



# *Code of* **Conduct**

OUR CORE VALUES IN ACTION





# Our Core Values *in Action*

## A Message from Albemarle's Chairman and CEO

*Kent Masters*

Our commitment to build a more resilient world drives not just what we do but how we do it. We work in close partnership with our customers and communities to use our natural resources wisely, transforming these resources into products that benefit the planet now and in the future. We are accountable for our impact on people across our operations, continuously collaborating with our stakeholders to drive more positive outcomes for all.

I'm proud that our Core Values have driven our growth, earning us not just a thriving business but most importantly, a solid reputation. Our work must always be guided by our Values: Care, Curiosity, Collaboration, Humility, Accountability and Integrity. Our Code of Conduct demonstrates how to put our Values in action. Throughout this Code, you will see principles guided by our Values and organized by activity, so you can easily see how they apply in your day-to-day work. Our interactive eCode for employees provides more detailed requirements and guidance in any given work situation.

Each of us has an internal compass guiding our ability to know right from wrong. We encourage you to be thoughtful about how that compass can help you navigate decisions at Albemarle. Remember, how we work is as important as what we sell.

Our work can be complex, and sometimes the right path forward may not be clear. If you are ever unsure what to do, put our Value of Humility in action by asking questions. It is also important to demonstrate Accountability, by speaking up when you see activity that conflicts with our Values or applicable laws. In this Code, we offer multiple ways for you to get help or report anything you think is wrong.

By committing to live by our Values and our Code, we build a stronger future for ourselves and everyone we humbly serve.

Best regards and be safe,

J. Kent Masters  
Chairman and Chief Executive Officer







# Our Core Values



## CARE

We improve the safety and support the well-being and resilience of our communities, employees and environment.



## CURIOSITY

We continuously learn and are comfortable taking informed risks to innovate.



## COLLABORATION

We work together, value each other and encourage diverse thought to drive better outcomes.



## HUMILITY

We share the credit and value the ideas of others to achieve goals together.



## ACCOUNTABILITY

We act with courage to take ownership for what matters and responsibly deliver results.



## INTEGRITY

We do what we say with honesty and transparency for the benefit of all.

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# Start With The Code

As Albemarle employees, our Core Values guide our daily actions and define the standards outlined in our Code of Conduct. The Code is organized by work activity, rather than area of law. You should see the Code as a starting point, especially when you are undertaking activities that are unfamiliar to you. You are responsible for knowing the Code requirements that apply to your job. If you know or suspect that local law sets different standards from our Code, we expect you to follow the higher standard.

## TO WHOM DOES THE CODE APPLY?

The Code applies to Albemarle Corporation, all Albemarle-controlled entities and their respective employees, officers and directors.

We also expect suppliers, contractors, agents, distributors, customers and any others acting on our behalf to be familiar with our Code and to comply with Albemarle’s Code of Conduct for Business Partners and applicable policies.

We seek to influence our non-controlled joint ventures, and our partners in those joint ventures, to ensure that the joint venture adopts requirements similar to those in this Code and our policies.

## MAKING THE RIGHT DECISION

The Code cannot address every situation you may face in your day-to-day activities. **When you are unsure about the right thing to do, ask yourself the following questions before acting:**

- Is my health and safety or the health and safety of others at risk?
- Am I acting consistently with our Core Values, this Code, our policies and applicable law?
- Am I authorized to do this activity?
- Do I feel comfortable doing this activity?
- What would my work colleagues, friends or family think if they knew what I was intending to do?
- Would I feel comfortable with my actions being reported on the front page of a newspaper?
- Will the activity attract adverse commentary on social media?

Sometimes our work doesn’t go according to plan. For example, say a permit application is delayed or rejected, or a production or sales target is missed. In those situations, when you think you’re under pressure, it is even more important to stop and reflect on these questions. Taking risks or cutting corners is not the answer. It is important that we make the right decision in every situation.

## eCODE

The Code is supplemented by our interactive eCode, which is accessible to Albemarle employees on computers and smartphones at [ecode.albemarle.com](http://ecode.albemarle.com). The eCode sets out specific requirements for each type of work activity, with links to supporting policies and details of whom to speak to if you have questions. All employees are expected to familiarize themselves with the eCode.

## ASKING QUESTIONS

The eCode provides access to additional resources including policies, procedures, guidance and frequently asked questions in each section.

**In addition, you can always get help from:**

- Your Supervisor
- Your HR Representative
- Global Ethics & Compliance
- The Legal Department
- The Integrity Helpline

## ACCOUNTABILITY FOR OUR ACTIONS

To uphold our Core Values it is important that we are all held accountable for our actions. How you work is an essential part of your performance at Albemarle. This includes not only how you apply our Core Values and this Code in your daily work, but also how you support others who are responsible for conducting training, monitoring, audits or investigations.

In accordance with our Global Discipline Policy, any violation of the Code, company policies or applicable laws may result in disciplinary action up to and including termination of employment. The Company may also voluntarily report potentially illegal behavior to law enforcement.

## KEEPING CODE FIT

Living our Core Values requires courage to do the right thing, especially in the most challenging circumstances. That courage is formed more easily when we build good habits into our daily routines.

- Take training that is offered to you
- Obtain approvals required by the Code and policies
- Act within your levels of authorization
- Make sure contracts you negotiate with customers, suppliers and other business partners are signed by all parties
- Submit invoices and business expense claims on time and with complete supporting documentation
- Classify and manage documents that you create or receive
- Re-read emails and documents before you send them to make sure they clearly convey your intended message
- Ask questions if you’re unsure about what to do
- Speak up if something doesn’t feel right





# Demonstrate care and courage by *Speaking Up*

As part of our Core Values, we seek to foster a culture where employees and other stakeholders feel safe to raise any matter related to Albemarle that is of concern to them. Speaking up helps Albemarle to prevent harm, manage risk and promptly address issues. **Such concerns include:**

- Working conditions affecting you or others, such as health, safety or security-related matters
- Payroll, performance reviews or other HR processes
- Bottlenecks or other process challenges that are preventing you from doing your job
- Perceived breaches of the Code
- Perceived breaches of applicable law

If you have a concern, you are encouraged to speak with your supervisor, local site leader or HR representative. There may also be alternative channels for reporting concerns using local grievance mechanisms at your site. Remember you do not need to have all of the facts; it does not have to affect you personally and you should not assume that someone else will report it. In line with our core value of Integrity, any concern must be raised in good faith.

If you have a Code concern, you can also contact:

- Global Ethics & Compliance via your local compliance manager or at [integrity@albemarle.com](mailto:integrity@albemarle.com)
- The Chief Compliance Officer
- The General Counsel
- The Chair of the Audit and Finance Committee of the Albemarle Board of Directors
- The Integrity Helpline





# Albemarle's Integrity Helpline

24 HOURS A DAY, 7 DAYS A WEEK

[www.IntegrityHelpline.Albemarle.com](http://www.IntegrityHelpline.Albemarle.com)

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 various means – phone, online or text message (in the US).

The helpline is operated in a manner consistent with the laws of the countries where we operate. To ensure that a focused and timely investigation can be undertaken, to facilitate communication and to establish your protection as someone who has reported concerns, you are encouraged to give your name, contact information and as much detail as you feel comfortable providing **(though reports can be made anonymously)**. Regardless of whether you choose to report anonymously or provide contact details, you will have an access code to follow up on your report and message the investigator using a secure message portal.

Due to local privacy laws in certain countries and the European Union, the Integrity Helpline may permit only specific types of reports such as accounting, financial, auditing and bribery matters. In those countries, please contact your HR Representative, the Legal Department or Global Ethics and Compliance to report other issues.

If calling inside the U.S., call 800-461-9330.

If you are dialing internationally, find the number below or visit [IntegrityHelpline.Albemarle.com](http://www.IntegrityHelpline.Albemarle.com) and choose your location to receive the number assigned to your country.

	<b>Argentina</b> 0800.333.0095		<b>Taiwan</b> 00801-14-7064		<b>Netherlands</b> 0-800-022-0441		<b>Japan</b> 0800-170-5621
	<b>Chile</b> 800 914 012		<b>Australia</b> 1-800-763-983		<b>U.A.E.</b> 8000-3570-3169		<b>Singapore</b> 800-852-3912
	<b>Germany</b> 0800-181-2396		<b>China, PRC</b> 00-400-120-3062		<b>Belgium</b> 0800-260-39		<b>United States</b> 800-461-9330
	<b>Korea</b> 070-4732-5023		<b>Hungary</b> 36-212111440		<b>France</b> 0805-080339		

# Supervisors:

RESPONDING TO SOMEONE WHO SPEAKS UP

Supervisors have a special responsibility to listen and act. Handling concerns appropriately is critical to demonstrating our Core Value of care, preserving trust protecting Albemarle.

If someone raises a concern, you should do the following:

- Thank the person for having the courage to speak up
- Remove distractions and listen carefully
- Take notes, free of subjective opinion
- Respond respectfully and take every concern seriously, even if you disagree
- Assure the employee that you – or someone else – will follow up with them in relation to the matter and that the concern will be handled confidentially and with care.
- Contact HR. If the concern relates to an alleged breach of the Code, you can also speak with Global Ethics and Compliance or the Legal Department. Do not attempt to conduct the investigation yourself.
- Immediately report any suspected retaliation against an employee who has raised a Code concern to Global Ethics and Compliance.

# Management of Code

## Investigations

Allegations of violations of our Code are taken very seriously at Albemarle.

We commit to:

- Conducting investigations objectively, promptly, discretely and thoroughly.
- Respecting the privacy and securing the personal data of those who are affected by an investigation.
- Preserving the anonymity of those who report concerns, if they have so chosen and where appropriate.
- Fully cooperating with any internal or governmental investigations and answering questions completely and honestly.

All investigations are conducted in accordance with our Investigations Policy, which are reviewed periodically with the Audit and Finance Committee of the Albemarle Board of Directors. Any violation of the Code, Company policies or applicable laws may result in disciplinary action up to and including termination of employment, in accordance with our Global Discipline Policy.

Nothing in this Code, the Investigations Policy, or supporting processes prevents you from seeking redress through administrative, judicial or other non-judicial remedies, or communicating with government agencies about possible violations of law or seeking legal advice as to your rights.

## PROHIBITION OF RETALIATION

We will not tolerate any direct or indirect acts of retaliation against an individual who in good faith reports a concern, including a suspected violation of this Code or applicable laws. This includes retaliation against anyone for participating in an investigation of suspected misconduct, whether conducted by Albemarle or any government agency. We will investigate all allegations of retaliation. Individuals who have engaged in retaliation will be disciplined, up to and including termination of employment.







# People

## In this *Section*

WORKING WITH EACH OTHER

MANAGING YOUR TEAM

HIRING NEW MEMBERS OF YOUR TEAM



# Working With *Each Other*

We believe in creating an inclusive working environment where diverse views are encouraged and celebrated. When we uphold the principles of trust and mutual respect, we foster a culture of performance, innovation and continuous improvement.

- We care for the health, safety and well-being of each other.
- We proactively collaborate with each other, encourage others to contribute, and appreciate constructive feedback.
- We treat our colleagues, customers, suppliers and other stakeholders with care, courtesy, fairness and respect.
- We seek to resolve disagreements or personal conflicts with others in a constructive manner.
- We consider the impact of our actions on others.
- We respect each other’s privacy and personal information.
- We do not 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.
- We do not engage in harassment, humiliation, bullying, retaliation or other forms of intimidation.
- We do not make unwelcome or inappropriate advances, including sexual harassment.
- We do not display or share offensive, threatening or demeaning materials.
- We do not bring weapons into our workplace.
- We do not participate in or pressure others to participate in inappropriate forms of hospitality or entertainment.

- We show care and courage by speaking up if we see others being harassed, bullied, intimidated or otherwise made to feel uncomfortable. We do not assume that others have already raised concerns.
- We do not knowingly make false allegations in relation to someone else’s conduct.
- We do not retaliate against those who have reported a Code concern or who are supporting a Code investigation as a witness.

## Managing *Your Team*

Albemarle leaders take personal accountability for the performance of their teams. Our leaders are responsible for fostering a positive, team-oriented environment that allows each employee to achieve their full potential.

- We lead by example, demonstrating behaviors that are consistent with our Core Values.
- We support and encourage the health, safety and well-being of our team.
- We comply with all applicable labor, immigration, equal opportunity, data privacy laws, regulations and rules.
- We believe in the freedom of our employees to join a trade union, and we comply with all works council agreements, and we do not interfere with workers’ freedom of association or right to collective bargaining.
- We frequently discuss and hold our teams accountable to our Core Values and this Code.
- We are responsible for creating an environment that is open and inclusive, and we value diversity of thought, experiences and cultures, and where the rights of all stakeholders are respected.
- We ensure our team members have the knowledge, skills and resources to perform their work safely, correctly and in accordance with the Core Values and this Code.
- We set clear, challenging but realistic goals that do not encourage employees to act in violation of our Core Values or this Code.

- We solicit and provide regular and constructive feedback to our teams and clearly communicate expectations where performance improvement is required.
- We treat all workers fairly and with respect. We do not harass, humiliate, bully or otherwise intimidate members of our team and we do not tolerate any form of child labor, forced labor or modern slavery.
- We promote our employees based on an individual’s skills, qualifications, performance and other legitimate and objective factors related to a job’s specific needs.
- We make decisions on employee pay, promotion, discipline and termination in a fair, equitable and transparent manner.
- We demonstrate humility by listening to team members who raise a concern and know what to do when concerns are raised.
- We do not permit or ignore inappropriate conduct. We speak up and take appropriate action.
- We do not tolerate retaliation against those who have the courage to speak up.





## Hiring New Members of Your Team

Our people are fundamental to the success of our company. We embrace diversity of experience, talent and thought.

- We are an equal opportunity employer; our employment decisions are based on an individual's skills, qualifications, performance and other factors related to a job's specific needs.
- We empower our new employees to realize their full potential through clearly defined roles, expectations, management support and levels of authority.
- We provide reasonable accommodations to those employees with disabilities to help them perform their job as required by applicable law.
- We do not tolerate any form of discrimination in relation to the hiring of employees.
- We strive to ensure prospective employees will embrace our Core Values and this Code.
- We report any potential conflict of interest arising from our planned hiring decisions.
- We do not offer employment as a means to improperly influence a government official to gain business or an improper advantage.
- We prohibit the use of child and forced labor, human trafficking or any other action that may adversely affect the labor or human rights of workers.
- We do not collude with competitors in relation to the hiring of, or compensation paid to, employees.







# Health, Safety & *The Environment*

## **In this** *Section*

WORKING SAFELY & LOOKING AFTER YOUR HEALTH

LIFE SAVING RULES

PROTECTING THE ENVIRONMENT

TRAVELING ON BUSINESS





## Working Safely & Looking After Your Health

We care for the health and well-being of employees, contractors, visitors and our host communities. We are committed to ensuring that everyone goes home safe and healthy every day. This commitment is a personal and mutual responsibility that we take very seriously.

- We operate our sites in accordance with all applicable health and safety laws, in addition to our Life-Saving Rules, policies and requirements.
- We expect our contractors, suppliers and visitors to our sites to follow applicable health and safety requirements.
- We take personal responsibility for our own health, safety and well-being. We lead by example.
- We look out for the safety of others and intervene where necessary to keep them safe.
- We demonstrate a visible commitment to safety by engaging and empowering employees through the allocation of leadership time, attention and resources.
- We take personal responsibility for working safely by completing required training and taking proactive steps to identify and prevent workplace-related injuries and illnesses.
- We only perform work that we are authorized, qualified and trained to perform.
- We do not commence or continue a task if the work cannot be performed safely.
- We deploy our SCAN (Survey, Consider, Act, and Notify) hazard recognition and mitigation tool daily in an effort to achieve zero safety incidents.
- We deal with safety issues honestly and openly and encourage people to speak up.

- We listen to others who raise safety concerns and do not retaliate against anyone for speaking up.
- We promptly investigate and share lessons learned from health and safety incidents to increase hazard awareness and minimize risk of recurrence.
- We conduct regular audits of our Health, Safety & Environment (HSE) programs at our global sites.
- We deal with physical and emotional health issues honestly and openly and encourage employees to speak up and raise concerns.
- We only commence work if we are adequately fit, sufficiently rested and free from the influence of alcohol, illegal drugs, exhaustion or medication that impairs our ability to work.
- The Company reserves the right, where legally allowed, to conduct random and for-cause inspections and drug/alcohol testing.
- Tobacco use is permitted only at Albemarle sites which have designated smoking areas.
- We ensure appropriate security arrangements are in place to protect the safety of workers in a manner that respects the rights of all stakeholders. This includes not providing support to any party that illegally controls mine sites or transportation routes or that engages in any other illegal activity related to mining.
- We take steps to protect the privacy of health-related data that we maintain on employees.



## 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.



### CONFINED SPACE

I obtain authorization by permit prior to entering confined spaces.



### LINE BREAK

I verify control of hazardous energy before line break.



### 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.**





# Protecting the *Environment*

We minimize the environmental footprint of our operations through careful management of energy and emissions, water, waste, and raw materials, including biodiversity. We believe that, as stewards of the environment, it is our duty to manage resources responsibly, as well as to mitigate adverse environmental impacts on the world around us.

- We strive to be as efficient as possible in managing our natural resources to support our growth in a sustainable manner.
- We continue to invest in new technologies and research to become more efficient with the raw materials needed in production and the processes themselves.
- We proactively set and work toward environmental targets to reduce greenhouse gas (GHG) emissions and freshwater consumption.
- We execute on our Climate Strategy with an ambition to be net-zero in our operations by 2050.
- We aim to reduce our overall energy consumption by working toward optimal energy efficiency in our operations and by purchasing energy from renewable sources where possible.
- We invest in novel technology that allows us to increase production without increasing water intensity.
- We work to reduce waste by maximizing the recovery of extracted minerals and recycling or re-using production by-products.
- We strive to preserve and restore natural habitats as best possible while minimizing the impact of our operations on biodiversity and respecting the rights of indigenous communities and other stakeholders.
- We identify, measure, and disclose environmental data across emissions, water and waste, while using data to inform decisions to minimize adverse impact on the environment.
- We comply with all applicable environmental laws, regulations, operating permits and our own environmental policies.
- We comply with environmental reporting requirements with transparency and accuracy and engage environmental regulators with integrity.
- We provide clear instructions and warnings on the appropriate handling, transportation, use and disposal of our products.
- We immediately report any leak, spill or release using internal reporting systems. Local environmental professionals promptly assess the need for external notifications that may be required in accordance with local rules, regulations and protection of the public. Being a responsible neighbor is a high priority.
- We prioritize managing risk related to handling hazardous materials.
- We promptly investigate and share lessons learned from environmental incidents to increase awareness and minimize risk of recurrence.
- We seek to ensure our business partners follow appropriate environmental standards and practices.
- We work with partners throughout our value chain to identify opportunities to reduce adverse environmental impacts.





# Traveling on *Business*

When we travel on behalf of Albemarle, we do so **safely and responsibly**.

- We take every precaution to ensure our safety, security and well-being during business travel.
- We comply with applicable immigration laws and obtain visas where required.
- We are mindful of local culture, customs and laws when we travel.
- We ensure that we are sufficiently rested after travel to perform work at a host site safely and effectively.
- We use authorized agents to make travel bookings so that the safety and security of our employees can be monitored.
- We are cost-conscious in our travel-related decisions and only incur reasonable travel expenses.







# Doing Business as *a Global Company*

## In this *Section*

ENGAGING WITH OUR CUSTOMERS & THIRD PARTY  
SALES REPRESENTATIVES

GATHERING COMPETITIVE INTELLIGENCE

CONTACT WITH COMPETITORS

SELECTING & MANAGING OUR SUPPLIERS

MOVING GOODS, RAW MATERIALS, EQUIPMENT AND  
TECHNOLOGY



# Engaging With Our Customers & Third-Party Sales Representatives

Our goal is to provide the best products and services to our customers, delivered to their satisfaction and manufactured sustainably. Working collaboratively with our customers, we seek to find value-added solutions that provide our customers a competitive advantage in the marketplace. We engage with customers with honesty, humility, integrity, transparency and respect and expect our third-party sales representatives to act in a similar manner.

- With curiosity, we seek to understand our customers’ requirements and collaborate to customize our products and services.
- We promise only what we can deliver and deliver what we promise.
- We strive to provide customers complete and accurate information concerning the performance, handling requirements and health risks of our products.
- We aim to promptly respond to questions from current and prospective customers.
- We address the concerns of our customers promptly and with humility.
- We respect the privacy of our customers and take steps to protect personal information of their employees.
- We collaborate with customers to identify opportunities to reduce adverse environmental impacts, while providing important environmental data for customers to understand their own environmental footprint.
- We seek to sell our products to customers directly, unless there is a demonstrated, critical business need or a legal requirement to use the services of a third-party sales representative.
- We prohibit all forms of bribery and corruption, whether by our employees, supplier, customers, third-party sales representatives or anyone else acting on our behalf.

- We do not offer or provide anything of value directly or indirectly with the intent to improperly influence or reward any customer employees (including any employees of state-owned enterprises) in order to gain business or an improper advantage.
- We do not request or accept anything of value that would improperly influence ourselves.
- We ensure that we are conducting business with reputable customers, for legitimate business purposes, with legitimate funds.
- We avoid business relationships with customers or third-party sales representatives that may be engaged in money laundering.
- We do not sell or ship to individuals, companies or countries if we know or suspect that such activity will violate anti-boycott, export controls or sanctions laws or regulations.
- We carefully select our third-party sales representatives, and appropriately monitor and audit their conduct.
- We require our third-party sales representatives to certify on a periodic basis compliance with applicable ethics and compliance laws, and the Albemarle Code of Conduct for Business Partners.
- We do not ask, expect or allow third-party sales representatives to carry out acts that would be a violation of this Code or applicable laws.
- We speak up if we are concerned that a customer or third-party sales representative is not acting in accordance with our Core Values, this Code or applicable laws.

# Gathering Competitive Intelligence

Gathering competitive intelligence enables us to better understand and anticipate the competitive environment in which Albemarle operates. However, the gathering of such information must be undertaken with care to ensure compliance with contract confidentiality obligations and applicable anti-corruption, competition, trade compliance and state secrets laws.

- We obtain competitive intelligence in an appropriate and lawful manner.
- We ask questions and seek guidance if we are unsure if we should ask for, keep or use competitive intelligence.
- We accurately document the source of our competitive intelligence.
- We do not obtain competitive intelligence by promises, gifts, bribes, deception, misrepresentations, “half-truths,” misrepresentations, theft or other improper means.
- We do not gather or accept competitive intelligence from a competitor.
- We do not ask a third party to disclose information, or accept such information, if we have reason to believe they are not authorized or contractually permitted to provide it.
- We do not offer or provide gifts, hospitality or anything else of value in exchange for the inappropriate disclosure of competitive intelligence.
- We do not ask or permit a third-party acting on our behalf to gather competitive intelligence in an inappropriate manner.





# Contact with Competitors

We believe in the principle of free trade. We are committed to vigorous but fair competition and act independently of our competitors. We expect our customers and vendors to compete fairly and will take action against those who do not.

- We compete on price, quality, volume, service, talent, research and innovation.
- We do not agree with competitors to fix, raise, lower or stabilize prices of goods that we sell.
- We do not fix other competitive terms such as pricing formula, sales terms, surcharges, discounts, margins, costs, rebates, commissions or credit terms with competitors.
- We do not disclose, request or otherwise exchange competitively sensitive information with competitors in an inappropriate manner.
- We do not agree with competitors to limit production, production capacity or capacity utilization.



- We do not rig bids or otherwise illegally coordinate bidding or tendering activities with competitors.
- We do not allocate markets, customers, suppliers or geographic territories with competitors.
- We do not agree with a third-party to boycott a particular supplier or customer even on apparently legitimate grounds (credit performance, safety).
- We do not enter into a no-poach agreement with competing hirers of talent or discuss compensation levels for potential or existing employees.
- We do not agree with competitors to limit the quality or features of our products, research or innovation.
- We avoid casual contact or communication with competitors that could give the impression of collusion or the inappropriate exchange of information between Albemarle and competitors.
- We do not use third parties (including consultants, third-party sales representatives or industry associations) to assist in or facilitate improper contacts or activities with competitors.
- We do not use our public communications to inappropriately disclose information to or otherwise illegally coordinate with competitors.







# Selecting and Managing *Our Suppliers*

Responsible and sustainable sourcing, in accordance with our Core Values and with respect for the human rights of our stakeholders, helps mitigate risk and build trust. We work to ensure that our suppliers are socially, legally and ethically responsible, treating the people who work for them fairly and with dignity.

- We source responsibly from producers and suppliers that meet our Core Values expectations and share our commitment to respecting the rights of their stakeholders.
- We prohibit suppliers from using child labor, forced labor or other forms of modern slavery or from participating in any unfair discrimination or inhumane treatment of workers.
- We do not tolerate any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals.
- When sourcing from or operating in conflict-affected and high-risk areas, we do not tolerate, profit from or in any way contribute to any forms of inhumane treatment, gross human rights violations, war crimes or crimes against humanity.
- We undertake due diligence as appropriate on prospective business partners that present heightened risk relating to human rights, health and safety, the environment, corruption, fraud, or antitrust to ensure that we conduct business only with suitable and reputable business partners.
- We seek to ensure that prospective and existing suppliers comply with applicable laws; supply with integrity; minimize their adverse impact on the environment and local communities; provide a safe and healthy workplace; and respect basic human rights of employees and laws relating to conflict minerals, forced labor and child labor.
- We conduct supplier qualification and competitive sourcing processes with transparency, treat supplier responses as confidential and do not provide any current or prospective supplier with an unfair or improper advantage.

- We monitor prospective and existing suppliers to ensure they are not engaging in collusion or inappropriately exchanging competitively sensitive information relating to Albemarle.
- We seek to avoid actual or potential conflict of interest arising from the selection or use of a supplier.
- We treat our suppliers with respect, communicate our requirements with clarity and transparency, and pay valid invoices on time.
- We expect our contractors and suppliers to comply with our health and safety requirements.
- We prohibit our suppliers from engaging in bribery, including facilitation payments, on Albemarle's behalf.
- We only pay for goods and legitimate services provided and monitor our suppliers for evidence of fraud or bribery, including bribery to conceal or disguise the origin of minerals or to misrepresent taxes or other fees paid to governments related to mining activities.
- We do not use suppliers if we suspect that such activity will violate export or sanctions laws or regulations.
- We do not ask, expect or allow a supplier to carry out acts that would be a violation of this Code or applicable laws.
- We avoid business relationships with suppliers that may be engaged in money laundering.
- We take prompt steps to investigate and remediate any credible information or indicators of violations by existing suppliers, including terminating supplier relationships where appropriate.
- Where appropriate, we attempt to engage with suppliers to mitigate or prevent risk before considering termination.
- We conduct periodic audits of suppliers to ensure that they adhere to our Business Partner Code.



## *Moving Goods,* **Raw Materials, Equipment And Technology**

To protect national security and foreign policy goals, the countries in which we operate regulate the transportation of goods, raw materials, equipment and technology across borders. Customs duties, taxes and fees are also applied on the importation of such items.

- We comply with all applicable import/export controls, sanctions and customs laws and regulations.
- We ensure that classifications, valuations, licenses, labeling and supporting documentation are accurate, complete and appropriately maintained.
- We transport goods, raw materials, equipment and technology only when authorized to do so.
- We do not ship from or to individuals, companies or countries if we know or suspect that such activity will violate import, export or sanctions laws or regulations.
- We prohibit our customs brokers, freight forwarders and other logistics providers from engaging in bribery, including facilitation payments, on Albemarle's behalf.







# *Conflicts* **of Interest**

## **In this** *Section*

MANAGING A CONFLICT OF INTEREST

OFFERING OR ACCEPTING GIFTS & HOSPITALITY

TRADING SECURITIES OF ALBEMARLE OR OUR  
BUSINESS PARTNERS

ENGAGING IN PERSONAL POLITICAL ACTIVITY



# Managing a *Conflict of Interest*

We respect the privacy of our employees and their right to pursue outside activities and interests. A conflict of interest can arise, however, when employees have a personal interest in a transaction or situation that could affect their business judgment, loyalty to Albemarle or work performance. When potential conflicts of interest arise, we take appropriate steps to manage the risks arising from them.

- We make business decisions in the best interests of Albemarle, without bias or favoritism.
- We avoid situations where personal activities, interests or relationships could affect, or be perceived to affect, our decision-making or work performance.
- We do not engage in outside interests that compete with Albemarle.
- We proactively disclose any potential conflict of interest, even if we think it will have no influence on our judgment or performance.



# Offering or Accepting *Gifts & Hospitality*

Giving or receiving reasonable gifts, meals or entertainment can sometimes be a part of maintaining and developing business relationships. Bribery and corruption risk can arise, however, when anything of value is offered to or accepted from a third-party.

- We only offer, provide or accept gifts, hospitality or anything else of value when there is a genuine business purpose, it is in the ordinary course of business and of a reasonable value.
- We prohibit bribery of anyone who can provide an improper advantage, including government officials, persons working in the private sector, trade union leaders and Company employees.
- We also prohibit improperly influencing an individual indirectly by offering or providing anything of value to:
  - their spouses, partners or relatives
  - their close friends, associates or business partners
  - a company in which the individual has a direct or indirect ownership interest
  - an organization with which the individual is associated (e.g., a charity).
- We do not solicit gifts, hospitality or anything else of value in exchange for a decision favoring the provider.
- We do not accept gifts, hospitality or anything else of value if it could affect, or be perceived to affect, our business judgment.
- We adequately identify any gift or hospitality that we provide, along with the identity of the recipient in our business expense claims, and provide appropriate supporting documentation.





# Trading In The Securities of *Albemarle or Our Business Partners*

Employees may be entrusted with material non-public information relating to Albemarle or its business partners in the performance of their jobs. This trust must not be violated by using the information for financial or personal benefit.

- We do not trade in the securities of Albemarle or another company when in possession of material non-public information relating to such company.
- We do not advise, encourage, “tip off” or otherwise cause others to trade in the securities of Albemarle or another company when in possession of material non-public information.
- We do not share or disclose material non-public information of Albemarle or another company unless authorized to do so.
- We take steps to prevent inappropriate access to material non-public information and take appropriate precautions when publicly disclosing Albemarle business information.
- We promptly report the inadvertent disclosure of material non-public information to an unauthorized person.
- We do not spread false or misleading information to manipulate the price or trading of securities of Albemarle or another company.

# Engaging In *Personal Political Activity*

We respect the right of our employees to participate in the political process, through personal contributions or by volunteering their personal time to candidates or organizations of their choice. Such participation is entirely a matter of personal choice and is encouraged, provided it does not affect an employee’s work or involve the use of Company assets and resources.

- We do not engage in personal political activity on the Company’s time or involve the use of any Company assets or resources.
- We do not reimburse an employee for his or her personal political contributions.
- We make it clear we are not representing Albemarle when engaging in personal political activity.
- We do not require or pressure employees to support any political party or politician.







# **Company** *Assets & Resources*

## **In this** *Section*

USING COMPANY ASSETS & RESOURCES

USING COMPANY IT & COMMUNICATION SYSTEMS



# Using Company Assets & Resources

Our business performance is dependent on the appropriate use, protection and care of the Company's assets and resources.

- We use Company assets and resources carefully, efficiently and for their intended business purpose.
- We spend Albemarle's funds with diligence, the appropriate authorization and within budget.
- We do not steal, use or dispose of Company assets or resources for personal gain.
- We limit our personal use of Company assets and resources and ensure such use does not interfere with our work.
- We do not permit unauthorized access to Albemarle sites or systems.
- We take appropriate precautions to prevent damage, misuse or theft of Company assets and resources.
- We respond appropriately and safely to any perceived risks or threats to Company assets and resources.

# Using Company IT & Communication Systems

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.

- We use the Company's computers, software and devices responsibly and securely, and in accordance with applicable policies and laws.
- We do not share network passwords with anyone, including supervisors, IT or third parties.

- We limit personal use of Company computers, software and devices, and ensure such use does not affect our IT systems or interfere with our work.
- We do not use personal email accounts or social media applications for proprietary or sensitive work-related communication.
- We do not download or install new software on Company computers or devices without authorization and an appropriate license.
- We do not disable virus software or attempt to remove viruses ourselves.
- We do not modify, duplicate or sell software on Company computers or devices without authorization.
- We do not attach unauthorized devices to Company computers, devices or networks.
- We do not use Company computers or devices to access or share inappropriate, offensive or illegal material.
- We respect the privacy of our colleagues, and do not access, intercept or disclose the communications of others without authorization.
- We do not disclose information about Albemarle's information system controls to any other employee or third-party who is unauthorized to receive it.
- We immediately report known, suspected or imminent access to our information and communications technology that is unauthorized.

Albemarle's computer hardware, software, phones, tablets and the data stored on them, and business-related data stored on employee's own phones, are Company assets and resources. To protect the Company, and our employees, we monitor the use of our information and communications technology and may access, preserve, review and delete business-related data in accordance with applicable policies and laws. Employees consent to permit all information they store or transmit on Albemarle's information systems to be monitored and accessed by authorized Albemarle personnel, and disclosed to law enforcement authorities.







# **Management of** *Information & Knowhow*

## **In this** *Section*

CREATING, PROTECTING & ENFORCING OUR  
INTELLECTUAL PROPERTY

CREATING, MANAGING & DISCLOSING ALBEMARLE  
BUSINESS INFORMATION

MANAGING PERSONAL DATA



# Creating, Protecting & Enforcing *Our Intellectual Property*

All intellectual property created during the course of work for Albemarle, or otherwise based on Albemarle’s information, belongs to Albemarle. Such intellectual property is a Company asset and must be used, protected and disclosed appropriately. We must similarly respect the intellectual property of others.

- We collaborate with transparency to develop intellectual property for the Company and take appropriate steps to protect it.
- We monitor for the unauthorized use of our intellectual property by others.
- We respect the intellectual property of others, and only use it when authorized to do so and in accordance with such authorization.
- We only disclose non-public Albemarle intellectual property to third parties, or to other Albemarle employees, if authorized to do so.
- We use Albemarle’s intellectual property only for the benefit of Albemarle.
- We use Albemarle’s trademark or brand only as authorized

# Creating, Managing & Disclosing *Albemarle Business Information*

The business information we create or receive is valuable and must be managed and protected much like any other Albemarle asset.

- We create business information that is clear, accurate, complete and in accordance with applicable policies, laws, accounting rules and practices.
- We retain business information in accordance with applicable laws and regulations.
- We ensure that business information accurately reflects the underlying transaction or event.
- We correctly classify the type and sensitivity of our information to ensure appropriate information security protection is applied.
- We do not falsify, alter, destroy or tamper with business information to misrepresent or conceal a transaction or event.
- We treat Albemarle’s business information with care and take appropriate steps to protect it from unauthorized access or disclosure.
- We do not disclose Albemarle business information to other employees, contractors or third parties unless authorized to do so.
- We do not use Albemarle’s business information for personal benefit.

# Managing *Personal Data*

We treat the privacy and personal data of all individuals with respect and take appropriate steps to protect it.

- We comply with all applicable data privacy laws.
- We collect, process, store, use, retain, transfer and delete personal data:
  - only when there is a legitimate business or legal need
  - when we are appropriately authorized
  - accurately, adequately, fairly and in a transparent manner.
- We treat personal data with care and take steps to ensure that it is secure and protected.
- We use customers’ and suppliers’ personal data only for the purpose of business-related communications.
- We only retain personal data for as long as it is necessary, and for the purpose for which the data was collected.
- We only share personal data with others when there is a legitimate business or legal need to do so, they are authorized to receive it, and we take steps to ensure they understand the importance of protecting that data.
- We prohibit the use of personal data of others for personal purposes, for the commercial benefit of anyone other than Albemarle or in any other inappropriate way.
- We take appropriate steps to ensure that the transfer of personal data, especially between countries, is legal and secure.
- For countries where there is a specific requirement to collect employee consent for a specific transfer of data, we obtain and document that consent.
- We take measures to ensure that third parties who collect, process or use personal data on our behalf do so in accordance with applicable laws and Albemarle’s Code of Conduct for Business Partners.
- We respond promptly and appropriately to requests from our employees and others to review, update, correct or delete their personal data.
- We report any suspected theft, accidental loss or unauthorized access, destruction or alteration of personal data as required by law.





# Finance

In this *Section*

MANAGING BUSINESS EXPENSES

RECORDING BUSINESS & FINANCIAL TRANSACTIONS



# Managing *Business Expenses*

Working for Albemarle often requires travel and other activities that involve incurring business expenses. Such expenses must be incurred for legitimate business purposes only and accurately recorded.

- We use corporate credit cards or Company purchasing cards only for permitted types of business expenses.
- We submit our expense claims honestly, accurately and on time.
- Our expense claims include reasonable detail and complete supporting documentation.
- We carefully review the expense claims of our team and only approve those within our financial approval authority.
- We do not authorize our own expenses or the expenses of a more senior employee.
- We do not submit false, incomplete or misleading expense claims.

# Recording *Business & Financial Transactions*

To maintain the trust of our investors, we must make good decisions and provide financial information that is accurate and complete. Albemarle maintains internal controls to ensure that our books and records fully and objectively reflect our business and financial transactions and their underlying business purpose in a materially accurate manner.

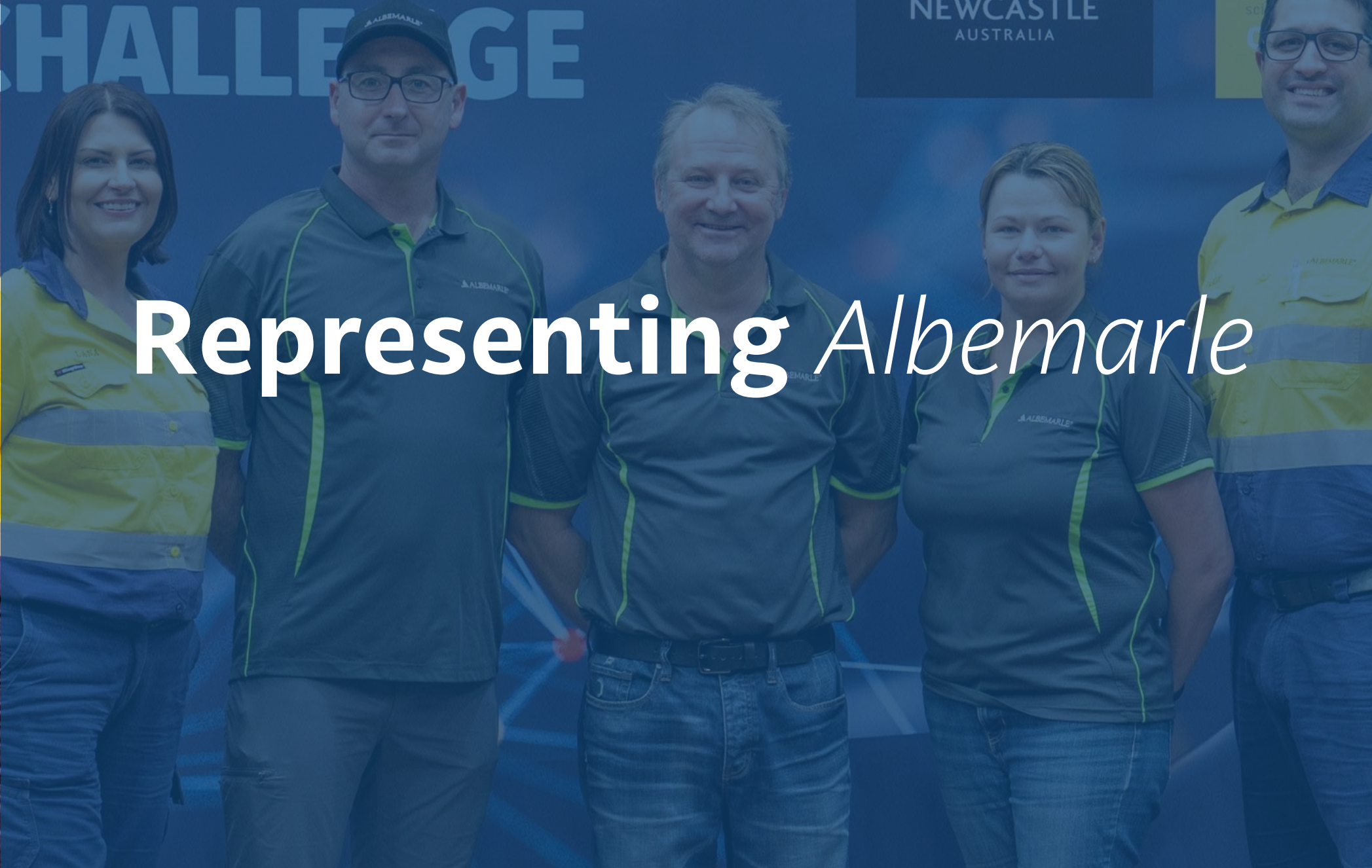
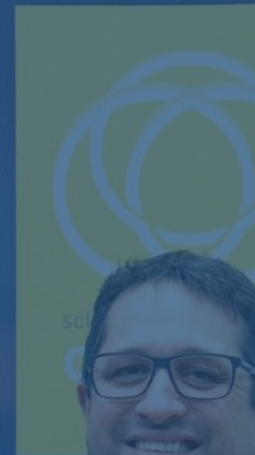
- We only execute transactions in accordance with this Code, applicable policies and laws. It is our personal responsibility to know those requirements.
- We only approve transactions within the scope of our delegated authority.
- We validate transactions and the source, destination and transmission of funds through appropriate supporting documentation.

- We do not intentionally create false, incomplete or misleading entries in our books or records.
- We do not use Albemarle funds or assets in violation of our Code or applicable law.
- We do not establish or maintain undisclosed or unrecorded Company funds or assets.
- We record all intercompany transactions at arm’s length, and in accordance with the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.
- We are honest, transparent and timely in our engagement with auditors and tax authorities.
- We immediately report concerns with the accuracy of our books and records, the integrity of our internal controls or any suspected fraud.
- We collect and understand documentation about prospective customers to ensure that they are involved in legitimate business activities and that their funds come from legitimate sources.





SCIENCE AND  
ENGINEERING  
CHALLENGE



# Representing *Albemarle*

## In this *Section*

ENGAGING WITH GOVERNMENT OFFICIALS

MAKING POLITICAL CONTRIBUTIONS ON BEHALF OF  
ALBEMARLE

ENGAGING WITH OUR HOST COMMUNITIES

MAKING CHARITABLE DONATIONS

SPONSORING AN EXTERNAL EVENT

PARTICIPATING IN AN INDUSTRY ASSOCIATION,  
EXHIBITION OR CONFERENCE



# Engaging With Government Officials

Government and regulatory decision-making directly affect our legal and social license to operate in every country in which Albemarle conducts business. We will proactively engage with governments on issues of concern to Albemarle, its businesses or its stakeholders (employees, investors, communities) to inform their decisions.

- We are courteous, truthful, cooperative and constructive when engaging with government officials.
- We apply or compete for government permits, licenses and business with humility, integrity, and transparency and free of any conflict of interest.
- We prohibit all forms of bribery of government officials or activity which could give the impression of bribery, whether by our employees, contractors or third parties acting on our behalf. This includes the making of facilitation payments.
- We do not offer or provide anything of value directly or indirectly with the intent to improperly influence any government official in order to gain business or an improper advantage.
- We check the qualifications, reputation, and relationships of business partners acting on our behalf to mitigate risks that they will engage in improper conduct with government officials to advance Albemarle’s interests.
- We ensure that information we provide to government officials is accurate, timely and in accordance with applicable laws.
- We cooperate with any government request or investigation and answer questions honestly.
- We do not obstruct legitimate government investigations by intentionally withholding, concealing or destroying relevant documents.
- We do not retaliate or discriminate against anyone who reports wrongdoing or lawfully cooperates with a government inquiry or investigation.

# Making Political Contributions on Behalf Of Albemarle

At Albemarle, we only make political contributions to advance and protect the legitimate interests of our Company, not those of any one individual. These political contributions are made only if they are authorized and permitted under Company policy, applicable laws and regulations.

- We do not make political contributions with the intent of improperly influencing any person in order to gain business or an improper advantage.
- We do not provide sponsorships, charitable donations or other payments to circumvent applicable laws or Company policies relating to political contributions.
- We do not use or allow others to use Albemarle assets or resources for any personal political campaign, political party, political candidate, elected official or any of their affiliated organizations.
- We do not require or pressure employees to support any political party or politician, make personal political expenditures or take any retaliatory action against employees who decide not to contribute.







# Engaging With Our Host Communities

At Albemarle, we strive for transparent communication and ongoing dialogue with all our stakeholders while sharing the benefits of our economic activity to build a positive legacy in the communities in which we operate. We seek to establish long-term community relationships based on meaningful engagement, care, respect, transparency, trust, honesty, humility and good faith.

- We respect and seek to promote the culture, heritage, life systems, customs, beliefs, rites and socio-cultural practices of neighboring communities.
- We value the traditional rights of indigenous communities over their habitat; recognize the unique relationship of indigenous communities with their environments; and respect community sites that are culturally or religiously significant.
- We are committed to conducting appropriate due diligence and preventing human rights abuses consistent with the U.N. Global Compact and Guiding Principles on Business and Human Rights including in our relationships with communities, employees and security providers, among other stakeholders.
- We value the participation of indigenous peoples in our workforce.
- We assess and consider the social, cultural, environmental and economic impact of our operations on others.
- We maintain the safety and security of our operations, while respecting the human rights of those in our host communities.
- We engage with communities as appropriate regarding our operations, grievance mechanisms, security arrangements and other activities that may impact host communities.
- We contribute to the development and quality of life of our host communities.
- We do not offer or provide anything of value with the intent to improperly influence a community representative to gain business or an improper advantage.

- We seek opportunities to procure locally where possible, to support the economic and social development of our host communities.
- We respond to community complaints in a timely manner and undertake action to address their concerns when appropriate.
- We will not retaliate against any Albemarle employee or member of our host communities for making a community-related complaint.





# Making Charitable Donations

Charitable donations are a way for Albemarle to contribute to worthy causes and are consistent with our Core Value of Care. To address fraud and corruption concerns, we seek to ensure that such funds are paid to the authorized recipient and spent in accordance with our charitable intent.

- We make charitable donations to promote, among other causes, education, health, social, wellness and cultural and veteran initiatives.
- We make charitable donations with transparency, in accordance with applicable laws and with no expectation of anything in return.
- We do not offer or provide charitable donations directly or indirectly with the intent to improperly influence any person (including a government official) to gain business or an improper advantage.
- We do not make charitable donations to inappropriately benefit ourselves or our spouse, partner, relatives, friends or associates.
- We make no charitable donations to organizations whose goals are incompatible with our Core Values or would otherwise damage our reputation.



# Sponsoring An External Event

Sponsorships can provide a way for Albemarle to help strengthen our communities, engage with customers and partners, and raise awareness of Albemarle's role in the communities in which we operate. To address fraud and corruption concerns we must ensure that sponsorship funds are paid to the authorized recipient and used for their intended purpose.

- We undertake commercial sponsorships for legitimate business and brand development purposes.
- We do not offer or provide or promise commercial sponsorships directly or indirectly with the intent to improperly influence any person (including a government official) in order to gain business or an improper advantage.
- We do not use commercial sponsorships to inappropriately benefit ourselves or our spouse, partner, relatives, friends or associates.



# Participating in an Industry Association, Exhibition or Conference

Albemarle participates in associations, exhibitions and conferences to contribute to industry discussion with business partners, peers and other stakeholders on matters of mutual interest. To protect our reputation and manage legal risk, we take steps to ensure that such industry collaboration is in accordance with our Core Values and supports our corporate strategy.

- We participate only in industry associations that have been authorized and that maintain public positions that are consistent with Albemarle's own policy.
- We seek to ensure that industry associations have adopted appropriate ethics and compliance policies, procedures and controls.
- We do not use associations, exhibitions or conferences to enter into any improper agreements with competitors or improperly restrict competition or share competitively sensitive information.
- We avoid casual contact or communication with competitors at industry events that could give the impression of collusion or the inappropriate exchange of information between Albemarle and competitors.
- We closely monitor any engagement that industry associations have with government officials and other stakeholders on our behalf.
- We manage potential conflicts of interest arising from our participation in any industry association, exhibition or conference.





A woman with her hair in a braid is seen from behind, operating a professional video camera. The camera's monitor is visible, showing a scene of people in a meeting. The background is a blurred office or meeting room with other people seated at a table.

# External *Communications*

## **In this** *Section*

**SPEAKING ON BEHALF OF ALBEMARLE**

**USING SOCIAL MEDIA**

**ADVERTISING ALBEMARLE AND ITS PRODUCTS**



# Speaking on Behalf of Albemarle

When talking about Albemarle or sharing Company information, we act as brand ambassadors of the Company and our Core Values. We protect Albemarle’s reputation by speaking with clarity, accuracy, integrity and transparency.

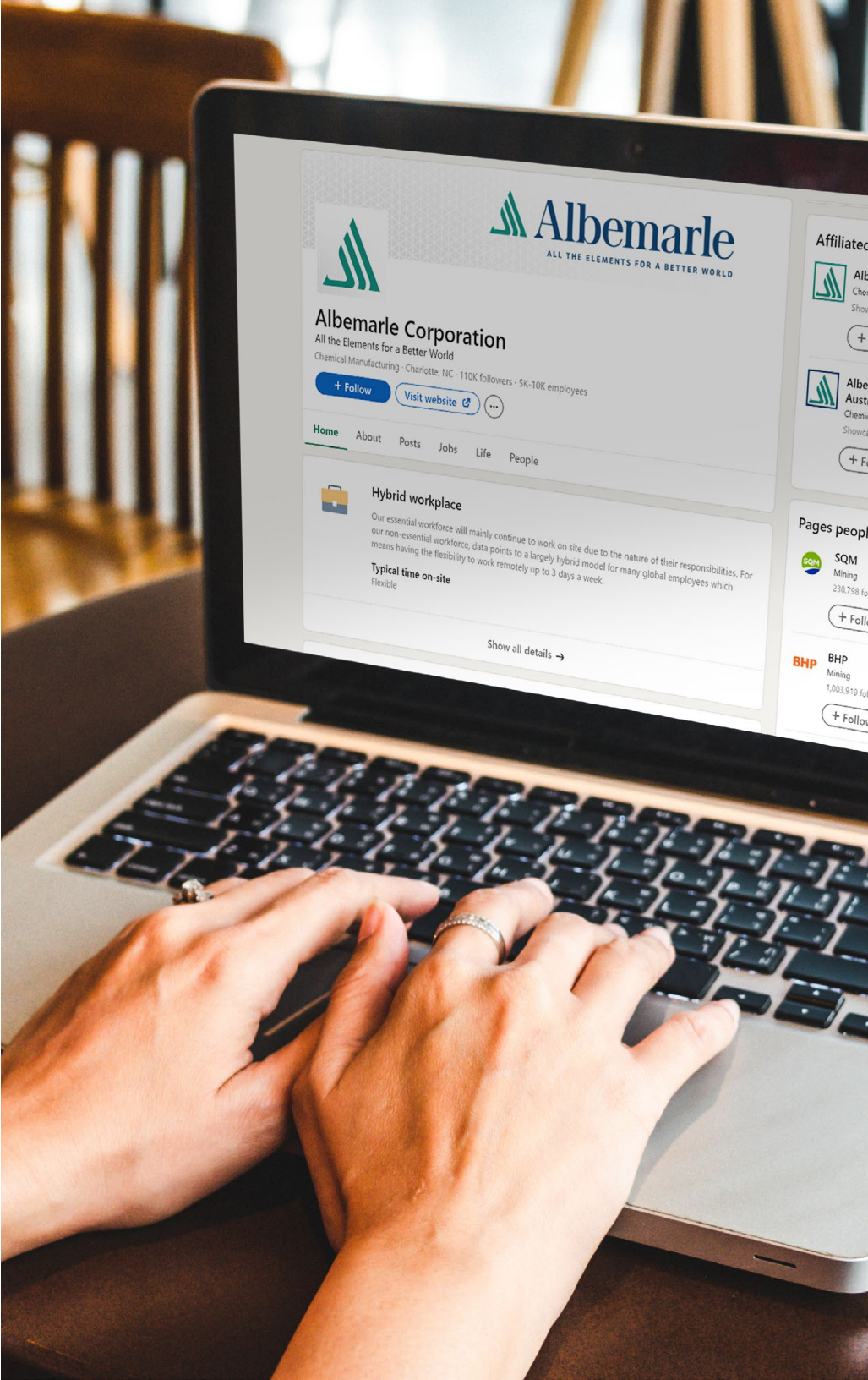
- We are strategic and thoughtful when identifying opportunities to speak on behalf of Albemarle.
- We comply with public disclosure laws and stock exchange rules, and disclose material non-public information only through authorized spokespersons.
- We do not publicly communicate in any way that is false, misleading or would damage our personal reputation or Albemarle’s reputation.
- We do not use our public communications to inappropriately disclose information to or otherwise illegally coordinate with competitors.
- We do not disclose publicly proprietary or other confidential information of Albemarle or our business partners without appropriate authorization.
- We do not use the intellectual property of others in our public communications unless authorized to do so by the owner.
- We do not speak to the press on behalf of the Company unless authorized and trained to do so.
- We make no charitable donations to organizations whose goals are incompatible with our Core Values or would otherwise damage our reputation.



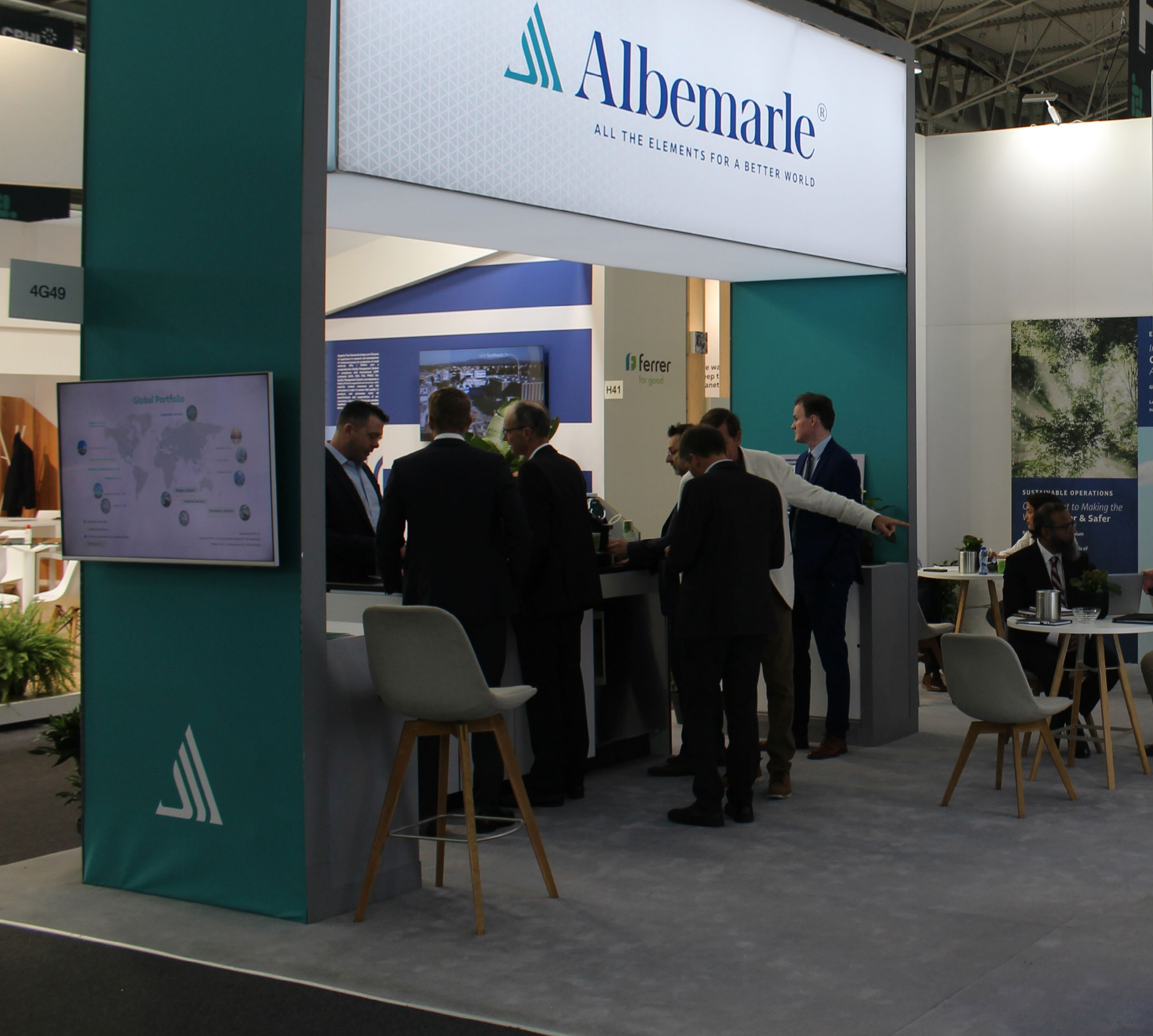
# Using Social Media

Social media offers us a chance to connect and share content about Albemarle with the online community. We protect Albemarle’s reputation through posting on social media with care, humility, integrity and transparency.

- We promote productivity by refraining from using social media during work hours, except when used for business purposes.
- We do not post vulgar, obscene, threatening, intimidating, recklessly false or harassing content, content portraying us as appearing to engage in illegal conduct, or content that disparages Albemarle’s products or services or its employees, customers, suppliers or competitors.
- We respect the Company’s proprietary information, and the privacy of our colleagues and others when posting information, images or video on social media.
- We do not post the personal data of our employees or customers on social media.
- We do not use social media applications for proprietary or sensitive work-related communication.







## Over 50 Years' Experience in *Lithium*

TOOLS FOR SYNT



Robust Product Stewardship &  
**Reliable, Global Partner – D**

## Advertising **Albemarle** and Its Products

We have a responsibility to represent our Company fairly and accurately, to inform our customers how to correctly handle our products and to maintain our reputation through consistent use of our brand.

- We advertise the Company and its products with accuracy and integrity.
- We comply with all applicable product regulatory laws in relation to our advertising, marketing and technical materials.
- We respect the data privacy rights of people who receive advertising material and other communications from us.
- We do not negatively comment on competitors or other third parties in our advertising.
- We do not engage in any media that promotes violence, falsehoods or otherwise harmful products or services.
- We do not create company resources that make claims that are obviously false or promise questionable results from their product or service.
- We are truthful and transparent with all forms of advertising and media.
- We always uphold the quality of our communication and marketing efforts in the reflection of our products and services.





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