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1 PURPOSE

The Tronox Sustainable Procurement Policy (the “Policy”) has been established to provide clarity on the Company’s expectations of its suppliers, business partners, and their subcontractors (“suppliers”). One of Tronox’s six core values is: Responsibility – We care for our environment and our communities. Tronox believes it is important to work with suppliers who exhibit the same commitment to sustainability and environmental stewardship as we strive for ourselves. This policy is aligned with our Supplier Code of Conduct to ensure that a consistent and systematic process is followed to further our sustainability goals.

2 SCOPE

This policy will apply globally to all suppliers who are considered high risk from a sustainability and environmental standpoint. As determined by Tronox’s overall Sustainability Strategy to target Carbon footprint reduction for our pigment products, in the first instance, the policy will focus on the high carbon impact goods and services at our chlorine pigment plants, with a view to expanding into the other areas of our business as part of our longer-term strategy.

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3 POLICY

All suppliers identified as high carbon impact categories of goods on the matrix in appendix A will be required to complete a Sustainability Performance Survey (Appendix C) on an annual basis. The Supply Chain Excellence team will be responsible for administration of the survey and for reporting the results. The Principal Environment/Sustainability Advisor will be responsible for supporting the development of the survey to ensure that it is fully aligned with the overall strategic objectives for sustainability and will enable the supplier's sustainability performance to be tracked over successive years.

The relevant category/regional Supply Chain team members will be responsible for ensuring that all applicable suppliers are included on the list of suppliers to be include in the survey process, and for encouraging participation in the survey. They will also be responsible for ensuring that all Purchase Orders and Contracts include appropriate sustainability clauses as defined by the Legal department. They should only engage will suppliers who meet our minimum standards for Safety and Environment. Consideration should be given to including sustainability KPI within any contracts for more than one year.

In the event that suppliers are unwilling to respond to the survey or are able to demonstrate an appropriate level of commitment to sustainability they will not be eligible for further business.

The survey results will be reviewed by The Principal Environment/Sustainability Advisor who will advise on actions Supply Chain should engage with suppliers on to improve future performance. The survey results and participation KPI will be presented to the Sustainability Council on an annual basis.

4 POLICY REVIEW AND EXCEPTIONS

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

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5 RELATED INFORMATION

25.00 Supplier Code of Conduct

25.02 Global Procurement and Governance Policy

25.03 Conflict Minerals Policy

25.05 Modern Slavery and Human Trafficking Statement

50.03 Environmental Policy

Appendix A – Risk Matrix – All active suppliers by category supplied

Below is the list of key supplies with a high impact on the carbon footprint or the pigment from Tronox's chloride plants.

- Synthetic rutile
- Mined rutile
- Chloride slag
- Ilmenite
- Calcium hydroxide
- Chlorine gas [membrane cell]
- Generic organic chemical [applicable as estimates for surface treatment/minor chemicals]
- Sodium aluminate
- Generic inorganic chemical [applicable as estimates for surface treatment/minor chemicals]
- Generic inorganic chemical [applicable as estimates for surface treatment/minor chemicals]
- Generic inorganic chemical [applicable as estimates for surface treatment/minor chemicals]
- Hydrated lime [packed]
- Nitrogen [gas]
- Nitrogen [liquid]
- Oxygen [gas]
- Oxygen [liquid]
- Petroleum coke [production only, no CO2e on use]

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Silica sand
Sodium hydroxide [membrane cell]
Sodium silicate [hydrothermal liquor]
Sulfuric acid [liquid]
Diesel
LPG
Natural Gas
Toluene
Other fuels for energy consumption

Appendix B – KPI

- Number of active suppliers who have been identified as high carbon impact for pigment from Tronox's chloride sites.
- Number of the suppliers identified above to have completed the sustainability questionnaire
- Number of suppliers committed to carbon reduction targets
- Number of suppliers committed to waste to landfill reduction targets

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Appendix C - Survey



Supplier Sustainability Performance Survey 2021

Brilliance in Action

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* Required

* This form will record your name, please fill your name.

General Information

1. Company name *

2. Company headquarter location (Country) *

3. Company contact name for follow up questions *

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4. Company contact email *

5. Company contact job title *

6. What is/are your main product category/categories?

- ☐ Synthetic Rutile
- ☐ Mined Rutile
- ☐ Chloride Slag
- ☐ Ilmenite
- ☐ Calcium Hydroxide
- ☐ Chlorine Gas (membrane cell)
- ☐ Sodium Aluminate
- ☐ Hydrated Lime (packed)

- ☐ Nitrogen (gas)
- ☐ Nitrogen (liquid)
- ☐ Oxygen (gas)
- ☐ Oxygen (liquid)
- ☐ Petroleum Coke (production only, no CO2e on use)
- ☐ Silica Sand
- ☐ Generic Organic Chemical
- ☐ Generic Inorganic Chemical
- ☐ Sodium Hydroxide
- ☐ Sodium Silicate (hydrothermal Liquor)
- ☐ Sulfuric Acid (liquid)
- ☐ Diesel
- ☐ LPG
- ☐ Natural Gas
- ☐ Toluene
- ☐ Other fuel for energy consumption

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7. How many factories/production facilities do you have? *

8. Please list your factory/production facilities (location and country) that supply Tronox *

9. Are you audited by Ecovadis? *

☐ Yes

☐ No

10. If yes, what is your most recent Ecovadis score?

11. What date was your most recent Ecovadis score reported?



Format: M/d/yyyy

Greenhouse Gas Emissions and Energy(Copy)

12. Do you monitor your green house gas emission (Scope 1&2)? *

☐ Yes

☐ No

13. How do you monitor your green house gas emissions? *

- ☐ On company level
- ☐ Per individual site
- ☐ Both

14. Are you using renewable energy? *

- ☐ Yes
- ☐ No

15. Are you using renewable energy in all facilities supplying Tronox? *

- ☐ Yes
- ☐ No

16. If no, do you plan to transition to using renewable energy in all facilities?

- ☐ Yes
- ☐ No

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17. Where are you sourcing electricity from? *

- ☐ Buying off the grid
- ☐ Produce own electricity
- ☐ Other

18. Do you have a strategic carbon neutrality target? *

- ☐ Yes
- ☐ No

19. If yes, what is your target percentage for carbon reduction by 2025?

20. What was your carbon reduction percentage for 2020? *

Waste

21. Do you monitor waste in your production facilities? *

☐ Yes

☐ No

22. How do you monitor waste in your production facilities? *

☐ Waste Mapping of Individual Stream

☐ Efficient Inventory Management

☐ Reduce Packaging Materials

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- ☐ Volume Reduction
- ☐ Recover, Reuse, Sort
- ☐ Establish a Preventative Maintenance Schedule
- ☐ Label and Organize the Warehouse Properly
- ☐ Minimize Water Usage
- ☐ Other
- ☐ None

23. What treatment method of waste do you make use of? *

- ☐ Incineration
- ☐ Landfill
- ☐ Recycle
- ☐ Reuse
- ☐ Other
- ☐ None

24. What treatment method of waste water do you make use of? *

- ☐ Internally treated
- ☐ Externally treated
- ☐ Directly released into surface water
- ☐ Other
- ☐ None

25. If your water waste is directly release into surface water, do you measure the quality of the treated water before discharging it to surface water?

- ☐ Yes
- ☐ No

26. Do you have a strategic zero waste to landfill reduction target? *

- ☐ Yes
- ☐ No

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27. If yes, what is your target percentage for waste to landfill reduction by 2025?

28. What was your waste to landfill percentage reduction for 2020? *

Other Sustainability Initiatives

29. Are your suppliers being audited with sustainability management platform like Ecovadis? *

☐ Yes

☐ No

30. Which of the following 10 principles of the UN Global Compact have you made commitment to? *

☐ Supporting and respecting the protection of internationally proclaimed human rights

☐ Making sure you are not a complicit in human rights abuses.

☐ Upholding the freedom of association and the effective recognition of the right to collective bargaining

☐ Eliminating all forms of forced and compulsory labor

☐ Effective abolition of child labor

☐ Eliminating discrimination in respect of employment and occupation.

☐ Supporting precautionary approaches to environmental challenges

☐ Undertaking initiatives to promote greater environmental responsibility

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- ☐ Undertaking initiatives to promote greater environmental responsibility
- ☐ Encouraging the development and diffusion of environmentally friendly technologies.
- ☐ Working against corruption in all its forms, including extortion and bribery.
- ☐ None of the above

31. Do you publish sustainability reports of your production facility/facilities supplying Tronox?

*

- ☐ Yes
- ☐ No

32. If yes, please provide the link