

Global Code of  
Business  
Conduct





# CONTENTS

<b>1 Brief Introduction</b>	<b>01</b>
1.1 Purpose	01
1.2 Scope of Application	01
1.3 Interpretation	01
<hr/>	
<b>2 Our Vision, Core Beliefs and Corporate Culture</b>	<b>02</b>
2.1 Our Vision	02
2.2 Our Core Beliefs	02
2.3 Corporate Culture	02
<hr/>	
<b>3 Commitments on Sustainable Development</b>	<b>03</b>
3.1 Clients	03
3.2 Employees	03
3.3 Investors	03
3.4 The Environment	03
3.5 Suppliers	04
3.6 Products	04
3.7 Communities	04
3.8 Regulatory Agencies	04
<hr/>	
<b>4 Human Rights and Labor</b>	<b>05</b>
4.1 Promotion of Diversification and Inclusiveness	05
4.2 Non-discrimination and Respect	05
4.3 No Harassment or Other Insulting Behaviors	05
4.4 Prohibition of Using Child Labor	06
4.5 Prohibition of Forced Labor, Modern Forms of Slavery and Human Trafficking	06
4.6 Occupational Health and Safety	06
4.7 Working Hours, Salary and Welfare	07
4.8 Career Choice and Talent Development	07
<hr/>	
<b>5 Community Communication</b>	<b>08</b>
5.1 Community Integration	08
5.2 Charity	08
5.3 Employee volunteering Services	08
5.4 Talent Localization	09

<b>6 Environmental Management</b>	<b>10</b>
6.1 Tackling Climate Change	10
6.2 Resource Management	10
6.3 Ecological Environment Protection	11
6.4 Management of Hazardous Chemicals	11
<hr/>	
<b>7 Risk Management of Business Activities</b>	<b>12</b>
7.1 Anti-unfair Competition and Anti-fraud	12
7.2 Anti-bribery and Anti-corruption	12
7.3 Anti-money Laundering and Counter-Terrorist Financing	13
7.4 Conflict of Interests	13
7.5 Insider Dealing	14
7.6 Fair Trading	14
7.7 Trade Compliance	14
7.8 Politics and Donations	14
7.9 Internal Audit	14
<hr/>	
<b>8 Supply Chain Management</b>	<b>15</b>
8.1 Supplier Management	15
8.2 Responsible Mineral Supply Chain Management	15
<hr/>	
<b>9 Information, Privacy and Confidentiality</b>	<b>16</b>
9.1 Intellectual Property Protection	16
9.2 Property and Resources Protection	16
9.3 Information, Privacy and Security	16
9.4 Media and Public Communication	17
9.5 External Information Disclosure	17
<hr/>	
<b>10 Implementation and Supervision</b>	<b>18</b>
10.1 COC Working Group's Organizational Structure and Responsibilities	18
10.2 Reporting, Punishment and Prevention	19
10.3 Preparation, Revocation and Revision	19

# 1 Brief Introduction



## 1.1 Purpose

As a lithium company with a broad global perspective, Tianqi Lithium Corporation (hereinafter referred to as “Tianqi Lithium”, “we” or “the Company”) (including its branches and subsidiaries) has always been proud of developing its commercial value at the same time as assuming any corresponding social responsibilities. We have been committed to conducting business per the highest ethical standard, and although the applicable standards of different business environments might be different, we still strive to ensure that our business and employee behaviors are compatible with local economy, culture and environment.

The Global Code of Business Conduct (hereinafter referred to as “the Code of Conduct”) covers the Company’s values and related policies as well as the codes of business conduct that shall be followed in terms of corporate philosophy, human rights and labor, community integration, environment protection, commercial activities, supply chain management, information disclosure and so on. These constitute the standard and guideline to be followed by all stakeholders and embody the attitude of Tianqi Lithium in treating stakeholders with sincerity and attaching great importance to the sustainable enterprise development, it further reflects the commitment of Tianqi Lithium to conduct global business according to the highest ethical standards.

## 1.2 Scope of Application

The Code of Conduct applies to all employees, officers, directors, suppliers and related partners of Tianqi Lithium (including its branches and subsidiaries). The Code of Conduct reflects our commitment to core beliefs such as pragmatism and honesty and covers the basic principles and policies that shall be followed by all stakeholders.

We encourage our suppliers and partners to adopt additional principles and policies on the premise of following the Code of Conduct; however, in no event shall such additional principles and policies conflict with or be more relaxed than the Code of Conduct.

## 1.3 Interpretation

The Code of Conduct provides an explanation of the ethical standards and codes of conduct that shall be followed by Tianqi Lithium in business activities and covers most scenarios and activities; however, it does not cover all potential situations or problems. If business activities involve the laws and regulations of the place of business of an overseas company, the requirements of such relevant laws and regulations shall be followed; if there is no definite requirement in the laws and regulations of the place of business of an overseas company, the Code of Conduct shall be followed.

The Code of Conduct does not cover all possible workplace scenarios, scenarios not covered in the Code of Conduct shall not be deemed acceptable. Furthermore, the Code of Conduct shall not supersede the Company’s policies. If you have any questions, please consult the COC working group.

 Email: [COC@tianqilithium.com](mailto:COC@tianqilithium.com)



## 2 Our Vision, Core Beliefs and Corporate Culture

### 2.1 Our Vision

Tianqi Lithium is committed to being a leading new energy materials company with lithium as our core.

### 2.2 Our Core Beliefs

- Distinction

As a leading enterprise in the lithium-centered new energy materials industry, Tianqi Lithium is committed to promoting industrial integration and upgrading on a global scale, shaping the new international image of Chinese companies and continuously creating unique values. As members of Tianqi Lithium, we should continually create unique values and improve our abilities.

- Aspiration

High efficiency is the basic feature of an excellent enterprise, and excellence represents the expectation for the enterprise and every employee. An excellent enterprise relies on outstanding employees, efficient execution, noble characters and excellent qualities. Tianqi Lithium pursues efficiency and excellence in its endeavor to become an efficient and excellent enterprise and to obtain the recognition of clients, peer companies and the public.

- Pragmatism

Looking for the truth and being pragmatic is not only our cultural heritage, but also depicts the basic working style of us in the Company. To be specific, we must be true in word and resolute in deed. In other words, we should remain down-to-earth and make solid progress on each project.

- Tenacity

Hard work is the source of Tianqi Lithium's achievements today and the foundation of our sustainable development. Tianqi people should be loyal to the industry, adhere to the spirit of entrepreneurship, maintain a sense of crisis, and persevere throughout difficult times. Tianqi Lithium will meanwhile safeguard and provide better protection for employees' interests.

- Honesty

We treat all stakeholders with sincerity, including investors, employees, clients, suppliers, governmental agencies and communities. We comprehensively consider all stakeholders' interests and strive to maintain good relationships with them to maximize their interests.

- Innovation

Tianqi Lithium has been committed to improving the quality of life through the use of "lithium" and continues to contribute to the sustainable utilization of energy resources and the improvement of the ecological environment. Through continuous innovation, we lead the changes in the industry and the world.

### 2.3 Corporate Culture

We adhere to the tenet of "changing the world with lithium" and are committed to developing the values of openness and cooperation in terms of corporate philosophy, management team, technology research and development, product quality, corporate financing, corporate culture and social responsibility. We aim to accomplish the allocation of resources in the world, fully adhere to international standards, conduct business operations according to international norms, and become a facilitator with worldwide influence in the global energy transition.



## 3 Commitments on Sustainable Development

In the course of international development, the Company has integrated the sustainable development idea of “changing the world with lithium” into its overall development strategy. The Company adheres to the principle of “economic benefits should never override the environment or people’s well-being and safety”. This is based on a foundation of risk prevention and control, with value creation as the inherent driving force, brand influence as an external influence, and good faith and compliance as basic operating principles. We create value for clients, employees and business partners while ensuring the sustainable development of the Company, thereby driving sustainable economic prosperity, environmental wellness and social progress.

### 3.1 Clients

Tianqi Lithium always treats clients with the highest integrity and honesty, creates the most value for clients through its excellent products and services, and pursues mutual economic and social benefits. When meeting the needs of clients, we always provide ideas and products exceeding their expectations.

### 3.2 Employees

Tianqi Lithium attaches great importance to the diversification and development of employees and is committed to offering equal opportunities in all aspects of employment. The Company offers a safe, convenient and harmonious working environment to employees, and maintains a sound motivation and training system to provide platforms and opportunities for self-improvement and career development of employees. / Besides, the Company prohibits any form of unequal workplace relationships and behaviors in violation of human rights and applicable laws.

### 3.3 Investors

Tianqi Lithium is concerned with the legitimate rights and interests of all investors, including small and medium investors. The Company conducts business operations in strict accordance with applicable laws and regulations, strives to boost its governance capabilities and business performance, receives inquiries and comments from investors through multiple channels, performs any prescribed information disclosure, and accepts investor supervision.

### 3.4 The Environment

Tianqi Lithium adheres to the concept of harmonious coexistence with the ecological environment and maintains a sound environmental management system to ensure emissions compliance, energy conservation, consumption reduction, and continuously improving environmental management level. The Company focuses on harmonious coexistence with the environment in the process of lithium mining and processing as well as biological diversity conservation. It actively responds to climate changes and encourages the integration of corporate development with environmental protection, which forms the basis for Tianqi Lithium’s unique “green competitiveness” in the market.

### 3.5 Suppliers

Tianqi Lithium regards stable and harmonious cooperation as an important support for sustainable development. It coordinates with upstream and downstream industries to build a harmonious ecosystem for the lithium industry, focuses on the management of responsible mineral supply chains, and carries out highly responsible management to promote the improvement of safety, quality and accountability of supply chains. This ensures that all products and services conform to the sustainable development requirements from their source.

### 3.6 Products

Tianqi Lithium promises to practice and adhere to the principles of product management, traceability, controllability and minimal environmental impact. It fully implements the Procedures for Due Diligence Investigation and Risk Identification and Control of Responsible Mineral Supply Chains and works hard to improve the Responsible Mineral Exploitation Risk Identification and Assessment Report. The Company sticks to the whole-process institutionalized management of the entire process from project site selection to post-mining processing, production and sales to create high-quality products that customers can trust and the market is satisfied with.

### 3.7 Communities

In the course of development, Tianqi Lithium upholds responsible cultural ideas and business practices by actively participating in public welfare undertakings and rural revitalization practices. We carry out employee volunteer services focusing on education, environment and community issues, fulfilling the sustainable development promise to “change the world with lithium” and going above and beyond the compulsory standards required by the law and the market for the Company.

### 3.8 Regulatory Agencies

Tianqi Lithium strictly abides by the policies and regulations of regulatory agencies, resolutely performs legal obligations, and actively responds to the requests of regulatory agencies through such channels as board of directors, investor relations management, information disclosure and public affairs management. Besides, the company continuously strengthens its key responsibilities, and boosts its awareness of compliance as well as level of standardized management from corporate governance aspects such as operation of board of directors, board of supervisors and general meeting of shareholders, internal control mechanism, information disclosure, accounting regulations, and prevention and control of insider trading.



## 4 Human Rights and Labor

In positive response to the Universal Declaration of Human Rights, Tianqi Lithium is committed to treat all persons following the principles of dignity, equality and mutual respect in all business activities, to protect and respect their human rights. We promise we will not treat employees differently due to gender, race, nationality, religion, or economic status.

### 4.1 Promotion of Diversification and Inclusiveness

We attach great importance to the diversified development of our employees and are committed to offering equal opportunities in all aspects of employment. We believe that every employee is unique and that different skills and cultures are important for the development of the Company. We expect the diversified development and personal growth of employees, recognize the diversified extension of employees (including freedom of association, cultural conventions and freedom of religion), and encourage the development of diversified and talented employees for such employees to add to the Company's competitive advantages.

### 4.2 Non-discrimination and Respect

The Company's recruitment, promotion and management are based on employees' individual performance and teamwork skills. The Company treats all employees equally and will resolutely eliminate discrimination on the basis of race, skin color, age, gender, religion, nationality, sexual orientation, blood lineage, veteran status, or any other category protected by law. We respect individual differences and their resulting innovation and treat all employees with dignity and respect, in order for employees to feel respected and achieve a sense of belonging.

The Company shall strictly abide by the laws, regulations and current industry standards of the place of business. It shall follow the principle of fairness and impartiality, and respect and safeguard all types of employment and career development rights, in regards to working hours, employment application, promotion, rewards, wages, overtime work, asking for leave, welfare, training opportunities, work allocation, social security, discipline, punishment, termination of employment and retirement.

### 4.3 No Harassment or Other Insulting Behaviors

Tianqi Lithium is committed to providing a safe working environment free from any violent threat or personal injury and makes all employees feel included and respected (including in training and travel stages). The Company safeguards reasonable boundaries among employees for employees to not feel harassed or otherwise uncomfortable.

**Violence in the workplace includes:**

- verbal intimidation, threats and physical assaults
- violent or threatening acts
- any act endangering workplace safety

The Company adopts a zero-tolerance policy in regard to the aforesaid acts of violence in the workplace as well as any retaliation due to complaints made by employees. If an employee is found to have committed any of the aforesaid acts, he will be given a severe punishment immediately.



## 4.4 Prohibition of Using Child Labor

Tianqi Lithium strictly prohibits the use of child labor. Suppliers or partners shall only employ employees aged 16 or above who have completed compulsory education or reached the minimum legal age of employment (whichever is the most stringent). In case of any difference or conflict between standards of different regions, the most stringent standard shall prevail.

## 4.5 Prohibition of Forced Labor, Modern Slavery and Human Trafficking

According to Article 4 of the Universal Declaration of Human Rights, no one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms. Tianqi Lithium strictly prohibits any threat of punishment or forcing any person to engage in labor or services involuntarily. We oppose all forms of human trafficking, especially the trafficking of women and children.

Tianqi Lithium closely observes the Universal Declaration of Human Rights to implement a fair labor system. We strictly prohibit the use of any form of forced labor or modern slavery in the Company's business and any associated business, including prison labor, military service labor, slave labor and any forms of human trafficking.

We protect the autonomy and personal freedom of Tianqi Lithium's staff and workers and prohibit any means of revoking or destroying employee identity or immigration documents, passports or work permits.

We're committed to increasing employees' awareness of the harm of modern slavery through professional training, advocacy and publicity. We develop high-quality independent employees in order to become a strong enterprise adhering to the principles of fairness and justice and promoting the harmonious and healthy development of individuals, society, and the Company

## 4.6 Occupational Health and Safety

The Company is committed to providing a safe and healthy workplace for all employees or other individuals that work on behalf of the Company, therefore establishing and improving appropriate health and safety policies.

The Company is further committed to the identification, mitigation, monitoring and control of existing and potential environmental risks in connection with our business activities as well as health and safety risks in the communities of our employees and business activities or other persons visiting our workplace.

All employees shall work safely according to the Company's policies, rules and regulations. All safety or health issues shall be reported to the supervisor, and the Company shall also establish a regular learning and testing plan to enable employees to receive systematic training to prevent the occurrence of labor accidents.

Meanwhile, employees shall avoid taking the initiative to get into danger and shall always ensure their own security. Every employee is entitled to leave the scene or work post if his safety or health is seriously threatened.

In order to continuously ensure the safety and health of employees, the Company promises to make a response promptly and efficiently, conduct an investigation on all accidents and near accidents, and promptly take appropriate remedial measures. Additionally, the Company will promptly learn from any such accident to take preventative measures to remove any hidden hazards.

## 4.7 Working Hours, Salary and Welfare

The Company shall follow the laws, regulations and industry standards of the place of business and shall implement a standard and flexible working hour system. The Company shall formulate a reasonable pay policy on the basis of such factors as employees' job position and grade and the prevailing market rate. The Company shall set the standards to pay wages and a statutory welfare system in accordance with applicable laws, pay overtime and pay all wages on time. When paying wages to employees, the Company will withhold and remit individual income tax on behalf of employees according to the relevant policies of the place of business.

## 4.8 Career Choice and Talent Development

The Company has been committed to providing diversified learning and development opportunities to employees. We combine personal development with the Company's development, to enable employees to grasp professional skills while improving personal skills and comprehensive qualities through training.

The Company encourages employees to choose jobs according to their career plan, interests and strengths and will appoint the most appropriate employees in a fair, open and impartial manner on the basis of suitability.

Tianqi Lithium endeavors to provide better working platforms and career development opportunities for employees, in order for employees to develop with the Company.





## 5 Community Communication

As Tianqi Lithium upholds the tenet of building a community with lithium, we responsibly manage our business's influence on the local communities. We firmly respect the cultures and customs of the local communities, recognize their lawful activities and legitimate rights and interests, and take initiative to seek stakeholders' participation. We encourage open community communication, and endeavor to make contributions to the community, to achieve harmony between the Company and the community.

### 5.1 Community Integration

Relying on "Tianqi Global Public Welfare Platform", we fully perform the duties of the Company's ESG and sustainability department by focusing on the infrastructure and public services of the community of business activities as well as the topics and opportunities in connection with our business and stakeholders around three major subjects (i.e. environment, education and community). We also continuously work to provide public welfare community services to promote positive change and development in the community.

Additionally, we endeavor to promote domestic and international cultural exchange. We respect local culture when building production and resource bases overseas, and promote the idea of responsibly "changing the world with lithium" to local communities by integrating internal and external resources and promoting cultural integration of communities.

### 5.2 Philanthropy

Tianqi Lithium's donations are always used to help social organizations resist natural disasters, build a harmonious ecological environment, provide assistance to dangerous and disadvantaged groups and increase social benefits.

All charitable donations and community investments of Tianqi Lithium shall conform to local laws and involve no illegitimate benefits. They shall be all accurately recorded in the Company's account books. We refuse to participate in any charitable donation or community investment involving the publicity of any specific belief or faith or benefiting only one religion.

The Company strictly prohibits employees from requiring recipients to create advantageous conditions in terms of financing, market access, administrative licensing and occupation of other resources in any form on behalf of themselves or the Company. The Company shall not engage in profit-making activities in the name of public welfare or charity.

### 5.3 Employee Volunteering Services

Tianqi Lithium is committed to implanting volunteerism into its idea of sustainable development, by encouraging and supporting the participation of all employees and guiding and regulating the manners and work habits of employees by means of a volunteer service guarantee system and the Tianqi Lithium Volunteer Service Manual. We aim to create a volunteer service culture in which "everyone can participate in donation activities everywhere".

Employees can voluntarily participate in the entire process of informatization management of volunteer services by means of online management tools, and the company is responsible for protecting personal information of employees.

## 5.4 Talent Localization

Concerning the employment and training of employees, Tianqi Lithium is based on the cultural characteristics and capabilities of its employees. We are committed to exploring appropriate local business talent and guiding business activities with the goal of community integration and employment development following local cultural norms.

We aim to become more connected with local economic development, community communication, laws and policies through talent localization without discrimination against employed persons in other regions.







## 6 Environmental Management

The environment has always been the focus of attention of Tianqi Lithium. Since our business is closely related to the ecological environment, we've been committed to identifying, mitigating, managing and controlling any environmental risks of our business activities by means of well-established systems and processes. We take effective and innovative techniques and measures actively in terms of green operation, ecological protection and tackling climate changes, in order to minimize our impacts on the environment. We hope for people from all walks of life to submit better suggestions and opinions.

### 6.1 Tackling Climate Change

In the global context of growing concern about climate change-related issues, we've incorporated methods for tackling climate change into our green management. Based on the recommendations of the TCFD (Task Force on Climate-related Financial Disclosures), we respond to long-term environmental compliance expectations with forward-looking risk management and have established corresponding countermeasures through a series of assessments on climate change risks and their relevance to and impact on the Group's business, so as to actively explore low-carbon transformation practices while reducing future risks.

We're committed to taking effective measures to reduce the carbon footprint of products throughout the life cycle, pay close attention to the carbon emission reduction of partners, achieve data collection and emission reduction path identification through carbon planning, and gradually establish carbon emission reduction targets in sustainable planning and business cooperation. Tianqi Lithium expects that it could keep in step with the international framework in the future while facilitating the realization of China's carbon peaking and carbon neutrality goals through continuously measuring, tracking, reducing and disclosing carbon emissions.

### 6.2 Resource Management

Tianqi Lithium upholds the principle of maximization of resource utilization efficiency as well as the philosophy of 3R<sup>1</sup> management of solid wastes, to reduce the amount of wastes through economical use of non-renewable energy sources and raw materials, to make continued efforts to reduce the company's energy consumption in business activities as well as the impact of improper use or management of resources on climate changes, to encourage and motivate employees to participate in energy conservation and consumption reduction management and promote the conservation and recycling of resources through formulating a target assessment mechanism and constantly monitoring, analyzing and evaluating the utilization of energy and resources and the gap between the actual and the target, so as to minimize adverse environment effects.

Besides, the company strictly observes the provisions of Water Law of the People's Republic of China and Measures for Implementation of Water Abstraction Licensing System, uses water resources and promotes the development of water conservation and water circulation technologies in a scientific and efficient manner, pays continuous attention to the water consumption pressure of projects in all factories and identifies the risks contained therein, conducts periodic analysis and evaluation of the effects of water consumption and water conservation measures on project sites, and adjusts the overall control and scheduling of utilization of water resources in a timely manner.

We expect that all employees could keep an open mind to innovation and changes. The company encourages managers to actively listen to the suggestions and opinions of employees on how to reduce resource consumption and seeks to constantly improve the sustainability of our business activities.

1. 3R means the principle of "Reduce", "Reuse" and "Recycle" that shall be followed in the development of circular economy.



## 6.3 Ecological Environment Protection

Tianqi Lithium promises to do its best to conduct its business operations in an environment-friendly manner and comply with all applicable environmental laws and regulations and follow industry best practices.

We've established a complete management control system with regard to the whole business process, namely: to conduct an environmental impact assessment before mining to assess the possible ecological environment impact of the project, and establish ecological protection and pollution prevention & control measures; conduct the analysis and assessment of the active mine and carry out the environmental restoration of the mine in sync with mining operations with regard to the possible impact on the ecosystem, minimizing the impact on soil, air, water bodies and species; carry out final ecological remediation after mine closure to ensure a healthy local ecological environment in the mining area.

We're particularly concerned about biodiversity and follow the principles of avoidance, reducing, restoration and offset. Before implementation of all construction, reconstruction and extension projects, we conduct a comprehensive assessment of the impacts of such projects on their surrounding biodiversity, including composition of local species, key species and potential local, regional and global habitats thereof, develop biodiversity protection measures for the entire process (including construction period, operation period and closure period) of such projects according to the assessment results, and establish follow-up biodiversity management plans on the basis of the mitigation level of such impacts.

Meanwhile, we require suppliers to obtain, maintain and update all necessary environmental permits (e.g. pollutant discharge permit), approvals and registration certificates and to comply with all operation and reporting requirements.

## 6.4 Management of Hazardous Chemicals

Tianqi Lithium has established Administrative Measures for Disposal of Solid Wastes, Chemical Control Procedures, Hazardous Waste Management Procedures and other relevant rules in accordance with Law of the People's Republic of China on the Prevention and Control of Atmospheric Pollution, Law of the People's Republic of China on Prevention and Control of Water Pollution, Law of the People's Republic of China on the Prevention and Control of Solid Waste Pollution and other applicable laws and regulations, to standardize the classification, collection, transfer, temporary storage and disposal of solid wastes and hazardous chemicals.

In 2019, the company's production base in Zhangjiagang, Jiangsu province allocated a special fund to maintain and upgrade equipment and build a hazardous waste warehouse according to the quantity and management requirements of hazardous wastes and chemicals, effectively reducing potential safety and environment risks in the storage process of hazardous wastes and chemicals and improving safety and environment management.



## 7 Risk Management of Business Activities

Tianqi Lithium follows the principle of good faith and the most stringent business ethics principles. We manage and control business risk in accordance with stringent policies and procedures and hope to provide our best in creating a good market environment.

### 7.1 Anti-unfair Competition and Anti-fraud

Tianqi Lithium has always obtained success through active participation in fair market competition. We fully comply with the Anti-Monopoly Law and similar anti-unfair competition laws of the country or region in which we are conducting business.

The Company has established the Anti-Fraud and Reporting Policy, which clearly stipulates the definitions, classification, accountability mechanism, reporting channels and handling process of fraud, and will take strict protection measures for informants. The Company hopes to standardize the professional conducts of all employees in this way, and requires all employees to strictly abide by applicable laws, regulations and professional ethics as well as the Company's rules and regulations, in order to prevent the occurrence of any behaviors that harm the interests of the Company or its stakeholders.

Employees can report any and all fraud, dereliction of duties, or acceptance of bribes or kickbacks through the anti-fraud complaints and reports channels made public by Tianqi Lithium.

#### Audit Department:

✉ Email: shenji@tianqilithium.com

☎ Tel: +86 28 8513 4967

#### Office of the Board of Directors:

✉ Email: ir@tianqilithium.com

☎ Tel: +86 28 8518 3501

### 7.2 Anti-bribery and Anti-corruption

#### • Commercial Sponsorship

Tianqi Lithium adheres to the core value of "treating stakeholders with sincerity" and has established reasonable Commercial Sponsorship Management Procedures in accordance with the Company's strategic development.

We focus on the rationality and necessity of commercial sponsorship activities, meanwhile maintaining well-established rules and restrictions on commercial sponsorship beneficiaries, approvals, uses and contracts.

All commercial sponsorship activities of Tianqi Lithium shall be conducted in accordance with the provisions of the relevant local anti-bribery and anti-corruption laws. The Company will examine the proposals and necessary expenditures for commercial sponsorship activities provided by each department and will ensure the authenticity, legitimacy, integrity and accuracy of archived documents and materials.

### • Gifts and Entertainment

With regard to offering gifts and entertainment to external parties (including but not limited to clients, business partners, civil servants and other external third parties), Tianqi Lithium has established Gifts and Entertainment Management Procedures in order to conform to all applicable anti-corruption and anti-bribery laws and to meet all compliance management requirements.

These Management Procedures clearly stipulate that the Company shall follow the principle of risk minimization when offering gifts and entertainment and grasp the rationality, necessity, and universality or particularity of entertainment activities. Meanwhile, the Management Procedures clearly state prohibitive provisions and divide responsibilities between the activity process and post-review rules.

### • Commercial Bribery

Tianqi Lithium adopts a zero-tolerance policy against bribes, kickbacks and other acts of offering or promising to offer anything of value that bring about improper business advantages. The Company attaches great importance to the United Nations Convention Against Corruption, Foreign Corrupt Practices Act and applicable anti-bribery provisions of the places in which the Company is conducting business operations. The Company shall not violate any of the aforesaid items.

The Company shall adopt strict selection with regard to the sensitive positions vulnerable to corruption, and sign the Letter of Commitment on Anti-commercial Bribery when signing a labor contract with new recruits. Meanwhile, the commercial contracts signed by and between the Company and its clients, suppliers, service providers and contractors shall contain anti-commercial bribery and anti-corruption clauses. In case of any noncompliance, the Company will give corresponding punishments as a warning.

## 7.3 Anti-money Laundering and Counter-Terrorist Financing

Tianqi Lithium strictly observes applicable Chinese laws and international treaties as well as anti-money laundering and counter-terrorist financing provisions of the competent jurisdiction in the place of business. The Company has established Anti-money Laundering and Counter-Terrorist Financing Compliance Regulations and established and improved anti-money laundering and counter-terrorist financing work management mechanisms.

Additionally, the Company has established identity files of its business partners and determined their risk grades on the basis of client data and the nature of the transactions. The Company releases anti-money laundering and counter-terrorist financing policies or checklists for relevant countries or regions on a regular basis and actively communicates with government sectors.

The Company has set a hotline for consulting and reporting anti-money laundering and counter-terrorist financing cases. If you find anything suspicious about any of the aforesaid acts, please promptly report to the COC working group through the hotline and avoid participating in illegal capital transactions.



Hotline for Compliance Reporting and Consulting: +86 28 8514 2629



E-mail for Compliance Reporting and Consulting: [legalaffairs@tianqilithium.com](mailto:legalaffairs@tianqilithium.com)

## 7.4 Conflict of Interests

Tianqi Lithium divides conflicts of interests into internal conflicts of interests and external conflicts of interests. Internal conflicts of interests involve kinship relations of the Company and are handled according to the avoidance principle for kinship relations. External conflicts of interests include both conflicts of positions and conflicts of interests. Generally, the Company will reach an agreement with its employees before establishing a labor relationship with them.

The identification of conflicts of interests is difficult. Any potential or actual conflict of interests shall be reported to the senior executive or provost officer independent of the incident involving such conflict of interests. The conflicts of interest among senior executives shall be reported to the board of directors. The COC working group shall check related clues and give corresponding punishments to any employees who intentionally conceal conflicts of interests or fail to honestly report conflicts of interests as per their areas of responsibility.

## 7.5 Insider Dealing

Tianqi Lithium attaches great importance to the establishment and improvement of the employee code of conduct. The Company incorporates business ethics training into our new employee training and offers training to all of its employees to improve employees' awareness of key points related to information disclosure of listed companies, definitions of insider dealing and related legal responsibilities. The Company's information disclosure, confidentiality and securities trading policies also stipulate the obligations of employees about trading the Company's securities.

No employee shall use any nonpublic information either about Tianqi Lithium or other companies that he has learned about through his employment status to affect his or any other person's decision on buying or selling the Company's securities.

## 7.6 Fair Trading

Tianqi Lithium always adheres to the highest business ethics standards for market competition. We strive to treat our clients, suppliers, competitors and employees fairly.

We prohibit employees from seeking benefits or damaging the interests of others through concealment, manipulation, or abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practices.

We promise to comply with regulatory obligations and deal with clients, suppliers and competitors fairly. We will not participate in anti-competitive sales behaviors or unfair trade practices.

## 7.7 Trade Compliance

Tianqi Lithium has always been conducting its business activities within the scope permitted by trade rules. It's our responsibility to prevent the Company's all trading activities and employee behaviors from going beyond their legal boundaries and to comply with all applicable laws, rules and business ethics in all of its business activities in the world.

We attach importance to the positive image and brand reputation established in our trading activities. All of our employees shall respect and comply with the laws of the cities, states and countries in which we are conducting business operations. Any employee who fails to comply with the Code of Conduct will be given a warning or punishment, including dismissal and handover to competent authorities.

## 7.8 Politics and Donations

Tianqi Lithium prohibits employees from directly or indirectly offering or promising to offering sponsorship or donations to gain or retain a competitive advantage in the industry. "Convenient payment" or other certain dealings may not be deemed as illegal or unethical, however, they violate the Company's policy. If any employee has any doubt about the application of such policy in a particular situation, he may consult the COC working group. The Company's legal affairs and risk control department will give advice and support for the behaviors in the particular situation.

Please note that any behavior in violation of the Code of Conduct may lead to such punishments as disciplinary sanction, dismissal and penalties or handover to the competent judicial department.

## 7.9 Internal Audit

Tianqi Lithium attaches importance to the independence and objectivity of the Company's internal control and audit. In the management process, the Company adheres to the cost-effective principle and considers the legitimacy, comprehensiveness, importance, balance and adaptability thereof.

The Company sets up an audit and risk committee under the board of directors, which is in the charge of an independent person who has good professional ethics and professional competence. The audit department conducts various internal audits on a regular basis and reports directly to the board of directors. The Company also determines whether to implement the planned target management and supervisory management over its branches or subsidiaries as per its actual business needs.

## 8 Supply Chain Management

Tianqi Lithium attaches great importance to the quality and safety of the supply chain and goes forward hand in hand with like-minded partners in the rapidly changing market competition. We expect suppliers to integrate the idea of sustainable development into their basic admittance standards.

### 8.1 Supplier Management

Tianqi Lithium has established Supplier Management Procedures and Purchase Management Procedures, carries out classified management of suppliers, and puts forward different forms of admittance requirements with regard to different categories of suppliers.

The Company focuses on environmental and social factors in the purchase process. The Company understands and assesses the performance of suppliers in terms of environment protection, employee rights and interests, anti-corruption, occupational health, and fulfillment of corporate social responsibility through multiple links such as supplier development, supplier tracking and improvement, and supplier change, and evaluates suppliers in multiple aspects. We also expect suppliers to actively communicate with us or seek support, to ensure their own vitality and quality.

### 8.2 Responsible Mineral Supply Chains Management

Tianqi Lithium prohibits engaging in the exploitation, trading, treatment and export of mineral resources in areas affected by armed conflicts and high-risk areas, fully respects the rights and interests of labor workers, and attaches importance to any possible environmental or social impact.

The Company has established the Responsible Mineral Supply Chain Management Manual, Responsible Mineral Exploration Risk Identification and Control Procedures and the Code of Conduct for Responsible Mineral Suppliers. We promise to abide by Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains, and incorporate them into all contracts and agreements signed by and between the Company and suppliers. The Company has built up a due management framework for supply chains and established the five-step approach for responsible mineral development to strengthen its supply chain management capabilities.

In addition, the Company adopts risk identification, risk assessment and risk control management procedures to reduce the risks of due management of supply chains and to conform to international requirements on supply chain safety management to the greatest extent possible.





# 9 Information, Privacy and Confidentiality

Tianqi Lithium focuses on the use and protection of information, gives the utmost praise and respect to knowledge innovation, and believes that communication is a bridge for two parties to establish a good relationship. We attach importance to the privacy and ownership of information and abide by applicable confidentiality and disclosure principles.

## 9.1 Intellectual Property Protection

Tianqi Lithium's intellectual property shall include but not be limited to patents, trademarks, copyrights and business secrets. This is one of the keys to our sustainable development. The use or transfer of intellectual property shall conform to applicable policies, procedures and laws.

Tianqi Lithium actively carries out the construction of the intellectual property management system and complies with all applicable laws and regulations of the countries/regions in which we are conducting our business operations. While establishing IPR strategies, making innovations in management mechanisms, standardizing process management, improving awareness of IPR protection and strengthening the protection of intellectual property rights, we also pay attention to the protection of intellectual property rights in supply chains, respect the intellectual property of suppliers, and set up the banner of "respecting knowledge, advocating innovation, integrity and law-abiding" in the industry to achieve the common development of employees, the company and the society.

## 9.2 Property and Resources Protection

Tianqi Lithium strives to provide safe workplaces, equipment and facilities as well as up-to-date technology systems to assist all persons in carrying out work. The Company's property, funds and resources shall only be used for legitimate business development, and shall not be used for personal gains or any fraudulent purpose.

In the event of an accident, misconduct or breach, we shall ensure that our property, resources and information systems are fully protected and prevent them from unauthorized use, damage, disclosure, transfer or removal.

Tianqi Lithium may provide electronic systems, communication networks and computer resources to its employee as the work requires. Employees may use the Company's equipment and resources to view, visit, store, share or send information for intended purposes, but shall not use them for their own purpose. The use of electronic equipment shall conform to the Company's relevant policies and directives. The Company prohibits throwing away, damaging, dismantling, letting or selling such electronic equipment or using said equipment to engage in any action that infringes upon the intellectual property rights of others or humiliates others.

## 9.3 Information, Privacy and Security

Tianqi Lithium divides its information into public information, confidential information, classified information and most confidential information. Employees shall process relevant written or oral information on the basis of the classification level of such information. The information of which the classification level cannot be determined shall be deemed as "confidential information". All information other than "public information" shall be collectively referred to as "nonpublic information" and belong to the Company's trade secrets. Every employee shall sign the Nondisclosure Agreement with the Company and perform the obligations of confidentiality as per the Nondisclosure Agreement. They shall not disclose or make available such information to people from outside the Company or irrelevant people from inside the Company without authorization. If such information has been disclosed, the employee shall take effective measures to prevent further expansion of the scope of information disclosure, and report to their direct supervisor.

The information retained in the Company's computers and servers or the information transmitted via the Company's work system and email system shall be deemed as the Company's property. Any work carried out or transmitted through the Company's property shall be subject to the Company's review. The Company has the right to reset passwords and codes to visit any computer or communication system, to the extent permitted by local law.

To the extent permitted by local laws, the Company reserves the right to review all of the Company's property without notice and may allow or require relevant law enforcement and security organs to carry out an investigation.

All employees are only allowed to view authorized documents or plans, including both electronic versions and hard copies. All employees who view, copy, distribute, delete, damage, or alter the Company's documents, passwords, computer systems or plans, or other property without authorization or use any information obtained at work improperly shall be deemed as having breached the Code of Conduct.

On the basis of the needs of business activities, Tianqi Lithium will collect, use, reserve and disclose personal information based on the principles of fairness, transparency and security. This includes personal information of employees, clients and suppliers and other personal information obtained in business activities. The Company will obtain informed consent before using personal information and take effective preventive measures. After such usage, the Company will take security measures in strict accordance with internal information management rules to prevent the disclosure of such information.

## 9.4 Media and Public Communication

Tianqi Lithium does not prohibit employees from forwarding any content which has been published by the Company on public platforms, and all followers may share and comment on such content.

If the comments and personal information of the Company's employee or stakeholder clearly reflect the relevance to the Company or its clients, business partners, or products, then such content shall not be aggressive, obscene, slanderous, threatening, harassing, divulging, or forged.

The employee shall apply to the Company for and receive corresponding training before making any statement on behalf of the Company. This is to ensure consistency between external media communication and the Company's business and brand, as well as for the Company's external communication to be accurate, truthful and harmonious.

After the content and interviewee of a media interview having been examined and approved by the company's designated department, the interviewee can accept such interview. With regard to the information that shall not be made public without examination and approval, no one may accept interviews or make disclosure to the public.


If an employee has any doubt about the use of any social networking software or matters concerning media interviews, he may consult the COC working group or the provost officer promptly in advance, to obtain professional advice.

## 9.5 External Information Disclosure

Tianqi Lithium focuses on the rights of all stakeholders to be informed and is committed to complying with the information disclosure obligation in a fair, just, accurate, timely and understandable manner.

The Company discloses its performance reports, statistical data and other relevant information by preparing periodical reports, holding performance seminars, meeting with analysts, attending investor research forums, or releasing interim reports. The Company performs its obligations concerning periodical information disclosure and required transmission, review and disclosure of major events in strict accordance with the External Information Use and Transmission Management System, to ensure the authenticity, accuracy and completeness of the information disclosed.

If you have any questions, please contact us via the following channels:

 Email for Consulting: [COC@tianqilithium.com](mailto:COC@tianqilithium.com)

 Policy/Procedure Inquiry: [www.tianqilithium.com](http://www.tianqilithium.com)

# 10 Implementation and Supervision

The following implementation and supervision rules are hereby formulated to maintain the effectiveness of the Code of Conduct.

## 10.1 COC Working Group's Organizational Structure and Responsibilities

### • Organizational Structure

Tianqi Lithium is to set up a COC working group; all production plants and subsidiaries shall set up a COC working group or supervisor as appropriate to supervise the specific implementation of the Code of Conduct.

The COC working group shall be independent of all departments and consists of the heads of all departments. All departments subordinate to the Company shall set their supervisors, They will be responsible for the overall supervision of illegal behavior in the workplace.

### • Duties and Responsibilities

#### (1) Institutional Development

Establish and continuously improve the Code of Conduct and its related systems and procedures, to ensure that the institutional development is in accordance with Tianqi Lithium's Code of Conduct.

#### (2) Cultural Development

Abide by the Code of Conduct, carry out the publicity and promotion of employee training, and enable employees to gradually understand and work under the Code of Conduct through multi-channel publicity and by changing the corporate culture.

#### (3) Development Promotion

Work together with related departments such as the HR department to establish checklists, conduct an investigation of career expectations and career development needs of employees, eliminate bad work habits, understand employees' will, promote the personalization of workplace culture, and increase the motivation of employees, per the Code of Conduct.

#### (4) Supervisory Management

The Company's employees shall abide by the requirements contained in the Code of Conduct, and the COC working group will investigate any employee who breaches corresponding regulations. Each department shall actively cooperate with such investigation and take the initiative to determine whether they are involved in such a breach.

#### (5) Accepting Consultation

The Company's website will contain a specific email address to enable all stakeholders or employees to promptly submit suggestions, advisory opinions, or complaints on the Code of Conduct to the COC working group.

The COC working group will give a reply concerning the received information after evaluation and discussion. If an urgent reply or return visit is required, it should be specified in advance.

 Email: [COC@tianqilithium.com](mailto:COC@tianqilithium.com)

#### (6) Record Retention

The COC working group shall record all anonymous and real-name complaints, information, comments, inquiries, requirements and advisory opinions received and shall retain such records for 3 years.

## 10.2 Reporting, Punishment and Prevention

Tianqi Lithium encourages employees to report their own or any other persons' violations of the Code of Conduct and encourages employees to report any improper practices to the COC working group via internal hotline, email, or other means.

The Company will keep the informant's information strictly confidential and prevent the informant from any retaliation or attack. If the reported violation is true, the informant will be given a corresponding reward; if the informant reports their own violation, the Company will give a lesser punishment, depending on the severity of the violation; if the reported employee violates applicable laws, they will be handed over to the competent judicial department.

The supervisor or the department head shall take preventive measures concerning the behaviors that have already appeared. The COC working group will take note and prevent such violations in their routine work.

## 10.3 Preparation, Revocation and Revision

The preparation, revocation and revision of the Code of Conduct shall be determined by all internal members of the COC working group through consultation. The COC working group has the right to make recommendations regarding the revocation or revision of some provisions contained in the Code of Conduct; such recommendations shall be updated from time to time according to the company's strategic planning and approved by all internal members in a vote.

Note: The English and Spanish versions of the Code of Conduct are for reference only and the final interpretation of the Code of Conduct is subject to the Chinese version.





Tianqi Lithium Corporation  
Address: Building 1 No.10 East Gaopeng Road,  
High-tech Zone, Chengdu, Sichuan, China



WeChat