



Modern Slavery Statement

Albemarle Wodgina Pty Ltd 2022

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 2022 (**reporting period**). This is the first year in which AWPL has been a reporting entity and this is AWPL's first 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 27 June 2023.

About us

At AWPL, we respect the human rights of those affected by our business activities. We operate in accordance with our Core Values, 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 located 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 60% of the shares and which is not itself a reporting entity.

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 60% 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**) and refining activities at trains 1 and 2 of the Kemerton refinery facility (**Kemerton**).

We currently engage 566 employees and 142 contractors.

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

Our supply chain

AWPL's activities are limited to the MARBL JV, and the majority of our expenditure is related to the operations of the MARBL JV. The activities and associated expenditure of the MARBL JV is best divided by operations at Kemerton and operations at Wodgina.

Wodgina

In respect of operations at Wodgina, the MARBL JV has entered into agreements for the supply of mining, crushing and logistics services with MinRes and its subsidiaries. AWPL does not directly control this expenditure or procurement decisions but has obtained comfort on a holistic level by the rigorous procurement processes undertaken by MinRes, which are described in their [2022 Modern Slavery Statement](#).

MinRes procures goods and services across several different sectors 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. 97.63% of MinRes' expenditure on goods and services at Wodgina in FY22 was attributable to Australian based suppliers. The key categories of expenditure for MinRes at Wodgina are services (14%), operational parts and supplies (28%) and machinery, vehicles, and equipment (8%).

Kemerton

Operational control of Kemerton is contracted by the MARBL JV to Albemarle Lithium Pty Ltd (ACN 618 095 471) (**ALPL**). ALPL was not a reporting entity for the purposes of the Act during the reporting period.

The main types of expenditure procured in relation to Kemerton are materials (including raw materials) (41%) and freight services (27%). Other Kemerton expenditure includes:

- corporate/building services including office maintenance services, cleaning and security;
- information and communications technology including hardware and software, printers, audio/visual equipment, data room services, desk phones and mobile phones used by our employees; and
- external professional services including financial services, taxation, legal, insurance, consulting and professional and personal development.

We work with 256 suppliers from a limited number of countries including Australia, the United Kingdom, Chile, Thailand, China, and the United States. Our suppliers are primarily located in Australia and expenditure in other jurisdictions accounts for less than 1% of total expenditure at Kemerton.

Modern slavery risks

We recognise that modern slavery is a common 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 initial desktop assessments of our operations and supply chains to identify and assess 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 in:

- the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities;
- the Walk Free Foundation's [Global Slavery Index 2018](#);
- 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 initial risk assessment has indicated that our operations and supply chain have a low potential for modern slavery risks. 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 are industries and sectors which 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. MinRes procures many of its supplies from Australian-based suppliers, with 97.63% of MinRes' direct supplier spend for Wodgina in the financial year ending 30 June 2022 in Australia.</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>General operations procurement, including financial, building management, cleaning, catering and security services also 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>Some raw and manufactured materials present a modern slavery risk due to the countries from which they are sourced. The main materials that AWPL acquires include gas, sodium hydroxide, sulphuric acid, lime, limestone and packaging consumables. All of our suppliers of raw materials are Australian companies, and the products are predominantly produced in Australia and therefore present a lower modern slavery risk.</p> <p>To address risks in our limited sourcing of services and materials from outside of Australia, we conducted modern slavery-focused desktop research on eight suppliers that were either located outside of Australia or potentially source products from outside of Australia. This research identified no significant red flags of modern slavery related to AWPL's supply chains.</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</p>

	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	We consider that there is a minimal geographic risk in AWPL's operations and supply chains as all of 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.

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 introduced a number of steps to assess and address modern slavery in our operations and supply chains.

Due diligence

As noted above, we undertook an initial risk assessment during the reporting period to identify any key modern slavery risks that existed 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 2022, this due diligence process was piloted in Albemarle's China operations, and the company is using the results to inform enhancements to global risk mitigation processes, including how we define high-risk locations and materials, collect supply chain mapping information, and conduct desktop screening of suppliers for red flags. These efforts are ongoing to achieve an appropriate understanding of Albemarle's suppliers globally and the extent of modern slavery risks present in their operations and supply chains. In addition, Albemarle has conducted human rights risk assessments at several Albemarle sites, covering a broad range of risks to workers and other stakeholders, including risks of forced labour.²

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 44 of the more than 500 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' rigorous procurement processes as described in their [2022 Modern Slavery Statement](#).

Where Albemarle identifies suppliers with elevated modern slavery risks, we are committed to making appropriate risk-based inquiries to assess and mitigate risks, such as through desktop research structured 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 present within our global operations and supply chain. This group is led by our Chief Risk Officer and assisted by consultants with specialist expertise in human rights and compliance. The Chief Risk Officer regularly reports to the Audit & Finance Committee of Albemarle's Board of Directors, generally highlighting risks identified as the most significant and reviewing the

² Please see Albemarle's [2022 Sustainability Report](#) for more information on Albemarle's risk assessment initiatives.

company's methods of risk assessment and risk mitigation strategies, which include human rights and modern slavery-related initiatives. The Chief Risk Officer also provides periodic reports on the status of our human rights program to our Sustainability Steering Committee. To further facilitate such oversight, in 2022, we updated the company's Enterprise Risk Management (**ERM**) framework to specifically consider sustainability factors when assessing the impact, likelihood, and severity of risks.

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. 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 how the company ensures that its engagement and activities 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.

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 passed on to 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.

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](#). In 2021, the Wodgina site and Albemarle's Greenbushes operations also began the IRMA self-assessment process, and we anticipate we will complete these assessments and start a third party audit at Greenbushes in 2023. 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

As this is our inaugural statement and we are continuously developing our modern slavery framework, we recognise there are further steps we can 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 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
- incorporating modern slavery standards into an overarching responsible sourcing policy, which will cover a range of topics related to human rights and environmental matters;
- 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;
- enhancing Albemarle's Code of Conduct for Business Partners and standard contract clauses to address modern slavery obligations in greater detail; and

- 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.

Consultation

AWPL consulted with its subsidiary MARBL Lithium Operations Pty Ltd 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 modern slavery working group within Albemarle.

Prior to being put to the Board of AWPL for review and approval, this statement was reviewed by Albemarle's Chief Risk Officer and 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 27 June 2023.

This statement is signed by Samantha Giannasi in their capacity as Director of AWPL on 27 June 2023.



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.	2
(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.	6
(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).	7
(g) Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	7