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1 PURPOSE

This standard aims to clearly articulate the basis and context for recalculations of our historic greenhouse gas (GHG) emissions inventory.

2 SCOPE

In line with the GHG Protocol’s Operational Control approach, this standard is applicable to all locations over which Tronox has operational control.

Tronox has used the 2019 calendar year as the base year for GHG emission calculations, taking into account that the acquisition of The National Titanium Dioxide Company Limited (“Cristal”) completed on the 10th of April, 2019.

3 STANDARD

In order to accurately track progress on our GHG intensity targets, we will adjust our historical GHG emissions inventory to account for significant changes, as described below. We will take into account a significance threshold of 5%. This means that any change, or accumulation of changes, which will impact absolute and/or intensity-based [per metric ton produced] GHG emissions for any given year by over 5% (decrease or increase), will result in the recalculation of the inventory in the specific year(s).

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The following cases trigger recalculation of our historical GHG emissions inventory:

Structural changes

Any changes to the structure of Tronox (transfer of ownership or control of emissions-generating activities or operations) may trigger recalculation of our historical GHG emissions inventory. While a single structural change might not have a significant effect on our historical emissions, the cumulative effect of a number of minor structural changes can result in a significant impact. Structural changes include:

- Mergers, acquisitions, and divestments
- Outsourcing and insourcing of emitting activities

Calculation methodology changes

Improved accessibility or accuracy of data, updated emission factors, or changes to our calculation methodology may all trigger recalculation of our historical GHG emissions inventory (if significance threshold of 5% is exceeded).

Data errors and other changes

Rectification of significant errors, a number of cumulative small errors, or any rectification as a result of unforeseen factors may trigger recalculation of our historical GHG emissions inventory (if significance threshold of 5% is exceeded).

4 CONSEQUENCES

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

5 STANDARD REVIEW AND EXCEPTIONS

This standard will be reviewed in accordance with business needs. Only the VP of SHEQ (Executive Sponsor) or his/her delegate is authorized to approve exceptions to this standard. Executive Sponsors are listed in the Policy Governance Policy 10.01.

6 RELATED INFORMATION

The policies related to Ethics, Compliance and Whistleblower Hotline can be found in the "Global Policy and Guidelines Library" section of the Intranet (<https://intro.tronox.com/>). Employees are responsible for reading the Company's policies.

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