics-compliance>.

- AWPL is a participant and holder of a 50% interest in the MARBL JV with Mineral Resources Limited (**MinRes**), which is a joint venture 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**); and
- ALPL engages in lithium refining activities at trains 1 and 2 of the Kemerton refinery facility (**Kemerton**).

As at 31 December 2024, we engaged 440 employees.

Our supply chain

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 [2024 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. 95% 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 2024) |
|------------------------------------|----------------------|
| Operational parts and supplies | 32% |
| Machinery, vehicles, and equipment | 21% |
| Logistics and transport services | 6% |
| Services | 10% |
| Fuel and Energy | 14% |
| Hire | 8% |
| Travel and Accommodation | 3% |
| Site Village Supplies | 2% |

Kemerton

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 third party expenditure procured in relation to Kemerton during the reporting period are:

| Category | % of spend (CY 2024) |
|--|----------------------|
| Facility Management | 26% |
| Waste Management | 15% |
| Maintenance, Repair and Operations (MRO) | 11% |
| Utilities and energy expenditures | 10.5% |
| Raw Materials | 3.6% |

During the reporting period, 100% of spodumene concentrate processed at Kemerton was sourced from the Greenbushes Lithium Operation, which is owned and operated by Windfield Holdings Pty Ltd (ACN

160 456 164) (**Windfield**) and its subsidiaries. Windfield is owned 49% by Albemarle in a joint venture with Tianqi Lithium Energy Australia (a joint venture between Tianqi Lithium Corporation and IGO Lithium Holdings). As it is itself a reporting entity, Windfield prepares and submits a separate modern slavery statement in accordance with the Act.

During the reporting period, we worked with 422 suppliers. 95% of our tier 1 suppliers were in Australia, with 5% from a limited number of countries including United States, China, Hong Kong, Netherlands and Germany. Our expenditure in other jurisdictions accounts for 3%, of the total expenditure in the reporting year.

Exploration

Expenditure for exploration operations in respect of tenements held by CMC Lithium and Titus during the reporting period totalled approximately A\$1.4m and included, but was not limited to, field support services (labor hire), technical consulting services, logistics and transport services and consumable and equipment purchases. The expenditure was exclusively with Australian registered businesses. The main types of expenditure procured in relation to exploration during the reporting period are:

| Category | % of spend (CY 2024)* |
|---|-----------------------|
| Technical Services & Consulting | 91.8% |
| Field Services (Labor Hire) | 1.9% |
| Logistics, transport & Storage services | 1.1% |
| Travel expenses | 3.3% |
| Consumables and equipment | 1.9% |

*Percentages are approximate

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 continued to undertake 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 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 periods. Particularly, we note that active contractors previously engaged by AWPL in respect of Kemerton are now engaged by ALPL. Our risk profile is summarised in the table below.

Risk profile

| Risk | Description of risk |
|-------------------|---|
| Sector / Industry | <p>We obtain 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, 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> |
| Product / Service | <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 (32%), machinery, vehicles and equipment (21%) and fuel and energy (14%). These categories include a number of higher risk products and services including electrical equipment, PPE and clothing, raw materials, diesel, petroleum and natural gas.</p> <p>The types of expenditure incurred by ALPL at Kemerton is concentrated in facility management (26%), waste management (15%), maintenance, repair and operations (MRO) (11%), utilities and energy expenditures (10.5%) and raw materials (3.6%), 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 ALPL'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 ALPL 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 ALPL'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</p> |

| | |
|------------|---|
| | 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. |
| Geographic | <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, ALPL engaged with a few suppliers from China and Hong Kong, 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 0.7% of ALPL'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 continues to conduct risk-based supply chain mapping of production inputs in its three business segments.

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 2024 and will extend into 2025.

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 68 of the more than 900 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 [2024 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

We adhere to a set of core values that recognise 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 supply chain mapping and review of 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.

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 Albemarle'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.
- Modern Slavery Due Diligence Procedure which sets out Albemarle's commitment to respect the human rights of our stakeholders, including workers in our supply chains and local community members.
- 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 or tolerate any form of modern slavery or forced or involuntary labour, including prison labour, indentured labour, bonded labour or slave labour;
- respect the human rights of employees and contractors, and treat them with dignity and respect, consistent with the UN Guiding Principles on Business and Human Rights;
- 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, forced labour and child labour;
- undertake appropriate measures to prevent any conflict minerals or materials made with forced labour or child labour from entering their supply chains, and notify Albemarle in writing if any minerals supplied to Albemarle are not conflict-free or if it becomes aware of any credible allegations or evidence of forced labour, child labour or other serious human rights issues in the supply chain;
- provide all necessary information to enable Albemarle to complete its own inquiries and due diligence on the origin of raw materials; and
- not source from sub-tier suppliers that use forced labour or child labour or that engage in any other type of human rights abuses.

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 CY2024 action items

| CY2024 action item | CY2024 Progress |
|--|---|
| Implement modern slavery due diligence procedure, including through further stakeholder engagement and expanded coverage of due diligence inquiries. | Continued the roll out implementation of the modern slavery procedure for new suppliers and existing ones utilizing a risk-based approach. . |
| Develop a dedicated modern slavery online training program to be assigned to employees exposed to activities that present an increased human rights and modern slavery risk. | 2024 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. |
| Enhance analytics around modern slavery risk and percentage of suppliers that were subject to due diligence, allowing ongoing monitoring of risks. | Procurement and Global Ethics and Compliance continued to work on enhancing analytics and confirmation of information involving the mapping of supply chain, prioritizing raw material suppliers |
| Rollout updates to Albemarle's Code of Conduct for Business Partners and standard contract clauses to address modern slavery obligations in greater detail. | In September 2024, Albemarle released an updated Code of Conduct for Business Partners. As detailed above, the new Code of Conduct includes enhanced supplier obligations with respect to modern slavery. |

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 or ALPL. 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.

As part of this ongoing commitment to IRMA certification, in 2024 we conducted a new human rights risk assessment at our Salar de Atacama site in Chile which we completed in early 2025. The assessment revealed that our operations are aligned with international human rights standards and that we have robust policies, procedures and practices in place to protect the rights of our employees, suppliers and communities. We remain committed to transparency and accountability as we continue to work toward ensuring we uphold the highest standards in our human rights practices.

On 7 August 2024, Albemarle's jointly owned Greenbushes Lithium Mine became the first Australian mine to commit to an IRMA independent audit.² 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 propose to:

- Rollout updates to our Modern Slavery Due Diligence Procedure and Human Rights Policy, according with the new needs that have been identified after its implementation.
- Launch a dedicated modern slavery online training for employees exposed to activities that present human rights and modern slavery risks.
- Continue to refining the mapping process through analytics related to suppliers exposed to human rights and modern slavery risks and continue risk monitoring.

Consultation

We consulted with the entities we own or control in the development of this statement by providing a copy of this statement to the boards of those companies for review and offering them 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, our 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 Boards of AWPL and ALPL and the Ethics and Compliance team.

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

This statement was approved by the Boards of each of AWPL and ALPL on 28 May 2025.

² <https://www.talisonlithium.com/news/talison-independent-irma-audit>

This statement is signed by Samantha Giannasi in their capacity as Director of both AWPL and ALPL on 03 June, 2025.

A handwritten signature in black ink, appearing to be 'SGi' with a stylized flourish.

Director of Albemarle Wodgina Pty Ltd and Albemarle Lithium Pty Ltd

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. | 5 |
| (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 |