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Responsible Sourcing Policy

Purpose

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, respecting ethical values, acting sustainably, and respecting human rights. This is not only the right thing to do, but also it is critical to maintaining trust.

The effective procurement of goods, services and raw materials is critical to the development and expansion of our sites and the manufacture and supply of our products to customers. Responsible and sustainable sourcing also helps mitigate risk and build trust with our customers, business partners, and the communities in which we operate. To this end, we work to ensure that our suppliers are socially, legally, and ethically responsible—and treat the people who work for them fairly and with dignity.

Scope

This Policy applies to Albemarle Corporation and its wholly owned subsidiaries (collectively, the “Company” or “Albemarle”), and their respective employees. Any violation of our [Code of Conduct](#), this Policy, related policies and procedures, or applicable laws may result in disciplinary action up to and including termination of employment. We may also choose not to work with or cease work with Business Partners (defined for purposes of this policy as: vendors, contractors, sales representatives and any other third-parties doing business with Albemarle) who do not meet these expectations and requirements. We will use our influence over non-controlled/operated joint ventures to encourage them to act in a manner consistent with these standards.

Responsible Sourcing-Related Responsibilities

Business Partners

Albemarle expects all Business Partners to act in a manner consistent with our Core Values and our [Code of Conduct for Business Partners](#).

Procurement

Albemarle employees and contractors who engage in procurement-related activities on behalf of the Company are responsible for selecting suppliers responsibly, including through competitive sourcing and supplier qualification processes that flag certain categories of suppliers for heightened due diligence. Procurement also plays a key role in implementing supply chain mapping and undertaking appropriate due diligence of those suppliers that present heightened risks of modern slavery and other human rights issues.

Corporate Sustainability

Albemarle's Corporate Sustainability team is responsible for working with Procurement to integrate sustainability considerations into the assessment of sourcing opportunities and for working with Business Partners to track and report on environmental impacts.

Global Ethics & Compliance

Albemarle's Global Ethics & Compliance team is responsible for leading Business Partner due diligence and monitoring processes to address risks related to legal compliance and human rights, and for related programmatic responsibilities such as training for Albemarle employees, contractors, and Business Partners, as appropriate.

Human Rights

Albemarle is committed to respecting the human rights of stakeholders throughout our supply chains, consistent with the UN Guiding Principles on Business and Human Rights. As set out in our [Code of Conduct](#), we prohibit our Business Partners from using child labor, forced labor, or other forms of modern slavery and we expect them to take appropriate measures to prevent such practices in their own supply chains.

We assess prospective Business Partners based on their risk profile and conduct additional due diligence on those that present heightened risks relating to human rights. Several factors are taken into consideration to determine if a Business Partner presents a high risk related to ethics and compliance and/or human rights, including, but not limited to, the type of service or product they offer to Albemarle and the location of the Business Partner in countries that represent a higher risk for corruption and human rights concerns. Through such due diligence, we seek to identify and mitigate potential and actual adverse impacts and facilitate access to appropriate remedies.

The due diligence process is followed by monitoring of Business Partner's activities with the goal of promptly identifying any new red flags.

Our commitment to human rights is supported by our policies, procedures, and related processes, including:

- Our [Code of Conduct for Business Partners](#), which includes standards for human rights and requires direct suppliers to cascade such standards to their suppliers;
- Our supplier onboarding processes described in our Global Procurement Policy and related procurement procedures, which flag certain suppliers for more in-depth ethics and compliance and human rights due diligence as outline in our [Human Rights Policy](#);
- Our supply chain mapping and due diligence process set out in our Supplier (Modern Slavery) Due Diligence Procedure, which holistically manages supply chain risks associated with modern slavery and sourcing from conflict-affected and high-risk areas (CAHRAs) in alignment with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- Our conflict minerals assurance process, which includes screening of third parties, management of raw material procurement, and heightened reporting requirements for relevant suppliers, as set out in our Supplier (Modern Slavery) Due Diligence Procedure;

- Our Supplier (Ethics & Compliance) Due Diligence Procedure, which supports Albemarle's anti-corruption compliance program and mitigates a range of other reputational and compliance risks associated with certain categories of service providers and other suppliers;
- Our human rights risk assessment process, which involves stakeholder engagement to identify and mitigate human rights risks associated with our operations and business relationships.

Health, Safety & Environment (HSE)

Albemarle is committed to ensuring all employees go home safe and healthy every day, and we expect our Business Partners to do the same. We require our Business Partners to maintain safe and healthy work environments [for their employees], to comply with applicable health and safety regulations, and to take steps to proactively identify safety concerns.

Albemarle is committed to addressing the impact of our operations on the environment, including by considering our carbon footprint and integrating measures to reduce and track our greenhouse gas (GHG) emissions. We expect our Business Partners to collaborate with us on our climate policy goals. Our commitment to sustainability is a fundamental part of our procurement activities, including supplier qualification, procurement planning, sourcing, and supplier management, as described in our Global Procurement Policy.

In accordance with Albemarle's commitment to sustainability, we have set a 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. We are also committed to water efficiency, managing waste with care, transparency, and conserving biological diversity and protecting ecosystems. Our commitment and governance around HSE is further described in our [Health, Safety, Security and Environment Policy Statement](#) and our [Environmental Policy](#).

Supplier Diversity

Albemarle is committed to supplier diversity and inclusion and recognizes the benefits of using a diverse, local supply base when appropriate. Albemarle strives to integrate supplier diversity and inclusion functions throughout the procurement process.

Albemarle's Supplier Diversity Program is an initiative which reflects our desire to support and participate in spending with a diverse business population in all communities in which Albemarle does business. The three main elements of Albemarle's diversity spend strategy are (i) actively seeking out and maintaining a diverse supplier base, (ii) building local supplier capability, and (iii) promoting local enterprise through localization of the supply chain.

Responsible Sourcing Obligations for All Business Partners

Albemarle requires its Business Partners to follow our Code of Conduct for Business Partners, which is incorporated by reference into supplier contracts. Additionally, Albemarle requires all supplier agreements to be in writing, prepared and/or negotiated by Procurement and other functions as appropriate, managed within Albemarle's contract management system, and properly approved and executed by authorized Albemarle personnel.

Responsible Sourcing Monitoring and Remediation

Albemarle is committed to monitoring compliance with our responsible sourcing standards and following up on instances of non-compliance, including through audits, investigation, remediation, and potential termination of the business relationship, where appropriate. Albemarle Business Partners that are suppliers of direct materials and other suppliers that present heightened risk are subject to risk-ranking and due diligence to assess and mitigate risks of forced labor, child labor, human trafficking, contributing to conflict, or other serious human rights abuses. Albemarle further commits to support processes to enable appropriate remedies if evidence of adverse impacts is identified.

Reporting

Albemarle is committed to periodic public reporting in our annual [Sustainability Report](#) on the responsible sourcing initiatives laid out in this policy and related policies and procedures, subject to business confidentiality, privilege, and other competitive concerns.

Albemarle will also update public reporting on our anti-forced labor compliance initiatives at least annually as required by law, including requirements under California's Transparency in Supply Chains Act, the U.K. Modern Slavery Act, and the Australian Modern Slavery Act, as applicable.

Speak Up

If you see or suspect activity involving Albemarle or its Business Partners that may violate this policy, our [Code of Conduct](#), [Code of Conduct for Business Partners](#), or applicable law, you are encouraged to speak up using one of the channels described below.

The Integrity Helpline is operated by an independent company and can be contacted 24 hours a day, 7 days a week, in multiple languages, by phone or online. In the U.S., the Helpline can also be contacted by text message. Details of how you can contact the Helpline are available on our website (www.IntegrityHelpline.Albemarle.com).

You may raise concerns directly with our Global Ethics & Compliance team by email: Integrity@albemarle.com.

You may also raise concerns by post:

Chief Compliance Officer, Albemarle Corporation

4250 Congress Street, Suite 900 Charlotte, NC, 28209

Albemarle employees and contractors are encouraged to visit the speak-up section of the eCode for information on other available channels for reporting.

We will not tolerate any direct or indirect acts of retaliation against an individual who in good faith reports a concern or suspected violation of this policy, our [Code of Conduct](#), our [Code of Conduct for Business Partners](#) 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.

Further Information

For further information please contact the Albemarle Sustainable Procurement team at globalprocurement@albemarle.com.