

Owner: Global Ethics and Compliance

Effective Date: December 15, 2022

Next Review Due: December 15, 2024

Policy

Introductions

Albemarle Corporation 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.

Our passionate commitment to employees, to the development of our host communities and for doing business the right way with our customers and business partners led to the development of our Core Values. Our Core Values are the foundation of the standards set out in the Albemarle Code of Conduct for employees and the Albemarle Business Partner Code for those who act on our behalf.

Respecting the human rights of our employees, workers in our supply chain, members of our communities and other stakeholders (collectively, our "stakeholders") represents all of our Core Values in Action. We believe that business can only flourish in societies where human rights are protected and respected. We recognize the human rights of our stakeholders as expressed in the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. We equally acknowledge our responsibility to consider and address the impact of our own operations on the human rights of our stakeholders. This is not only the right thing to do, it is critical to maintaining trust and our legal and social license to operate.

Purpose & Scope

This Policy provides direction and guidance to ensure that our engagement and activities support the fundamental principles of basic human rights. If you know or suspect that local law sets different standards from this Policy, we expect you to follow the higher standard.

This Policy consolidates and expands on the spirit and commitments of our Core Values, the Albemarle Code and Business Partner Code that concern the protection of human rights. It also references other human rights-related Albemarle policies and procedures that all employees must rigorously follow in their day-to-day work. These standards reflect 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.

This Policy applies to Albemarle Corporation, all Albemarle-controlled entities and their respective employees, officers and directors globally. Any violation of the Code, this Policy, related policies and procedures, or applicable laws may result in disciplinary action up to and including termination of

employment. We may also elect to not work or cease work with business partners who do not meet these expectations and requirements.

Human Rights and the Work Environment

We believe in powering the potential of diverse, innovative and inclusive teams that create value for individuals, Albemarle and its stakeholders. The success of Albemarle's business depends on a safe, collaborative, accessible and respectful work environment in which the talent, experience and views of all employees are valued. In accordance with our **Global Labor Policy**:

- We care for the health, safety and well-being of each other, and create a work environment that fosters mutual respect. We are committed to ensuring that everyone goes home safe and healthy every day.
- We provide employees and contractors with safe, secure and clean working conditions, and similar conditions for on-site living quarters. We operate sites in accordance with all applicable occupational health and safety laws and regulations.
- We comply with all applicable labor and immigration laws, regulations and rules.
- We prohibit child labor, and prevent the use of any child labor.
- We prohibit forced labor and human trafficking.
- We respect employees' lawful rights of freedom of association, including their right to join or not to join a labor union.
- We provide fair compensation, and comply with all applicable laws governing wage and working hour requirements (including compensation, benefits and overtime) and maintain appropriate records.
- We treat our colleagues, customers, suppliers and other stakeholders with care, courtesy, dignity, fairness and respect, in moments of agreement as well as disagreement. We consider the impact of our actions on others. We do not engage in physical abuse, sexual or other harassment, humiliation, bullying, retaliation, verbal abuse or other forms of intimidation.
- We will provide equal employment opportunities for all applicants and employees; our employment decisions are based on an individual's skills, qualifications, performance and other factors related to a job's specific needs.
- We value diversity of thoughts, experiences and cultures. We prohibit discrimination of employees or future employees, in any form including as to 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.
- We respect and protect the privacy and personal data of our employees and contractors.

To live up to these commitments, Albemarle employees must strictly follow Albemarle's:

- HSSE Policy and applicable procedures;

- Life Saving Rules; and
- Global Labor Policy.

Engaging with our Host Communities

We engage with our host communities with care, respect, transparency, honesty and humility, and seek to make positive contributions to these communities. In accordance with our Global Community Relations & Indigenous Peoples Policy:

- We assess and consider the social, cultural, environmental, economic and human rights impact of our operations on others, and conduct due diligence where appropriate.
- We take action to identify, prevent and, where necessary, mitigate and remediate adverse human rights impacts that are directly connected to our operations.
- We maintain the safety and security of our operations, while respecting the human rights of those in our host communities.
- We contribute to the development and quality of life of our host communities.
- We value the culture, heritage and diversity of views of our host communities, and respect community sites, which are culturally or religiously significant.
- We support the principles set out in the UN Declaration on the Rights of Indigenous Peoples, and the principle of free, prior and informed consent,
- We respond to community complaints in a timely manner and undertake action to address their concerns when appropriate.
- We prohibit all forms of corruption, recognizing that corruption can undermine many human rights.

To live up to these commitments, Albemarle employees must strictly follow Albemarle's:

- Global Community Relations and Indigenous Peoples Policy;
- Local procedures governing community interactions, social contributions, and related matters; and
- Global Ethics & Compliance policies and procedures related to anti-corruption, charitable donations and commercial sponsorships.

Responsible Sourcing

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

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sourcing, in accordance with our Core Values and with respect for the human rights of our stakeholders, also helps mitigate risk and build trust.

- We communicate our Core Values and human rights expectations to our suppliers in our Code of Conduct for Business Partners and in contractual obligations, which require similar standards to those we require for our own workplace, such as prohibitions on forced and child labor, and protections for a range of workers' rights.
- We require our suppliers to prevent any conflict minerals entering their supply chains, and to notify Albemarle in writing if any minerals supplied to Albemarle are not conflict-free.
- We 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.
- If we identify credible information or indicators of human rights violations by suppliers, we take prompt steps to investigate and remediate any issues, including terminating supplier relationships where appropriate.

To live up to these commitments, Albemarle employees must strictly follow Albemarle's:

- Procurement policies and procedures; and
- Global Ethics & Compliance policies and procedures related to anti-corruption due diligence.

Our Business Partners must strictly follow our Code of Conduct for Business Partners and all contractual obligations, including those related to ethics, compliance and human rights.

Speak Up

Speaking up by raising questions or potential concerns helps Albemarle to engage with stakeholders, prevent harm, manage risk, promptly address issues, and continuously improve our processes. You must speak up if you see or suspect activity may violate our Code, this Policy or applicable law.

You are encouraged to speak with your supervisor or local site leader in the first instance. If you feel uncomfortable speaking to your supervisor, or that your concern is not being properly addressed, you can always speak to your HR Representative, Regional Compliance Manager or a member of the Legal Department. You can also contact the Chief Compliance Officer, Global Ethics & Compliance (via integrity@albemarle.com), the General Counsel or the 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., the Helpline can also be contacted by

text message. Details of how you can contact the Helpline are available on our website (www.IntegrityHelpline.Albemarle.com).

All reported incidents are addressed in accordance with Albemarle's Investigations Policy and Procedure. Albemarle prohibits all forms of retaliation against people who report concerns in good faith.

Further Information

For further information please contact the Albemarle sustainability team at sustainability@albemarle.com