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**1 PURPOSE**

The objectives of the policy are: To comply with Anti-Money Laundering (AML) and Anti-Terrorist Financing (ATF) laws and regulations; to recognize, investigate and report suspicious activity; and to protect the reputation and integrity of the Tronox.

**2 SCOPE**

This policy is applicable to all employees managed directly under Tronox.

**3 POLICY**

It is the policy of Tronox to institute appropriate policies, procedures, and controls to comply with applicable AML and ATF laws and regulations in the U.S. and other jurisdictions in which Tronox has an operating presence. To support the policy, Tronox has implemented a comprehensive internal AML compliance program, which includes:

- A system of internal controls to verify ongoing compliance, including written policies and procedures
- Employee training (effectiveness of Tronox’s AML efforts depends on the knowledge and vigilance of its employees)
- Independent audit testing
- Customer due diligence procedures including collecting and verifying the identity of beneficial owners of legal entity clients

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**4 CONSEQUENCES**

A breach of this policy may result in disciplinary action up to and including termination of employment, in accordance to local policies.

**5 POLICY REVIEW AND EXCEPTIONS**

This policy will be reviewed in accordance with business needs. Only the General Counsel or his/her delegate is authorized to approve exceptions to the policy. Executive Sponsors are listed in the Policy Governance Policy 10.01.

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