

CODE OF CONDUCT

FOR BUSINESS PARTNERS





NAVIGATING OUR CODE

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POWERING POTENTIAL

We Seek to Make the World Safe & Sustainable By Powering the Potential of People

Albemarle Corporation (Albemarle) is a global specialty chemicals company with leading positions in lithium, bromine and refining catalysts. We power the potential of companies in many of the world's largest and most critical industries, from energy and communications to transportation and electronics.

Sustainability is at the heart of everything we do at Albemarle. We are committed to improving the quality of human life through the development of innovative products, protection of the environment and doing the right thing in our communities. Working side by side with our stakeholders, we develop value-added, customized products that help address the world's most important environmental needs. Our solutions combine the finest technology and ingredients with the knowledge and knowhow of our highly experienced and talented team of operators, scientists and engineers.

Discovering and implementing new and better performance-based sustainable solutions is what motivates all of us. We think beyond business as usual to drive innovations that create lasting value.

Our Core Values

Albemarle's passionate commitment for doing business the right way with our customers, neighbors and you, our Business Partners, led to the development of our Core Values. These six behavior-based principles speak directly to the characteristics we hold high and serve as the foundation of our culture:

CARE

We value safety and the well-being of each other. We help make our communities better. We are stewards of the environment.

CURIOSITY

We encourage questions and wonder. We seek continuous learning, improvement and innovation.

COURAGE

We are comfortable being vulnerable. We are willing to take informed and shared risks, but not shortcuts.

COLLABORATION

We believe two are better than one when two act as one. We are empowered to perform our jobs and are accountable for the result.

HUMILITY

We share the credit and value the ideas of others – it's not about me. We value diversity of thoughts, experiences and cultures.

INTEGRITY AND TRANSPARENCY

We are our word. We do what we say. We communicate and act transparently. What you see is what you get.

Our Core Values are supported by the Albemarle Code of Conduct (Albemarle Code), a public statement of the standards we expect of our employees in our daily work.

Our Commitment

Albemarle is committed to the highest standards of social and environmental responsibility, conducting business ethically and in a manner consistent with our Core Values. This commitment includes compliance with applicable laws at all times, as well as respecting ethical values and acting sustainably. This is not only the right thing to do, it is critical to maintaining trust and our legal and social license to operate.

OUR CODE OF CONDUCT FOR BUSINESS PARTNERS

Business Partners play a critical role in Albemarle's success, helping us to deliver the promises we make. In accordance with the Albemarle Code, we seek to ensure that our Business Partners are aligned with our Core Values.

We have developed this Code of Conduct specifically for our Business Partners (Business Partner Code). Albemarle expects its Business Partners to operate in accordance with the Business Partner Code and in full compliance with all applicable laws and regulations. If local law sets higher standards than the Business Partner Code, we expect Business Partners to follow the higher standard.

TO WHOM DOES THE CODE APPLY?

Albemarle expects its vendors, contractors, sales representatives and any other third party doing business with Albemarle (Business Partners) to act in a manner consistent with our Core Values and this Business Partner Code of Conduct. We also expect our Business Partners to ensure that sub-contractors they engage on our behalf do the same.

BUSINESS PARTNER ACCOUNTABILITY

To uphold our Core Values, it is important that we are all held accountable for our actions. How our Business Partners adhere to our Core Values and work in accordance with this Business Partner Code of Conduct is an essential part of their performance for Albemarle.

We may elect to not work with or cease to work with Business Partners who do not meet our expectations. Any violation of this Business Partner Code or applicable laws may result in termination of the Business Partner's relationship with Albemarle.

SPEAK UP

Speaking up by raising questions or potential concerns helps Albemarle to improve understanding, engage with stakeholders, prevent harm, manage risk and promptly address issues. Business Partners are expected to immediately speak up if they see or suspect activity involving Albemarle that may violate this Business Partner Code or applicable law.

If you have a concern, you must speak with your contact at Albemarle or a member of Albemarle's management. You may also contact our Global Ethics & Compliance team (integrity@albemarle.com) or our **Integrity Helpline**.

The Integrity Helpline is operated by an independent company and can be contacted 24 hours a day, 7 days a week, in multiple languages, by phone or online. In the U.S., it can also be contacted by text message. Details of how Business Partners can contact the Helpline can be found on our website (www.IntegrityHelpline.Albemarle.com). Albemarle prohibits all forms of retaliation against people who report concerns in good faith.

QUESTIONS

Working together, all of us will ensure we do business the right way. If you have questions regarding the Business Partner Code or about our expectations of our Business Partners, please contact our Integrity Helpline or our Global Ethics & Compliance team (integrity@albemarle.com).



BUSINESS PARTNER OPERATIONS



WORKPLACE CONDITIONS

At Albemarle, we believe in the potential of diverse, innovative and inclusive teams that create value for individuals and our community. We care for the health, safety and well-being of each other, and create a work environment that fosters mutual respect.

We similarly expect our Business Partners to:

- Respect the human rights of their employees and contractors, and treat them with dignity and respect.
- Ensure that all work is voluntary.
- Prevent the use of child labor and employ only workers who meet the applicable minimum legal age.
- Provide employees with safe, secure and clean working and living conditions.
- Comply with all applicable labor and immigration laws, regulations and rules.
- Provide fair compensation and comply with all applicable laws governing wage and working hour requirements (including compensation, benefits and overtime) and maintain appropriate records.
- Provide equal opportunity in the workplace.
- Respect employees' lawful rights of freedom of association, including their right to join or not to join a labor union.
- Promote a "speak-up" culture that does not tolerate retaliation – Business Partners should provide workers with an effective mechanism to report something that is potentially unsafe,

illegal or unethical (e.g., health and safety concerns, adverse human rights impacts, environmental incidents like leaks, spills, or releases; or corrupt practices, as described in this Business Partner Code).

Business Partners are also expected not to:

- Discriminate based on race, color, ancestry, national origin, citizenship, age, physical or mental disability, medical condition (including pregnancy), religion, political affiliation, marital status, gender, sexual orientation, gender identity, genetic information, veteran status, or any other status or characteristic protected by applicable law.
- Engage in harassment, abuse, humiliation, bullying, mental or physical coercion, retaliation or other forms of intimidation.
- Make unwelcome or inappropriate advances, including sexual harassment.
- Use forced or involuntary labor, including prison labor, indentured labor, bonded labor or slave labor.
- Engage in any other type of human rights abuses.

HEALTH & SAFETY

At Albemarle, we care for the health and well-being of employees, contractors, visitors and our host communities above everything else. We are committed to ensuring that everyone goes home safe and healthy every day. We expect a similar commitment from our Business Partners.

More specifically, we expect our Business Partners to:

- Maintain a safe and healthy work environment, and operate sites in accordance with all applicable occupational health and safety laws and regulations.
- Obtain, keep current and comply with all required health and safety permits.
- Follow our health and safety requirements, including our Life Saving Rules, when visiting or working on an Albemarle site.
- Take proactive steps to identify safety concerns and prevent workplace-related fatalities, injuries and illnesses.



THE ENVIRONMENT

Albemarle is committed to protecting the environment, and environmental responsibility is at the core of how we operate. We minimize the environmental footprint of our operations through careful management of raw materials, supplies, natural resources, utilities and waste.

We expect our Business Partners to:

- Comply with all applicable environmental laws, regulations, operating permits and their own environmental policies and sustainability programs.
- Follow our environmental requirements when visiting or working on an Albemarle site.
- Adopt measures to manage the discharge of solid waste, wastewater, air emissions and storm water runoff in compliance with applicable laws.
- Safely handle, transport and dispose of hazardous materials in an environmentally responsible manner and in compliance with applicable laws.
- Minimize the environmental impact of their business operations and manage the natural resources on which we all depend in a responsible manner.
- Comply with environmental reporting requirements with transparency and accuracy and engage environmental regulators with integrity.
- Reduce, reuse and recycle materials whenever reasonably possible.



COMMUNITY ENGAGEMENT

At Albemarle, we engage with our host communities with care, respect, transparency, honesty and humility, and seek to make positive contributions to these communities.

We expect our Business Partners to:

- Comply with applicable laws, regulations and their own policies concerning community engagement, indigenous people and human rights.
- Consider the social, cultural, human rights, environmental and economic impact of their operations on others.
- Take action to prevent and, where necessary, mitigate and remediate adverse human rights impacts that are directly connected to their operations and relationships.
- Maintain the safety and security of their operations, while respecting the human rights of those in their host communities, including by ensuring that any security providers follow recognized international standards.
- Ensure that any social or charitable contributions made to their host communities are reasonable and appropriate, properly documented and recorded.
- Value the culture, heritage and diversity of views of their host communities and respect community sites that are culturally or religiously significant.
- Value the traditional rights of indigenous communities over their habitat.
- Respond to community complaints in a timely manner and undertake action to address their concerns and remediate adverse impacts when appropriate.
- Business Partners must not retaliate against any member of their host communities for making a complaint in good faith.

RESPONSIBLE SOURCING & SUPPLY

The effective procurement of goods, services and raw materials is critical to the development and expansion of our sites and the manufacture and supply of our products to customers. Responsible and sustainable sourcing, in accordance with our Core Values, also helps mitigate risk and build trust.

We expect our Business Partners to:

- Communicate expectations for responsible sourcing with their suppliers.
- Explore opportunities to procure locally to support the economic and social development of our host communities.
- Provide Albemarle with high-quality products and services that are in compliance with all applicable regulations and that meet all applicable quality and safety standards.
- Undertake appropriate due diligence on raw materials in their supply chain 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.
- Provide all necessary information to enable Albemarle to complete its own inquiries and due diligence on the origin of raw materials.
- Provide clear instructions and warnings on the appropriate labeling, handling, transportation, use and disposal of their products in compliance with all applicable laws and regulations.



BUSINESS INTEGRITY

Business Partners shall conduct their business ethically and act with integrity. Albemarle expects its Business Partners to:

- Comply with all applicable laws and regulations, including those relating to anti-corruption, anti-money laundering, antitrust and competition, boycotts, gifts, lobbying, payments to government officials, political donations and other related regulations.
- Only offer or provide gifts, travel, entertainment or other benefits to third parties on behalf of Albemarle when such benefits are reasonable and infrequent, modest in price and appearance, properly recorded, and consistent with both this Business Partner Code and applicable law. Pre-approval from Albemarle should also be obtained if it is required in the Business Partner's contract with Albemarle. Benefits that Business Partners provide to Albemarle employees are subject to Albemarle's Gift & Hospitality Policy.
- Avoid any interaction with Albemarle employees that may conflict, or appear to conflict, with those employees' duty to act in the best interest of Albemarle.
- Report any actual, potential or perceived conflict of interest—or transactions, activities or situations where personal interests may run counter to Albemarle's interests—to Albemarle (integrity@albemarle.com or the **Integrity Helpline**). While a conflict of interest is not necessarily a violation of Albemarle policy, failing to promptly disclose a conflict is always a violation.



Business Partners also must not:

- Directly or indirectly offer, make or promise to make, authorize, or give any payment of funds, kickbacks, bribe, rebate, payoff or other unlawful payment or thing of value to any government official or any other person to obtain or retain business, gain any unfair or improper advantage, or induce or influence any act or decision of a government official.
- Make any facilitation payments, which are small, unofficial payments generally provided to lower-level government officials to persuade them to perform or expedite routine, non-discretionary services or actions (e.g., customs clearance or the issuance of licenses, permits or visas).
- Engage in any form of commercial bribery or otherwise offer or accept incentive payments or gifts to obtain or retain Albemarle's business.
- Engage in fraud, extortion or embezzlement to obtain an unfair or improper advantage.
- Engage in, or tolerate, any form of money laundering or activity that supports the financing of terrorist activity.
- Conduct business activities that violate trade sanctions or embargoes restricting transactions with certain countries, entities, and individuals or with certain end-uses and users to protect national security and combat terrorism, the proliferation of weapons of mass destruction, narcotics trafficking, human trafficking and other human rights abuses.
- Participate in boycotts that are not sanctioned by the U.S. government or applicable U.S. laws.

- Enter into agreements or take actions that illegally or improperly restrain trade or restrict or circumvent competition.
- Trade in the securities of Albemarle when in possession of material non-public information relating to Albemarle.



WORKING WITH ALBEMARLE



WORKING AT ALBEMARLE SITES

The success of Albemarle's business depends on a collaborative, safe, efficient and respectful work environment. To that end, Albemarle expects its Business Partners to ensure that their employees, contractors, subcontractors and agents conduct themselves in a manner consistent with Albemarle's Core Values, the Business Partner Code, site-specific workplace policies and all applicable local laws.

When working on Albemarle sites, Business Partners are expected to:

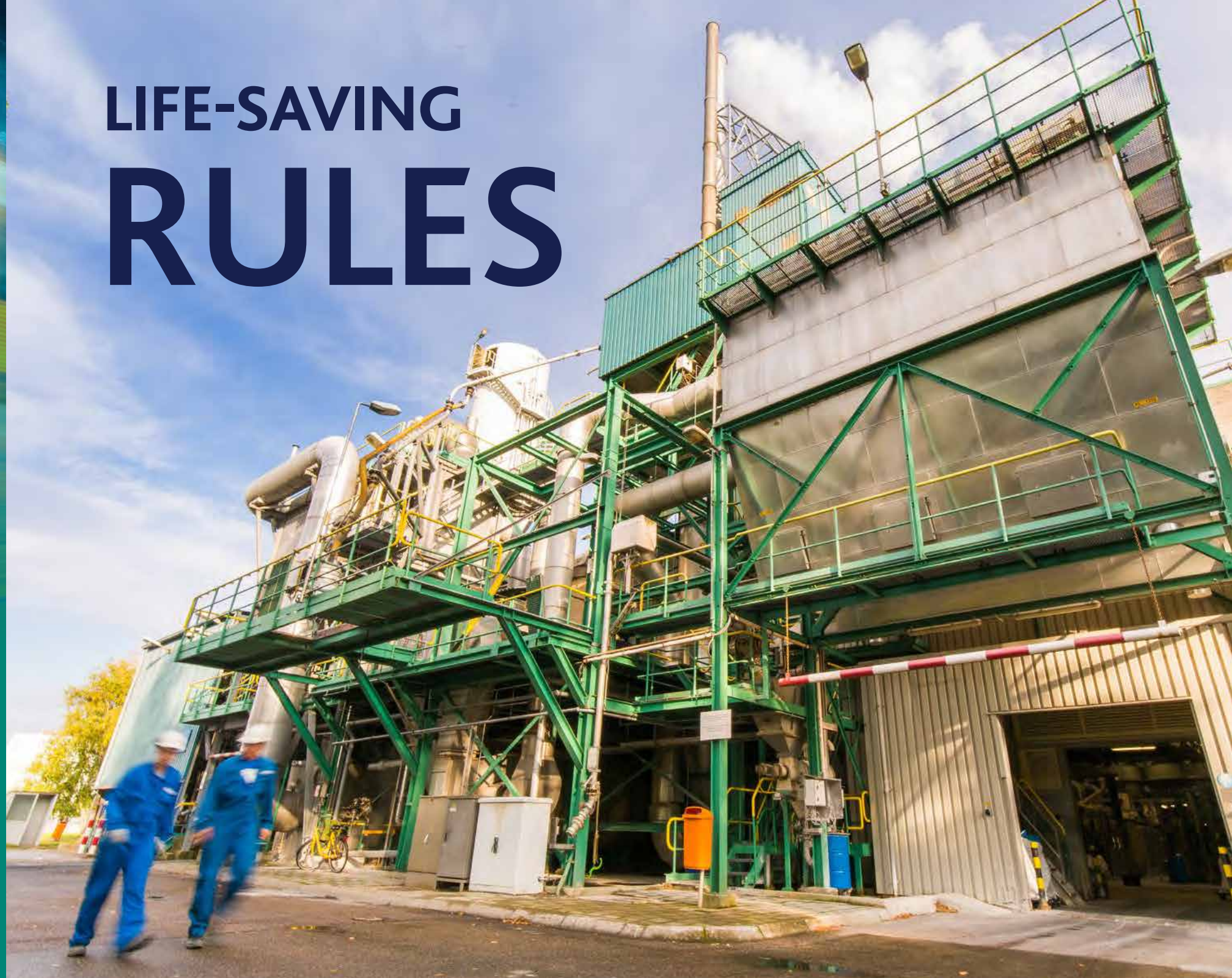
- Follow the applicable law, standards and procedures (including health and safety) for the Albemarle site.
- Follow the Albemarle Life-Saving Rules.
- Proactively collaborate with other workers, encourage others to contribute and appreciate constructive feedback.
- Treat other workers, Business Partners and stakeholders with care, courtesy, fairness and respect, in moments of agreement as well as disagreement.
- Consider the impact of their actions on others.
- Show care and courage, and speak up if they see others being harassed, bullied, intimidated or otherwise made to feel uncomfortable. Do not assume that others have already raised concerns.
- Respect the privacy and personal data of those with whom they come in contact.

In addition to the requirements set out in the Workplace Conditions section of this Code, when working on Albemarle sites, Business Partners are also expected not to:

- Permit unauthorized access to Albemarle sites.
- Display or share offensive, threatening or demeaning materials.
- Bring weapons into our workplace.
- Participate in or pressure others to participate in inappropriate forms of hospitality or entertainment.
- Knowingly make false allegations in relation to someone else's conduct.
- Retaliate against those who have reported a Code concern.

To ensure a safe working environment, Albemarle reserves the right, where and when legally allowed, to conduct random and for-cause inspections and drug/alcohol testing.

LIFE-SAVING RULES



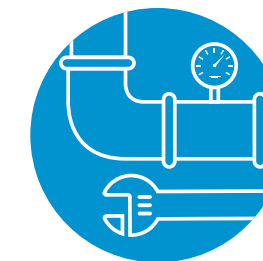
WORK PERMIT

I obtain permits before work begins and abide by the controls.



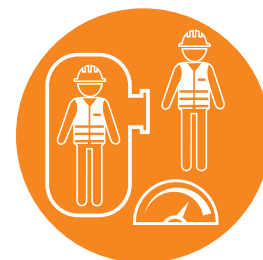
LOCK OUT TAG OUT

I identify, isolate, and test all energy sources, before work begins.



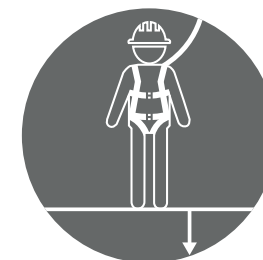
LINE BREAK

I verify control of hazardous energy before line break.



CONFINED SPACE

I obtain authorization by permit prior to entering confined spaces.



WORKING AT HEIGHTS

I work safely at heights, using appropriate fall protection.



PPE

I wear all of the prescribed Personal Protective Equipment (PPE).



ELECTRICAL

I only use proper, inspected and protected electrical equipment.



BYPASSING SAFETY CONTROLS

I obtain authorization before overriding, modifying or disabling safety controls.

Safety is everyone's responsibility.

**KNOW THE RULES.
FOLLOW THE RULES.
SAVE LIVES WITH THE
RULES.**

USE OF ALBEMARLE ASSETS

Albemarle's business performance is dependent on the appropriate use, protection and care of our assets and resources. For example, Albemarle's computer hardware, software and phones must be used appropriately to prevent unauthorized access to our IT and communications systems or inappropriate disclosure of Albemarle information.

Business Partners provided with Albemarle assets and resources are expected to:

- Use these assets and resources carefully, efficiently and for their intended business purpose.
- Limit the personal use of these assets and resources and ensure such use does not interfere with any work being performed for or on behalf of Albemarle.
- Take appropriate precautions to prevent damage, misuse or theft of these assets and resources.
- Respond appropriately and safely to any perceived risks or threats to Albemarle's assets and resources.



Business Partners provided with Albemarle's hardware, software and personal devices are expected to:

- Use them responsibly and securely, and in accordance with applicable policies and laws.
- Respect the privacy of other workers.
- Immediately report known, suspected or imminent access to our IT and communications systems that is unauthorized.

Business Partners are also expected not to:

- Use or dispose of Albemarle assets or resources for personal gain.
- Share network passwords with anyone or otherwise permit unauthorized access to Albemarle systems.
- Use personal email accounts or social media applications for proprietary or sensitive work-related communication.

- Access, intercept or disclose the communications of others without authorization.
- Download or install new software on Albemarle computers or devices without authorization and an appropriate license.
- Disable virus software or attempt to remove viruses themselves.
- Modify, duplicate or sell software on Albemarle computers or devices without authorization.
- Attach unauthorized devices to Albemarle computers, devices or networks.
- Use Albemarle computers or devices to access or share inappropriate, offensive or illegal material.
- Disclose information about Albemarle's information system controls to any other employee or third party who is unauthorized to receive it.





MANAGEMENT

OF ALBEMARLE INTELLECTUAL PROPERTY & INFORMATION

The intellectual property and business information we provide to our Business Partners is valuable, sensitive and must be managed and protected. We treat the privacy and personal data of all individuals with respect and take appropriate steps to protect it, and we expect our Business Partners to do the same.

More specifically, we expect our Business Partners to:

- Treat Albemarle's intellectual property and business information with care and take appropriate steps to protect them from misuse, theft or unauthorized access or disclosure.
- Respect the intellectual property rights of Albemarle and others, and only use such intellectual property when authorized to do so and in accordance with such authorization.

- Comply with applicable data privacy laws when collecting, storing, using, deleting and transferring or otherwise processing personal data. Any processing of personal data on Albemarle's behalf shall only be undertaken by Business Partners where there is a legitimate business or legal need; when they are appropriately authorized and only when performed accurately, fairly and in a transparent manner.

Business Partners are expected to immediately report all inappropriate, accidental or unauthorized disclosure, access or use of personal data or Albemarle business information to databreach@albemarle.com.

Business Partners are also expected not to:

- Disclose Albemarle intellectual property, business information or personal data to third parties unless authorized to do so.
- Use Albemarle intellectual property, business information or personal data for personal benefit.

Albemarle's information and communications technology hardware and systems, including desktop or laptop computers, Albemarle-owned handheld or mobile devices, hard drives and other storage media, all hardware, software and processes that collect, process, store and distribute data in the Albemarle environment (ICT Hardware and Systems), as well as all information created, stored and/or transmitted on Albemarle ICT Hardware and Systems (along with any Albemarle business information stored on the personal devices of independent contractors who are authorized

to access Albemarle ICT Hardware and Systems), are the property of Albemarle. Users have no expectation of privacy in that information.

To protect the company and our assets, resources and employees, Albemarle monitors the use of its ICT Hardware and Systems and may access, preserve, review and delete data (including Albemarle business information on personal devices of independent contractors) in accordance with applicable policies and laws.

Users consent to permit all information they store or transmit on Albemarle's ICT Hardware and Systems, and any Albemarle business information (including email and texts) they receive, store, or transmit on a personal device, including personal data, to be monitored, accessed and, in general, processed by authorized Albemarle personnel and disclosed to law enforcement authorities or other third parties, to the extent permitted by law, and agree that they have no expectation of privacy in such information.



RECORDING BUSINESS & FINANCIAL TRANSACTIONS INVOLVING ALBEMARLE

Albemarle maintains the trust of our investors if the Albemarle financial information provided to them is accurate and complete. Albemarle's Business Partners and other key stakeholders are expected to maintain internal controls to ensure that books and records relating to Albemarle fully and objectively reflect our business and financial transactions and their underlying business purpose in a materially accurate manner.

We expect our Business Partners to:

- Create business information for Albemarle that is clear, accurate, complete and in accordance with applicable laws, accounting rules and practices.
- Ensure that business information accurately reflects the underlying transaction or event.
- Ensure sale or purchase transactions conducted on behalf of Albemarle are supported by a written contract (such as a vendor agreement or purchase order).
- Maintain such books, accounts, and records in accordance with document retention periods stipulated in contracts with Albemarle.

In order to ensure its own compliance with applicable laws, and consistent with and subject to Albemarle's contracts with its Business Partners, Albemarle expects its Business Partners, for a period of 2 years after the end or termination of its business relationship, to allow Albemarle or its selected representative to audit such books, records and electronic data during the Business Partner's normal business hours in order to evaluate whether the Business Partner has complied with its obligations under its contract with Albemarle, this Business Partner Code and all applicable laws.

Business Partners must not falsify, alter, destroy or tamper with business information to misrepresent or conceal a transaction or event involving Albemarle.

REPRESENTING ALBEMARLE



MARKETING OR SELLING ALBEMARLE'S PRODUCTS

We engage with customers with honesty, humility, integrity, transparency and respect and expect our third-party sales representatives to act in a similar manner.

Business Partners who market or resell Albemarle's products are expected to:

- Seek to understand customers' requirements and collaborate with Albemarle to customize our products and services.
- Strive to provide customers complete and accurate information concerning the performance, handling requirements and health and environmental risks of our products.
- Ensure that they are conducting business with reputable customers, for legitimate business purposes and involving legitimate funds.
- Address the concerns of customers promptly and with humility.
- Respect the privacy of customers and take steps to protect personal information of their employees.

- Periodically certify compliance with applicable ethics standards and laws, and this Business Partner Code, if requested by Albemarle.
- Speak up if they are concerned that someone (for example an Albemarle employee, Business Partner employee, subcontractor or a customer) is acting contrary to the Albemarle Code or this Business Partner Code.
- Comply with all applicable product regulatory laws in relation to the advertising and marketing of Albemarle products.

Business Partners are also expected not to:

- Obtain competitive intelligence on behalf of Albemarle by deception, misrepresentations, "half-truths", theft, payments or giving of things of value, or other improper means.
- Ask a third party to disclose information, or accept such information, if there is reason to believe they are not authorized or contractually permitted to provide it.



TRANSPORTING GOODS, RAW MATERIALS, EQUIPMENT AND TECHNOLOGY

Albemarle complies with all applicable import/export controls, sanctions and customs laws and regulations when transporting goods, raw materials, equipment and technology across borders.

We expect our Business Partners to:

- Store and transport goods, raw materials, equipment and technology safely and securely for Albemarle and in compliance with all applicable laws and regulations.
- Ensure that classifications, valuations, licenses, labeling and supporting documentation are accurate, complete and appropriately maintained and make such documentation available to Albemarle as required.
- Undertake appropriate screening of all vessels, containers and other equipment and their owners to ensure compliance with sanctions laws and regulations.

Business Partners must not ship from or to individuals, companies or countries if they know, should know, or suspect that such activity will violate import, export or sanctions laws or regulations.

ENGAGING WITH GOVERNMENT OFFICIALS

Government decision-making directly affects our legal and social license to operate in every country in which Albemarle conducts business. We proactively engage with governments on issues of concern to Albemarle, its businesses or its stakeholders (employees, investors, communities) to inform their decisions. Such engagement may involve Business Partners acting on our behalf.

Business Partners are expected to:

- Be courteous, truthful, cooperative and constructive when engaging with government officials on behalf of Albemarle.
- Seek approval from Albemarle before engaging with any new government agency on its behalf.
- Allow Albemarle the opportunity to review any information before it is submitted to a government agency on behalf of Albemarle, and to participate in any meetings with government officials that concern Albemarle.
- Ensure that information provided to government agencies on behalf of Albemarle is accurate, timely and in accordance with applicable laws.
- Cooperate with any legitimate government request or investigation affecting Albemarle, answer questions honestly and notify Albemarle of the government contact.

Business Partners also must not:

- Obstruct legitimate government investigations affecting Albemarle by intentionally withholding, concealing or destroying relevant documents and other information.
- Retaliate or discriminate against anyone who reports in good faith wrongdoing or lawfully cooperates with a government inquiry or investigation.





SPEAKING ON BEHALF OF ALBEMARLE

When talking about Albemarle or sharing our information, Business Partners act as brand ambassadors of the company and our Core Values. Business Partners protect Albemarle's reputation by speaking with clarity, accuracy, integrity and transparency.

Business Partners are expected to:

- Obtain authorization from Albemarle's Corporate Communications team before speaking or issuing public communications on behalf of Albemarle (including to the media).
- Refer all media or investor enquiries relating to Albemarle to our Corporate Communications or Investor Relations teams, respectively.
- Contact Albemarle if they know or suspect business information of Albemarle is about to be disclosed in the public domain without authorization.
- Only use authorized imagery, logos and templates in public communications on behalf of Albemarle.

Business Partners are also expected not to:

- Publicly communicate in any way that is false, misleading or would damage Albemarle's reputation.

- Publicly disclose proprietary or other confidential information of Albemarle without appropriate authorization.
- Use the intellectual property of others in public communications to be made on behalf of Albemarle, unless authorized to do so by the owner.



