

Freedom of Association Policy***Policy No. 40.17***

Contents

1	PURPOSE	1
2	SCOPE	2
3	POLICY	2
4	REPORTING POLICY VIOLATIONS.....	2
5	CONSEQUENCES	3
6	POLICY REVIEW AND EXCEPTIONS.....	3
7	RELATED INFORMATION	4

1 PURPOSE

Tronox Holding plc (together with its subsidiaries and affiliates, “Tronox” or the “Company”) and its management are committed to complying with all applicable laws protecting the rights of workers to freely associate in accordance with core International Labour Organization (ILO) conventions. All of our businesses globally must respect the rights of workers to freely associate, organize and bargain collectively in accordance with applicable laws and the customs of the countries in which they are employed. Where employees are represented by a legally recognized union, Tronox is committed to bargaining in good faith with the employees’ freely chosen representative. All of our businesses must respect the rights of workers to communicate openly with management regarding working conditions without fear of retaliation, harassment, intimidation, penalty or interference.

<i>Date Issued: September 30, 2022</i>	<i>Title of Policy Owner: Senior Vice President, Chief Sustainability and Human Resources Officer</i>	<i>Page 1 of 4</i>
<i>Electronically Controlled Document – For the Latest Version Check the Intranet</i>		

Freedom of Association Policy***Policy No. 40.17***

2 SCOPE

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

3 POLICY

Tronox will:

- Comply with all applicable laws, regulations and collective bargaining agreements.
- Co-operate in good faith with the bodies that our employees collectively choose to represent them (such as trade unions or work councils) within the appropriate national legal frameworks.
- Allow employees to freely elect representatives of their choice.
- Provide facilities to employees' representatives to enable them to carry out their functions promptly and efficiently, in such a way that does not impair the efficient operation of Tronox's facilities.
- Facilitate employee representatives to consult with management regarding workplace processes through participation in employee forums and cooperation committees.
- Recognize employee representatives and engage in good faith collective bargaining processes with them.
- Communicate the existence of this policy to our supplier and vendors and ask that they make the same commitment as Tronox.

4 REPORTING POLICY VIOLATIONS

Tronox employees must report known or suspected violations of this Policy or laws or regulations. Tronox management will not retaliate or tolerate any harassment or

<i>Date Issued: September 30, 2022</i>	<i>Title of Policy Owner: Senior Vice President, Chief Sustainability and Human Resources Officer</i>	<i>Page 2 of 4</i>
<i>Electronically Controlled Document – For the Latest Version Check the Intranet</i>		

Freedom of Association Policy***Policy No. 40.17***

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 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.

6 POLICY REVIEW AND EXCEPTIONS

The Senior Vice President, Chief Sustainability and Human Resources Officer will approve any revisions or exceptions to this policy.

<i>Date Issued: September 30, 2022</i>	<i>Title of Policy Owner: Senior Vice President, Chief Sustainability and Human Resources Officer</i>	<i>Page 3 of 4</i>
<i>Electronically Controlled Document – For the Latest Version Check the Intranet</i>		

Freedom of Association Policy***Policy No. 40.17***

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".

<i>Date Issued: September 30, 2022</i>	<i>Title of Policy Owner: Senior Vice President, Chief Sustainability and Human Resources Officer</i>	<i>Page 4 of 4</i>
<i>Electronically Controlled Document – For the Latest Version Check the Intranet</i>		