

***Animal Testing Policy
Policy No. 50.17***

Effective Date October 15, 2022

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1 PURPOSE

Tronox Holding plc (together with its subsidiaries and affiliates, “Tronox” or the “Company”) and its management is fully committed to ensuring and protecting animal welfare. This policy (the “Policy”) describes our commitment to not use animals for product or ingredient testing of any kind except for regulatory compliance or other legal requirements which may require animal testing for certain ingredients to demonstrate product safety.

2. SCOPE

This policy applies worldwide to Tronox and to all its directors, officers and employees (collectively, “Tronox Employees”) as well as all third-parties, contractors, agents, distributors, and consultants when conducting business with, or on behalf of Tronox.

3. POLICY

Tronox will not support any animal testing except where legally required or where it is deemed essential to demonstrate safety for human health, and the environment. Tronox is committed to the responsible reduction, refinement, and replacement (3Rs) of animal testing by using the best available non-animal approaches and techniques, including New Alternative Methods (NAMs) and those approved and accepted by regulatory authorities.. Where animal testing is required, the best and most appropriate testing methods e.g. internationally accepted methods such as the OECD

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(The Organization for Economic Co-operation and Development) will be used, and testing will be conducted in laboratories certified by the AAALAC (Association for Assessment and Accreditation of Laboratory Animal Care) and/or meet the government animal welfare requirements of the country in which the testing laboratory operates.

To ensure we meet our commitments, the Director, Product Stewardship will be the single point of responsibility for review, assessment, and implementation of the best available technology to reduce, refine and replace animal testing. The Director, Product Stewardship will periodically conduct audits of all animal testing practices assessing compliance with the commitments outlined in this policy.

4. REPORTING

Any animal welfare or compliance issues should be reported to the Director, Product Stewardship for appropriate follow up action. Concerns may also 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.

Tronox management will not retaliate or tolerate any harassment or retaliation of anyone for reporting, in good faith, known or suspected violations of this Policy.

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5. CONSEQUENCES

A breach of this Policy may result in disciplinary action up to, and including termination of, employment.

6. POLICY REVIEW AND EXCEPTIONS

The Director, Product Stewardship will approve any exceptions to this policy.

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