

TRONOX HOLDINGS PLC Labor and Human Rights Report

2023

Overview

Tronox Holdings plc is a values-based organization with a long-standing commitment to improving the human capital of our employees, contractors and the individuals who live in the communities where we operate. As a company we regard ourselves as being part of an ecosystem that will flourish only when all the constituent elements enjoy a mutualistic symbiotic relationship.

Our values are in line with our commitment to the United Nations Global Compact (UNGC) https://www.unglobalcompact.org, the United Nations Guiding Principles on Business and Human Rights guidingprinciplesbusinesshr_en.pdf (ohchr.org) and are expressed in our Code of Business and Ethics Conduct https://compliance.tronox.com/code-of-conduct/, and Supplier Code of Conduct https://compliance.tronox.com/supplier-code-of-conduct/.

In the spirit of continually improving its corporate culture and remaining in compliance with an ever evolving regulatory environment, Tronox frequently reviews and updates its labor and human rights-related policies and, where needed, creates new policies. Improvements to Tronox's policies, practices and procedures occasionally result from issues and concerns raised on our publicly available **Ethics and Compliance Website** https://compliance.tronox.com/. All issues raised on the hotline are investigated confidentially and, if requested, the anonymity of the alleger is strictly protected. Allegations and the outcome of each investigation are reported quarterly to the Audit Committee of the Board of Directors.

This report covers the labor and human rights topics that Tronox believes are most relevant to a company focused on mining heavy mineral concentrates, upgrading the titanium content of those concentrates and turning the resulting feedstocks into titanium dioxide (TiO₂) used by our customers to produce paints and coatings. These topics include keeping our employees, contractors and the individuals who live near our facilities safe, promoting diversity and inclusion regardless of an individual's race, ethnicity, age, gender, religion or disability and acquiring, developing and nurturing the potential of our employees.

This report considers our global operation and includes the corporate offices as well as the manufacturing and mining sites worldwide. Broadly the group is viewed on a regional operation basis and accordingly, this report may reference either a region or a specific site where a particular intervention has been piloted or progressed to.

What Matters for Our Company

Based upon our long-term strategy of becoming the world's leading vertically integrated manufacturer of TiO₂, our leadership assessed various subject matter areas related to labor and human rights to ensure that Tronox's human capital-related strategies and goals were aligned with the United Nation's 2030 Agenda for Sustainable Development. Below we set forth and describe the social topics that are relevant for our Company.

- Continuous Employee and Contractor Education and Training
- Universally Applicable Training Programs

As a global organization, Tronox's human capital consists of diverse nationalities and cultural

backgrounds. Accordingly, all training and education that is provided takes into account any cultural nuances that may be applicable to and/or inappropriate in a particular geographic setting.

The promotion of basic human rights, ethical business conduct, and protection of every person's physical safety have universal application and are continually reinforced to our employees. One of the best ways to inculcate these principles is through periodic training. The topics covered below are among those on which we train. At a minimum, we educate our employees on the code of conduct when they join our company and annually to all employees thereafter. All employees are required to confirm in writing that they will adhere to our code of conduct when hired.

- Ethics and Compliance Training –the ethical standards expected of employees while at work and outside of work and the minimum protections to which all employees are entitled in local law. This training includes whistleblower information and protection standards;
- Conflict of Interest Training –the identification of a conflict of interest/potential conflict of interest, how to notify the company of such conflict of interest/potential conflict of interests, recusal from the conflict of interest situation and the consequences for a failure to properly notify the company of a conflict of interest/potential conflict of interest:
- Anti-harassment and Workplace Violence Training –the constituent elements of harassment (whether physical, sexual, direct or indirect) and workplace violence and how to report any incidents or suspected incidents to the appropriate channels for investigation;
- ❖ Site specific Health and Safety Training in relation to the risks encountered in employees' day-to-day activities undertaken in the course and scope of employment;
- Privacy and Access to Information Training the handling, processing, storage and destruction of personal information and the manner in which same must occur;
- Information Security and Cyber Security Training focused on the identification of security threats to the Company's information systems and how to appropriately neutralize such threats;
- ❖ Diversity and Inclusion Training webinars and seminars are provided relating to each of the cultures woven into the fabric of the Tronox business, including fundamental greetings and means of engaging with our colleagues worldwide in a respectful manner that enables everyone to feel welcome and valued at Tronox; and
- Sustainability Training Sustainability is one of Tronox's core values, training is provided to all employees on the importance of environmental management on a macro and micro level in all elements of our business. A key focus area in 2022 to 2025 is to ensure that our procurement activities are undertaken in a sustainable manner.

The above trainings are codified in various policies that are similarly updated as required and accessible to all employees, and in many cases publicly via the Tronox intranet (https://compliance.tronox.com/policy-library):

- Anti-Harassment, Workplace Violence and Equal Employment Opportunity Policy 40.10
- Diversity and Inclusion Policy 40.01
- ❖ Ethics, Compliance and Whistleblower Hotline Policy 60.02

- Antitrust Compliance Policy 60.03
- Anti-Bribery Laws Policy 60.07
- Anti-Money Laundering Policy 60.16
- Health and Safety Policy 50.01
- ❖ Health and Safety Guidelines 50.02
- Environmental Policy 50.03 (note, each country in which we operate has a dedicated environmental management policy)
- Information Security Policy 30.01

Function-Specific Training Programs

Tronox takes pride in its ability to identify and nurture talent within the organization. Ongoing, function-specific training is provided to all functions to (i) ensure a consistent baseline of knowledge and capacity, (ii) enhance adult basic education and training (this is particularly important in the developing countries in which Tronox operates) (iii) ensure all profession-specific continuing education requirements are adhered to, and (iv) reward and incentivize employees to further their careers within their chosen fields.

To this end, the Company provides financial assistance (in the form of subsidies and/or bursaries) to further education and encourages employee exchanges between sites worldwide to enable and foster knowledge sharing and development. Please see **Career Management and Training** for more information.

Employee Health and Safety

Tronox places an uncompromising focus on operating safe, reliable, and responsible facilities, and we measure our progress with both safety metrics and leading indicators. We believe every employee and contractor has a responsibility for safety, and we proactively identify and manage risk, conduct ourselves responsibly, exercise good judgement, and take accountability for our actions.

Tronox considers the health of its employees on a holistic basis and considers the physical and mental wellbeing of its employees as a key contributor to the overall success of the company. Psychological safety in the workplace is an enabler for the timeous rectification of any safety concerns the employees may have. It is of paramount importance to the company that our employees feel safe to raise any concerns they may have without fear of any repercussion.

KPIs

Tronox tracks two key metrics in the traditional areas of employee health and safety, namely Disabling Injury Frequency Rate (DIFR) and Total Recordable Injury Frequency Rate (TRIFR). As a means of incentivizing safety performance for all employees 15% of the annual compensation incentive plan worldwide is directly linked to these two metrics. Both DIFR and TRIFR are calculated relative to the number of injuries to employees and contractors over a 200,000 hour time period.

Each year in February, our Board of Directors establishes forward looking metrics on which we base that year's payout under our annual compensation incentive plan. While the overarching target is zero recordable injuries in all our operations, we annually set more challenging targets

for TRIFR and DIFR as we travel the road to zero.

Our performance for these two metrics for the period 2020 to 2022 is set out below:



As can be seen from the above graphs, year-on-year the Tronox employee performance is either stable or shows an improvement in the number of injuries, while there appears to be a slight increase in the number of injuries sustained by contractors. As a result Tronox has commenced a contractor management program globally to reduce the injuries sustained with the first full year of results being available in December of 2023.

As is the norm in the mining and manufacturing sectors, Tronox provides personal protective equipment (PPE) to all of its employees that is suitable to the respective hazards and risks the employees may face in their day-to-day working lives. Traditionally, such PPE has been designed by males for use by males and do not take into account the differences in physique between men and women. Tronox has not only obtained body-type and preference suitable PPE, but in Saudi Arabia where cultural norms dictate attire, the company has designed and manufactured bespoke PPE for women that is both safe and culturally appropriate.

As mental health concerns are frequently not as visible as physical health concerns, Tronox has undertaken various activities and campaigns worldwide to ensure that its employees understand the importance of mental health and have access to the necessary tools and assistance should they be in need of same.

The Tronox Stallingborough site piloted a mental health first aid program and thirty three employees completed training in 2022. The company is investigating the possibility of extending this program to other sites.

A Culture Survey was independently conducted at our Stallingborough site in March 2023, by a human resources consulting firm which specializes in improving diversity and inclusion. The entire site was invited to participate in the blind survey and 58% of the total employee and contractor population responded in full. The primary findings were that the employees and contractors are proud to be part of a company with a 70 year history and are committed to its ongoing success. There is positivity over the company values and the plans for the site and a clear understanding of the need for individual and collective responsible behaviors to ensure the safety of all onsite. The highest scoring elements in this culture survey were attributable to inclusion, purpose and the flexibility of the operation as viewed by its employees and contractors.

A global culture survey was launched on 24 June 2023 by an independent third party. The results of this survey will only be available for reporting purposes in 2024.

In Australia, Brazil, Saudi Arabia and South Africa professional psychologists were invited to site to provide leaders with the necessary tools to identify and provide primary support to team members who may be showing signs of distress and to de-stigmatize conversations about mental health. The company additionally provides confidential, independent counselling services under the umbrella of its occupational health function. The success of the meditation room in Brazil is being considered for replication in other regions.

The health and well-being of our employees is also prioritized and emphasized throughout the organization. All sites offer subsidized canteen/food trucks with a variety of hot and cold food daily. Water is freely available at all sites, and juices, milk and soft drinks are available for purchase. Yoga classes are offered on site in Stallingborough. Both Stallingborough and the Netherlands provide bicycle subsidies to employees to facilitate cycling to and from work and gym subsidies to enable exercise more generally. The Netherlands additionally provides a variety of fresh fruit weekly to its employees. South Africa has annual health and wellness days when a variety of medical professionals are provided at no charge to do BMI checks, eye testing, HIV and blood pressure measurements.

You can find our historical performance in respect of these metrics as well as our current year target in our **Annual Sustainability Report** available on our website https://www.tronox.com/about-us/sustainability/sustainability-reports/.

Career Management and Training

The Tronox vertical integration business model means that we operate both titanium ore mines and TiO_2 pigment plants on a global basis. Our success requires that employees can deploy their knowledge and skills across the value chain, in both mining and chemical operations, in order to best leverage our human capital. Accordingly, a high priority is placed on knowledge transfer. This is achieved by:

- relocating employees at all levels of the organization in different countries and operations;
- engaging in global projects that draw talent from multiple sites and disciplines; and
- creating centers of excellence that specialize in particular functions.

In order to enable our employees to not only enhance their existing skillset but to stretch into new areas of potential expertise, Tronox has implemented a number of formal and informal initiatives.

- ❖ The EMEA region is running a trial of two distinct mentorship programs. The first entails cross-disciplinary mentorship in which senior employees are paired with junior employees to facilitate growth in general business acumen, and the second entails new employees being paired with more seasoned employees within the same discipline to facilitate skills sharing and succession planning.
- Where appropriate (or where requested by an employee) coaching is provided to assist employees in developing the necessary competencies to progress within the organization or to manage change from one function to another more efficiently.
- Online education is available to all employees via a broad based global learning platform, providing leadership development, business skills and information

technology.

- ❖ In order to assist corporate functions which serve the entire enterprise such as HR, Finance and Legal, Tronox launched an audio-visual education series (available online globally) that examines the nature and operation of each of the key functions within the business in a digestible and easily understood manner.
- ❖ Technical skills assessments are routinely conducted in respect of our workforce that is engaged in our key technologies including mining, smelting/furnaces, chlorination, oxidation, finishing, and packaging. In addition, the Tronox Learning and Development Department continually develops new programs to address lacunae and secure a sustainable future for the company.
- All employees agree on performance targets within their departments that form part of the annual performance review process. These performance targets include business, personal and safety related matters as appropriate to the function. The achievement of these personal KPIs are assessed at mid-year and an annual performance appraisal occurs shortly after the end of the financial year, worldwide. All employees receive a personalized rating, that may be challenged if they do not agree with the rating as given.
- ❖ No employees have been subject to any redundancy program in the last 12 months. All redundancy programs undertaken prior to a year ago have been implemented strictly in accordance with local laws and subject to compensation and outplacement programs (where appropriate).

KPIs

Tronox ensures that all annual training that is mandated by regulation or in order to maintain professional standards or qualifications is completed timely.

Tronox actively offers paid internships and learnerships at its sites worldwide that are primarily geared towards drawing new talent to the business from our host communities. The intention is to provide the interns and learners with the necessary tools to obtain permanent employment whether with Tronox or third parties.

Tronox has been awarded Top Employer® status for its Dutch operations and intends obtaining this status throughout its European operations by 2025. It is then intended to obtain the certification on a region by region basis until the entire global organization is recognized. In 2023, the Top Employer® accolade was awarded to only 2053 companies in 121 countries. The Top Employers Institute is the global authority in recognizing the best human rights policies.

Child Labor, Forced Labor and Human Trafficking

Tronox maintains and enforces a Policy to combat **Slavery and Human Trafficking** which can be found on our Compliance Portal https://compliance.tronox.com/labor-and-human-rights/. Tronox is committed to ensuring that slavery and human trafficking are not taking place in any form within Tronox's business or any part of its supply chain. In line with this Tronox has procedures to ensure the deterrence of any such conduct including a Code of Ethics and Business Conduct ("Code of Conduct") that applies to all Tronox employees, as well as agents, suppliers and contractors who perform work on behalf of Tronox. Our Code of Conduct is

available on our Compliance Portal https://compliance.tronox.com/code-of-conduct/. Additionally, Tronox has established a specific Supplier Code of Conduct ("Supplier Code of Conduct") also available on our Compliance Portal https://compliance.tronox.com/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. 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.

KPIs

We have a "zero tolerance" attitude towards child labor, forced labor and human trafficking. Each year, we seek to train all of our employees on the code of conduct and ask each employee to certify that they will adhere to the provisions of the code which includes a section on modern slavery. In addition, we actively promote use of our "Speak Up!" hotline among employees, suppliers and other stakeholders. We carefully track the number of claims we receive that relate to child labor, forced labor and human trafficking. We have not received any allegations related to this topic in the past three years. Given our "zero tolerance" policy, our goal is to not receive any credible allegations of such conduct by Tronox and its employees and suppliers. We also require that all of our suppliers confirm alignment with the Supplier Training Video on Tronox ESG Standards which covers key elements of environment, social and governance and reinforces our alignment with UNGC principles regarding forced and child labor.

Given the global footprint of the company, a one-size-fits-all approach to labor related matters is not appropriate. Accordingly, Tronox works closely with local human resources benchmarking organizations and publicly available salary surveys on a by country basis (and revised annually), to ensure that the terms of service and remuneration offered to its employees in the various jurisdictions are –

- fair and strictly in accordance with the relevant labor laws particularly as regards working hours, annual leave, sick leave and maternity/paternity leave and employees are entitled (but not obliged) to purchase additional leave;
- recognize collective bargaining, establish Works' Councils and union representation on site:
- market related, show gender and experience level parity;
- do not contain any unreasonable restraint of trade type provisions;
- do not require any employee to deliver their identity/passport documentation to the company as a condition of employment; and
- do not exceed the maximum acceptable number of hours worked, with country appropriate overtime to be paid to those qualifying for such overtime; and
- since the Covid 19 pandemic, a high degree of flexibility has been introduced where to the extent possible employees are encouraged to work in an environment that is most convenient for them
- provide health care and/or subsidized health care in accordance with local requirements.

Diversity, Discrimination and Human Rights

As a global company, it is imperative that we foster a tolerant workforce that recognizes and embraces individuals with diverse backgrounds and perspectives, that reflect our customer base and the communities in which we operate.

Foundational to this effort is fostering a culture of non-discrimination. As discrimination has the potential to be encountered in numerous areas of human interaction, the Company has chosen to select targeted projects that will encourage diversity of thought and action. As these projects mature and reach stable operating states additional projects will be commenced. This approach is geared toward tangible, sustainable results that will make the most impact in the lives of our employees and surrounding communities. The three projects currently under way relate to gender diversity, race diversity and physical/neurodiversity, with the objective that everyone is welcome and has the possibility to thrive at Tronox.

To assist in this effort, Tronox has created a series of videos, available worldwide that have a focus on the company values and how to live them on a daily basis. In addition, regular cultural awareness video conferences are held that introduce the different cultures and languages spoken in the company.

KPIs

With regard to KPIs to track Diversity, Discrimination and Human Rights, we have taken a regional approach:

<u>EMEA</u>: Tronox is creating targeted advertising that encourages applications from females, persons with disabilities and is accepting of those with diverse gender orientation.

<u>Saudi Arabia</u>: Given the historical cultural bias against including women in the workforce, we are particularly proud of our success in Saudi Arabia. This is particularly so in the Yanbu manufacturing facility. As at June 2023, there are a total of 15 female full time employees, one of whom works in the plant in Yanbu and an additional 9 females have been recruited as part of the Tronox Saudi Arabia Talent Program. As we integrate women employees in operational roles previously held exclusively by men and to ensure that these employees can perform their employment functions safely and in comfort, Tronox has created dedicated ablution and changing facilities and women-only office spaces. As described above, we have also designed and manufactured specific PPE for females in Saudi Arabia that is both functional and preserves cultural modesty.

<u>United Kingdom</u>: A 50% female intern milestone has been reached in Tronox United Kingdom manufacturing facility in 2023. Additionally, the senior leadership team is 30% female. Work is additionally underway to ensure that the site is accessible to those in wheelchairs and/or otherwise unable to comfortably move around the site

<u>France</u>: Tronox has achieved its 6% government mandated target for the appointment of persons with handicaps. Included in the June 2023 payslip is a self-diagnostic to determine whether or not an employee has a disability and how to go about having such disability formally recognized as this allows for tax benefits and accommodations to be made for the employee to make their work-life more comfortable. In addition, a multi-year project is also underway to upgrade and increase the female facilities in France. To date, the existing two person change room and shower facility in the operations area, has been completed and can now

accommodate 11 females simultaneously. The next upgrade will be made to the maintenance department.

<u>South Africa</u>: In South Africa the female ablution facilities were upgraded in KZN and lactation rooms kitted out in such a manner that they are not only functional and hygienic, but also pleasant and comfortable.

All sites are also actively engaged in education and awareness campaigns regarding the LGBQTI+ community and ensuring that our sites are safe spaces.

The women in leadership project has identified several high female performers for specific training and mentorship to assist them in attaining the most out of their career aspirations with Tronox.

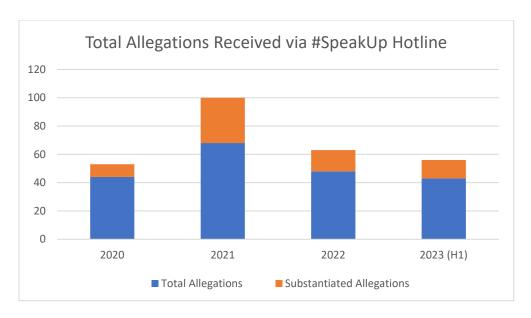
Protection of Human Rights – Hotline Process, Investigation, HR training and Outcomes

As set out above an independent third party operates the Tronox #SpeakUp Compliance Hotline. The primary objective of the hotline is to enable employees, contractors and/or any person visiting our sites or interacting with any of our employees to raise any concerns (including human rights concerns) that they may have.

The hotline is designed in such a manner that should the alleger wish to remain anonymous, they are able to do so while still being able to interact with investigators, should they need additional information. The hotline (and training relating to the use of the hotline) is available at all operating sites and corporate offices, may be accessed online or telephonically. The individual is free to communicate in their language of preference should English not be their first language.

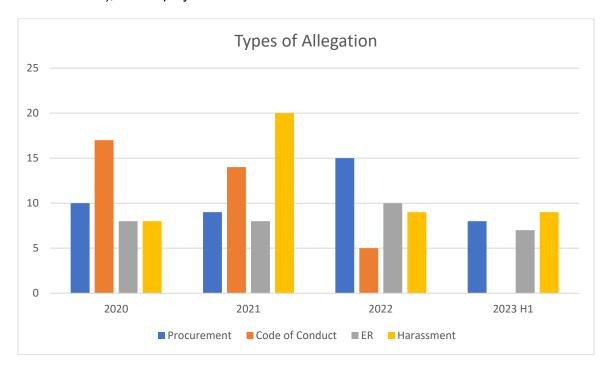
While the report provided by the investigators is kept confidential, Tronox publicizes the number, type and geographic locations at which allegations have been investigated, whether the allegation was substantiated, partially substantiated or unsubstantiated and the relevant remedial action (if necessary) taken.

Remedial action may take any number of forms depending on the severity of the violation and can vary from counselling and additional training, to suspensions and as an ultimate consequence termination of employment/the vendor contract. All such terminations occur strictly in accordance with the local laws.



Saudi Arabia, South Africa and Australia show the highest number of reported cases.

70% of the allegations received relate to irregularities in the procurement process, code of conduct violations (other than harassment), employee relations and harassment (including sexual harassment). Tronox has a zero tolerance policy regarding harassment (in all forms), bullying and any matter that would constitute a criminal offence in the relevant country. In all instances where such an allegation is shown to be substantiated (and in two instances partially substantiated), the employee/vendor contract was terminated.



• Social Dialogue in South Africa

Of the approximately 6,500 people we employ across six continents, over 2,000 individuals or roughly one-third of our employee population live and work in the Republic of South Africa. Indeed, South Africa hosts the largest contingent of Tronox employees of any country in which we operate. Our significant presence in the South African mining sector gives us a unique perspective on those aspects of the UN's 2030 Agenda for Sustainable Development aimed at achieving economic and social prosperity so that "no one is left behind."

The government of South Africa has embraced the UN's 2030 Agenda for Sustainable Development as complementary with its own aspirations to create a more just society that addresses the legacy of the Apartheid regime. Companies like Tronox engaged in the natural resources extraction and beneficiation sectors bear a special responsibility in the socio-economic upliftment of South Africa and its people, by implementing their development agendas, in a manner that aims at ending discrimination against historically disadvantaged South Africans, women, youth empowerment and addressing poverty, unemployment and inequality on a sustainable basis.

There are many regulations and policies applicable to our operations in South Africa that enable us to promote the development of our South African employees and suppliers and the communities where we operate. The Broad-Based Socio-Economic Empowerment Charter for the Mining and Minerals Industry 2018 ("Mining Charter") is a policy document that was specifically created to cater for the interests and socio-economic upliftment of all stakeholders within the mining supply chain. All mining companies are required to compile a Social and Labor Plan that is refreshed on a five-year cycle. Tronox's current and historic **Social and Labor Plan** is available on our website here https://www.tronox.com/about-us/global-locations/.

The Mining Charter also requires mining companies to create career development plans both on a function and individual basis and fast track eligible talent. As the mining industry is a knowledge-based industry offering South Africans an opportunity at economic development the objectives of the Mining Charter's career development directives are multi-faceted and include tangible and aspirational goals related to skill development, training, diversity, creating opportunities for historically disadvantaged persons, and research and development into pertinent areas including mining and environmental restoration.

We are proud of our implementation of the Mining Charter as well as the significant number of other programs and initiatives we maintain that benefit our employees and the communities where we operate.

- ❖ In 2020 we implemented an employee stock ownership plan for all our non-executive level South African employees. The plan pays a guaranteed distribution annually and every three years pays out an aggregated top-up distribution that is based on the performance of our business in South Africa as a whole.
- ❖ In 2021 a South African region specific Social and Ethics Committee was established. In accordance with the Companies Act 71 of 2008, South African companies with a high public interest score are required to have a social and ethics action plan to address the needs of their employees. While the South African operations would be entitled to rely on the global program given the group structure of Tronox, it was decided that the specific needs of the South African region merited a bespoke social and ethics engagement.

- ❖ The mentorship program that was piloted in 2020 has gone from strength to strength. Under the program, 15 members of the South African senior executive team and the board of directors received training in mentorship and were paired with up to four high potential employees. Mentoring occurs on a monthly basis and assists employees in better understanding their environment, their drivers, inhibitors to success and setting realistic and achievable goals. The intention is that on successful completion of the mentorship program, the employees being mentored will be ready for either career progression or promotion.
- ❖ We actively support education among our employees, their families and our surrounding communities. Specifically, in 2022 we awarded 20 scholarships for students in the local community to attend university (with 28 students continuing their education from 2021) and 68 engineering learnerships and 20 draughtsman learnerships were awarded. 28 employees received managerial development training. 8 professionals in training internships were awarded. 21 internal bursaries were awarded to existing staff. , approximately 100 internships within Tronox in a range of technical and professional areas, and 29 internships expressly for individuals from our community with disabilities.
- ❖ We also support the development of leaders on the continent of Africa by sponsoring an annual scholarship at the African Leadership Academy (ALA) in Johannesburg. ALA seeks to transform Africa by identifying, developing and connecting Africa's future leaders, training them to work together to address Africa's greatest challenges, achieve extraordinary social impact, and accelerate the continent's growth trajectory. ALA notes that Africa's greatest need is ethical and entrepreneurial leadership, and so they comb Africa to identify outstanding young leaders, ages 15-18, who demonstrate the passion and brilliance to transform the future of the continent. These young leaders are then provided a two-year intensive program of intellectual growth and hands-on leadership development. Everyone who applies and is then admitted to ALA, regardless of financial background or nationality, is eligible to receive significant financial assistance in the form of scholarships and loans towards studying at ALA and accessing membership to the lifelong ALA network.

Encouraging STEM worldwide

- ❖ Tronox fosters very close relationships with the various universities and technical institutions in the countries in which we operate which frequently results in Tronox hosting both undergraduate and post graduate students at its sites worldwide.
- ❖ There are at present, five postgraduate students at the Stallingborough site in the UK and another student at the Thann facility in France.

Who is Covered by Our Policies

Generally speaking, our labor and human rights report applies to the same group of stakeholders as our Code of Ethics and Business Conduct. That is, depending on the particular policy, it applies to all officers, directors and employees of Tronox as well our agents, suppliers, contractors and other partners who are providing goods and services to Tronox or acting on our behalf.

Who Owns this Report

This report and the relevant policies is owned by owned jointly by our Senior Vice President, Chief Human Resources Officer and Senior Vice President, General Counsel and Corporate Secretary.

Updating and Maintaining the Relevance of this Report

This report and the policies underlying it are reviewed and updated on an annual basis as part of our process for preparing our annual GRI report.

How We Communicate This Report

This report and the underlying policies that it supports are available to both external and internal stakeholder groups on our **Compliance Portal** at https://compliance.tronox.com/. Some of the specific policies underlying this report are available only to our employees for business and commercial reasons.

Thank you for reading this report and for your ongoing interest in Tronox.

Jean-François Turgeon Co-Chief Executive Officer

John D. Romano Co-Chief Executive Officer