



Labor and Human Rights Report

Overview

Tronox Holdings plc is a values-based organization with a long-standing commitment to improving the human capital of our employees, contractors and the individuals who live in the communities where we operate.

Our values are in line with our commitment to the **United Nations Global Compact (UNGC)** <https://www.unglobalcompact.org/> and are expressed in our **Code of Business and Ethics Conduct** <https://compliance.tronox.com/code-of-conduct/> and **Supplier Code of Conduct** <https://compliance.tronox.com/supplier-code-of-conduct/>. Many of the policies, practices and procedures that ensure we identify and address any deviations from these values are available on our **Ethics and Compliance Website** <https://compliance.tronox.com/>.

This report covers the labor and human rights topics that Tronox believes are most relevant to a company focused on mining heavy mineral concentrates, upgrading the titanium content of those concentrates and turning the resulting feedstocks into titanium dioxide (TiO₂) used by our customers to produce paints and coatings. These include keeping our employees, contractors and the individuals who live near our facilities safe, promoting diversity and inclusion regardless of an individual's race, ethnicity, age, gender, religion or disability and acquiring, developing and nurturing the potential of our employees.

What Matters for Our Company

Based upon our long-term strategy of becoming the world's leading vertically integrated manufacturer of TiO₂, our leadership assessed various subject matter areas related to labor and human rights to ensure that Tronox's human capital-related strategies and goals were aligned with the United Nation's 2030 Agenda for Sustainable Development. Below we set forth and describe the social topics that are relevant for our Company.

- **Employee Health and Safety**

Tronox places an uncompromising focus on operating safe, reliable, and responsible facilities, and we measure our progress with both safety metrics and leading indicators. We believe every employee and contractor has a responsibility for safety, and we proactively identify and manage risk, conduct ourselves responsibly, exercise good judgement, and take accountability for our actions.

KPIs

Tronox tracks two key metrics in the area of employee health and safety. To ensure that the health and safety of our employees and contractors is always front and center in the minds of management, 15% of our annual compensation incentive plan is tied directly to two metrics which we track carefully: Disabling Injury Frequency Rate (DIFR) and Total Recordable Injury Frequency Rate (TRIFR). In 2020, our DIFR and TRIFR results placed us in the 1st quartile (0.0 to 0.2 range)

and 2nd quartile (0.3 to 0.6 range), respectively among the U.S. Bureau of Labor Statistics Chemical Manufacturing Companies. Each year in February, our Board of Directors establishes forward looking metrics on which we base that year's payout under our annual compensation incentive plan.

You can find our historical performance in respect of these metrics as well as our current year target in our **Annual Sustainability Report** available on our website <https://www.tronox.com/about-us/sustainability/sustainability-reports/>.

- **Career Management and Training**

Because we operate both titanium ore mines and TiO₂ pigment plants, and because our operations span the world, we not only require specialty skills in mining and TiO₂ pigment manufacturing, but we also need people who are willing to learn skills across both operations and who can help us extract value from our integrated model. Accordingly, we place a high priority on knowledge transfer (including by relocating skilled leaders across countries and between mining and TiO₂ pigment operations, by staffing high-potential employees in regions on global projects, and by enabling collaboration in global centers of excellence).

In order to encourage each of our employees to develop to the full extent of their capabilities, we have implemented the following initiatives:

- ✓ Offered online education to all employees via a broad based global learning platform, providing leadership development, business skills and information technology;
- ✓ Launched an education series covering topics specific to Tronox using video webinars available globally; and
- ✓ Completed a technical skills assessment of our workforce in our key technologies including mining, smelting/furnaces, chlorination, oxidation, finishing, and packaging, and began developing a program to build the capabilities for our future.

KPIs

We track a range of metrics to ensure that we are making progress relative to our career management and training goals. These metrics include the amount invested on annual investment in various forms of career, technical, and compliance training, the number of hours our employees spent on various forms of training, and the percentage of our employees who undergo annual performance appraisals. We publish these metrics in our Sustainability Report available here <https://www.tronox.com/about-us/sustainability/sustainability-reports/>.

- **Child Labor, Forced Labor and Human Trafficking**

Tronox maintains and enforces a Policy to combat **Slavery and Human Trafficking** which can be found on our Compliance Portal <https://compliance.tronox.com/labor-and-human-rights/>.

Tronox is committed to ensuring that slavery and human trafficking is not taking place in any form within Tronox's business or any part of its supply chain. In line with this Tronox has in procedures to ensure the deterrence of any such conduct including a Code of Ethics and Business Conduct ("Code of Conduct") that apply to all Tronox employees, as well as agents, suppliers and contractors who perform work on behalf of Tronox. Our Code of Conduct is available on our Compliance Portal <https://compliance.tronox.com/code-of-conduct/>.

Additionally, Tronox has established a specific Supplier Code of Conduct ("Supplier Code of Conduct") also available on our Compliance Portal <https://compliance.tronox.com/supplier-code-of-conduct/>. Tronox expects our suppliers to adhere to both the Code of Conduct and Supplier Code of Conduct, which set out our expectations to ensure issues of human trafficking and slavery do not take place in its business or supply chains. The Supplier Code of Conduct sets forth the expectation that Tronox's suppliers shall protect the human rights of their employees, to treat them with dignity and respect, and shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor. This includes a prohibition on the transportation, harboring, abduction, fraud, or payments to any person having control over another person for purposes of exploitation.

KPIs

We have a "zero tolerance" attitude towards child labor, forced labor and human trafficking. Each year, we seek to train all of our employees on the code of conduct and ask each employee to certify that they will adhere to the provisions of the code which includes a section on modern slavery. In addition, we actively promote use of our "Speak Up!" hotline among employees, suppliers and other stakeholders. We carefully track the number of claims we receive that relate to child labor, forced labor and human trafficking. We have not received any allegations related to this topic in the past three years. Given our "zero tolerance" policy, our goal is to not receive any credible allegations of such conduct by Tronox and its employees and suppliers.

- **Diversity, Discrimination and Human Rights**

As a global company, it is imperative that we foster a workforce composed of people with diverse backgrounds and perspectives, reflecting our customer base and the communities in which we operate. Foundational to this effort is fostering a culture of non-discrimination, particularly related to gender equity. Enabling women to participate fully in every aspect of our business is not only the right thing to do, it's also just smart business and opens up for us opportunities to recruit talented employees. That is why we recently embarked upon a program of bringing women employees into our Yanbu, Saudi Arabia facility which heretofore had been male only. To fully achieve gender equality, it is imperative that we develop a workforce culture where there is "zero" tolerance for harassment in any form.

An important component of how we promote diversity, anti-discrimination and human rights is our Tronox Diversity and Inclusion Network that collaborates with all employees to bring diversity and inclusion education to our sites through educational interactions, team sharing opportunities and social events.

KPIs

Tronox tracks multiple metrics related to this topic and sets goals that we believe are of particular relevance to a mining and chemical company that operates on a global scale. All of these metrics and goals are available in our annual sustainability report under the caption, Diversity and Equal Opportunity that is available on our website <https://www.tronox.com/about-us/sustainability/sustainability-reports/>.

- **Social Dialogue**

Of the approximately 6,500 people we employ across six continents, over 2,000 individuals or roughly one-third of our employee population live and work in the Republic of South Africa. Indeed, South Africa hosts the largest contingent of Tronox employees of any country in which we operate. Our significant presence in the South African mining sector gives us a unique perspective on those aspects of the UN's 2030 Agenda for Sustainable Development aimed at achieving economic and social prosperity so that "no one is left behind."

The government of South Africa has embraced the UN's 2030 Agenda for Sustainable Development as complementary with its own aspirations to create a more just society that addresses the legacy of the Apartheid regime. Companies like Tronox engaged in the natural resources extraction and beneficiation sectors bear a special responsibility in the socio-economic upliftment of South Africa and its people, by implementing their development agendas, in a manner that aims at ending discrimination against historically disadvantaged South Africans, women, youth empowerment and addressing poverty, unemployment and inequality on a sustainable basis.

There are many regulations and policies applicable to our operations in South Africa that enable us to promote the development of our South African employees and suppliers and the communities where we operate. The Broad-Based Socio-Economic Empowerment Charter for the Mining and Minerals Industry 2018 ("Mining Charter") is a policy document that was specifically created to cater for the interests and socio-economic upliftment of all stakeholders within the mining supply chain. All mining companies are required to compile a Social and Labor Plan that is refreshed on a five-year cycle. Tronox's current and historic **Social and Labor Plan** is available on our website here <https://www.tronox.com/about-us/global-locations/>.

The Mining Charter also requires mining companies to create career development plans both on a function and individual basis and fast track eligible talent. As the mining industry is a knowledge-based industry offering South Africans an opportunity at economic development the objectives of the Mining Charter's career development directives are multi-faceted and include tangible and aspirational goals related to skill development, training, diversity, creating opportunities for historically disadvantaged persons, and research and development into pertinent areas including mining and environmental restoration. We are proud of our implementation of the Mining Charter as well as the significant number of other programs and initiatives we maintain that benefit our employees and the communities where we operate.

- ✓ In 2020 we implemented an employee stock ownership plan for all our non-executive level South African employees. The plan pays a guaranteed distribution annually and every

five years pays out an aggregated top-up distribution that is based on the performance of our business in South Africa as a whole.

- ✓ We recently implemented a formal mentoring program targeted at our high-potential younger talent. Under the program, 15 members of the South African senior executive team and the board of directors received training in mentorship and were paired with up to four high potential employees. Mentoring occurs on a monthly basis and assists employees in better understanding their environment, their drivers, inhibitors to success and setting realistic and achievable goals. The intention is that on successful completion of the mentorship program, the employees being mentored will be ready for either career progression or promotion.
- ✓ We actively support education among our employees, their families and our surrounding communities. Specifically, in 2020 we awarded 53 scholarships for students in the local community to attend university and 45 scholarships for our own employees to enhance their educational credentials in areas related to their employment activities. In addition, Tronox sponsored 89 vocational internships for young people from the community with local business partners, approximately 100 internships within Tronox in a range of technical and professional areas, and 29 internships expressly for individuals from our community with disabilities.
- ✓ We also support the development of leaders on the continent of Africa by sponsoring an annual scholarship at the African Leadership Academy (ALA) in Johannesburg. ALA seeks to transform Africa by identifying, developing and connecting Africa's future leaders, training them to work together to address Africa's greatest challenges, achieve extraordinary social impact, and accelerate the continent's growth trajectory. ALA notes that Africa's greatest need is ethical and entrepreneurial leadership, and so they comb Africa to identify outstanding young leaders, ages 15-18, who demonstrate the passion and brilliance to transform the future of the continent. These young leaders are then provided a two-year intensive program of intellectual growth and hands-on leadership development. Everyone who applies and is then admitted to ALA, regardless of financial background or nationality, is eligible to receive significant financial assistance in the form of scholarships and loans towards studying at ALA and accessing membership to the lifelong ALA network.
- ✓ A holistic wellness program has been implemented for all employees through which we assist employees in managing their day-to-day medical needs including BMI tests, audiology and optometry.

Who is Covered by Our Policies

Generally speaking, our labor and human rights report applies to the same group of stakeholders as our Code of Ethics and Business Conduct. That is, depending on the particular policy, it applies to all officers, directors and employees of Tronox as well our agents, suppliers, contractors and other partners who are providing goods and services to Tronox or acting on our behalf.

Who Owns this Report

This report and the relevant policies is owned by owned jointly by our Senior Vice President, Chief Human Resources Officer and Senior Vice President, General Counsel and Corporate Secretary.

Updating and Maintaining the Relevance of this Report

This report and the policies underlying it are reviewed and updated on an annual basis as part of our process for preparing our annual GRI report.

How We Communicate This Report

This report and the underlying policies that it supports are available to both external and internal stakeholder groups on our **Compliance Portal** at <https://compliance.tronox.com/>.

Some of the specific policies underlying this report are available only to our employees for business and commercial reasons.

Thank you for reading this report and for your ongoing interest in Tronox.



Jean-François Turgeon
Co-Chief Executive Officer



John D. Romano
Co-Chief Executive Officer