**Rio Tinto Lithium**
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Report

# Responsible Minerals Assurance Process (RMAP) Due Diligence Report

Rio Tinto Lithium

## Introduction

This report summarizes how Rio Tinto Lithium complied with the requirements of the Responsible Minerals Assurance Process (RMAP) of the Responsible Minerals Initiative (RMI) during the reporting period from 2 November 2024 to 31 October 2025.[1]

- Date of publication: 9 April 2026
- Public location of this report: riotinto.com/en/products/lithium
- For more information on Rio Tinto, please visit: riotinto.com
- Material in scope: lithium carbonate

## RMAP Assessment Summary

An audit was conducted to evaluate the company's alignment with the RMI Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains - All Minerals. The audit represented the second RMAP assessment of the Bessemer City and Fénix sites and included a review of relevant policies and procedures, evaluation of management systems related to responsible minerals sourcing, and verification of supporting documentation and records for the reporting period.

The reporting period was 2 November 2024 to 31 October 2025 for Bessemer City and 2 November 2024 to 7 October 2025 for Fénix. The start of the reporting period is determined by the end date of the previous period and ending within the maximum 45-day window before the current onsite assessment date.

***Bessemer City, North Carolina, United States***

The Bessemer City site is our longest running operational lithium site, tracing its roots back to the 1950s, and produces one of the broadest portfolios of high-performance lithium products in the world, including lithium hydroxide, high-purity lithium metal, butyllithium and several other specialty lithium chemicals. This site provides an annual production capacity of 15,000 metric tons of lithium hydroxide, produced from lithium carbonate from Fénix.

[1] Note: On 6 March 2025, Rio Tinto officially acquired Arcadium Lithium plc ("Arcadium Lithium"), which became Rio Tinto Lithium. In this document, "Rio Tinto Lithium", "the company", "we", "us" and "our" are sometimes used for convenience where references are made to Arcadium Lithium and/or its subsidiaries Livent USA Corp. and Minera del Altiplano S.A., now wholly owned subsidiaries of Rio Tinto.

The Bessemer City site holds internationally recognized ISO certifications for Quality (ISO 9001), Environmental Management (ISO 14001), and Occupational Health and Safety (ISO 45001), underscoring our commitment to quality, sustainability, and workplace safety. In addition, the site is IATF 16949 certified for Automotive Quality Management Systems.

In 2024, the Bessemer City site completed its inaugural Responsible Minerals Initiative (RMI) Environment, Social, and Governance (ESG) audit with an overall rating of 100%. The assessment is valid for two years.

The Bessemer City site underwent the Responsible Minerals Assurance Process (RMAP) assessment between 3 December 2025 and 4 December 2025. The assessment is valid for one year. The assessment was conducted by Arche Advisors. The location Customer Identification Number (CID) is CID004749.

***Salar del Hombre Muerto, Catamarca, Argentina***

Our Fénix site is located at the Salar del Hombre Muerto in the Catamarca province of Argentina, 1,300 kilometers northwest of Buenos Aires, high in the Andes mountains at an elevation of approximately 4,000 meters above sea level. Fénix has been producing lithium carbonate from high-quality lithium brine utilizing a proprietary selective adsorption direct lithium extraction (DLE) technology process since 1997.

The Fénix site is certified under the ISO 9001, 14001, and 45001 programs and IATF 16949. The site also completed the RMI ESG audit in 2024 with an overall rating of 100%. The assessment is valid for two years.

The site underwent the RMAP assessment between 20 November 2025 and 21 November 2025. The assessment is valid for one year. The assessment was conducted by Arche Advisors. The location CID is CID004747.

Additionally, the company participates in the Extractive Industries Transparency Initiative (EITI), supporting the disclosure of payments and other material information in accordance with international transparency standards. For more information, visit riotinto.com/en/sustainability/ethics-compliance/transparency

## Governance

Rio Tinto conducted an assessment of Arcadium Lithium's policies during the early stages of integration and found them to be largely aligned with Rio Tinto's own policies. Based on this review, it was determined that the Lithium business would continue operating under its existing policies through 2025 (unless otherwise noted). Throughout 2025, Arcadium Lithium's *Code of Ethics and Business Conduct*, *Human Rights Policy* and *Responsible Sourcing of Minerals Policy* established core standards across a broad range of human and workplace rights in the business's global operations and supply chain:

**Code of Ethics and Business Conduct:** The Arcadium Lithium Code of Ethics and Business Conduct ("Code of Ethics") applied to all employees, officers, directors, and contractors of Arcadium Lithium and its subsidiaries. The Code of Ethics set a "zero tolerance" approach to ethical violations, including "any form of harmful child labor and forced or compulsory labor," and included the expectation that suppliers conduct themselves in an ethical and responsible manner consistent with company standards. In September 2025, Rio Tinto Lithium introduced the Rio Tinto Code of Conduct ("The Way We Work").

**Human Resources and Hiring Policies:** Arcadium Lithium maintained both global and local recruitment and employment policies to mitigate risk of labor exploitation. Additionally, comprehensive training was provided to ensure employees can recognize and escalate human rights concerns within its operations.

Employment policies and hiring procedures were maintained at each location of operation that comply with national, state, and local labor laws. In the United States, it followed the Employment Eligibility Verification process and At Will Employment policy. All sites provided final candidates with an offer letter for which there

is no implied obligation for the candidate to accept. In Argentina, the procedure for hiring and onboarding included guidelines for documentation to be submitted by the applicant. These measures were implemented to ensure compliance with current labor legislation, establish formal controls to prevent child labor, and guarantee the protection and development of human rights.

**Human Rights Policy:** Arcadium Lithium's Human Rights Policy also applied to all employees, officers, directors, and contractors of Arcadium Lithium plc and its subsidiaries in 2025. It outlined the business' commitment to respecting human rights and complying with laws, rules, and regulations governing human rights in the countries in which it operates. This included specific provisions addressing non-discrimination, child and forced/ bonded labor, freedom to associate and collectively bargain, health and safety, working conditions, fair wages and compensation, migrant workers, and no harsh or inhuman treatment/harassment.

**Responsible Sourcing of Minerals Policy (RSM Policy):** Arcadium Lithium adopted the RSM Policy in 2024 to mitigate the risk of potential adverse impacts on human rights, including risks that may directly or indirectly finance, or benefit armed groups and/or involve other serious human rights abuses in Conflict-Affected and High-Risk Areas (CAHRA). The RSM Policy aligns with the Organization for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRA) and addresses the risks identified in Annex II of the OECD Guidance. The policy applies to all Rio Tinto Lithium facilities and suppliers of lithium carbonate and is publicly available on the company's website at riotinto.com/en/products/lithium.

The RSM Policy was reviewed in January 2026 and approved by our Managing Director, Rio Tinto Lithium, who is committed to supporting its continuous improvement. Following approval, the updates were communicated to employees and relevant suppliers, and key employees were trained on the changes to ensure effective implementation.

## Management Systems

### Management Structure

As part of our commitments to responsible business practices outlined in our RSM Policy, the company's due diligence management system includes the following aspects:

- The **Global Regulatory Manager** oversees the due diligence program, which includes supervision of the third-party screening tool and CAHRA risk assessments. Should any Annex II risks be identified during the assessments, the Global Regulatory Manager promptly reports these to the Due Diligence Committee.
- Due diligence outcomes, such as the CAHRA risk assessments, are reviewed by the **Due Diligence Committee** as needed and quarterly by the Corporate Import and Export Compliance Committee (CIECC). The CAHRA risk assessments results were reviewed by the CIECC committee beginning in the fourth quarter of 2024, providing visibility into the assessments and enabling improvements to the overall process. The Committee is composed of representatives from Operations, Logistics, Tax, Finance, Procurement, Legal, and Regulatory. Its responsibilities include meeting at least semi-annually to review import and export-related compliance matters, including due diligence considerations. Additionally, during these sessions, results of the third-party screening tool are shared, with particular attention to suppliers and customers generating higher-risk alerts.
- The **Global Risk Management and Trade Compliance Specialist** is accountable for conducting the CAHRA risk assessments, per procedure for Identifying and Assessing Risks in Mineral Supply Chains. These assessments involve analyzing potential risks related to sourcing, trade, and

transportation of relevant minerals, with a particular focus on factors such as human rights violations and sanctions. In addition to conducting risk assessments, the specialist plays a critical role in monitoring and interpreting alerts designed to identify risks associated with suppliers and customers within the supply chain. This includes reviewing potential alerts such as financial crimes, corruption, and adverse media reports, and escalating issues as appropriate.

- **Global Procurement** plays a critical role in the due diligence process by ensuring adherence with the supplier onboarding procedure. This includes thorough screening of prospective suppliers before engagement, as well as detailed review of all documentation, including the answers to the responsible sourcing questions and an assessment of the risks associated with those answers, before entering into any contractual agreements. This process aids by ensuring that suppliers meet the company's ethical, legal, and operational standards, thereby mitigating potential risks associated with non-compliance.

**Internal Systems of Control**

**Chain of custody and traceability controls:** Rio Tinto Lithium maintains internal controls to ensure traceability and integrity of its mineral supply chain. The company's business is vertically integrated, with lithium carbonate for the US operations sourced exclusively from our Fénix site. The teams at these two sites operate systematically under established procedures to verify that all incoming shipments align with purchase order details – such as material type, source, and quantity – before recording receipt in our materials management system. This system facilitates traceability, allowing each batch of lithium carbonate to be tracked back to its origin at the Fénix site and supporting transparency across the supply chain.

**Third-party screening and monitoring controls:** The company utilizes third-party screening software as a core internal control to identify potential risks associated with suppliers and customers. Screening is conducted prior to engagement and continues throughout the duration of the business relationship. The tool monitors sanctions lists, enforcement actions, legal and regulatory concerns, and adverse media, among other indicators.

**Supplier engagement and performance oversight:** Internal controls are in place to ensure suppliers remain aligned with the company's responsible sourcing expectations following approval of engagement. Supplier performance is overseen through structured engagement activities, including periodic communications and meetings tailored to supplier category and risk profile. These controls support transparency, reinforce responsible sourcing expectations, and enable the timely identification of emerging risks during the supplier relationship.

**Grievance mechanism:** Rio Tinto Lithium maintains an ethics hotline available at all times to all employees, customers, suppliers, and other individuals to report any concerns, including any potential human rights violations or concerns. As of September 2025, Rio Tinto Lithium adopted the Rio Tinto Code of Conduct ("The Way We Work") and implemented the Rio Tinto myVoice grievance system for our employees. Once myVoice was in place, legacy grievance mechanisms automatically redirected users to myVoice.

It is Rio Tinto Lithium's policy and intent to investigate any reported violations of the Code of Ethics, any other company policy or any applicable law that Rio Tinto Lithium becomes aware of, and to take appropriate action, as determined by Rio Tinto Lithium, based on the results of the investigation. Investigations into any reported violations are carried out by Rio Tinto Lithium's Ethics & Compliance teams who have employees in different global locations.

Where we identify that we have caused or contributed to an adverse human rights impact, we are committed to providing for, or cooperating in, its remediation through legitimate processes. Rio Tinto Lithium received no substantiated reports of human rights violations in 2025.

**Record keeping system:** The company has established records retention requirements to support due diligence, supplier screening, and chain of custody activities. Relevant records are retained for a minimum of five years and securely maintained within the company's electronic systems to ensure availability for internal review and audit purposes.

### Employee Training

All employees receive Code of Ethics training to ensure a shared understanding of its core values, ethical standards, and how to raise concerns, including reporting mechanisms and available resources. In 2025, this training was updated to incorporate dedicated human rights content to provide employees with the knowledge to recognize and respond to modern slavery risks, further strengthening our existing human rights and antislavery compliance measures. It covered key warning signs of labor exploitation, the importance of conducting due diligence on suppliers, and the need for vigilance when assessing pricing, working conditions, and other potential risk factors. The training also reinforced the expectations for suppliers to uphold international labor standards and emphasized employees' responsibilities to report concerns to help maintain an ethical and responsible supply chain.

Rio Tinto Lithium also provides ongoing training updates to reflect any changes in regulations or company policies, fostering a culture of compliance and integrity throughout the organization. In 2025, employees in relevant roles completed training on to the most up-to-date Responsible Sourcing of Minerals Policy and the procedure for Identifying and Assessing Risks in Mineral Supply Chains. They also underwent refresher courses on the due diligence process and responsibilities of different roles within the company.

## Risk Identification

The company follows a structured and risk-based process to identify, assess, and mitigate risks within its minerals supply chain. Risk identification activities occur at multiple stages of the supplier lifecycle, including supplier onboarding and throughout the ongoing supplier relationship.

### Supplier Onboarding and Monitoring

Prior to engagement, all prospective suppliers are subject to a formal onboarding process designed to identify and mitigate potential risks before approval. Suppliers are required to complete a supplier onboarding form, which includes company information, beneficial ownership details, and responsible sourcing questions addressing labor practices, human rights and ethical conduct. Global Procurement reviews all submitted information, and any inconsistencies, errors, or incomplete responses are communicated to the supplier for clarification and resolution. Where responses indicate elevated risk, the company conducts additional due diligence, which may include enhanced screening, follow-up questions, or the implementation of specific mitigation measures. If risks cannot be adequately mitigated, the company may decide not to proceed with engagement.

Following approval and engagement, suppliers are subject to continuous monitoring to ensure ongoing compliance with the company's responsible sourcing expectations. Active suppliers are screened daily and identified alerts or changes in risk profile are reviewed, assessed, and escalated as appropriate.

### Risk Assessment

To identify and assess Annex II risks, the company has established a formal procedure for Identifying and Assessing Risks in Mineral Supply Chains (2024). This procedure outlines a systematic methodology for evaluating sourcing risks related to relevant minerals.

Risk assessments include determining whether relevant minerals originate from, or transit through CAHRAs, or whether suppliers source from such areas. The process is conducted annually, using recognized and credible external resources, including Dodd-Frank Act criteria; EU CAHRA List; Fragile States Index Heat Map; and Heidelberg Global Conflict Barometer. Any potential red flags identified through this process triggers further analysis and validation steps to determine the existence and severity of risks.

The procedure includes an in-depth analysis of the supplier's supply chain and may involve on-the-ground assessments when deemed necessary, relevant, and feasible. All assessment findings are documented, and significant issues are escalated to the Due Diligence Committee and reported to the Corporate Import and Export Compliance Committee (CIECC), as appropriate.

**Risk Mitigation**

Rio Tinto Lithium is committed to mitigating identified risks in a timely manner. The company reserves the right to verify compliance at any time. If risks are identified, appropriate mitigation measures will be implemented. During the reporting period we did not source the relevant mineral from high-risk locations; all lithium processed at Bessemer City and Fénix came from our own sites in Argentina.

Where validated Organization for Economic Co-operation and Development (OECD) Guidance Annex II risks are identified, we will review the risk and implement the most appropriate course of action. Mitigation actions may include the immediate development and adoption of a risk management plan, or the immediate suspension or termination of engagement. If a risk management plan is implemented but fails to achieve the intended outcomes within six months, the company will proceed with temporary suspension or termination of the relationship with the supplier.

## Conclusion

**During the reporting period, no validated Annex II risks were identified in the supply chain of relevant minerals based on the company’s internal risk assessment and monitoring activities. The third-party audit results were positive and demonstrated a strong level of conformance with Responsible Minerals Assurance Process (RMAP) expectations.**

The third-party audit identified only one issue, which was related to the Responsible Sourcing of Minerals Policy and was promptly addressed. Following the audit, and prior to the publication of this report, the Responsible Sourcing of Minerals Policy was amended to disclose the due diligence procedures that have been in place since the previous audit. The observation did not indicate any systemic deficiencies in the company’s overall due diligence system.

Rio Tinto Lithium will continue to progress alignment with Rio Tinto Group and remains committed to ongoing monitoring and continuous improvement of its processes to fulfil RMAP requirements and OECD due diligence expectations.

Focus areas for 2026 include:

- Continuing integration with the Rio Tinto Group, including the adoption and implementation of the Rio Tinto Global Procurement standard, Supplier Code of Conduct, Human Rights policy, and further alignment of our due diligence processes.
- Approve the Responsible Sourcing of Minerals Policy as a new Rio Tinto policy to be applied across Rio Tinto Lithium sites where applicable.