

Effective Date: November 2, 2020
Next Review Due: November 1, 2021

Policy

Introduction

Sustainability is at the heart of everything we do at Albemarle. It is an integral part of living up to our Core Values of Care, Collaboration, Courage, Curiosity, Humility, Integrity and Transparency. We believe that sustainability entails a commitment to improve the quality of human life through innovative products, protection of the environment and doing the right thing in our communities.

We recognize that health, safety, environmental protection, and respect for the human rights of our stakeholders are critical to our sustainable growth, and we embrace the opportunity to build mutually beneficial relationships with the communities where we live and work.

We are committed to building our operations and developments based on the principles of cooperation and generation of shared value. This facilitates progress in the local communities in which we operate, contributing to more equitable local, regional and national development. We support the principles set out in the **UN Declaration on the Rights of Indigenous Peoples** and the **International Council on Mining & Metals Position Statement on Indigenous Peoples and Mining**. We also maintain an overarching commitment to respect the human rights of our stakeholders and to avoid human rights abuses, consistent with the **UN Guiding Principles on Business and Human Rights**. This is not only the right thing to do, it is critical to maintaining trust and our legal and social license to operate.

Purpose & Scope of This Policy

This Policy provides direction and guidance to ensure that our engagement with local communities, including indigenous peoples, are in accordance with fundamental principles of basic human rights, our Core Values, the Albemarle Code of Conduct (**Engaging with our Host Communities**) and our **Human Rights Policy**. Where appropriate this Policy is supplemented by procedures governing engagement with local communities. If you know or suspect that local law sets different standards from this Policy or supporting procedures, we expect you to follow the higher standard.

This Policy applies to Albemarle Corporation, all Albemarle-controlled entities and their respective employees, officers and directors globally. Any violation of the Code, this Policy, related policies and procedures, or applicable laws may result in disciplinary action up to and including termination of employment. We may also elect to not work or cease work with business partners who do not meet these expectations and requirements.

Our Core Values in Action

In accordance with our Code of Conduct (Engaging with Our Host Communities):

- We seek to establish long-term community relationships based on meaningful engagement, care, respect, trust, transparency, honesty, humility and good faith.
- We recognize the unique relationship of indigenous communities with their environments, and we respect and seek to promote the culture, heritage, life systems, customs, beliefs, rites and socio-cultural practices of neighboring communities, and especially those associated with indigenous communities existing in the areas of influence of our operations.
- We value the participation of indigenous peoples in our workforce.

To ensure a coordinated approach in interactions with community representatives, the Code of Conduct requires:

- Consultation with the employee responsible for local community engagement and any relevant country manager in advance of all meetings with community representatives;
- A summary of all meetings with community representatives to be prepared and provided to Government Affairs;
- Immediately reporting any complaints or inquiries received from host communities to the employee responsible for local community engagement and any relevant country manager, and in accordance with any applicable grievance mechanism;
- Following Albemarle's review and approval processes if you are considering offering anything of value, including gifts or hospitality, to a community representative, or receiving the same from a community representative;
- Obtaining pre-approval from Global Ethics & Compliance before offering employment, a temporary contract or an internship to, or a contract to a vendor owned by:
 - a community representative in a position of influence or authority over Albemarle's business;
 - a relative of such a community representative; or
 - an individual who was such a community representative in the past two years.
- Consultation with Global Ethics & Compliance, and notification to your supervisor, if you, your spouse, your partner or a [relative](#) becomes a community representative who has influence over Albemarle's affairs;
- Immediately contacting Global Ethics & Compliance or the Legal Department if a community representative makes a request for a bribe, including a facilitation payment.

For more information please refer to the Code of Conduct ([Engaging with Host Communities, Offering or Accepting Gifts & Hospitality, Hiring New Employees, Managing a Conflict of Interest](#)).

Maintaining Relationships with our Host Communities

When engaging with our host communities:

- We seek to understand, recognize and accept the importance of establishing respectful relationships between the company and the communities neighboring its operations, placing special emphasis on those established with indigenous communities.
- We seek to promote a harmonious and respectful relationship of the company's workers, contractors and subcontractors with the communities neighboring Albemarle's operations, seeking relationships that safeguard the dignity of people and the sustainable development of communities, including through local procurement where appropriate. Under the Code of Conduct (**Selecting and Managing Vendors**) and the **Global Procurement Policy**, pre-approval is required before using a Compliance Sensitive Vendor – which includes any vendors who we know or suspect are directly or indirectly owned by a community representative or a close relative of a community representative, who engage with our host communities on our behalf, or who are recommended by a community representative.
- We seek to establish mutually beneficial agreements with our neighboring communities, ensuring compliance with all obligations by law.
- In locations where we routinely interact with indigenous communities, we seek to develop, implement, and continuously improve detailed procedures to provide company employees with practical guidance regarding community interactions, social contributions, and related matters.
- We are honest and transparent in our environmental and social management, and actively communicate this so that our neighboring communities understand our operations, plans and projects.
- We maintain processes for sharing feedback and raising concerns, and responding to concerns in a timely manner – we will not retaliate against any Albemarle employee or member of our host communities for making a community-related complaint in good faith.
- Under the Code of Conduct (**Selecting and Managing Vendors**) and the **Global Procurement Policy**, pre-approval is required for engaging vendors who provide site security services.

Understanding and Mitigating Risks in our Operations

In conducting our operations:

- We assess and consider the human rights, social, cultural, environmental and economic impact of our operations on others, and conduct due diligence where appropriate.
- We take measures to prevent, and where necessary, mitigate and remediate adverse impacts that are directly connected to our operations and relationships.

Free, Prior and Informed Consent

Whenever we need to expand our activities via land use, we are committed to respecting the principle of free, prior and informed consent (FPIC) in our engagement with indigenous communities and host governments.

Pre-Approval for Donations to Community Projects & Charities

In accordance with our Code of Conduct (**Engaging with Our Host Communities** and **Making Charitable Donations**) and **Anti-Corruption Policy** pre-approval is required before offering or giving:

- charitable donations on behalf of Albemarle; or
- financial or in-kind support to a community project on behalf of Albemarle.

Further information on the process for pre-approval can be found in the **Charitable Donations and Community Projects Procedure**.

Albemarle Foundation Support of Employee Philanthropic Efforts

In addition to the support and commitments established under agreements with our neighboring communities, Albemarle Foundation Global supports our employees' volunteer efforts in the communities where we live and operate.

Pursuant to the Foundation Charter, the Foundation performs due diligence to understand community needs, considers employees' stated interests, and confirms alignment with our Core Values to make donations that leverage both sweat equity and financial support and generate opportunities for volunteerism. Among Albemarle's most important responsibilities are nurturing our communities and promoting our employees' philanthropic efforts.

Further Information

For further information please contact the Albemarle sustainability team at sustainability@albemarle.com