

Conflict Minerals Policy***Policy No. 25.03***

Effective Date April 15, 2021**Contents**

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1 PURPOSE

Tronox Holding plc (together with its subsidiaries and affiliates, “Tronox” or the “Company”) and its management are committed to responsible sourcing, compliance with applicable legal requirements and meeting the expectations of our customers. Accordingly, Tronox does not wish to inadvertently provide support to the armed groups operating in the eastern Democratic Republic of the Congo (DRC) that are funded through proceeds from the mining or trade of so-called “conflict minerals” or 3TGs (tin, tantalum, tungsten and gold). The atrocities committed by these armed groups led to the creation of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, built on the framework of the UN Guiding

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Principles on Business and Human Rights. Legal requirements have followed, requiring certain companies to disclose their due diligence consistent with the OECD Guidance, mitigating the risk that the 3TGs they purchase may directly or indirectly fund conflict in the DRC, adjoining countries, or other high-risk areas of the world. By adopting this Policy and collaborating with our customers and suppliers Tronox is doing what it can to promote responsible business practices consistent with our values.

2 SCOPE

This Policy applies worldwide to Tronox and to all its directors, officers and employees (collectively, “Tronox Employees”) as well as, vendors and suppliers.

3 POLICY

Tronox is committed to responsible sourcing of 3TGs using the OECD due diligence framework, so as not to support conflict or human rights abuses in the DRC region or other areas of the world, while avoiding de facto embargoes. This position is consistent with our values and respect for human rights in our own operations and our supply chains.

Tronox global suppliers of the 3TGs are required to:

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- Supply materials to Tronox that are "Conflict-Free," meaning 3TGs that are from recycled or scrap sources or that do not directly or indirectly finance armed groups through mining or mineral trading in the DRC, adjoining countries or any other high-risk area of the world as determined by applicable regulatory bodies ("high-risk areas").
- We expect our suppliers to be transparent and responsibly source from the DRC, adjoining countries, and high-risk areas, in order to avoid de facto embargoes.
- Adopt policies and due diligence management systems consistent with OECD Guidance to identify, prevent, mitigate and, where appropriate, remediate risks associated with 3TGs as well as require their suppliers to adopt similar policies and practices. Tronox expects suppliers to cooperate with Tronox in evaluating compliance with these requirements.
- Provide Tronox with summary report from the Responsible Mining Initiative (RMI) demonstrating the approval by RMI of the site Tronox is purchasing from. When such approval expires, provide Tronox with the updated approval.
- Suspend or discontinue engagement with up-stream suppliers after failed attempts at mitigation, remediation or non-conformance with Tronox's policy.

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Tronox employees must report known or suspected violations of this Policy or laws or regulations applicable to conflict minerals. Tronox management will not retaliate or tolerate any harassment or retaliation of anyone for reporting, in good faith, known or suspected violations of laws, regulations, or Tronox policies or procedures, including this Policy.

Concerns may be reported to a supervisor, to the General Counsel, or via the Tronox Ethics and Compliance Hotline, “Speak Up”, which is administered by third-party provider Convercent. The Hotline reporting service is available 24 hours a day, 7 days a week. Written reports may be made online at: tronox.com/speakup. Telephone reports may be made to: +1 800 4619330. (This number is toll-free in the US and Canada only; local toll-free numbers may be found at tronox.com/speakup). Please refer to the Ethics, Compliance and Whistleblower Hotline Policy 60.02 for further information.

Subject to local law, you have the option to report violations anonymously. Any report will be handled confidentially. The General Counsel of Tronox reports to the Audit Committee of the Board of Directors with respect to Hotline reports received and respective outcomes.

5 CONSEQUENCES

A breach of this Policy may result in disciplinary action up to, and including termination of, employment. Violations of applicable conflict mineral laws may expose the Company to significant fines, loss of government contracts, and reputational harm. Intentional misconduct may also expose the Company and responsible employees to criminal enforcement action by government authorities.

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6. POLICY REVIEW AND EXCEPTIONS

The Chief Procurement Officer will approve any revisions or exceptions to this policy.

7. RELATED INFORMATION

To ensure compliance with the laws and regulations, Tronox employees should read, become familiar with, and adhere to the more detailed topical policies and procedures, such as the Tronox Supplier Code of Conduct, Tronox Code of Ethics and Business Conduct and other related policies that can be found in the "Global Policy and Guidelines Library" section of the Company's internal website entitled "inTro".