

May 12, 2022

Modern Slavery and Human Trafficking Statement – Tronox Holdings plc

Tronox Holdings plc has prepared this Statement pursuant to Section 54 of the U.K. Modern Slavery Act 2015 (the “U.K. Act”). This Statement is made on behalf of Tronox Holdings plc and its consolidated subsidiaries (collectively, “Tronox”) even though only certain of its U.K. subsidiaries are subject to the requirements of Section 54 of the U.K. Act.

Overview of Tronox

Tronox is the world’s largest integrated manufacturer of titanium dioxide pigment. Tronox operates titanium-bearing mineral sand mines and beneficiation and smelting operations in Australia, South Africa, and Brazil to produce feedstock materials that can be processed into titanium dioxide for pigment, as well as high-purity titanium chemicals, including titanium tetrachloride and Ultrafine© titanium dioxide. It is our long-term strategic goal to be vertically integrated and consume all our feedstock materials in our 9 TiO₂ pigment facilities located in the United States, Australia, Brazil, UK, France, the Netherlands, China and the Kingdom of Saudi Arabia (“KSA”). The mining, beneficiation and smelting of titanium-bearing mineral sands creates meaningful quantities of zircon that we also supply to customers around the world.

Our Policies to Combat Slavery and Human Trafficking

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 place policies and 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. Additionally, Tronox has established a specific [Supplier Code of Conduct](#) (“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. Tronox is committed to complying with all applicable laws, rules, and regulations governing employment, immigration, and labor relations, including child labor, working hours and fair wages, and expects each of its suppliers to act accordingly. The use of child labor by suppliers and representatives is prohibited.

The Supplier Code of Conduct is incorporated as part of Tronox's standard form procurement contract. Breach of contract, including breach of the Supplier Code of Conduct, allows Tronox to terminate the contract. 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.

As part of this commitment to prohibit human trafficking, suppliers may not engage in any of the following conduct:

1. Destroying, concealing or confiscating identity or immigration documents;
2. Using fraudulent recruiting tactics; or
3. Charging employees unreasonable recruitment fees or providing inadequate housing based upon local standards, laws and directives.

Tronox's Due Diligence Process

Tronox undertakes a compliance review of vendors, with heightened due diligence scrutiny of vendors in areas of the world, or activity, that carry higher risk. Our compliance procedures contemplate corrective action.

Training Available to Tronox Employees

Tronox employees receive periodic training on the Code of Conduct. In addition, Tronox employees are required to certify upon commencement of employment with Tronox that they have read and understand the Code of Conduct. The Code of Conduct also provides that, if a Tronox employee needs guidance on an ethical or legal question or has knowledge of a potential violation of the Code of Conduct, policies or procedures, he or she must seek advice from one or more of a list of resources or report it via a 24-hour help line. The same channels are open to all third parties. All reports of alleged violations will be investigated. If the results of an investigation indicate that corrective action is required, Tronox will decide the appropriate steps to take, including discipline, up to and including termination of employment or, in the case of a third party, the business relationship.