

Albemarle®

Code of **Conduct**

FOR BUSINESS PARTNERS



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All the Elements *for a Better World*

WE'RE COMMITTED TO BUILDING A MORE RESILIENT WORLD

Albemarle Corporation ("Albemarle") leads the world in transforming essential resources into critical ingredients for mobility, energy, connectivity and health. We partner to pioneer new ways to move, power, connect and protect with people and planet in mind. A reliable and high-quality global supply of lithium and bromine allows us to deliver advanced solutions to our customers.

We are committed to sustainability in all that we do, transparently sharing insights into our sustainability strategy, objectives and accomplishments. Our approach to environmental stewardship, responsible sourcing, community engagement and employee welfare is a daily pursuit across all aspects of our organization.

Our innovative technologies and practices minimize our environmental footprint and ensure a sustainable supply of critical minerals for the future while minimizing our environmental impact.

We achieve our purpose by transforming essential resources into critical ingredients that provide sustainable solutions for the energy transition, clean transportation, electrification, and digitization — improving the safety, health, and quality of life for people around the world.

Our sustainable competitive advantages include efficient management of world class resources, safer and more effective leading process chemistry, and high-impact innovation with a focus on recycling and circularity.

We also emphasize partnerships and stakeholder engagement to innovate and improve the sustainability of our supply chain and our stewardship of people and planet.

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

Our Core Values

At Albemarle, we guide our actions and culture by the care of others, humbly serving both people and planet. That's why we work together with partners to ask questions, imagine possibilities, and consider alternatives.

Albemarle's passionate commitment to doing business the right way with our employees, communities, external stakeholders and you, our Business Partners, led to the development of our Core Values. These six behavior-based principles serve as the foundation of our culture:

Care

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

Collaboration

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

Accountability

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

Curiosity

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

Humility

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

Integrity

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

Our Commitment

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

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

Our Code of Conduct *for Business Partners*

As stated in our Code of Conduct, we are committed to treating our Business Partners with care, courtesy, fairness, integrity and respect. We also seek to collaborate with our Business Partners in our commitment to ethical, safe, and responsible business practices. Business Partners play a critical role in Albemarle's success, helping us to fulfill the promises we make. In accordance with the Albemarle Code, we seek to ensure that our Business Partners are aligned with our Core Values. We have developed this Code of Conduct specifically for our Business Partners (Business Partner Code.) Albemarle expects Business Partners to operate in accordance with the Business Partner Code and in compliance with all applicable laws and regulations. If local law sets higher standards than the Business Partner Code, we expect Business Partners to follow the higher standard.

TO WHOM DOES THE CODE APPLY?

Albemarle expects its vendors, contractors, sales representatives, distributors, resellers and any other third-party doing business with Albemarle ("Business Partners") to act in a manner consistent with our Core Values and this Business Partner Code of Conduct. We also expect our Business Partners to ensure the same standards are upheld by any sub-suppliers and sub-contractors they engage, whether those parties are working on our behalf or in association with Albemarle's businesses.

BUSINESS PARTNER ACCOUNTABILITY

To uphold our Core Values, it is important that we are all held accountable for our actions. Our Business Partners' adherence to our Core Values and work in accordance with this Business Partner Code of Conduct is an essential part of their performance for Albemarle. We reserve the right to discontinue our collaboration with Business Partners who fail to meet our expectations. Any violation of this Business Partner Code or applicable laws may result in suspension and/or termination of the Business Partner's relationship with Albemarle.

SPEAK UP

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

If you have a concern, you must raise it, and there are many channels available to do so. You must speak with your contact at Albemarle or a member of Albemarle's management. You may also contact our Global Ethics & Compliance team (integrity@albemarle.com) or our Integrity Helpline. The Integrity Helpline is operated by an independent company and can be contacted 24 hours a day, 7 days a week, in multiple languages, by phone or online. In the U.S., it can also be contacted by text message. Details of how Business Partners can contact the helpline can be found on our website (www.IntegrityHelpline.Albemarle.com).

For any reported issues that require an investigation, Albemarle expects your cooperation with reasonable inquiries to follow up on such issues, including providing Albemarle access to relevant information, personnel and documentation upon reasonable request.

Albemarle preserves the anonymity of those who report concerns, if they have so chosen and where appropriate, and prohibits all forms of retaliation against people who report concerns in good faith. Nothing in this Code or its supporting processes prevents you from communicating with government agencies about possible violations of the law or from seeking legal advice as to your rights.

QUESTIONS

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



Business Partner Operations

02

Workplace *Conditions*

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

We Similarly Expect Our Business Partners to:

- Respect the human rights of their employees and contractors, and treat them with dignity and respect, consistent with the United Nations Guiding Principles on Business and Human Rights.
- Ensure that all work is voluntary, and that workers are free to leave work at any time or terminate their employment without penalty, if reasonable notice is given.
- Prevent the use of child labor and employ only workers who meet the applicable minimum legal age. If employing any workers above the minimum legal age but under the age of 18, Business Partners are expected to prevent any such workers from performing work that may jeopardize their health or safety, including night shifts and excessive overtime.
- Prevent any unreasonable restrictions on workers' freedom of movement.
- Provide employees with safe, secure, and clean working conditions and (if relevant) living conditions.
- Comply with all applicable labor and immigration laws, regulations, and rules, including applicable standards of the International Labour Organization.
- As part of the hiring process, provide all workers with a written document in a language they understand that contains a description of terms and conditions of employment.
- Provide fair compensation and comply with all applicable laws governing wage and working hour requirements (including compensation, leave, benefits and overtime) and maintain appropriate records.
- If hiring workers through labor recruiters or employment agencies, perform due diligence to ensure they comply with all applicable laws and follow standards consistent with this Code.
- Provide equal opportunity in the workplace.
- Respect employees' lawful rights of freedom of association and collective bargaining, including their right to join or not to join a labor union.
- Make workers aware of their rights and responsibilities both verbally and in writing at the time of hire.
- Promote a "speak-up" culture that does not tolerate retaliation. Business Partners should provide workers with effective mechanisms to report work-related concerns, including perceived breaches of policy, applicable laws or working conditions affecting them or others (e.g., health, safety, environmental, or security-related matters). The mechanism should permit workers to report anonymously in workers' native language or another language that they understand.
- Provide workers with training on workplace rules and procedures, the reporting mechanism, and relevant health and safety information.

Business Partners Are Also Expected Not to:

- Discriminate based on race, color, ancestry, national origin, legal status, citizenship, age, physical or mental disability, medical condition (including pregnancy), religion, political affiliation, marital status, gender, sexual orientation, gender identity, genetic information, veteran status, or any other status or characteristic protected by applicable law.
- Engage in any form of harsh or inhumane treatment, including violence, harassment, verbal or physical abuse, corporal punishment, humiliation, bullying, mental or physical coercion, retaliation or other forms of intimidation.
- Make unwelcome or inappropriate advances, including sexual harassment or misconduct.
- Tolerate any form of modern slavery or forced or involuntary labor as defined by the International Labour Organization, including prison labor, indentured labor, bonded labor or slave labor (collectively, "forced labor").
- Charge workers any fees or costs for recruitment, directly or indirectly, such as costs associated with travel, processing work visas, and processing other official job-related documents. If any such fees are found to have been paid by workers, repay such fees to the workers.
- Hold or deny workers' access to their identity or immigration documents, including government-issued identification, passports, or work permits.
- Deduct workers' wages or benefits as part of disciplinary action.
- Engage in any other type of human rights abuses.



Health *& Safety*

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

More Specifically, We Expect Our Business Partners to:

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

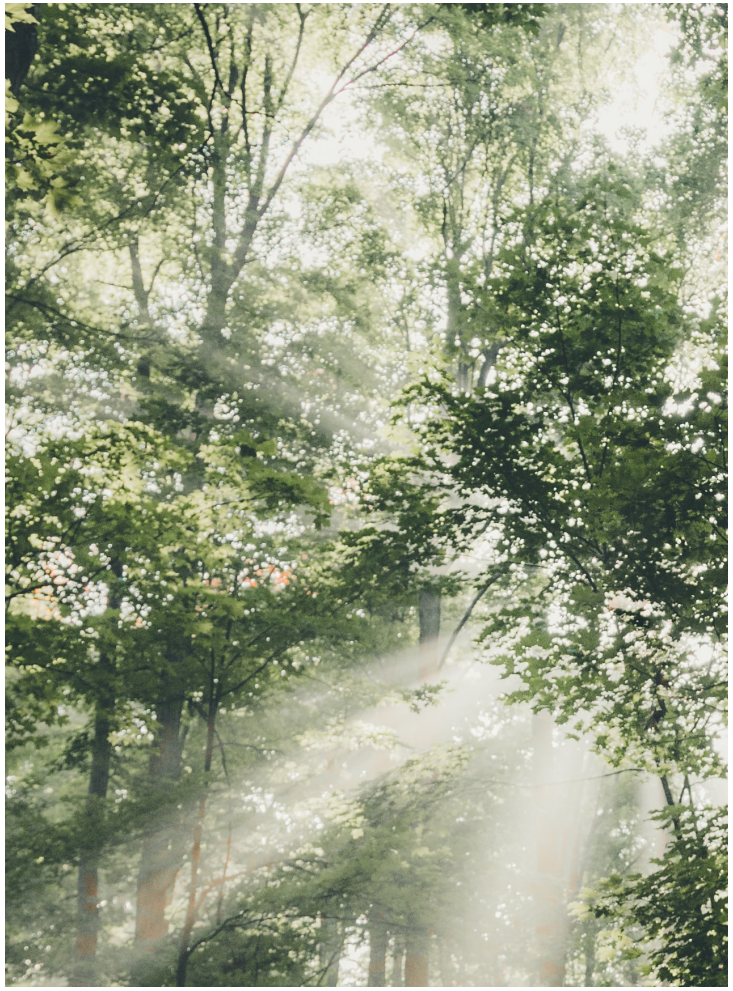


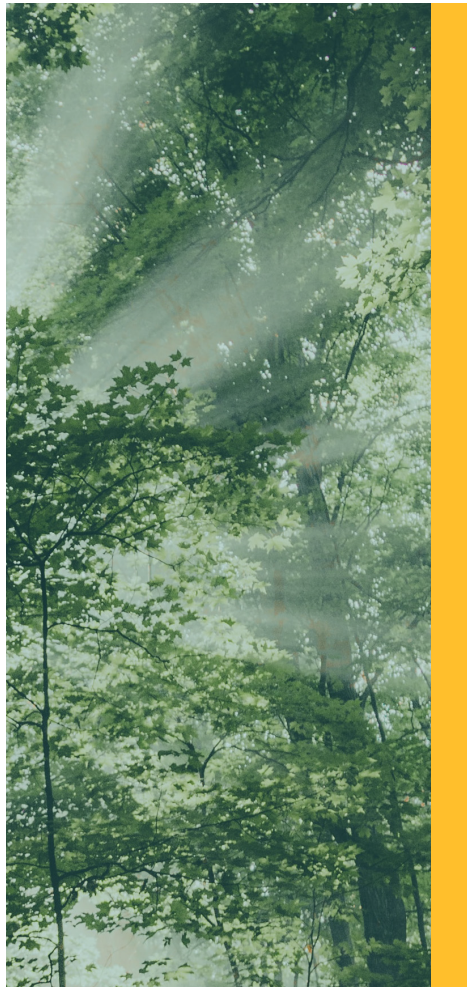
The Environment

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

We Expect Our Business Partners to:

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





Community *Engagement*

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

We Expect Our Business Partners to:

- Comply with applicable laws, regulations, and their own policies concerning community engagement, indigenous people and human rights.
- Consider the social, cultural, human rights, environmental and economic impact of their operations on their communities and other stakeholders.
- Take action to identify, prevent and, where necessary, mitigate and remediate adverse human rights impacts. These impacts are directly connected to their operations and relationships, consistent with the United Nations Guiding Principles on Business and Human Rights.
- Maintain the safety and security of their operations, while respecting the human rights of those in their host communities. This includes ensuring that all security providers follow recognized international standards.
- Ensure that any social or charitable contributions made to their host communities are reasonable and appropriate, given in good faith, and properly documented and recorded.
- Value the culture, heritage and diversity of views of their host communities and respect community sites that are culturally or religiously significant.
- Value the traditional rights of indigenous communities over their habitat.
- Provide an effective mechanism for local community members and other stakeholders to report complaints or concerns related to the Business Partner's operations and relationships.
- Respond to community complaints in a timely manner and undertake action to address their concerns and remediate adverse impacts when appropriate.
- Business Partners must not retaliate against any member of their host communities for making a complaint in good faith.




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Responsible Sourcing, *Sustainable Procurement & Supply*

The effective procurement of goods, services and raw materials is critical. It aids in the growth and expansion of our sites, and in the production and delivery of our products to customers. Responsible and sustainable sourcing, in accordance with our Core Values, Global Procurement Policy, and Responsible Sourcing Policy, also helps mitigate risk and build trust.

We Expect Our Business Partners to:

- Communicate expectations for responsible sourcing and sustainable procurement with their suppliers.
- Explore opportunities to procure from diverse and local goods and services suppliers as part of our Supplier Diversity Program. This supports the economic and social development of our host communities when appropriate.
- Track enterprise greenhouse gas (GHG) emissions data and Product Carbon Footprints (PCFs); integrate measures to reduce and track GHG emissions specific to products and services provided to Albemarle when requested.
- Collaborate with Albemarle's climate policy goals, including our sustainability ambition to achieve net-zero carbon emissions in our operations by 2050, and support the goals of the Paris Agreement, aimed at avoiding dangerous climate change due to global warming.
- Submit to Environmental, Social, Governance (ESG) and Sustainability assessments, and Corrective Action Plans where applicable.
- Commit to water efficiency, managing waste with care, transparency, conserving biological diversity, and protecting ecosystems.
- Provide Albemarle with high-quality products and services that comply with all applicable regulations and that meet all applicable quality and safety standards.
- Undertake appropriate due diligence on raw materials in their supply chain and abide by all applicable laws and regulations related to conflict minerals, forced labor and child labor.
- Undertake appropriate measures to prevent any materials made with forced labor or child labor from entering their supply chains. Notify Albemarle in writing immediately upon becoming aware of any credible allegations or evidence of forced labor, child labor or other serious human rights issues in the supply chain.
- Undertake appropriate measures to prevent any conflict minerals from entering their supply chains. This includes (as appropriate for minerals suppliers) implementing the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs) or an equivalent and recognized due diligence framework. Notify Albemarle in writing if any minerals supplied to Albemarle are not conflict-free.

- Conduct appropriate supply chain mapping and cooperate with Albemarle's due diligence supply chain mapping and ongoing monitoring processes, by providing requested information, documentation and responses to questionnaires.
- Provide all necessary information to enable Albemarle to complete its own inquiries and due diligence on the origin of raw materials, including, but not limited to, completing any requested conflict-minerals reporting templates in a timely manner.
- Provide clear instructions and warnings on the appropriate labeling, handling, transportation, use and disposal of their products in compliance with all applicable laws and regulations.
- Permit Albemarle or its appointed representatives reasonable access to the Business Partner's facilities, personnel and corporate records for the purpose of conducting audits or any other inquiries to assess compliance with this Code. Where any deficiencies are identified, collaborate with Albemarle to develop and execute a corrective action plan to ensure effective remediation in a timely manner.
- If engaging security providers, implement controls consistent with international standards for public and private security arrangements, such as the Voluntary Principles on Security and Human Rights.
- Adopt a code or other policies that incorporate principles of responsible business conduct compatible with this Code and the OECD Guidelines for Multinational Enterprises.
- Implement a management system designed to ensure compliance with applicable laws, regulations and customer requirements related to the Business Partner's operations and products; conformance with the Business Partner's policies for responsible business conduct; and identification and mitigation of operational risks related to responsible business conduct.
- Conduct due diligence and use appropriate contractual provisions to ensure that sub-suppliers and sub-contractors in Albemarle's supply chains comply with standards consistent with this Code.

Business Partners Are Also Expected Not to:

- Provide any direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals. Also, avoid supporting any other party that illegally controls mine sites or transportation routes or that engages in any other illegal activity related to mining.
- Profit from, or in any way contribute to, any forms of inhumane treatment, gross human rights violations, war crimes or crimes against humanity when sourcing from or operating in conflict-affected and high-risk areas.
- Source from sub-tier suppliers that use forced labor or child labor or that engage in any other type of human rights abuses.







Business Integrity

03

Business *Integrity*

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

- Comply with all applicable laws and regulations, including those relating to anti-corruption, anti-money laundering, antitrust and competition, boycotts, gifts, lobbying, payments to Government Officials, political donations and other related regulations.
- Only offer or provide gifts, travel, entertainment or other benefits to third parties on behalf of Albemarle when such benefits are reasonable and infrequent, modest in price and appearance, properly recorded, and consistent with both this Business Partner Code and applicable law. Pre-approval from Albemarle should also be obtained if it is required in the Business Partner's contract with Albemarle. Benefits that Business Partners provide to Albemarle employees are subject to Albemarle's Gift & Hospitality Policy.
- Avoid any interaction with Albemarle employees that may conflict, or appear to conflict, with those employees' duty to act in the best interest of Albemarle.
- Conduct due diligence and use appropriate contractual provisions to ensure that sub-suppliers and sub-contractors connected with the work performed with Albemarle comply with the standards defined in this Code.
- Proactively report any actual, potential or perceived conflict of interest to Albemarle. This includes transactions, activities or situations where personal interests may run counter to Albemarle's interests. The Business Partner shall proactively identify and promptly disclose to Albemarle any instance where its employee, officer, director, agent, or subcontractor who performs work for Albemarle or having physical or system access to an Albemarle site or location, or having a familial or close personal relationship with an Albemarle employee or contractor, regardless of whether a conflict exists is believed to exist. Disclosure is required upon discovery and prior to engaging in or continuing any business activities or site-based work with Albemarle.
- Report these to Albemarle via email (integrity@albemarle.com) or the Integrity Helpline. While a conflict of interest is not necessarily a violation of Albemarle policy, failing to promptly disclose a conflict is always a violation. Business Partners must also inform Albemarle if they know or suspect that anyone acting on Albemarle's behalf is offering, requesting, or making an improper payment or providing anything of value to a Government Official*or any person in connection with Albemarle business.
- A "familial or close personal relationship" includes a spouse, domestic partner, parent, child, sibling, in-law, grandparent, grandchild, or any other relationship that could reasonably create a conflict of interest or the appearance of a conflict.



Business Partners also must not:

- Directly or indirectly offer, make or promise to make, authorize, or give any payment of funds, kickbacks, bribe, rebate, payoff or other unlawful payment or thing of value to any Government Official or any other person to obtain or retain business, gain any unfair or improper advantage, or induce or influence any act or decision of a Government Official.
- Make any facilitation payments. These are small, unofficial payments generally provided to lower-level Government Officials to persuade them to perform or expedite routine, non-discretionary services or actions (e.g., customs clearance or the issuance of licenses, permits or visas).
- Engage in commercial bribery, including offering or accepting improper incentives, kickbacks or benefits in connection with Albemarle's business.
- Engage in fraud, extortion or embezzlement to obtain an unfair or improper advantage.
- Engage in money laundering or conduct that supports terrorist financing.
- Conduct business activities that violate trade sanctions or embargoes, export control or trade restrictions. These restrictions apply to transactions with certain countries, entities and individuals, as well as certain end-uses and users to protect national security and combat terrorism, the proliferation of weapons of mass destruction, narcotics trafficking, human trafficking and other human rights abuses.
- Participate in boycotts that are not sanctioned by the U.S. government or applicable U.S. laws.
- Enter into agreements or engage in conduct that unlawfully restrains trade or restricts competition.
- Trade in Albemarle securities while in possession of material non-public information relating to Albemarle.

*** "Government Official" is defined broadly, and can include:**

- an officer, employee or anyone acting on behalf of any government body including a department or agency at any level (national, regional, or local). Examples include a government minister, regulator, judge, city mayor, police officer, military personnel, customs official and employees of public educational institutions.
- an employee of public international organizations such as the United Nations and World Bank;
- an employee of state-owned or controlled enterprises, such as refineries;
- a political party, party official or candidate for public office; and
- a person holding a position created by custom or convention who perform public functions or may influence governmental decisions such as, an indigenous community leader or member of a royal family.



Working with Albemarle

04

Working at *Albemarle Sites*

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

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

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

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

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

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



Life-Saving *Rules*

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

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

LINE BREAK
I verify control of hazardous energy before line break.

CONFINED SPACE
I obtain authorization by permit prior to entering confined spaces.

WORKING AT HEIGHTS
I work safely at heights, using appropriate fall protection.

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

ELECTRICAL
I only use proper, inspected and protected electrical equipment.

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

SAFETY

Safety Is Everyone's Responsibility.

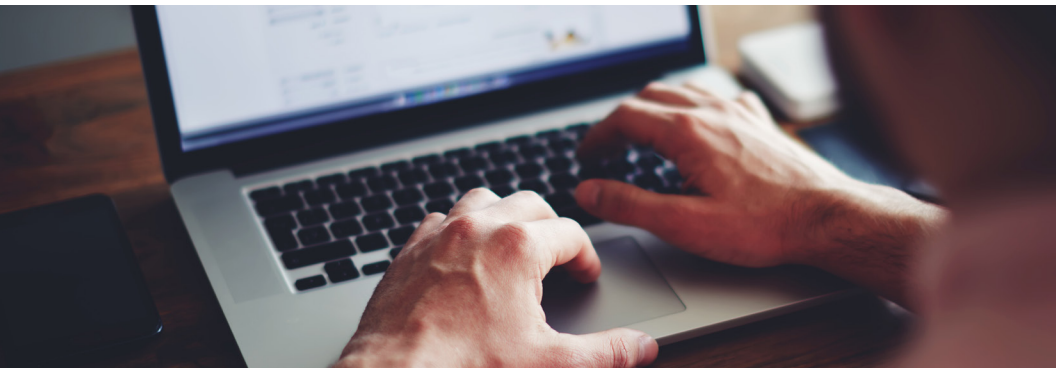
Know the Rules.
Follow the Rules.
Save Lives with the Rules.

Use of *Albemarle Assets*

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

Business Partners Provided with Albemarle Assets and Resources Are Expected to:

- Use assets responsibly and securely, and in accordance with applicable policies and laws.
- Use assets carefully, efficiently and for their intended business purpose.
- Limit personal use of these assets and ensure such use does not interfere with any work being performed for or on behalf of Albemarle.
- Take appropriate precautions to prevent damage, misuse or theft.
- Respect the privacy of other workers.
- Report any of the following to Albemarle IT (IT.Security@albemarle.com) immediately:
  - » Any lost or stolen assets
  - » Perceived risks or threats to Albemarle's assets and resources (e.g. viruses, phishing, etc.)
  - » Known, suspected or imminent unauthorized access to Albemarle's IT and communications systems



Business Partners Are Also Expected Not to:

- Use or dispose of Albemarle assets or resources for personal gain.
- Share passwords with anyone or otherwise permit unauthorized access to Albemarle systems.
- Use personal email accounts or social media applications or messaging apps for proprietary or sensitive work-related communication.
- Access, intercept or disclose the communications of others without authorization.
- Download or install new software on Albemarle computers or devices without authorization and an appropriate license.
- Disable virus software or attempt to remove viruses themselves.
- Modify, duplicate or sell software on Albemarle computers or devices without authorization.
- Attach unauthorized devices to Albemarle computers, devices or networks.
- Use Albemarle computers or devices to access or share inappropriate, offensive or illegal material.
- Disclose information about Albemarle's information system controls to any other employee or third party that is unauthorized to receive it.

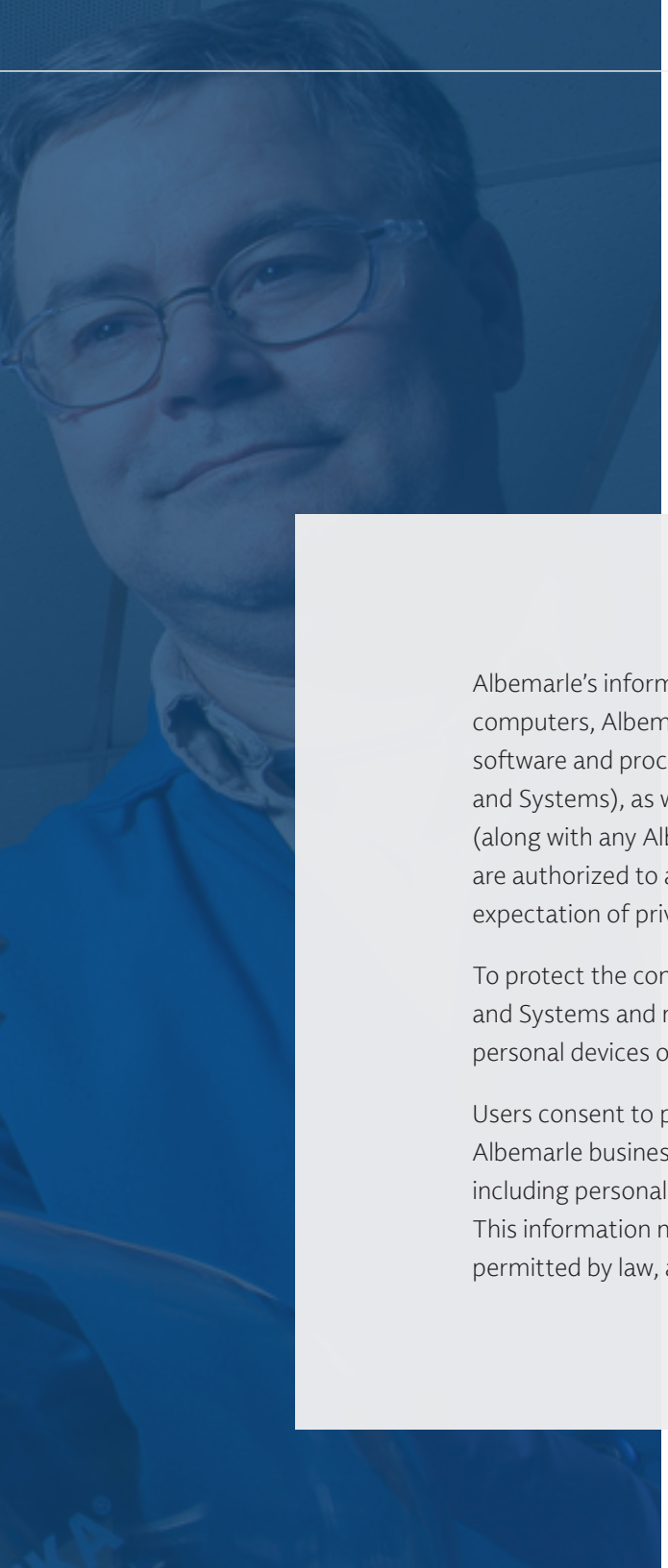
Management of Albemarle
Intellectual Property & Information

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

Specifically, We Expect Our Business Partners to:

- Treat Albemarle's intellectual property and business information with care and to take appropriate steps to protect them from misuse, theft or unauthorized access or disclosure.
- Respect the intellectual property rights of Albemarle and others, and only use such intellectual property when authorized to do so and in accordance with such authorization.
- Comply with applicable data privacy laws when collecting, storing, using, deleting and transferring or otherwise processing personal data. Any processing of personal data on Albemarle's behalf shall only be undertaken by Business Partners when there is a legitimate business or legal need; when they are appropriately authorized and only when performed accurately, fairly and in a transparent manner.

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



Business Partners Are Also Expected Not to:

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

Albemarle's information and communications technology hardware and systems, including desktop or laptop computers, Albemarle-owned handheld or mobile devices, hard drives and other storage media, all hardware, software and processes that collect, process, store and distribute data in the Albemarle environment (ICT Hardware and Systems), as well as all information created, stored and/or transmitted on Albemarle ICT Hardware and Systems (along with any Albemarle business information stored on the personal devices of independent contractors who are authorized to access Albemarle ICT Hardware and Systems), are the property of Albemarle. Users have no expectation of privacy in that information.

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

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

Recording Business & Financial Transactions *Involving Albemarle*

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

We Expect Our Business Partners to:

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

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

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





Representing Albemarle

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Marketing or Selling *Albemarle's Products*

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

Business Partners Who Market or Resell Albemarle's Products Are Expected to:

- Seek to understand customers' requirements and collaborate with Albemarle to customize our products and services.
- Strive to provide customers with complete and accurate information concerning the performance, handling requirements, and health and environmental risks of our products.
- Ensure that they are conducting business with reputable customers, for legitimate business purposes and involving legitimate funds.
- Address the concerns of customers promptly and with humility.
- Respect the privacy of customers and take steps to protect personal information of their employees.
- Periodically certify compliance with applicable ethics standards and laws, and this Business Partner Code, if requested by Albemarle.
- Speak up if they are concerned that someone (for example an Albemarle employee, Business Partner employee, subcontractor or a customer) is acting contrary to the Albemarle Code or this Business Partner Code.
- Comply with all applicable product regulatory laws in relation to the advertising and marketing of Albemarle products.



Business Partners Are Also Expected Not to:

- Obtain competitive intelligence on behalf of Albemarle by deception, misrepresentations, "half-truths", theft, payments or giving of things of value, or other improper means.
- Ask a third party to disclose information, or accept such information, if there is reason to believe they are not authorized nor contractually permitted to provide it.



Transporting *Goods, Raw Materials, Equipment & Technology*

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

We Expect Our Business Partners to:

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

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

Engaging with *Government Officials*

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



Business Partners Are Expected to:

- Be courteous, truthful, cooperative and constructive when engaging with Government Officials on behalf of Albemarle.
- Seek approval from Albemarle before engaging with any new government agency on its behalf and confirm that no registration, disclosure or authorization is required.
- Allow Albemarle the opportunity to review any information (presentations, comments — verbal or written) before it is submitted to a government agency on behalf of Albemarle and to participate in any meetings with Government Officials that concern Albemarle.
- Ensure that information provided to government agencies on behalf of Albemarle is accurate, timely and in accordance with applicable laws.
- Cooperate with any legitimate government request or investigation affecting Albemarle, answer questions honestly and notify Albemarle of the government contact.

Business Partners Also Must Not:

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

Speaking on *Behalf of Albemarle*

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

Business Partners Are Expected to:

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

Business Partners Are Also Expected Not to:

- Publicly communicate in any way that is false, misleading or would damage Albemarle's reputation.
- Publicly disclose proprietary or other confidential information of Albemarle without appropriate authorization.
- Use the intellectual property of others in public communications to be made on behalf of Albemarle, unless authorized to do so by the owner.





Albemarle®

Code of **Conduct**

FOR BUSINESS PARTNERS

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09-2026