

# **IRMA SURVEILLANCE ASSESSMENT PUBLIC REPORT**

MINE SITE

Planta Salar de Atacama

OPERATING COMPANY

Albemarle

COUNTRY OF OPERATION

Chile

17 APRIL 2026

# Acknowledgements

IRMA believes that third-party, independent audits are most credible when there is robust participation not only from participating mines, but also from workers and stakeholders, particularly those from affected communities.

Outside stakeholders are not remunerated for their participation and willingly give their time to provide perspectives and information on mine site performance. IRMA would like to recognize Albemarle and plant workers, governmental representatives, and members of affected communities for their participation in this audit.

# Table of Contents

Acknowledgements.....	2
Table of Contents.....	3
Audit Details .....	6
<b>1. Mine Site Overview .....</b>	<b>7</b>
1.1. Overview of location .....	7
1.2. Overview of operation.....	10
1.2.1. Scope of activities and facilities included in audit.....	11
1.2.2. Activities or facilities excluded from scope of audit .....	11
1.2.3. Limitations of audit .....	12
<b>2. Mine Site Assessment Process .....</b>	<b>13</b>
2.1. Overview of IRMA Process.....	13
2.1.1. Scope and Limitation of Audits.....	14
2.1.2. IRMA Complaints Process .....	14
2.2. Surveillance Audit Process.....	15
2.3. Stakeholder Engagement .....	15
2.3.1. Written comments/inquiries .....	15
2.3.2. Mine Staff.....	16
2.3.3. Workers/Contractors.....	17
2.3.4. Government Agencies .....	18
2.3.5. Participating Communities and Civil Society Groups .....	19
2.4. Summary of Mine Facilities Visited.....	20
<b>3. Summary of General Scope Items .....</b>	<b>21</b>
3.1. General operational status.....	21
3.1.1. General outcome of compliance monitoring/audits.....	21
3.1.2. Regulatory inspections, violations, enforcement actions .....	21
3.1.3. Lawsuits and other external legal, non-regulatory actions.....	21
3.2. Stakeholder considerations.....	22
3.2.1. Stakeholder feedback/complaints received by site since prior audit .....	22
3.2.2. Stakeholder feedback/complaints received by auditors or IRMA since prior audit.....	23
3.3. Summary of Material Operational or Administrative Changes at Site Since the Previous Audit .....	24
3.4. Site-Specific Issues Identified for Follow-Up Review in Previous Audit.....	24
3.5. Progress on Previous Corrective Actions.....	25
3.6. Notable Performance Improvements .....	42
3.7. Concerns Related to Continued Maintenance of Achievement Level.....	43


<b>4. General Performance by IRMA Standard Principle and Chapter .....</b>	<b>44</b>
4.1. Principle 1: Business Integrity .....	44
4.1.1. Chapter 1.1—Legal Compliance.....	44
4.1.2. Chapter 1.2—Community and Stakeholder Engagement.....	45
4.1.3. Chapter 1.3—Human Rights Due Diligence.....	46
4.1.4. Chapter 1.4—Complaints Mechanism/Access to Remedy.....	47
4.1.5. Chapter 1.5—Revenue and Payments Transparency.....	48
4.2 Principle 2: Planning for Positive Legacies.....	49
Chapter 2.1—Env/Soc Impact Assessment and Management .....	49
Chapter 2.2—Free, Prior and Informed Consent .....	50
Chapter 2.3—Community Support and Benefits.....	51
Chapter 2.4—Resettlement.....	52
Chapter 2.5—Emergency Preparedness and Response .....	52
Chapter 2.6—Planning/Financing Reclamation & Closure.....	53
4.3 Principle 3: Social Responsibility .....	54
Chapter 3.1—Fair Labor and Terms of Work .....	54
Chapter 3.2—Occupational Health and Safety.....	55
Chapter 3.3—Community Health and Safety.....	56
Chapter 3.4—Conflict-Affected and High-Risk Areas.....	57
Chapter 3.5—Security Arrangements.....	57
Chapter 3.6—Artisanal and Small-Scale Mining.....	58
Chapter 3.7—Cultural Heritage.....	58
4.4 Principle 4: Environmental Responsibility .....	59
Chapter 4.2—Water Management.....	60
Chapter 4.3—Air Quality.....	61
Chapter 4.4—Noise and Vibration.....	61
Chapter 4.5—Greenhouse Gas Emissions.....	62
Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas.....	63
Chapter 4.7—Cyanide Management .....	64
Chapter 4.8—Mercury Management.....	64
<b>5. Performance on Critical Requirements.....</b>	<b>65</b>
<b>6. Next Steps.....</b>	<b>69</b>
6.1 Corrective Action Plans.....	69
Principle 1 Outstanding Corrective Action.....	69
Principle 2 Outstanding Corrective Action.....	70
Principle 3 Outstanding Corrective Action.....	70
Principle 4 Outstanding Corrective Action .....	70
6.2 Timing of Future Audits.....	71

6.3. Focus Areas for Next Audit ..... 71

Appendix A: Revised Corrective Action Plan..... 73

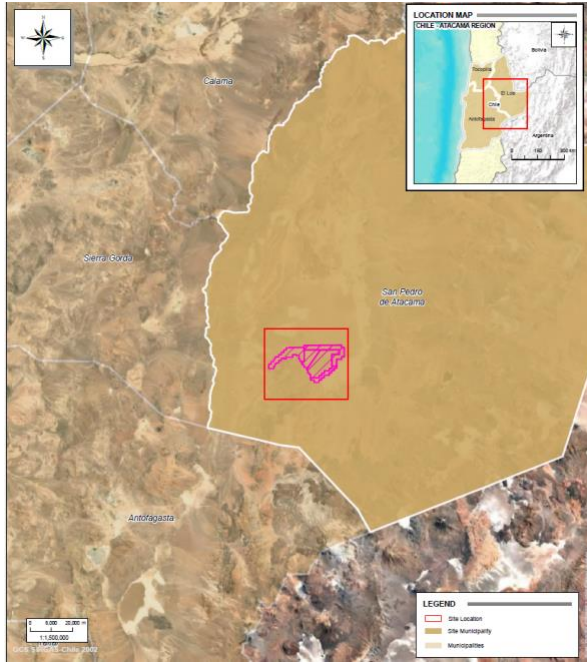
Endnotes..... 78

# Audit Details

Name of Mine:	Albemarle Planta Salar de Atacama
Operating Company:	Albemarle Limitada
Mine Owner:	Albemarle Limitada
Country of Operation:	Chile
Mined Material(s):	Concentrated lithium brine, potash, bischofite, halite, and sylvinitite
# Employees / contractors:	362 employees and 880 contractors at the time of audit
IRMA audit webpage	responsiblemining.net/albemarle-atacama
Audit Type:	Surveillance Audit
Audit Dates:	Desktop review: 16 June 2025 Onsite audit: 28 July-1 August 2025
Audit Firm:	ERM CVS
Audit Team:	Lead/EHS Assessor (1) Social Assessor (1) EHS Assessor (1)
Audit Firm Declaration:	<p>✓ The findings in this report are based on an objective evaluation of evidence (through review of documents; first-hand observations at the mine site; and interviews with mine staff, workers, and stakeholders) considered within the scope of the Surveillance audit activities.</p> <p>✓ The audit team members were deemed to have no conflicts of interest with the mine.</p> <p>✓ The audit team members were professional, ethical, objective, and truthful in their conduct of audit activities.</p> <p>✓ The information in this report is accurate according to the best knowledge of the auditors who contributed to the report.</p>
Scope of Audit:	Brine extraction, production, evaporation, associated maintenance, and ancillary services at the Albemarle Planta Salar de Atacama, Chile.
IRMA Standard Version:	IRMA Standard for Responsible Mining, v.1.0 (June 2018)
IRMA Achievement Level:	IRMA 50
Achievement Decision Date:	20 June 2023
Achievement Expiration Date	19 June 2026
Authorized Representative	Glenn Keays, ERM CVS, Director, Operations (Mining)
Representative Signature	
IRMA Reference Number:	IRMA-0124-STD1.0-01-SRV OLD: IRMA-STD-ERM-001-V-03600

# 1. Mine Site Overview

## 1.1. Overview of location



The Albemarle Salar Plant is located inside the mining concession area owned by Albemarle in the Salar de Atacama sector, in the commune of San Pedro de Atacama, El Loa Province, Antofagasta Region, 280 km from the city of Antofagasta.

Salar de Atacama is located in the Central Andes of Chile, limited to the east by the Andes Mountains and to the west by the Domeyko Mountains. The operations are in the extreme east of the Antofagasta Region and close to the border with the Republic of Argentina and the Plurinational State of Bolivia.

The nearest city, Calama, is approximately 190 kilometers by road to the northeast.

Figure 1 provides a general map indicating the global location of the mine site.

Figure 1: Global Location of Site

The communal area is 23,439 square kilometers and has an approximate population of no more than 10,000 inhabitants, who are primarily clustered in the small populated areas of San Pedro de Atacama, Toconao, Socaire, and Peine. 18 Indigenous groups are present in localized areas around the north and east of the Salar de Atacama. These include:

Community	Approximate population (2017 census and municipality records)
San Pedro de Atacama	4,500-5,000
Quitor	Included in San Pedro de Atacama
Solcor	
Larache	
Yaye	
Séquitur	
Cúcuter	
Coyo	
Solor	
Toconao	700-800
Socaire	350 – 400
Peine	300 – 350

Talabre	100 – 200
Camar	100 – 200
Río Grande	>100
Machuca	>100
Catarpe	>100
Huatín	>100

The Antofagasta Region is sparsely populated, with most towns located along the Pacific coast. Indigenous communities that live along the Salar de Atacama flat participate in several local economic activities, that include traditional activities of agricultural and livestock subsistence (e.g., alfalfa, corn and vegetables agriculture, and herding of llamas, sheep and vicuñas). Other traditional activities include community based tourism services (located in San Pedro de Atacama and surrounding areas), that include lodging, provision of local guides, traditional cuisine, ecotourism focused on wildlife and landscape observation and local cultural experiences.

The Salar de Atacama is completely flat over an extensive area at approximately 2,300 m above mean sea level (MAMSL) and has an area of approximately 3,500 km<sup>2</sup>. The flat terrain is the lowest area of the basin (depocenter) and the basin is endorheic, meaning that all water received by the basin as precipitation flows to the depocenter. The Central Andean Plateau and the Atacama Desert are two important features that help generate lithium brines in the Central Andes.

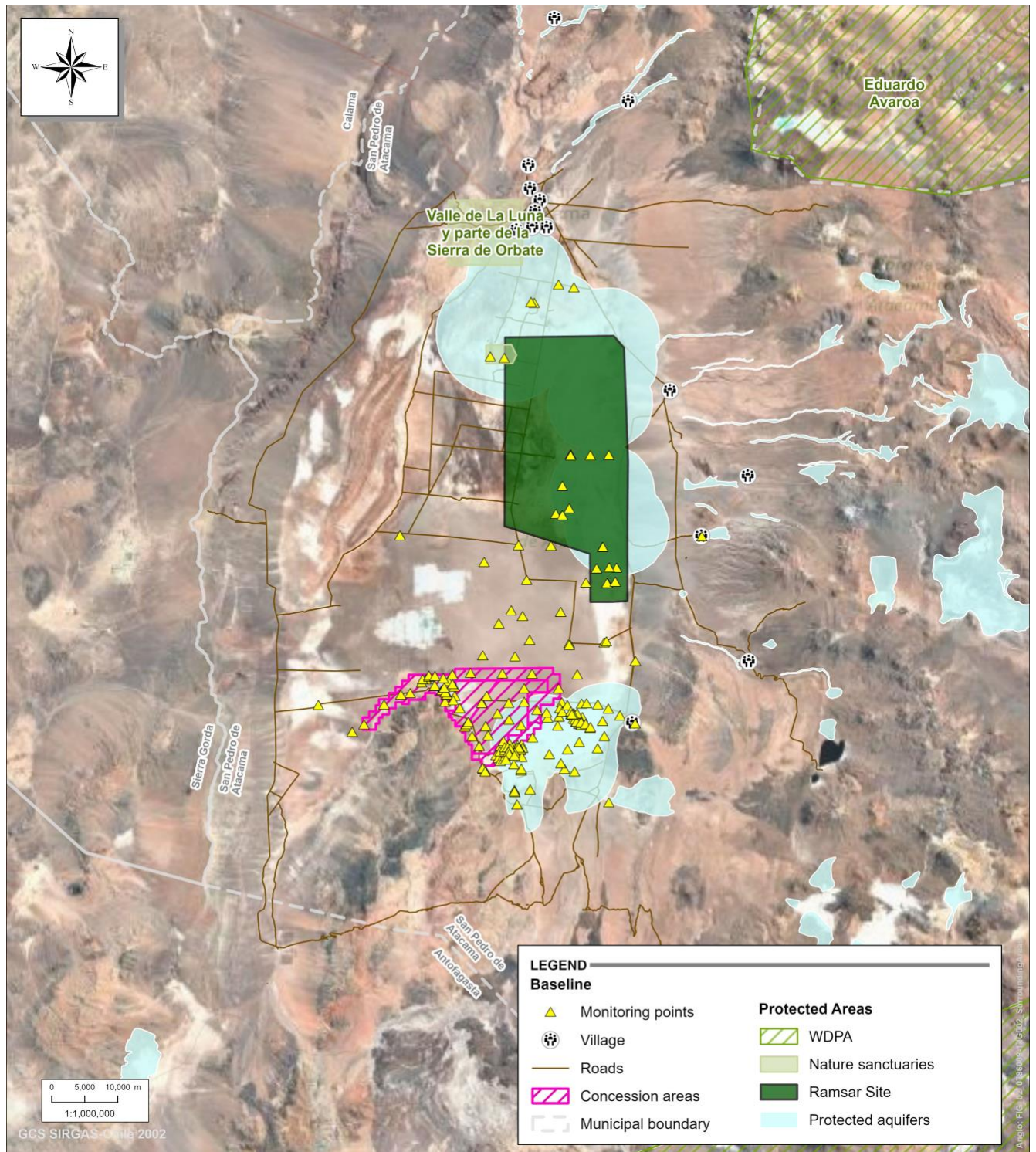
Abandoned mines exist in the area as a result of a mining boom in sodium nitrate that occurred in the 19th century.

Antofagasta has an international airport, and the city of Calama has the closest commercial airport to the Salar. Albemarle’s Planta Salar de Atacama has an airstrip for direct access, located at the south end of the Salar facilities, and has been designed for smaller jet and propeller-powered aircraft. Figure 2 provides a regional map of the mine site location.

The climate in this region is high altitude marginal desert, which receives 20 and 60 millimeters of rainfall per year, and mostly in the summer from January to March (SRK Consulting (U.S.), Inc. SEC Technical Report Summary – Salar de Atacama, August 2022). The main climatic feature in this region is extreme aridity. December to March has the hottest temperatures, reaching close to 35 degrees Celsius, with the winter months of June to August reaching -5 degrees Celsius. While the Salar de Atacama is one of the driest places on Earth, it does receive some water from rainfall and snow melt from the high mountains in the Andes.

Groundwater safe for human consumption (after potable water treatment), herding, and agriculture can be sourced from the aquifers contained in the alluvial fans. However, beneath the salt crust of the Salar de Atacama lies a large reservoir of a salt-rich solution, the brine. Due to its high salt concentration, the brine is neither suitable for human consumption nor agriculture.

Figure 2: Regional Location of Site



## 1.2. Overview of operation

Albermarle's operations in Chile are developed in two areas, the Salar de Atacama and La Negra. Albermarle lithium operations at the Salar de Atacama commenced in 1983, operating through a company incorporated with CORFO (Chile's Production Development Corporation). The current contract, which allows Albermarle to extract lithium brine from the owned mining concessions in the Salar de Atacama is set to expire in 2043.

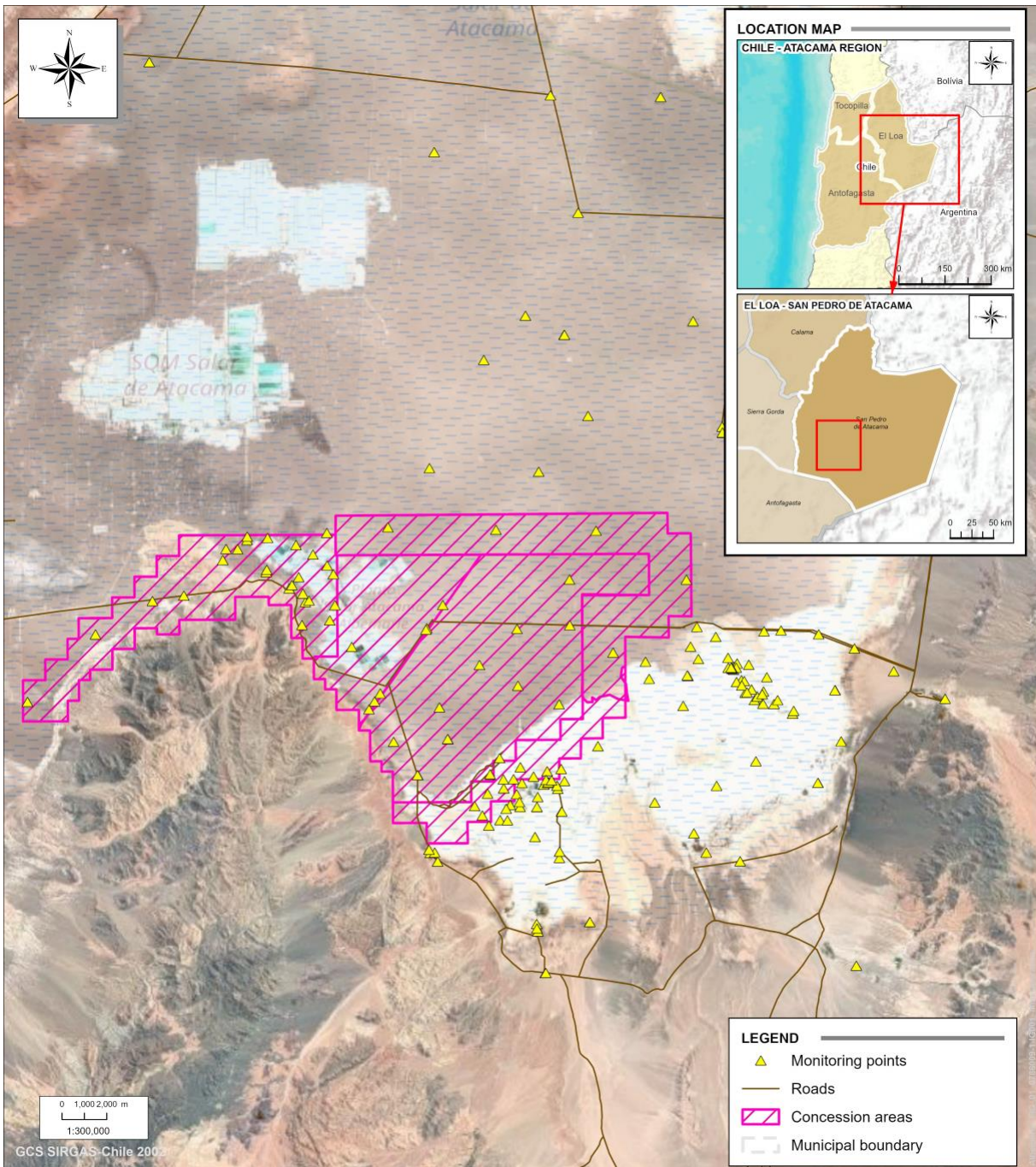


Figure 3: Layout of Site Operations

The operation consists of the extractions of a lithium-rich chloride brine from production wells. The brine is then pumped into evaporation ponds, where the lithium chloride in the brine is concentrated due to water evaporation and salts precipitation because of sun radiation. Following concentration, the brine is transported to the La Negra mineral processing plant for processing and conversion to lithium carbonate. The La Negra plant is located about 15 km to the east of Antofagasta city and approximately 260 km away from the Salar de Atacama. It is not included in the scope of this assessment.

The Salar site includes the extraction operations of brine well fields, brine supply pipelines to evaporation ponds, primary processing facilities to create a concentrated brine, a potash plant that creates a potassium chloride product, and worker housing. Other associated facilities at the site include by-product storage areas, fuel storage and fueling system, airstrip, security guard house, warehouses, change room, dining room, administrative office building, maintenance facilities, operations building, and laboratory. Figure 3 presents the physical configuration of site operations.

The site has undertaken a Salar Yield Improvement project to recover lithium contained in the stored salts through two bischofite lines and one carnallite line. The new Salar Yield Improvement Plant commenced operation in August 2023. It is expected this will allow Albemarle to increase lithium recovery rates in a 15%, leading to more efficient lithium production.

### 1.2.1. Scope of activities and facilities included in audit

The surveillance assessment of the Albemarle Planta Salar de Atacama Lithium Brine operations included the visit of onsite operational and processing facilities. This included:

- Extraction of lithium-rich brine, evaporation ponds and primary processing facilities
- Potash plant
- Salar Yield Improvement Project
- Salt storage areas
- Fuel storage and fueling system
- Waste storage areas
- Security guard house
- Maintenance facilities
- Administrative office building
- Operations building
- Laboratory

### 1.2.2. Activities or facilities excluded from scope of audit

The La Negra plant, used for processing and converting lithium chloride to lithium carbonate, is a stand-alone facility located outside the concession area.

During the surveillance audit, the audit team confirmed it is not included in the scope of this IRMA Assessment in accordance with the IRMA Assessment Manual.

### 1.2.3. Limitations of audit

The audit team was able to access and visit most areas that were planned as part of the audit scope. However, adverse weather conditions, including rainfall in the desert area and snowfall in the highland regions, were experienced at the time of the onsite audit. Due to safety concerns for the audit team and deteriorating road conditions, Albemarle's management and the ERM CVS audit team mutually agreed to suspend the week's activities and the audit team returned to Calama one day earlier than planned. This decision was made to mitigate the risk of the audit team becoming stranded at the mine site in the event of worsening weather conditions.

Because of this, the Potash Plant was not visited during the surveillance onsite visit. External stakeholder engagement was similarly affected by the weather conditions. Efforts were made to reschedule interviews to take place remotely, however one interview was not able to take place despite participant willingness due to weather-related internet access issues. Two interviews originally scheduled to be conducted in person were successfully conducted remotely.

These exclusions did not impact the overall audit objectives or findings.

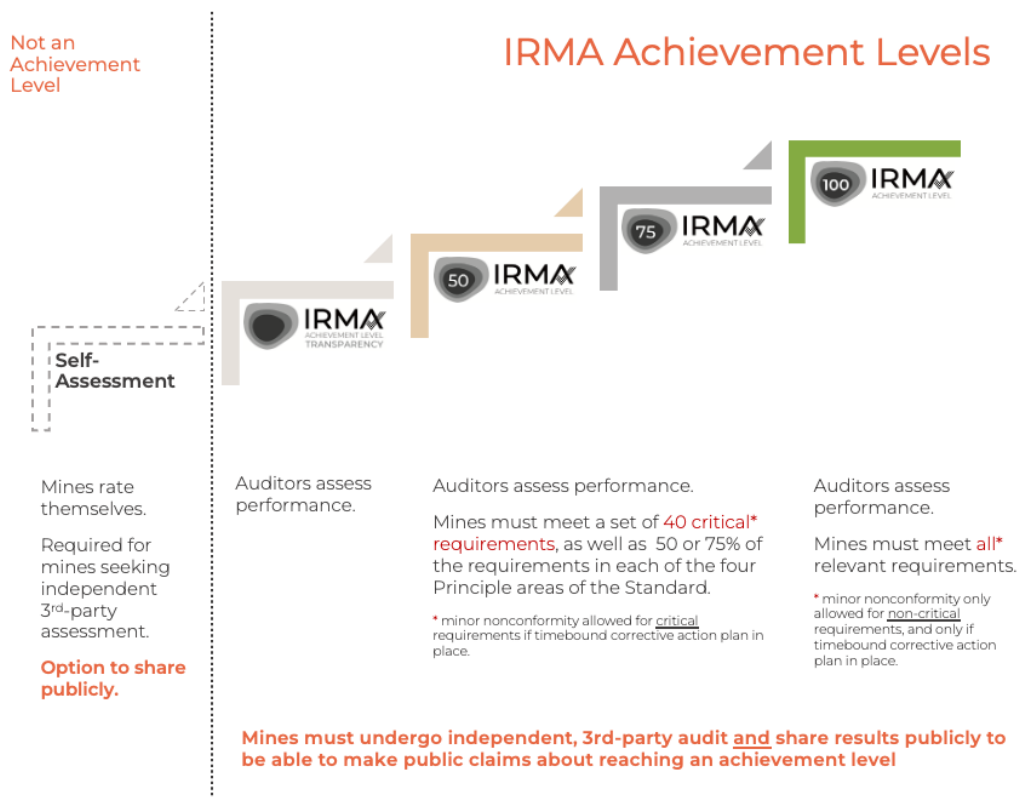
## 2. Mine Site Assessment Process

### 2.1. Overview of IRMA Process

There are three primary types of assessment in the IRMA process: a full audit (including the initial audit and subsequent renewal audits), where the mine site is assessed against all relevant IRMA requirements; a surveillance audit, typically conducted 12-18 months after the initial audit, and special audits which are conducted in addition to the normal cycle of audits to assess progress on corrective actions, review significant changes to operations, or follow up on grievances or incidents.

This audit report reflects the outcomes of the surveillance audit. Surveillance audits are intended to be abbreviated audits conducted midway through the assessment cycle to verify continued conformity of critical requirements, progress on completing corrective actions, and any focus areas identified by the audit firm. In addition, the audit considers feedback from stakeholders since the previous audit and material changes to operations, personnel, management systems, or the surrounding environment to determine if changes have affected the site's ability to continue to deliver achieved performance scores.

IRMA recognizes four levels of achievement. For a complete description of the assessment process and achievement levels, see IRMA's Audit Firm Requirements, available on IRMA's web site.<sup>1</sup>



## 2.1.1. Scope and Limitation of Audits

Within the IRMA system, independent, third-party assessment is a process by which mines are assessed against the IRMA Standard for Responsible Mining by external auditors. Audits are conducted by approved audit firms using auditors who have undergone IRMA training, meet IRMA competency requirements, and have been deemed to have no conflicts of interest with the mine site under assessment.<sup>2</sup>

Audits are carried out in general conformance with established industry practice for independent audits (i.e., ISO 19011).<sup>3</sup> In addition to document review, audits include on-site observation of operations and the surrounding environment, review of documents and records, and interviews with site personnel and relevant stakeholders.

IRMA surveillance audits are not full audits, meaning that conformance with all requirements reviewed in the most recent full audit (e.g., initial audit or renewal audit) does not need to be re-established. Typically, surveillance audits are intended to allow the audit firm, who has issued a public verification of performance, to assess the site's ongoing status, review any incidents, confirm regulatory compliance, and review progress on corrective actions to verify that no changes have occurred that would materially affect the site's ability to maintain the achievement level.

Auditor evaluations are based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed in auditor comments are based on the facts available at the time of the audit within the limits of the existing data, scope of work, budget, and schedule.

Audit evidence is based on samples of available information. Therefore, there is an element of uncertainty in auditing, and those acting upon the audit conclusions should be aware of this uncertainty.

In alignment with IRMA's stakeholder engagement requirements, the stakeholder engagement plan (SEP) developed for the Albemarle surveillance audit identified 12 civil society representatives, prioritizing the inclusion of Atacameño Indigenous communities to ensure meaningful representation. During the stakeholder engagement process, some Indigenous leaders declined participation, and an unforeseen adverse weather event impacted the process, limiting certain interviews to online formats and causing the cancellation of one confirmed interview due to connectivity issues. These circumstances were documented transparently, and mitigation measures were applied to maintain inclusivity and integrity of the process. Ultimately, 7 interviews were successfully conducted out of the 12 representatives selected in the SEP for Stage 2, demonstrating adherence to IRMA principles of participatory engagement and continuous improvement under challenging conditions.

## 2.1.2. IRMA Complaints Process

IRMA stakeholders who wish to file a complaint related to the mine site assessment process may submit feedback on the IRMA website. Details on the complaints process can be found in IRMA's Issues Resolution Procedure which can be accessed from the main IRMA website.

## 2.2. Surveillance Audit Process

The surveillance audit process includes a desktop review and onsite audit by the audit firm. The on-site audit can include a series of interviews with mine staff (workers and management team), relevant community representatives, local non-governmental organizations (NGOs) if any, governmental agencies, documentation review, and visits to operational areas, surrounding area, and other locations including surrounding communities.

## 2.3. Stakeholder Engagement

IRMA requires that stakeholders be engaged as part of the mine site assessment process. Audits are announced by IRMA and audit bodies, and prior to the on-site audit there is additional outreach carried out by audit firms.

As part of the surveillance audit, ERM CVS held community meetings with seven stakeholders and rightsholders potentially impacted by the mining operations. These meetings were conducted either in or near the respective communities, with locations selected to consider accessibility, or virtually via MS Teams. While logistical support for organizing the meetings was provided by the Albemarle team, all engagements were facilitated exclusively by ERM CVS auditors, without the presence of mine personnel.

During the onsite visit however, there was a significant change in regional weather conditions, including rainfall in the desert area and snowfall in the highland regions where indigenous Atacameñas communities within Albemarle's area of influence are located. Due to safety concerns for the audit team and deteriorating road conditions, Albemarle's management and the ERM CVS audit team mutually agreed to suspend the week's activities earlier than planned. This decision was made to mitigate the risk of the audit team becoming stranded at the mine site in the event of worsening weather conditions.

This impacted three scheduled in-person interviews. Two of the scheduled in-person interviews were transitioned to virtual meetings via MS Teams. However, one stakeholder was unable to participate in the alternative format due to limited internet connectivity in his community affected by the weather. Follow-up with this stakeholder will be prioritized at the next on-site audit.

### 2.3.1. Written comments/inquiries

Two formal enquiries were received from stakeholders and rightsholders between the initial audit and the surveillance audit. More details about these enquiries can be found in section 3.2.1. and on the IRMA website.

Forty-seven days prior to the onsite surveillance visit, the assessment was announced on the ERM CVS website, IRMA's website, and through IRMA's free distribution newsletter. The announcement included an invitation to stakeholders to submit written comments about the environmental and social performance of the Albemarle Salar de Atacama mine to the audit firm via email, online stakeholder feedback form or a dedicated voicemail line, and invitation to participate in the assessment. The announcement was prepared in English and Spanish.

At the same time, Albemarle distributed posters of the audit announcement to the local communities and to workers and sent letters to the stakeholders and Indigenous rightsholders to inform them about the audit and to invite interested parties to participate in the interview process or to submit formal or written feedback.

Albemarle's outreach efforts included posters in several locations, including the Peine, Camar, Talabre and Toconao communities and the Council of Atacameños Communities (Consejo de Pueblos Atacameños - CPA) office. This was verified by the auditors during the onsite audit.

As general meetings with communities were postponed until August 2025, the invitation to participate in the audit was communicated to all 18 indigenous communities via the Directive of the CPA. The Directive includes representatives from the Machuca, Larache, Talabre, Quítor, and San Pedro communities, who then informed the remaining communities about the audit.

The mine and ERM CVS also carried out direct outreach to selected stakeholders and community leaders via WhatsApp to coordinate meetings.

ERM CVS did not receive correspondence from stakeholders prior to the surveillance audit. Of the 22 stakeholders and Indigenous rightsholders mapped by the stakeholder plan prepared by the independent audit firm and contacted by the social auditor and the Albemarle community team, seven stakeholders responded to invitations and scheduled interviews, of which six were carried out.

One representative of an indigenous community declined to participate due to scheduling issues. No additional options of providing feedback, such as submitting comments by email, were provided to the stakeholder at the time. There was no response from other contacted stakeholders that were invited to participate in the audit or provide feedback. The social auditor also followed up directly with them via WhatsApp, but no response was received.

### 2.3.2. Mine Staff

The following individuals were interviewed as subject matter experts in one or more topics relevant to the IRMA standard. The positions listed were those held at the time of the audit.

#### Position/Role

---

Senior Legal Counsel

---

Ethics & Compliance Regional Manager

---

External Attorney

---

Environmental Sustainability Engineer

---

Regional Procurement Manager

---

Deputy Compliance Manger & Investigations

---

Finance Manager

---

---

Environmental Sustainability Engineer

---

HSS Superintendent

---

Community Relations Assistant Manager

---

President of the Joint Health and Safety Committee

---

Operations Superintendent

---

Salar Plant Manager

---

Head of Environment

---

Environmental Specialist

---

Senior Prevention Advisor

---

Sustainability Manager

---

Community Relations Manager

---

Community Relations Coordinator

---

Social and Environmental Leader

---

Permit Leader

---

Environmental Manager

---

Monitoring Specialist

---

Hydrogeologist

---

HR Director

---

HR Business Partner Salar

---

Regional Talent Attraction Manager

---

### 2.3.3. Workers/Contractors

During the surveillance audit, ERM CVS conducted scheduled worker engagements, comprising 6 individual interviews and 2 group interviews (with 2 and 4 participants each). These scheduled interviews were supplemented by additional impromptu conversations with individuals and small groups encountered in various areas (6 persons) of the mine during the environmental, health, and safety (EHS) portion of the onsite audit without management present. In total, 18 workers were interviewed through scheduled and impromptu interviews.

Prior to the onsite visit, ERM CVS selected a diverse sample of workers and contractors for interviews. The selection process aimed to include representation across different age groups, genders, lengths of service at the Albemarle mine (ranging from a few months to

approximately 10 years), and job roles or functions—including managers, coordinators, technicians, and machine operators.

The interview list included both company employees and contractors. For each selected worker, a backup individual of the same gender or similar role within the company or contractor was identified. Due to the mine shift work schedule, a few selected workers were replaced by their backups; however, all scheduled interviews were successfully completed.

In total, 4 contractors and 8 direct workers were interviewed via scheduled interviews. Their job roles and functions included mining (4 workers), safety and security (3 workers), maintenance/engineering (2 workers), administrative roles (3 workers) and others.

Interview topics included working conditions, freedom of association, health and safety, and grievance mechanisms. All engagements were conducted onsite in designated conference rooms and offices, without the presence of Albemarle management personnel. Interview participants were selected directly by ERM CVS to minimize bias and encourage candid responses.

Date	Meeting Type	Number of Attendees*
28/07/2025	Individual Interview	1M
28/07/2025	Individual Interview	1F
29/07/2025	Individual Interview	1M
29/07/2025	Individual Interview	1M
29/07/2025	Individual Interview	1F
29/07/2025	Individual Interview	1M
08/07/2025	Group Interview	1F, 1M
08/07/2025	Group Interview	1F, 3M
<b>Total</b>	<b>18 worker interviews:</b>	<b>12 scheduled (8M, 4F) 6 impromptu</b>

\* M = Male; F = Female

### 2.3.4. Government Agencies

ERM CVS conducted an interview with one government agency representative identified as having authority over or a relationship with the Albemarle mine. The interview was conducted without mine personnel present.

Despite efforts from the Albemarle support team to reschedule interviews with local authorities, the limited time and weather-related challenges such as limited internet connectivity in certain communities meant that only one authority representative was interviewed during the surveillance audit.

#### Government Institution

Peine Environmental Control Agency – 1 F

**Total 1 (0M; 1F)\***

\*M = Male; F = Female

### 2.3.5. Participating Communities and Civil Society Groups

To identify relevant stakeholders and interested parties for interviews during the onsite audit, ERM CVS specialists conducted a background/ media review, consulted with the mine's team, and analyzed the updated stakeholder database provided by Albemarle.

Prior to the audit, all 18 indigenous communities in the area were invited to participate in the audit or provide feedback via the Directive of the CPA (Consejo de Pueblos Atacameños - Council of Atacameños Communities), an organization of traditional authorities with a mandate to represent the 18 Atacameñas indigenous communities..

Leaders and representatives from five of the Indigenous communities, located along the southern edge of the Salar, in proximity (within an approximate radius of 55 km) to Albemarle's operations, were also directly invited to participate in the surveillance audit. A representative of one of the indigenous communities was unavailable for an interview during the site visit period, due to scheduling issues. No additional options for providing feedback, such as submitting comments by email, were used.

Four in-person interviews were scheduled with leaders and representatives from the Peine, Socaire, Camar and Toconao communities. To represent the remaining 13 indigenous communities, the social auditor scheduled an interview with the President of the CPA as part of the surveillance audit.

During the surveillance audit, in-person interviews were conducted with leaders and representatives from two Indigenous communities (Peine, Toconao). Due to the aforementioned adverse weather conditions, two interviews originally scheduled to be conducted in person were successfully held online: one with the president of the Indigenous Association of Socaire and another with the president and team of the CPA. The scheduled interview with a representative of Indigenous Association of Camar (institution of Camar Atacameña indigenous community) was also unable to take place, however although the president expressed willingness to participate in an online interview, weather-related issues prevented internet access in the community, and the remote interview could not be conducted. Considering that this was the last day of fieldwork, no alternative was provided for conducting an interview or any other form of information gathering with the Indigenous representative.

Additional interviews included other Indigenous community members (Peine local residents) and municipal representatives from San Pedro de Atacama were held in the Peine community. These discussions covered key areas such as social development, quality of life and environment, health, education, and cultural preservation.

Date	Community, NGO Name	Meeting Location	Total Number of Attendees*
------	---------------------	------------------	----------------------------

31/07/2025	President of the Peine Neighborhood Council	At the institution's headquarters	1M
31/07/2025	President, Legal Director and Environmental Director of the Consejo de Pueblos Atacameños, CPA	Via Teams	3M
31/07/2025	President of the Atacameña Community of Socaire	Via Teams	1M
30/07/2025	President of the Margarita Chocobar Foundation of Toconao	At the institution's headquarters	1F
11/09/2025	President of the Albemarle Union	Via Teams	1M
<b>Total</b>			<b>7 (6M, 1F)</b>

\*M = Male; F = Female

## 2.4. Summary of Mine Facilities Visited

The following areas were visited or observed during the on-site visit:

<b>Operational areas</b>	<p>General process overview, including:</p> <ul style="list-style-type: none"> <li>Brine wells pump stations/extraction wells</li> <li>Evaporation ponds/concentrators</li> <li>Harvest areas, stockpiles, and reservoirs</li> <li>Fresh water supply</li> <li>Brine truck loading system</li> <li>Salar Yield Improvement Plant</li> </ul>
<b>Non-operational areas visited</b>	<ul style="list-style-type: none"> <li>Camp site</li> <li>Administrative offices</li> <li>Dining halls</li> </ul>
<b>Surrounding Communities</b>	<p>Due to adverse weather conditions during the onsite audit, ERM CVS was only able to visit two Indigenous communities within Albemarle's area of influence: Peine and Toconao. Engagements with other communities were conducted either virtually or through the CPA (Consejo de Pueblos Atacameños), the institutional body representing 18 Atacameño Indigenous communities.</p>

## 3. Summary of General Scope Items

General information regarding the mine's ongoing performance is summarized in this section. Summary information related to specific chapters is provided in Section 4.0.

The surveillance assessment concluded that the mine has continued to maintain the basic systems identified in the prior assessment.

As part of the surveillance audit, the audit team reviewed whether chapters that were marked as not relevant at the initial audit continue to not be applicable at the mine.

### 3.1. General operational status

#### 3.1.1. General outcome of compliance monitoring/audits

The mine has undergone a review of all IRMA critical requirements. The site developed an Excel spreadsheet "IRMA Requirements Compliance Management.", which includes all IRMA requirements, generating different actions with responsible areas and planned closing dates. There is also a Monthly IRMA Report with activities in progress, those overdue, and completed activities. The monthly report has been generated since September 2023. According to the last available report dated on April 2025, there are 138 activities still in progress, with 16 activities closed in the month.

#### 3.1.2. Regulatory inspections, violations, enforcement actions

A sanctioning process is underway with the Environmental Superintendency (SMA, Superintendencia del Medio Ambiente) related to an enforcement action that began on March 9, 2022. The process deals with the over-extraction of brine and failure to comply with measures committed to in the early warning plan in the aquifer sector in a timely manner. The site has submitted a defense on April 8th, 2022. In May 28<sup>th</sup>, 2025, the SMA asked the DGA (Water Bureau) to issue its report on the information provided by Albemarle. As of the date of the audit (July 2025), the DGA had not yet issued the report, and neither was there a resolution from the SMA.

#### 3.1.3. Lawsuits and other external legal, non-regulatory actions

An environmental lawsuit filed on April 8, 2022 was resolved by a settlement on December 16, 2024, which was approved by the First Environmental Court (Primer Tribunal Ambiental). The claim was related to compensation for environmental damage against three mining companies, including Albemarle Limitada (ALB), for continuous extraction of water resources from the Monturaqui-Negrillar-Tilopozo aquifer. The site reported these extractions were in compliance with the current permits. At the time of the surveillance audit, the settlement phase was underway for implementation of the committed measures.

An international arbitration dispute concerning commission payments for mining concessions from the mining agreement has been terminated through mutual agreement on April 30, 2024.

### **3.1.4. Summary of major events, health and safety incidents, and performance records**

#### **Safety and Incident Management Summary**

##### *Incidents:*

A total of 250 incidents were reported across various departments since the initial audit in 2021. This included 54 incidents in 2022, 129 incidents in 2023 and 67 incidents in 2024. The most affected areas included Operations at the pools and administrative activities. Incident reports were distributed across multiple locations. Incident severity ranged from alerts, near misses, and incidents from level 1 to level 3 (low to significant). Most incidents were attributed to unsafe actions.

##### **Hazard Detection Management:**

A total of 1,370 hazard detections were reported in the last year, with a closure rate of 96.13%. Most detections were successfully closed, and overdue cases were minimal. Compliance rates across departments were strong. Weekly tracking showed a reduction in overdue detections and steady progress in verification and closure.

## **3.2. Stakeholder considerations**

### **3.2.1. Stakeholder feedback/complaints received by site since prior audit**

Verified data from documentation covering the period following the initial audit up to the surveillance audit onsite visit indicates that in 2023, Albemarle's grievance mechanism received 143 communications, of which 18 were registered as complaints. These complaints were related to vehicle traffic in the mining operations area (22.8%), noise generated by operations (22.2%), and lack of information disclosure (22.2%). In 2024, out of 157 communications received, 10 were registered as complaints. Among these 10 complaints, 5 were related to late payments by Albemarle contractors. 4 complaints were raised concerning contractor behaviour, including refusal to move containers from unauthorized areas, treatment of a community member, trespassing and reckless driving. One complaint was raised against Albemarle for lack of notice of a power outage. In 2025, up to the time of the surveillance audit onsite visit, 4 complaints had been registered, half of which were related to water sampling activities conducted by Albemarle's team for quantitative monitoring of water availability in the region. Other complaints during the period were related to the relationship between the mine team and the community water monitors, such as failure to comply with agreed scheduled times for fieldwork.

### 3.2.2. Stakeholder feedback/complaints received by auditors or IRMA since prior audit

All observations or comments regarding stakeholder perceptions, both from workers or contractors, external stakeholders and Indigenous rightsholders, were documented during interviews conducted at the onsite visit.

Two written inquiries were received from stakeholders between the initial audit and the surveillance audit.

On 10 April 2024, Complaint #IRMA-2024-001 was received from SIRGE Coalition, raising questions about how the audit firm assessed conformity with the Free, Prior and Informed Consent (FPIC) chapter and how evidence was weighed and assessed in reaching audit findings. Details of the complaint, and responses from IRMA Secretariat and ERM CVS can be accessed on IRMA website: [Complaint #IRMA-2024-001 - IRMA - The Initiative for Responsible Mining Assurance](#).

Chapter 2.2 FPIC was addressed during this surveillance audit through interviews with company subject matter experts, review and analysis of available documentation, and consultations with representatives of Indigenous communities and the Consejo de Pueblos Atacameños (CPA). In this context, Albemarle has established an agreement with 18 Atacameñas communities through a formal convention with the CPA, which defines a participatory dialogue framework aligned with IRMA requirements.

The company indicates that it has indirectly obtained the free, prior, and informed consent (FPIC) of Indigenous Peoples for current operations by presenting a signed agreement with the CPA. This agreement sets out processes to representatives in addressing past and present concerns raised by the communities and in implementing remediation and/or compensation measures for historical impacts on Indigenous rights and interests. The participatory process was agreed upon with Indigenous Peoples through the CPA agreement, as confirmed by CPA representatives. Furthermore, meeting minutes of Mesas de Trabajo Permanente (MTPs) were provided to evidence how Albemarle implements the commitments established in the agreement. For more details, see Section 4.2, Principle 2: Planning for Positive Legacies, Chapter 2.2.

On 16 April 2024, Complaint #IRMA-2024-002 the Earthworks organization regarding the results and methodology of the initial audit. Details of the complaint, and responses from IRMA Secretariat and ERM CVS can be accessed on IRMA website: [Complaint #IRMA-2024-002 - IRMA - The Initiative for Responsible Mining Assurance](#)

Surveillance audits are significantly reduced in scope compared to the initial audit, however the length of the surveillance audit was set to four days onsite to allow for additional time to interview workers, community representatives, rightsholders and other stakeholders, as well as assess compliance during site tours to operational areas. Impromptu worker interviews were carried out during site tours to gather further evidence of site performance from worker feedback.

All 18 indigenous communities were invited to participate via the CPA; however, no responses were received from 13 communities. A representative from one indigenous community

(Socaire) which did not participate during the initial audit was interviewed for the surveillance audit.

Both complaints indicated the need to increase opportunities for community participation in the audit and improve availability of feedback mechanisms. Prior to the surveillance audit, ERM CVS launched an updated website form for stakeholders to provide feedback or requests to be interviewed at the onsite audit. This form was available in both English and Spanish. A voicemail line in Spanish for stakeholders' outreach was set up to provide another option for contacting the audit firm.

The audit announcement was published 7 weeks before the audit to offer rightsholders and stakeholders additional time to reach out to the audit firm, and posters of the announcement were distributed by Albemarle via the CPA and in public areas within local communities. This was verified by the audit team during the surveillance visit. The selected dates of the surveillance audit also considered the 2025 Indigenous Consultation Process led by State entity CORFO to minimize interference between a voluntary and a State led process.

The IRMA Secretariat has also conducted in-person outreach with rightsholders and other stakeholders between October 15 to 19, 2023, March 25 to 26, 2024, March 27 to 29, 2025, and September 10 to 13, 2025. Outreach focused on addressing inquiries related to understanding the results of the initial audit, grievances posted on the IRMA website and conducting workshops to define audit report dissemination tools.

### 3.3. Summary of Material Operational or Administrative Changes at Site Since the Previous Audit

Since the previous initial IRMA audit conducted in April 2022, the site has undertaken a Salar Yield Improvement project to recover lithium contained in the stored salts through two bischofite lines and one carnallite line. The new Salar Yield Improvement Plant that began construction in March 2022 commenced operation in August 2023. It is expected this will allow Albemarle to improve their production efficiency, increasing lithium recovery rates by 15%.

No other material operational or administrative changes were reported to have occurred since the previous audit.

### 3.4. Site-Specific Issues Identified for Follow-Up Review in Previous Audit

During the initial IRMA assessment in April 2022, it was noted that the mine planned to start the installation and operation of the Salar Yield Improvement Plant, whose objective is to recover lithium contained in the collected salts. The construction began in March 2022, and operations were initiated in August 2023. Currently, it employs a total of 30 workers, including shift leaders, supervisors, coordinators, and operators.

### 3.5. Progress on Previous Corrective Actions

The following table provides a summary of the corrective action plan provided in the previous audit report and notes where progress has been made. If auditors believe a change in rating is warranted, this is documented in the critical requirements summary table in Section 5. In addition, ongoing management of corrective actions, including those below and any new corrective actions arising from this audit, are addressed in Section 6 of this report.

<b>Requirement #</b>	1.1.1.1.
<b>Requirement</b>	The operating company shall comply with all applicable host country laws in relation to the mining project.
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially meets
<b>Justification from previous report</b>	Essential permits to access lithium resources and land are in place. In addition, organizational permits related to environmental licenses and water resources were provided. A meeting with the site legal manager included a discussion of the company's legal situation, including two open tax-related lawsuits, and evidence of how Albemarle is dealing with the matter.
<b>Planned Corrective Action(s) from previous report</b>	<ul style="list-style-type: none"> <li>• Within the framework of an eventual arbitration termination agreement (conciliation), propose improvements in the clauses that may generate controversies in order to avoid future differences in interpretation.</li> <li>• Propose an integral agreement to the SII, establishing guidelines that provide clarity on the interpretation criteria that the SII will apply to Albemarle's operations.</li> <li>• Advance in the exploration of new sources of water supply from outside the Salar de Atacama.</li> </ul>
<b>Comments on Progress</b>	<ul style="list-style-type: none"> <li>• An agreement was reached between CORFO and the mine to terminate the international arbitration dispute.</li> <li>• At the time of the site surveillance visit, no final decisions from the Tax Court has been issued in pending tax lawsuits (See Section 4.1. for more detail). This requirement therefore remains rated as Substantially Meets. Once a final decision is made by the authority, this topic will be further reviewed during the next IRMA assessment.</li> </ul>

- Regarding alternatives for supplying water from outside the Salar de Atacama, discussions with potential suppliers who could provide the water supply were underway at the time of the surveillance audit. A mapping of other mining companies with the capacity to provide desalinated water was in progress to confirm options and volumes. The proposed deadline to stop pumping freshwater from the basin and current sources (Tilopozo, Tucúcaro and Peine) is April 2028.

As the tax lawsuit resolution is still pending, this requirement will retain its rating. Compliance with requirement 1.1.1.1. will be further reviewed during the next IRMA assessment.

<b>Requirement #</b>	<b>1.2.2.2.</b>
<b>Requirement</b>	<p>The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <ul style="list-style-type: none"> <li>a. Providing relevant information to stakeholders in a timely manner;</li> <li>b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;</li> <li>c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;</li> <li>d. Soliciting feedback from stakeholders on issues relevant to them; and</li> <li>e. Providing stakeholders with feedback on how the company has taken their input into account.</li> </ul>
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially meets
<b>Justification from previous report</b>	<p>The organization provides evidence that in recent years agreements were signed with 18 local communities; these lay out the basis for stakeholder engagement that meets sub-criteria a-e. The organization also provides meeting records and minutes for recent years. However, communities indicate that there is room for improvement in terms of direct engagement (rather than through the local MTP or Consejo, which many see as non-representative) and that information is filtered through the MTP and Consejo and does not reach them directly. Communities also indicate that they can give and receive feedback to and from the organization, but again through the MTP, which several communities indicated was not representative or sufficient.</p>

---

**Planned  
Corrective  
Action(s) from  
previous report**

- Critical analysis of current communication mechanisms and channels.
- Propose changes to current mechanisms and channels.
- Propose new forms of communication that include local Assemblies, diverse local groups.
- Implement actions whose goal is to communicate better the Company's plans.
- Preparation of a Citizen Relations and Participation Plan that includes opportunities for improvement detected in the Current communication mechanisms and channels. This plan should involve the community in the areas of Cultural Heritage, Safety, Environment, and Human Rights.
- Socialization should consider, at least, the following instances:
  - Presentation of the Plan to the indigenous communities and the community in general through
  - Permanent Worktables (MTP's) and other social networks.
  - Visits to the community around the Salar de Atacama Plant and collection of general comments.
  - Compilation of observations, comments and contributions on the plan, either by adapting the plan or specifying why the observation, comment or contribution was discarded.

---

**Comments on  
Progress**

Albemarle's engagement with Indigenous communities continues to be structured through the Permanent Working Groups (Mesas de Trabajo Permanente – MTP), established under the framework of agreements signed with the Consejo de Pueblos Atacameños (CPA).

Interviews with community members during the initial audit revealed limitations in the effectiveness of this dialogue mechanism. Concerns were raised regarding the flow of information and the representativeness of the MTP and CPA structures, which some stakeholders and rightsholders felt did not adequately reflect the diversity of voices within the communities. This aligns with the issues raised in Complaints 001 and 002 (See Section 3.2.2.).

In response to these concerns, Albemarle contracted an external consulting firm to conduct a diagnostic study of its communication and engagement procedures (INFORME N° 1 - Desafíos de sostener Canales de Comunicación de Alto Estándar en la Minería: El Caso de Albemarle y las Comunidades del Salar de Atacama, Santiago, junio 2025) whose report was presented on June 2025.). The study resulted in a set of recommendations aimed at improving the structure of the engagement plan, related to:

- Grievance Mechanism and Communication Channels
- Digital Accessibility Limitations
- Social Impact Monitoring

- Role of the Community Relations Team (RRCC)
- Operational Continuity and Internal Coordination
- Policy and Protocol Gaps
- Institutionalization of Good Practices
- Leadership Dependency Risk
- Permanent Working Table (MTP)
- Social Investment Guidance

Nevertheless, as of the surveillance audit, there is no evidence that a formal engagement plan has been developed or implemented based on the diagnostic findings.

While initial steps have been taken to assess and improve engagement practices, the company has not yet fulfilled the corrective action plan outlined in the IRMA initial audit, particularly regarding the development and implementation of a comprehensive and inclusive stakeholder engagement plan. This requirement remains rated as Substantially Meets.

<b>Requirement #</b>	<b>1.3.2.1.</b>
<b>Requirement</b>	The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights "risks") and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at a minimum, when there are significant changes to the mining project, business relationships, or in the operating environment.
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially meets
<b>Justification from previous report</b>	The organization is progressing in the identification and assessment of human rights risks. The main human rights risks identified were potential adverse environmental impacts and potential discrimination of indigenous workers, among others.  For previous changes in operations, such as Campamento Chepica and "Modifications and Improvement of the Solar Evaporation Ponds System in the Salar de Atacama," an assessment with potentially affected rights holders was not carried out.

Planned Corrective Action(s) from previous report	<ul style="list-style-type: none"> <li>• Determine the process and frequency with which a human rights risk assessment will be conducted.</li> <li>• Update and incorporate the above into the Human Rights Risk Management procedure.</li> <li>• Define actions to fully implement the Human Rights Risk Management procedure. These actions include, among others, additional human rights audits and follow-up of action plans.</li> </ul>
Comments on Progress	<p>Albemarle contracted an external consulting firm to update its Human Rights Risk Assessment and Human Rights Policy in 2025. This process included the development of a human rights risk and impact matrix, along with a corresponding action plan and prioritization strategy for the identified risks. It is unclear the process that is in place to periodically update the assessment.</p> <p>While this represents a step toward fully meeting IRMA requirement 1.3.2.1, which calls for a continuous process to identify and assess potential and actual human rights impacts, the surveillance audit found that the implementation of this process remains incomplete.</p> <p>The human rights risk assessment was conducted using a methodology developed by independent professionals with expertise in human rights due diligence. The process included interviews and consultations with affected and potentially affected stakeholders, such as local communities, Indigenous peoples, vulnerable groups, employees and contractors.</p> <p>The findings of the assessment were shared with select internal stakeholders such as local leadership but not all affected parties were given the opportunity to review and provide feedback on the results.</p> <p>Therefore, while the development of the matrix and action plan demonstrates progress, the company has not yet fully complied with the requirements as defined in the corrective action plan. This requirement remains rated as Substantially Meets.</p>
Requirement #	1.4.1.1.
Requirement	<p>The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as "stakeholders") have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities.</p>
Critical	Yes

Rating from previous report	Substantially meets
Justification from previous report	<p>The organization has an 'integrity helpline' (available 24/7) and other internal grievance processes that are available to workers. Evidence was observed on site of the socialization of this mechanism, and workers confirmed knowledge of it.</p> <p>There is not yet an exclusive functioning grievance mechanism for communities outside of the Mesas de Trabajo Permanente (MTP), which many community members view as effective only in bringing community-level grievances (not individual grievances) to the organization. The organization provided evidence that the creation of an exclusive grievance mechanism for communities is in progress, and that they have shared preliminary details of this mechanism with 14/18 communities with whom they have agreements.</p> <p>An important consideration of the organization's conformance to these criteria is to what extent the site is required or obligated to defer to traditional structures of representation as reflected by the agreements signed with the 18 indigenous communities in the project area. Guidance notes for similar criteria in IRMA (i.e., guidance note for 2.2.3.2) state that sites can encourage, but not impose, more egalitarian or otherwise distinct participatory structures on indigenous groups with whom they have relations. Community grievances expressed through the MTP (and responses to them) would constitute an appropriate form of receiving and responding to complaints. Thus, the organization can encourage (as they are by creating an alternative mechanism) but not impose additional channels of engagement upon the communities. Moreover, if all workers have access, and most community members have at least one resource through the CPA or MTP, and the site has begun socializing the more 'individualized' mechanism, it is evident – although imperfect - that most stakeholders have access to some form of complaint and grievance mechanism process.</p> <p>The 2022 Community Complaints and Grievances Report provide evidence that the mine is receiving complaints and that people are making use of the systems in place to raise concerns.</p>
Planned Corrective Action(s) from previous report	<ul style="list-style-type: none"> <li>• Implement a specific mechanism for community complaints and grievances (including indigenous communities and external stakeholders in general) that complies with the highest standards in this area.</li> <li>• Implement a management system for received grievances that allows keeping a record of incoming complaints and claims as well as the procedure used to analyze and respond to them, including a record of the outcome of each complaint and/or claim.</li> </ul>

**Comments on Progress**

Since the initial audit, Albemarle has established a formal process for receiving, evaluating, forwarding, and responding to community complaints and grievances. The process includes an initial assessment by the Community Relations department, referral to the relevant internal area, review and response by an Interdisciplinary Committee, and communication of the response to the complainant. Response times vary depending on the channel used, ranging from 12 to 90 days, particularly in cases involving investigations related to violations of the Code of Conduct.

Complaints and grievances are registered and monitored using a centralized digital platform. Anonymous complaints can be submitted through the Integrity Channel or directly to Community Relations staff, with immediate registration on the digital platform. On an annual basis, the site reports to the community on statistics related to the mechanism performance and received cases. A third party is also contracted to carry out an annual measurement of community trust in the grievance mechanism.

While progress has been made to implement a mechanism for community complaints and grievances and its management, interviews conducted with external stakeholders and rightsholders suggest that further efforts are needed to ensure that the grievance mechanism is fully understood, including strengthening the dissemination of the mechanism and its operation, as well as introducing new outreach methods to reach a broader audience. This requirement remains rates as Substantially Meets.

<b>Requirement #</b>	<b>2.1.3.1.</b>
<b>Requirement</b>	The operating company shall demonstrate that it has undertaken a comprehensive evaluation of the potential environmental and social impacts associated with the mining operation.
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially meets
<b>Justification from previous report</b>	Although Chilean legislation does not require projects to formally undertake a scoping process along with the ESIA process, the screening and scoping phases are conducted in practice, since the approval procedure requires an early identification of the expected environmental and social impacts to qualify the project. Also, the organization has recently implemented an internal screening and scoping procedure to early detect environmental and social risks;

---

therefore, the effectiveness of the implementation should be assessed in the future.

---

**Planned  
Corrective  
Action(s) from  
previous report**

- Constantly verify the application of the procedure and use of records in projects carried out.
  - Analyze and review the need to incorporate modifications and improvements in the implementation of screening and scoping. If necessary, update procedure "Socio-environmental screening/scoping and socialization/indigenous consultation".
  - Ensure that all project areas are aware of the procedure and implement it.
  - Evaluate the effectiveness of the screening/scoping in all the instances indicated by the procedure.
- 

**Comments on  
Progress**

The site has made substantial progress in implementing a comprehensive evaluation of environmental impacts. Multiple documents demonstrate the use of predictive modeling (MODFLOW), monitoring plans, and annual effectiveness evaluations for brine extraction reduction. The Early Warning Plan (PAT) and Environmental Monitoring Plan show proactive hydrological risk management and protection of sensitive ecosystems.

Social impact evaluation is partially addressed through citizen participation records and community feedback on mitigation and voluntary commitments. Citizen participation records confirm engagement with local communities; however, available documentation does not specify whether participation included broad representation of Atacameño communities or only specific groups. However, further documentation is needed to confirm full implementation of social impact assessments and internal screening/scoping procedures across all project areas. Further documentation would consist of completed social impact assessments for all project areas, internal screening and scoping reports that detail risk identification and mitigation measures, and evidence of stakeholder engagement such as meeting summaries or consultation records. It should also cover approval reports confirming adherence to procedures and monitoring documents that demonstrate ongoing compliance. This requirement remains rated as Substantially Meets.

---

<b>Requirement #</b>	<b>2.5.1.1.</b>
<b>Requirement</b>	All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining.
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially meets
<b>Justification from previous report</b>	The emergency plan evidenced in response to this IRMA requirement complies with the requirement. During stage 2 it was observed that community consultation for potential emergencies that could impact them was in the latest stages of development but not concluded. Consultation was ongoing, but no feedback had yet been received. The plan also has missing components, including awareness and preparedness for emergencies at local level (APELL), including stakeholder participation requirements.
<b>Planned Corrective Action(s) from previous report</b>	<ul style="list-style-type: none"> <li>• In developing emergency plans, review and consider the United Nations Environment Program’s Awareness and Preparedness for Emergencies at the Local Level (APELL) guidelines for mining.</li> <li>• Conduct drills according to planning (internal and with the community) and consider evacuation of the camp.</li> <li>• Verify that the updates of the emergency plans have been socialized with the community, that their consultations and feedback have been received and analyzed, as well as the incorporation of those aspects that require so, and that the responses to each of the observations received have been generated.</li> </ul>
<b>Comments on Progress</b>	<p>The site has developed a comprehensive emergency response plan in June 2025 that outlines clear procedures, roles, and resources for managing incidents ranging from minor on-site events to major emergencies requiring external intervention. The plan includes detailed site access information, inventories of hazardous substances, and designated ambulance meeting points for readily available medical response.</p> <p>In July 2025, Albemarle carried out a multi-agency emergency drill simulating a serious vehicular accident. This exercise involved Albemarle’s internal emergency brigade, local ambulance services, firefighters, and police, demonstrating effective coordination and</p>

response capabilities. Staff rosters for operational shifts are documented to confirm availability and coverage.

While internal preparedness is strong, standards will require additional documentation showing how all UN APELL goals have been met, including how communities have been consulted, how their feedback has been incorporated into emergency planning, and confirmation that updated plans have been shared with affected stakeholders and rightsholders. External stakeholders and rightsholders interviewed acknowledged that in the event of natural emergencies, they can rely on support from the operating company. However, they reported being unaware of any formal emergency response plans developed for the communities in relation to mining operations. This requirement therefore remains rates as Substantially Meets.

<b>Requirement #</b>	<b>2.5.2.1.</b>
<b>Requirement</b>	The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers' representatives, and the operating company shall incorporate their input into the emergency response plan and include their participation in emergency response planning exercises.
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially Meets
<b>Justification from previous report</b>	<p>The organization provided evidence that an emergency plan dealing specifically with the workers' camp in Peine was prepared and presented to community leaders for feedback in early May 2022 (feedback received in June 2022). While recognizing a longer history of cooperation on emergency matters with the community of Peine, the formulation of this plan and its socialization amongst the community did not occur prior to the Stage 2 onsite audit.</p> <p>During the follow-up assessment further evidence of improved communication with community was observed. Drill performed identified gaps; however, still there is an opportunity to better communicate with community leaders, formulate a communication plan that is not based on persons but on positions, and ensure when community leaders change that this is reflected and properly communicated.</p> <p>During the further assessment the site generated a critical scenario drill to complement the complete drill program.</p>

**Planned Corrective Action(s) from previous report**

- Socialize emergency plans with workers.
- Socialize emergency plans with general community leadership positions and include feedback in future updates.
- Generate a relationship procedure with the elected new board of directors, to address short, medium and long-term community issues, in order to ensure that the continuity of the work is not lost regardless of the elected candidate.
- Incorporate into emergency plans formal communication mechanisms with the communities when appropriate
- Coordinate emergency drills in collaboration with the communities.

**Comments on Progress**

The company has demonstrated strong internal preparedness through structured emergency protocols, annual training, and detailed role assignments for workers. A multi-agency emergency drill conducted in July 2025 further illustrates Albemarle’s coordination with external institutions such as ambulance services, fire departments, and police.

However, while institutional collaboration is evident, the requirement specifically emphasizes community engagement. The evidence provided does not yet confirm that community members were consulted during the development of the emergency plan, nor that their feedback was incorporated into its design. External stakeholders and rightsholders interviewed indicated that they had not been consulted during the planning process nor had they participated in any emergency drills conducted in the region.

The rating of “Substantially Meets” is supported by evidence of a formal emergency response plan, structured internal preparedness, and coordination with external agencies, as well as documented drills and corrective actions aimed at improving community engagement.

<b>Requirement #</b>	<b>3.1.3.3.</b>
<b>Requirement</b>	The operating company shall take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to female workers.
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially Meets

Justification from previous report	The organization provided evidence of an anti-discrimination policy, and equal opportunity and fair treatment in employment awareness raising for employees (through the code of conduct). The organization has a formalized and socialized policy on workplace discipline, including prohibition of harassment.
Planned Corrective Action(s) from previous report	<ul style="list-style-type: none"> <li>• Diagnosis and assessment in Standard 3162</li> <li>• Evaluate frequency and effectiveness of training process on measures to prevent and address harassment, bullying and/or exploitation.</li> <li>• Conduct a 360° evaluation to leaders.</li> <li>• Assess the opportunities for implementing a 360° evaluation system and based on this, evaluate its implementation.</li> </ul>
Comments on Progress	<p>The site has demonstrated progress in addressing workplace harassment, intimidation, and exploitation, particularly in relation to female workers. In compliance with national legislation, the company has recently developed and implemented a formal protocol aimed at fostering a respectful and violence-free work environment. This protocol outlines clear rights for workers, including the ability to report incidents confidentially and receive fair treatment throughout investigative processes. It also establishes the company's responsibilities, such as ensuring preventive measures are in place, protecting individuals from retaliation, and coordinating with contractors to uphold the same standards. Furthermore, Albemarle has conducted a psychosocial risk assessment using historical data and mutuality criteria, identifying key risks across operational areas. These actions reflect a structured approach that supports the corrective measures outlined in the previous audit, including leadership evaluations and training effectiveness reviews. Worker interviews during the surveillance audit have not further reported on presence of discrimination or harassment. Therefore, the rating of this requirement can be upgraded to Fully Meets.</p>

**Requirement # 3.2.4.1.**

**Requirement** The operating company shall implement measures to protect the safety and health of workers including:

- a. Informing workers, in a comprehensible manner, of the hazards associated with their work, the health risks involved and relevant preventive and protective measures;
- b. Providing and maintaining, at no cost to workers, suitable protective equipment and clothing where exposure to adverse

	<p>conditions or adequate protection against risk of accident or injury to health cannot be ensured by other means;</p> <p>c. Providing workers who have suffered from an injury or illness at the workplace with first aid, and, if necessary, prompt transportation from the workplace and access to appropriate medical facilities;</p> <p>d. Providing, at no cost to workers, training/education and retraining programs and comprehensible instructions on safety and health matters as well as on the work assigned;</p> <p>e. Providing adequate supervision and control on each shift; and</p> <p>f. If relevant, establishing a system to identify and track at any time the probable locations of all persons who are underground.</p>
<b>Critical</b>	Yes (a and b)
<b>Rating from previous report</b>	Substantially Meets
<b>Justification from previous report</b>	<p>As communicated to the audit team, all companies in Chile have the obligation to inform their workers (DS N°40/article 21) about the risks involved in their work, the preventive measures to be adopted and the correct work methods. In line with this requirement, all workers receive information according to their activities, depending on their function (see "Obligation to Inform"). In addition, each new worker is provided with personal protective equipment (PPE) and is given an induction (Induction HSS Hombre Nuevo). There are also annual training programs. Regarding emergencies or accidents, the organization has an emergency and contingency plan for the Salar Plant. The organization has implemented various monitoring methods to ensure the understanding and control of key hazards. From the site observations, those methods present variability in their effectiveness with opportunities around control effectiveness assurance at various organizational levels. This includes field supervisors that at times were not knowledgeable on the management system processes including risk assessment, control measures, and how to report gaps to those expected controls. When gaps are identified, actions seem to be symptomatic and not consistently addressing root causes. This could contribute to the increase in the operational risk profile of the organization if not addressed.</p> <p>For reactive measures, the organization provides proper field/site medical attention and transportation to higher complexity centers if it's needed.</p>
<b>Planned Corrective</b>	<ul style="list-style-type: none"> <li>• Generate an action plan to increase the performance of root cause analysis to improve the operation of the Salar Plant in general.</li> </ul>

Action(s) from previous report	<ul style="list-style-type: none"> <li>• Establish a periodical instance to show and receive feedback from workers, showing the general analysis of accident rates, root causes and improvements made in management.</li> <li>• Establish a periodical instance to show and receive feedback from the communities, showing the general analysis of accident rates, root causes and improvements made in management.</li> </ul>
Comments on Progress	<p>Workers were observed conducting daily tailgate safety meetings before initiating their shift. All non-routine activities are required to develop a hazard assessment. Routine activities are covered with SOPs that inform workers about hazards and risks. A range of special work permits is in place to manage high-risk activities. Interviewed supervisors seemed knowledgeable about all these processes and the same approach was observed and reported in different operational areas including contractors applying the same methods and processes.</p> <ul style="list-style-type: none"> <li>• The mine has developed a root cause analysis procedure (Code SGC-SAL-PSM-02) with instructions on how to conduct root cause analysis as part of the action plan to improve the performance of root cause analysis.</li> <li>• The internal incident and issues management system gives all employees the ability to report incidents. To manage incidents, the company uses the “Facilex” platform, which allows all workers to report and access information on occupational safety incidents, process safety events, environmental issues, and security-related occurrences. Incident data is reviewed in various forums, including weekly shift-start meetings, supervisor roundtables, contractor meetings, and critical focus meetings allowing to show accident rates and improvements made.</li> </ul> <p>Albemarle’s training for supervisors contained a section to help supervisors understand how their daily roles tie into compliance or other requirements from ISO certification or IRMA.</p> <p>The mine has also established semiannual incident reports to show the general statistics of accident rates and receive feedback from workers. This has led to employees leading safety moments at the beginning of meetings to share personal and professional safety advice and experiences with their teams, and coworkers are encouraged to speak up if they identify safety risks. According to employees and contractor interviews, there is a sense that the company’s health and safety is a core value in everyday activities and that effectiveness of health and safety prevention is responsibility of everyone by following established protocols in a consistent manner.</p> <p>This requirement can be upgraded to Fully Meets.</p>

Requirement #	3.3.1.1.
---------------	----------

<b>Requirement</b>	<p>The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:</p> <ul style="list-style-type: none"> <li>a. General mining operations;</li> <li>b. Operation of mine-related equipment or vehicles on public roads;</li> <li>c. Operational accidents;</li> <li>d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);</li> <li>e. Mining-related impacts on priority ecosystem services (see also IRMA Chapter 4.6);</li> <li>f. Mining-related effects on community demographics, including in-migration of mine workers and others;</li> <li>g. Mining-related impacts on availability of services;</li> <li>h. Hazardous materials and substances that may be released as a result of mining-related activities (see also IRMA Chapter 4.1); and</li> <li>i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease) that could occur as a result of the mining project.</li> </ul>
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially Meets
<b>Justification from previous report</b>	<p>Documents provided address environmental and operational risks, although the assessment of subcriteria (f), (g), and (i) are not yet integrated into formal risk assessment processes. Rather, they were evaluated in a standalone assessment in May 2022 (Arcadis 2022), which drew, for some sub-criteria, on the 2009 EIA and other studies.</p>
<b>Planned Corrective Action(s) from previous report</b>	<ul style="list-style-type: none"> <li>• Create a procedure that establishes regular risk assessments related to the impacts of mining activities on community demographics, service availability, and the generation of hazardous substances, in addition to other risks currently identified.</li> <li>• Include demographic variables, infrastructure impacts, and impacts on communities' customs, systems, and quality of life, as well as associated human rights risks, in the "Screening, scoping, dissemination, socialization, and consultation" procedure.</li> </ul>

- Generate a procedure to assess this impact when it has been identified in the screening or scoping of any project modification or in closure plan activities.

**Comments on Progress**

The mine hired an external consultant service to provide a proposed procedure to develop the social impact assessment that will establish regular risk assessments related to the impacts of the mining activities on the community demographics, service availability and infrastructure impacts, quality of life, in addition to other identified risks.

However, the Social Impact Assessment Report has not been started, and the site has not developed a community health and safety risk management plan. This requirement therefore remains rated as Substantially Meets.

**Requirement #**

4.1.4.1.

**Requirement**

A risk-based approach to mine waste assessment and management shall be implemented that includes:

- a. Identification of potential chemical risks (see 4.1.3.2.e) and physical risks (see 4.1.3.3) during the Project conception and planning phase of the mine life cycle;
- b. A rigorous risk assessment to evaluate the potential impacts of mine waste facilities on health, safety, environment, and communities early in the life cycle;
- c. Updating of risk assessments at a frequency commensurate with each facility's risk profile, over the course of the facility's life cycle; and
- d. Documented risk assessments reports, updated when risks assessments are revised (as per 4.1.4.1. subsection c).

**Critical**

Yes

**Rating from previous report**

Substantially Meets

**Justification from previous report**

Evidence provided indicates that a rigorous risk assessment on the mine waste facilities has been included in the most recent version of the closure plan and of the ESIA; however, a risk assessment associated with the domestic water treatment plant or the hazardous waste storage area could not be found.

**Planned Corrective**

- Evaluate the frequency with which a specialized external periodic evaluation of all physical-chemical risks, that may occur during

Action(s) from previous report	the operation, should be carried out, and that they be systematized together with all the risks identified for the abandonment stage in the closure plans.
Comments on Progress	Risk assessments for wastewater treatment and hazardous waste storage provided during the surveillance audit. This requirement can be upgraded to 'Fully Meets'.
<b>Requirement #</b>	<b>4.1.5.6.</b>
<b>Requirement</b>	<p>On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <ul style="list-style-type: none"> <li>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);</li> <li>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);</li> <li>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS (see 4.1.5.7); and</li> <li>d. Inform the management review to facilitate continual improvement (see 4.1.5.8).</li> </ul>
<b>Critical</b>	Yes
<b>Rating from previous report</b>	Substantially Meets
<b>Justification from previous report</b>	Evidence provided shows that the organization conducts internal inspections and external audits on the mine components such as the stockpiles. Anomalies identified are included in an action plan where their correction is monitored. However, performance objectives have not been set yet.
<b>Planned Corrective Action(s) from previous report</b>	<ul style="list-style-type: none"> <li>• Establish performance targets and KPIs for each operation related to salt reserves (e.g.: decrease the number of finds each year) and follow up on a semi-annual basis.</li> <li>• Generate targets and KPIs for the reduction of all types of waste.</li> </ul>
<b>Comments on Progress</b>	The proposed actions from the initial report corrective action plan do not explicitly address the gaps identified in the requirement. However, the mine has completed a study of stockpiles in February 2025 to evaluate the performance of the facilities and inform updates to risk management processes. As a result of this study, the mine developed

---

several proposals to address stockpiles with operational zones that exceeded their permitted boundaries. As these actions were ongoing at the time of the surveillance audit, this requirement remains rated as Substantially Meets.

---

## 3.6. Notable Performance Improvements

Implementation of Risk Matrix for Economic and Environmental Crimes Act: The Compliance Department developed and now manages a comprehensive risk matrix aligned with Chile's Economic and Environmental Crimes Act (Ley de Delitos Económicos y Ambientales). This matrix is maintained on the "Audit Board" platform, supporting proactive compliance monitoring.

Digital Tools for Compliance Monitoring:

- A new Power BI dashboard was launched to track IRMA requirements, with automated monthly updates sent to designated site personnel.
- The "Zyght" platform is used to record and monitor accident metrics.
- The "Facilex" platform enables all employees to report workplace injuries, enhancing transparency and accessibility.

Functioning of the Joint Health and Safety Committee: The "Comité Paritario de Higiene y Seguridad" operates as a formal mechanism for worker participation in occupational health and safety matters, including supporting the H&S Department in performing monthly inspections of workplace safety conditions and carrying out training and outreach activities to enhance the safety culture of the organization. They also participate in inspections conducted by competent authorities to represent workers.

Cultural Heritage Management: The company submitted a Cultural Heritage Protection Plan (2021–2022) to the Permanent Working Groups (MTPs) in coordination with the Consejo de Pueblos Atacameños (CPA). The plan is currently under revision and will be updated based on the findings of the new Environmental Impact Assessment (EIA). The existing plan is being reviewed by the working committees and will be updated and improved based on this review and new information provided during the preparation of the new Environmental Impact Assessment (EIA) for the future renewal of the mine's activities.

Community Education on Water Management: The site developed a dynamic and accessible communication tool titled "Journey of Water," which includes an animated video, posters, and PowerPoint presentations to explain the water cycle and site water use in a clear and engaging format.

ISO 50001 Certification: In 2024, Albemarle's Chilean operations achieved ISO 50001 certification, demonstrating the implementation of a robust Energy Management System and a commitment to continuous improvement in energy efficiency.

Support for Biodiversity Research: In 2024, the site carried out the "Estudio de Flamencos Andinos en el Salar de Atacama," contributing to scientific understanding and conservation efforts related to local flamingo populations.

Enhanced Stockpile Imaging: The site completed a project to improve imaging and monitoring of all stockpiles. The increased accuracy in inventory management would help with accuracy during emergency management.

### 3.7. Concerns Related to Continued Maintenance of Achievement Level

After review of the surveillance assessment, no evidence of performance deterioration that could present a risk of not maintaining the previously awarded level of IRMA 50 achievement level was observed. However, three observations were made:

**Subcontractor Compliance Oversight:** The site currently lacks a formal mechanism to monitor how subcontractors are meeting the IRMA requirements applicable to their activities. This gap may pose risks to sustained compliance and accountability across the operation's extended workforce.

**Pending Environmental Sanctioning Process:** The Chilean Environmental Superintendency initiated a sanctioning process on March 9, 2022. The procedure has progressed slowly due to the complexity of the charges. The site has submitted a formal defense, and the Environmental Water Directorate is reviewing the additional documentation. As of the audit date, no resolution has been issued, and it remains undetermined whether a regulatory violation has occurred.

**Tax related lawsuit:** Tax matters remain pending on differences of interpretation of specific tax on mining activity and on operational mining income taxes. At the time of the site surveillance visit, no final decisions from the Internal Revenue Service (SII, Servicio de Impuestos Internos) have been issued in the tax lawsuits.

**Stakeholder Engagement Process:** Following allegations from community members raised during and after the initial audit that the Permanent Working Groups (Mesas de Trabajo Permanente – MTP) do not adequately represent their communities and that not all information is shared with them directly, the mine has carried out a diagnostic study of its communication and engagement procedures. However, as of the time of the surveillance audit, no significant changes have been made to the stakeholder engagement structures, which may interfere in the maintenance of the rate level for this chapter.

During the interviews, the communities' representatives indicates that the communities were not clearly informed of their FPIC rights as defined by IRMA; no evidence of measures to address participation barriers for marginalized or vulnerable groups was presented..

The respondents reported that the community representatives' involvement remains limited to dialogue platforms, without direct participation in formal decision-making. Further validation related to FPIC will be required at the next audit.

## 4. General Performance by IRMA Standard Principle and Chapter

Because the surveillance audit is limited in scope, this audit did not include assessment of every requirement in every chapter. An overview of current performance from the surveillance audit for each chapter that was audited (partially or wholly) is provided in the following subsections.

### 4.1. Principle 1: Business Integrity

During the previous audit, this principle received an overall score of 72.2 %. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

#### 4.1.1. Chapter 1.1—Legal Compliance

Chapter 1.1. was fully audited during the surveillance audit. Progress on the critical requirement 1.1.1.1. is summarized in Section 3.5.

This chapter focuses on Legal Compliance, requiring that mining operations comply with applicable laws and regulations, including those related to labor, the environment, health and safety, and community rights.

At the Albemarle site, essential permits for accessing lithium resources and land are in place, along with organizational licenses related to environmental and water resource management.

Pursuant to critical requirement 1.1.1.1., as well as 1.1.3.1. and 1.1.5.1., a review of the site's legal context revealed that an environmental lawsuit filed on April 8, 2022, was resolved on December 16, 2024, with the approval of the Environmental Court. Thirteen measures were committed as part of the resolution, and the case has now entered the conciliation phase. A compliance report has been submitted to the State Defense Council, and no other lawsuits are currently active.

Separately, a sanctioning process was initiated by the Environmental Superintendency (SMA, Superintendencia del Medio Ambiente) on March 9, 2022. The site has submitted a defense, and the Environmental Water Directorate is evaluating supplementary information a resolution to the sanctioning process has not been reached yet at the time of the audit (July 2025).

An international arbitration dispute concerning commission payments to CORFO under a mining agreement has been terminated through mutual agreement.

Following the initial audit, the site has developed a Risk Matrix aligned with the Economic and Environmental Crimes Act (Ley de Delitos económicos y ambientales) to monitor legal compliance. This matrix is managed by the Compliance area via the Audit Board Platform and is updated quarterly.

Meanwhile, the site was actively exploring alternatives for water supply outside the Salar de Atacama at the time of the surveillance audit. Discussions are ongoing with potential suppliers, and options are being mapped to meet a deadline of April 2028.

Pursuant to 1.1.2.1., the site has reviewed IRMA requirements in collaboration with the compliance department and the Leader Council, confirming no conflicts with existing policies. Issues raised by authorities have been addressed, and corrective actions have been approved. Additionally, as mentioned above, Albemarle has appealed open sanction dossiers related to water consumption, citing interpretational differences with the authorities.

Pursuant to 1.1.4.1., although the site has policies that communicate its expectations regarding environmental and social performance, there is no formal tracking system for contractor compliance with IRMA standards. Because of this, no evidence was available on how contractors are complying with environmental and social requirements that are consistent with IRMA requirements.

Compliance activities are tracked using an Excel-based IRMA Requirements Compliance Management system, which outlines responsibilities and deadlines. A monthly IRMA Report has been generated since September 2023 to monitor progress, which includes completed, overdue, and ongoing activities.

Pursuant to 1.1.5.2. and 1.1.5.3., documentation related to site compliance records and the sanctioning processes is publicly available to all via the SNIFA and SEA websites. These platforms also publish consultations and permit modification requests submitted by the mine. All information related to these processes is public, with no confidential data being withheld.

## 4.1.2. Chapter 1.2—Community and Stakeholder Engagement

Chapter 1.2 was partially audited during the surveillance audit. Seven requirements from this chapter were audited, including critical requirement (1.2.2.2.) and six requirements which did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement 1.2.2.2. is summarized in Section 3.5.

In 2016, the operating company established formal agreements with the Consejo de Pueblos Atacameños (CPA), representing 18 Indigenous communities, five located in the southern area of the Salar, near the mine, and thirteen in the northern area. These agreements continue to define engagement mechanisms, primarily through the Permanent Working Groups (Mesas de Trabajo Permanente – MTP), which serve as the main platform for dialogue.

Pursuant to 1.2.1.2., Albemarle commissioned a diagnostic study of stakeholder and rightsholder engagement, conducted by a consulting firm in June 2025, in order to improve its communication procedures. This study included benchmarking with other mining and energy companies and referenced recommendations from the Extractive Industries Transparency Initiative (EITI). However, the finalized engagement plan has not yet been implemented at the time of the surveillance audit. This topic is expected to further reviewed during the next audit cycle.

However, pursuant to 1.2.1.3., no updated procedures were identified following the diagnosis that include direct consultation with community members, nor did the site incorporate culturally appropriate methodologies for the inclusion of vulnerable groups. There is no evidence that an updated Stakeholder Engagement Plan (SEP) has been developed or implemented based on the study findings.

Interviews with community members continue to reveal limitations in the effectiveness and inclusiveness of the MTPs. Concerns were raised about the representativeness of the CPA and the extent to which feedback mechanisms reflect the diversity of voices within the communities. Additionally, the company has not demonstrated that it has assessed the internal dynamics or governance structures of the communities to mitigate potential conflicts related to representation and engagement pursuant to 1.2.1.4.

Pursuant to 1.2.3.1. and the environmental licensing process for the Direct Extraction Project for direct lithium extraction (DLE), the company submitted a proposal for an Early Citizen Participation Process (Proceso de Participación Ciudadana Temprana – PCT), which has not yet been initiated.

In summary, while formal structures for engagement exist, there are gaps in inclusivity, representativeness, and the implementation of recommendations aimed at strengthening stakeholder engagement practices in alignment with IRMA requirements.

### 4.1.3. Chapter 1.3—Human Rights Due Diligence

Chapter 1.3 was partially audited during the surveillance audit. Twelve requirements from this chapter were audited, including three critical requirements (1.3.1.1., 1.3.2.1., 1.3.3.3.) and nine requirements which did not achieve a Fully Meets rating at the initial audit.

Critical requirement 1.3.1.1. was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement. Progress on the critical requirement 1.3.2.1. is summarized in Section 3.5. Critical requirement 1.3.3.3. continues to be Not Relevant.

Pursuant to critical requirements 1.3.1.1. and 1.3.1.2., the operating company has presented its Human Rights Policy, originally issued in 2022 and updated in early 2025. The policy is integrated into the company's strategic framework and has been validated through internal governance processes, including interviews with senior executives, indicating approval at the highest organizational level.

The policy was developed with input from internal experts in compliance, legal, and community relations, and supported by a specialized consulting firm. It aligns with international standards such as the UN Guiding Principles on Business and Human Rights and the IRMA Standard. The policy outlines expectations for internal personnel and business partners, referencing codes of conduct, disciplinary procedures, and supplier due diligence mechanisms.

Pursuant to 1.3.2.5, operational integration was evidenced through grievance mechanisms, labor protocols, anti-harassment policies, and a risk management plan aligned with IRMA. However, interviews with workers, external stakeholders and rightsholders revealed limited awareness of the policy and its implications

Pursuant to critical requirement 1.3.2.1 and requirements 1.3.2.2-1.3.2.4., the company contracted a consulting firm to update its Human Rights Risk and Impact Assessment, resulting in a risk matrix, stakeholder mapping, and an action plan with prioritization strategies. The methodology applied considered the scale and complexity of operations and relevant national legislation. While the assessment identified risks related to causing, contributing to, or being linked with adverse human rights impacts, no evidence has been found of actual adverse impacts to date pursuant to critical requirement 1.3.3.3.

Despite the development of an action plan, there is no evidence of its implementation, nor of procedures for monitoring salient risks or publicly reporting on the effectiveness of human rights due diligence pursuant to 1.3.5.1. Additionally, although interviews with rightsholders were conducted during the assessment, there is no indication that they reviewed or provided feedback on the final document. The company reported that the draft will be submitted for stakeholder review prior to final publication.

In summary, while the company has made progress in formalizing and updating its human rights framework, gaps remain in stakeholder and rightsholder awareness, implementation of action plans, and transparency in monitoring and reporting, for full alignment with IRMA requirements.

#### 4.1.4. Chapter 1.4—Complaints Mechanism/Access to Remedy

Chapter 1.4 was partially audited during the surveillance audit. Ten requirements from this chapter were audited, including a critical requirement (1.4.1.1.) and nine requirements which did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirement 1.4.1.1. is summarized in Section 3.5.

Pursuant to critical requirement 1.4.1.1., since the initial audit, Albemarle has implemented a structured grievance mechanism aligned with IRMA's Standard and the UN Guiding Principles on Business and Human Rights. The process includes initial assessment by the Community Relations department, referral to the relevant internal area, review by an Interdisciplinary Committee, and communication of the response to the complainant. Response times range from 12 to 90 days, depending on the complexity of the issue.

The mechanism allows for anonymous submissions via the Integrity Channel or directly through Community Relations staff, with all complaints registered on a centralized digital platform. The site grievance procedure includes a commitment to protect complainant anonymity and non-retaliation, with breaches subject to internal investigation pursuant to 1.4.5.2. Complaints involving serious human rights concerns are escalated to the Compliance Department.

According to the information provided by the site, the design process of the grievance mechanism included considerations of cultural, geographic, and physical barriers. Internal training was provided to relevant personnel to communicate expectations regarding respectful and appropriate conduct when handling complaints.

The updated grievance mechanism included outreach and training provisions for vulnerable groups such as Indigenous women, elderly individuals, and persons with disabilities. However, the audit identified some outstanding gaps. Pursuant to 1.4.5.1., interviews with internal and external stakeholders and rightsholders revealed limited understanding of how

to use the mechanism or track complaints anonymously. Specifically, interviewees expressed uncertainty regarding:

- How to submit complaints anonymously;
- How to track the status of submitted complaints; and
- How the company communicates its responses and resolutions.

There is no evidence that stakeholders and rightsholders were involved in the design of the mechanism or that their feedback has been actively solicited or incorporated into annual evaluations pursuant to 1.4.2.1. and 1.4.4.3. Additionally, while the Permanent Working Tables (Mesas de Trabajo Permanente) serve as forums for presenting results and receiving feedback, stakeholders and rightsholders were uncertain about how outcomes are communicated to the broader community pursuant to 1.4.6.1.

These findings indicate that although the company has made progress in formalizing its grievance procedures, the mechanisms are not yet fully accessible, transparent, or trusted by community stakeholders and rightsholders.

Therefore, while Albemarle has met the corrective action plan for critical requirement 1.4.1.1., further efforts are needed to confirm that the grievance mechanism is fully understood and utilized by stakeholders and rightsholders, particularly those in vulnerable or remote communities.

The reviewed documentation did not contain evidence of public disclosure of grievance outcomes. Although one meeting agenda referenced the topic, no specific information was presented. Furthermore, while the mechanism does not restrict access to other judicial or non-judicial remedies, it also does not explicitly guarantee this right in the event of dissatisfaction with the operational-level process pursuant to 1.4.3.1.

In summary, Albemarle's updated grievance mechanism aligns with key IRMA requirements, however opportunities for improvement remain in the areas of stakeholder engagement, transparency of outcomes, and use of community input to promote the continuous improvement and effectiveness of the mechanism.

#### 4.1.5. Chapter 1.5—Revenue and Payments Transparency

Chapter 1.5 was partially audited during the surveillance audit. Two requirements from this chapter were audited, including critical requirement 1.5.5.1, and one requirement which did not achieve a Fully Meets rating at the initial audit. Critical requirement 1.5.5.1. was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for critical requirements.

Pursuant to 1.5.2.2., Albemarle publicly reports on production, revenues and other financial payment information such as agreements with local communities.

Financial reports include the Salar de Atacama operations and the La Negra Chemical Plant and are available on the Albemarle Chile website at <https://www.albemarle.com/cl/en/sustainability/chile-operations/economic>

Since 2024, they are also required to publish quarterly financial statements with the Financial Market Commission (CMF) These can be accessed at:

<https://www.cmfchile.cl/institucional/mercados/entidad.php?mercado=O&rut=85066600&grupo=&tipoentidad=EMRYT&row=AAAwy2ACTAAAGD0AA6&vig=VI&control=svs&pestanía=112>

However, tax matters remain pending on differences of interpretation of specific tax on mining activity and on operational mining income taxes. At the time of the site surveillance visit, no final decisions from the Tax Court have been issued in the tax lawsuits.

Pursuant to the critical requirement 1.5.5.1., the Albemarle Anti-Corruption Policy prohibits all forms of bribery and corruption whether by employees, outside sales representatives, or anyone else acting on their behalf. This is included in contracts with contractors and suppliers. The site has processes in place to communicate anti-corruption policies to employees and contractors, and interviewed stakeholders and rightsholders were generally aware of them.

## 4.2 Principle 2: Planning for Positive Legacies

During the previous audit, this principle received an overall score of 81.5 %. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

### Chapter 2.1—Env/Soc Impact Assessment and Management

Chapter 2.1 was partially audited during the surveillance audit. Requirements from this chapter which were audited included critical requirement 2.1.3.1 Progress on this critical requirement is summarized in Section 3.5.

Pursuant to critical requirement 2.1.3.1., Environmental Impact Assessment for the Salar de Atacama project presents a detailed overview of how the modification and improvement of the solar evaporation pond system will be managed to protect the region's sensitive hydrological and ecological systems. The study evaluates potential environmental impacts across all phases of the project including construction, operation, and closure. Using a combination of field data, predictive modeling, and long-term monitoring strategies. It identifies key environmental components such as groundwater levels, water quality, and lagoon ecosystems, and applies advanced simulation tools like MODFLOW and SEAWAT to forecast changes under various operational scenarios. These models are updated regularly to reflect new data and provide accuracy in predicting future conditions.

On 16 April 2024, Complaint #IRMA-2024-002 the Earthworks organization regarding the results and methodology of the initial audit. Details of the complaint, and responses from IRMA Secretariat and ERM CVS can be accessed on IRMA website: [Complaint #IRMA-2024-002 - IRMA - The Initiative for Responsible Mining Assurance](#)

The complaints raised questions around the methodology of scoring for Chapter 2.1. The IRMA Standard does not currently require audit firms to independently verify the quality of documents like the Environmental and Social Assessment. However, during the surveillance audit, the audit team verified that the ESIA was conducted by a competent third-party contractor. This chapter will be further assessed during the renewal audit.

## Chapter 2.2—Free, Prior and Informed Consent

Chapter 2.2 was partially audited during the surveillance audit. Six requirements from this chapter were audited, including a critical requirement 2.2.2.2. and five requirements which did not achieve a Fully Meets rating at the initial audit. This chapter's critical requirement was rated as Fully Meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for the critical requirement.

At the initial audit, Albemarle reported that the Chilean government did not implement Free, Prior and Informed Consent (FPIC) prior to granting mining rights. At the time of the original Environmental Impact Assessment (EIA), in 2009, Chile had not yet ratified ILO Convention 169, and national legislation did not require direct consultation between project developers and affected Indigenous communities. Although a general citizen participation process was conducted, it did not meet international FPIC standards. The company did not issue a public statement explaining its decision to proceed under these conditions.

During the surveillance audit, the site presented new evidence in the form of a broader set of agreements with Indigenous communities neighboring its operations. This included agreements signed and approved by communities before the initial IRMA audit and a general agreement signed with the Consejo de Pueblos Atacameños (CPA) (Peine 2012; CPA 2016). The participatory process was agreed with Indigenous Peoples through the CPA, which was confirmed during interviews with CPA representatives at the onsite audit.

The site also provided evidence of new agreements established with communities in the southern portion of the Salar. These additional agreements focused on addressing community-identified concerns related to mining operations. The agreements established processes to enable participation of community representatives in addressing past and present concerns and in implementing measures related to historical impacts on their rights and interests.

Further evidence was also provided regarding consultation and engagement processes, including the operation of Permanent Working Tables (MTPs). Meeting minutes demonstrated that MTPs are used to share operational information, impact assessments, and management measures with Indigenous communities. The documentation showed community involvement in water resource monitoring and decision-making processes, indicating that community representatives are aware of their rights within the participatory framework. Albemarle has also communicated planned projects or activities to Indigenous communities and, in some cases, suspended activities where consent was not granted.

While no evidence was provided that Albemarle explicitly informs community representatives of their FPIC rights, as required by 2.2.3.1, reviewed documentation and stakeholder feedback demonstrated ongoing engagement and documented compliance with commitments defined in signed agreements. The agreements included mechanisms for dialogue, remediation, and compensation for historical impacts.

FPIC appears implicit within the continuous engagement and outcomes of these agreements, and can be considered implemented or formally recorded within the context of the mine's relationship with Indigenous communities. The operating company therefore demonstrated current and verifiable consent for ongoing operations at the Salar and implementation of processes to inform, consult, and obtain consent for project modifications

that may generate new impacts. These elements are consistent with IRMA's expectations for existing mines under Critical Requirement 2.2.2.2.

In general, the governance structures, participatory monitoring, and examples of communities exercising veto power were consistent with the IRMA Standard requirements. However, further verification will be needed at the next audit to verify that the mine has effectively addressed barriers to participation affecting vulnerable or marginalized groups within the communities. Additionally, although the MTPs serve as dialogue platforms and the meeting minutes demonstrate joint deliberations, and there have been instances where activities were halted due to lack of community consent, ongoing stakeholder engagement during future audits will be needed to further verify that solution-planning processes include the direct participation of community representatives in decision-making.

For example, while the site provided documented evidence of public disclosure and consultation regarding new projects, the auditors were unable to directly confirm with rightsholders during the surveillance visit that Albemarle conducted formal consultation processes with Indigenous communities regarding changes to their activities and whether such changes may affect their rights or interests, in accordance with 2.2.2.3.

Further engagement with Indigenous Peoples during future audits will be required on the ongoing validity of their consent, clarification of territorial authority in areas with overlapping claims, compliance with commitments established in agreements, and effectiveness of remediation measures.

## Chapter 2.3—Community Support and Benefits

Chapter 2.3 was partially audited during the surveillance audit. Seven requirements from this chapter were audited, which did not achieve a Fully Meets rating at the initial audit. There are no critical requirements in this chapter.

Pursuant to 2.3.2.3., Albemarle has established a multi-layered engagement framework with Indigenous communities in the Salar de Atacama region. In addition to its formal agreement with the Consejo de Pueblos Atacameños (CPA), which includes 18 communities, the company has signed complementary mutual-benefit agreements with specific communities in the southern area, such as Peine and Talabre. These agreements aim to promote education, cultural preservation, and economic development through scholarships, technical training, support for cultural festivities, and entrepreneurship programs aligned with local vocations like tourism.

The company also maintains a cooperation agreement with the municipality of San Pedro de Atacama to support the protection of Atacameño cultural heritage. These initiatives are part of a broader strategy to contribute to community well-being and strengthen relationships with Indigenous Peoples.

The benefit-sharing model established under the CPA convention enables the allocation of financial resources for community-led investment in priority needs. While Albemarle ensures the transfer of funds, it does not intervene in decisions regarding their use. Communities are required to report periodically on fund utilization, but the company does not formally monitor the effectiveness or impact of these expenditures. Documentation of plans and

activities exists but is not publicly disclosed due to confidentiality agreements requested by the communities pursuant to 2.3.3.5.

Although community members interviewed during the audit acknowledged positive changes resulting from these investments, concerns were raised about the proportionality of resource distribution and the inclusiveness of dialogue processes. Stakeholders and rightsholders noted that the Permanent Working Tables (Mesas de Trabajo Permanente – MTPs), which serve as the primary engagement platform, do not always ensure that feedback mechanisms reflect the diversity of voices within the communities. Additionally, there is no evidence that the company has identified vulnerable individuals or groups who may face barriers to participation, nor that it has implemented measures to ensure their inclusion pursuant to 2.3.3.2.

The agreements were developed with legal support to prevent noncompliance with local legislation, but it remains unclear whether legal advisors were funded by the company or the communities pursuant to 2.3.3.3. While Albemarle has a documented history of supporting capacity-building initiatives upon request, there is no evidence that these programs are designed to be sustainable or that they explicitly include marginalized groups.

In summary, Albemarle demonstrates a structured and proactive approach to community engagement and benefit-sharing. However, the audit identified gaps in inclusivity, transparency, and monitoring of the investment results. Strengthening mechanisms for stakeholder participation, especially for vulnerable groups, and enhancing oversight of benefit distribution would improve alignment with IRMA's standards on community engagement and responsible mining.

## Chapter 2.4—Resettlement

Chapter 2.4 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue not to be applicable at the mine site and confirmed that there were no physical resettlement or economic displacement processes related to the operation of the mine. Any projects' changes will be limited to the operational area currently in use. This confirms the initial audit determination, and this chapter remains not relevant.

## Chapter 2.5—Emergency Preparedness and Response

Chapter 2.5 was partially audited during the surveillance audit. Four requirements from this chapter were audited, including two critical requirements (2.5.1.1, 2.5.2.1.), and two requirements that did not achieve a Fully Meets rating at the initial audit. Progress on the critical requirements 2.5.1.1 and 2.5.2.1 which were both rated as substantially meets, is summarized in Section 3.5.

Pursuant to 2.5.1.1, Albemarle's updated 2025 Emergency Preparedness and Response Plan for the Salar Plant includes a detailed framework designed to safeguard personnel, infrastructure, and the environment from operational, natural, and social emergencies. The plan begins with an objective: to establish a reliable and well-resourced structure capable of responding effectively to emergencies. It outlines specific goals such as assigning roles to

workers, maintaining operational continuity, minimizing the impact of incidents, and educating staff on inherent risks and preventive measures.

The scope of the plan covers emergency scenarios within the plant and its contractors, including the transport and storage of hazardous and non-hazardous substances. Responsibilities are distributed among various groups: the Emergency Brigade handles internal incidents with specialized skills in fire, chemical, and rescue operations; internal support includes security and health staff; external support involves police, firefighters, and nearby medical centers; and clinic personnel coordinate medical response and ambulance logistics.

Workers are expected to understand and apply emergency regulations, while industrial security guards facilitate emergency vehicle access and manage traffic. The plant's location in the Salar de Atacama is detailed, including its altitude and proximity to other facilities, with access routes defined from Baquedano and San Pedro. Maps and annexes identify production areas, hazardous material storage, fire suppression systems, and emergency meeting points, all in compliance with Chilean health regulations.

Emergency levels are categorized into three tiers. Level 1 incidents are minor and manageable with trained staff, such as extinguishing a small fire. Level 2 requires activation of the Emergency Brigade and the Emergency Committee due to broader implications. Level 3 involves major emergencies needing immediate external intervention, including ambulances, firefighters, and police, working alongside internal teams.

The pre-emergency phase emphasizes training, annual drills, and plan reviews, especially after incidents or when new procedures or substances are introduced. Communication systems like radios and phones were maintained in working order, with designated channels and contact numbers shared during training. Emergency reporting protocols require clear identification, location, type of emergency, number of people involved, and injury details. Whether using radio or phone, staff must follow structured procedures to maintain accuracy and timely alerts.

Emergency equipment includes showers and eye wash stations for chemical exposure, and a detailed inventory of hazardous substances. Contractors conduct monthly inspections using checklists for rescue gear used in confined spaces and at heights, including helmets, ascenders, descenders, pulleys, and anchor systems all standardized by brand and quantity. This was confirmed during the onsite visit.

However, pursuant to 2.5.2.1., some interviewed external stakeholders reported being unaware of any formal emergency response plans developed for the communities in relation to mining operations. Furthermore, some interviewed stakeholders and rightsholders indicated that they had not been consulted during the planning process nor had they participated in any emergency drills conducted in the region.

## Chapter 2.6—Planning/Financing Reclamation & Closure

Chapter 2.6 was partially audited during the surveillance audit. Nine requirements from this chapter were audited, including three critical requirements (2.6.2.1., 2.6.2.6., 2.6.4.1.) and six requirements that did not achieve a Fully Meets rating at the initial audit. This chapter's three

critical requirements were rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for critical requirements.

Pursuant to 2.6.2.1., the mine continues to maintain a mine closure and reclamation plan (for the Salar de Atacama operation and La Negra Mining Plant). The closure plan was last updated in May 2021.

The financial provisions for reclamation and closure have been approved by the appropriate authority (Servicio Nacional de Geología y Minería) on December 27, 2024. The mine has not developed a procedure in the closure plan for public comments to be taken before partial or final surety release as required by IRMA.

The mine has publicly committed to providing interested parties with at least 60 days to comment on the closure plan, pursuant to 2.6.4.5. However, a formal procedure to submit and receive comments to the operating company has not been included within this communication; therefore, it is unclear how comments can be provided and received.

## 4.3 Principle 3: Social Responsibility

During the previous audit, this principle received an overall score of 74.5 %. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

### Chapter 3.1—Fair Labor and Terms of Work

Chapter 3.1 was partially audited during the surveillance audit. Twelve requirements from this chapter were audited, including six critical requirements (3.1.2.1., 3.1.3.3., 3.1.5.1., 3.1.7.2., 3.1.7.3., 3.1.8.1.) and six requirements which did not achieve a Fully Meets rating at the initial audit. Of this chapter's six critical requirements, five were rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for critical requirements. The remaining critical requirement, 3.1.3.3 was rated as substantially meets. Progress on this critical requirement is summarized in Section 3.5.

Pursuant to critical requirement 3.1.2.1., collective bargaining agreements are renewed every three years, with the most recent negotiation in 2023 concluding successfully and without strike action. The company maintains monthly union meetings with each group, and on-site meetings are coordinated through Human Resources.

Albemarle continues to be affiliated with Women in Mining (WIM) Chile and has committed to actively recruiting women across its operations. As of 2025, the company has achieved 80% engagement in women focused and community initiatives.

Albemarle was ranked third among top employers for university graduates in summer 2025.

Finally, Albemarle is undertaking a comprehensive corporate human rights policy review, initiated in December 2024. This review includes structural reforms, alignment with national and international human rights instruments, expanded coverage of environmental and anti-corruption measures, defined roles and responsibilities, and mandatory training and socialization across all levels of the organization.

## Chapter 3.2—Occupational Health and Safety

Chapter 3.2 was partially audited during the surveillance audit. Thirteen requirements from this chapter were audited, including critical requirement 3.2.4.1. and twelve requirements which did not achieve a Fully Meets rating at the initial audit. Progress on critical requirement 3.2.4.1., which was rated as substantially meets at the initial audit, is summarized in Section 3.5.

Pursuant to 3.2.4.1., the organization has established a structured methodology for identifying and analyzing occupational risks, which incorporates the hierarchy of control. However, this methodology does not currently extend to emergency situations. For non-routine tasks, the company applies specific tools such as the Safe Work Analysis and the SCAN + ENERGIES approach to identify risk and implement mitigation measures.

Workers were observed conducting daily tailgate safety meetings before initiating their shift. All non-routine activities are required to develop a hazard assessment. Routine activities are covered with SOPs that inform workers about hazards and risks. A range of special work permits is in place to manage high-risk activities. These include permits for isolation and lockout, work at height, hot work, lifting operations, opening lines, confined spaces, energized work, and excavations. The risk assessment process evaluates the significance and potential consequences of hazards across all operational activities. The risk management plan is reviewed and updated every two years or whenever significant operational changes occur. Complementing this, a Preventive Program for Workplace Safety Activities is also in place.

Personnel and contractors were observed using their personal protective equipment and using their respective inspection checklists to assess safe conditions of their work area, tools and machinery. During interviews, personnel confirmed that PPE is provided at the expense of the company and that SOPs inform them about risks of routine activities. They also mentioned that non-routine activities have to be previously assessed through safe work analysis.

Operational safety is supported by a comprehensive set of procedures and work instructions, including a master list specific to the Planta Salar operation. The Health, Safety, and Security (HSS) department maintains 19 dedicated procedures and 41 cross-cutting procedures applicable across departments. These procedures guide the implementation of risk control measures.

New employees undergo an onboarding process that covers a wide range of topics, including the company's quality, environmental, and safety policies; risk prevention responsibilities; internal health and safety regulations; and legal frameworks such as the Social Security Law. The induction also includes training on incident reporting, emergency procedures, PPE usage, expected conduct, equipment lockout, special work permits, internal driving rules, and the identification and control of operational and occupational health risks. Annual training programs are provided at no cost to workers. Interviews confirmed that training is being conducted during working hours at no costs to workers.

Pursuant to 3.2.3.4., the site has a functioning Joint Health and Safety Committee (CPHS, Comité Paritario de Higiene y Seguridad), composed of elected employee representatives and appointed employer representatives. The committee meets monthly and conducts 2–3

workplace inspections per month. It also organizes extraordinary meetings, collaborates with contractors, and forms subcommittees as needed. Inspection reports were observed to be shared with relevant departments, followed by re-inspections to verify compliance.

The company continues to endorse a Non-Retaliation Policy and a Raise Your Hand Policy, both of which provide the framework so that workers can report concerns without fear of reprisal. The Non-Retaliation Policy explicitly prohibits any form of retaliation against individuals who report concerns in good faith or participate in investigations. Disciplinary action, including termination, is applied in cases of retaliation. According to site contacts and logs, no retaliation incidents have been reported since the initial audit.

To manage incidents, the company uses the “Facilex” platform, which allows all workers to report and access information on occupational safety incidents, process safety events, environmental issues, and security-related occurrences. Incident data is reviewed in various forums, including weekly shift-start meetings, supervisor roundtables, contractor meetings, and critical focus meetings. Additional forums include Monday check-in meetings and Tuesday performance dialogues with the Plant Manager.

In compliance with Chilean law and pursuant to 3.2.5.2., all serious or fatal incidents must be reported to the relevant authorities, including the Health Service, Labor Inspection, Forensic Medical Service, and Investigative Police. The last notification occurred in 2016, prior to the initial audit.

The company tracks accident metrics through the “Zyght” platform, covering both Albemarle employees and contractors. Health studies are conducted to monitor exposure to psychosocial risks, noise, dust, UV radiation, ergonomic hazards, and lighting conditions.

During interviews with direct employees and contractor interviews, the interviewees reported they felt that the organization sets safety as a priority. They confirmed that the company communicates that effectiveness of health and safety prevention should be everyone’s responsibility.

According to site representatives, there were no vulnerable worker groups with unique occupational health and safety risks at the Salar de Atacama site at the time of the surveillance audit.

## Chapter 3.3—Community Health and Safety

Chapter 3.3 was partially audited during the surveillance audit. Nine requirements from this chapter were audited, including critical requirement 3.3.1.1. and eight requirements which did not achieve a Fully Meets rating at the initial audit. Progress on critical requirement 3.3.1.1., which was rated as substantially meets at the initial audit, is summarized in Section 3.5.

As part of its efforts to comply with IRMA’s standards on community health and safety, the mining site has engaged an external consultant to propose a procedure for conducting a Social Impact Assessment (SIA). Section 8 of the consultant’s proposal outlines the scope of this procedure, although it remains to be confirmed whether the proposed methodology meets the minimum requirements set forth by IRMA’s critical criteria.

The proposed SIA is designed to assess the social impacts across all phases of the mining operation's life cycle, however, at the time of the site visit, the social impact assessment had not been started.

The site has not yet developed a community health and safety risk management plan. The intention is to create this plan once the SIA provides a comprehensive diagnosis of the risks and impacts on the health and safety of the community.

As of now, the Social Impact Assessment Report has not been finalized, and there is no publicly available information regarding community health and safety risks, impacts, or monitoring results. Therefore, changes were not observed in the performance of this chapter.

## Chapter 3.4—Conflict-Affected and High-Risk Areas

Chapter 3.4 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue not to be applicable at the mine site and confirmed that this chapter continues to be not relevant.

## Chapter 3.5—Security Arrangements

Chapter 3.5 was partially audited during the surveillance audit. Eight requirements from this chapter were audited, including critical requirement 3.5.1.2. and seven requirements which did not achieve a Fully Meets rating at the initial audit. This chapter's critical requirement was rated as fully meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for the critical requirement.

At the time of the surveillance audit, the site employed 35 guards working in two shifts on a 7 on 7 off schedule, with 19 guards active during both day and night. There are no vigilantes, and the security team includes security guards and personnel entry and exit control service in the mine and facility area. The safety procedure, which was in place at the time of the initial audit, includes clear use of force guidelines, and no firearms are used by the security department.

Security operations are supported by a security matrix that has been reviewed and renewed annually since the initial audit.

Incident tracking is managed through an Excel based system, and compliance actions are followed up weekly. Security reviews are held every Tuesday, and leadership meetings every Thursday include dashboard presentations by the security team. The site has not experienced a strike in six years, and maintains active engagement with the sindicato de trabajadores. Oversight is provided by Human Resources, ensuring alignment with internal policies.

During interviews conducted with workers, contractors, and external stakeholders, responses were unanimous in describing a positive and respectful relationship between the operational security team and both employees and neighboring communities. No incidents or conflicts involving the security personnel were reported by any of the interviewees.

## Chapter 3.6—Artisanal and Small-Scale Mining

Chapter 3.6. was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue not to be applicable at the mine site and confirmed that this chapter continues to not be relevant.

## Chapter 3.7—Cultural Heritage

Chapter 3.7 was partially audited during the surveillance audit. Ten requirements from this chapter were audited, which did not achieve a Fully Meets rating at the initial audit. There are no critical requirements in this chapter.

Since the initial audit, Albemarle has developed a framework for the identification, assessment, and mitigation of risks to cultural heritage, with particular attention to Indigenous communities. This framework is supported by formal agreements, such as the Sustainability and Mutual Benefit Cooperation Agreements with the Consejo de Pueblos Atacameños (CPA) and the Indigenous Community of Peine, which establish Permanent Working Tables (Mesas de Trabajo Permanente – MTPs) as formal platforms for dialogue, consultation, and grievance resolution.

The company mandates that all employees, contractors, and subcontractors adhere to community agreements and internal rules derived from them. Interactions with Indigenous representatives must be reported to the Community Relations Management, and training programs are in place to promote cultural sensitivity and respectful engagement.

During interviews, a community leader expressed concern that the mine camp might have been constructed along a traditional “Tropeiros” route, potentially affecting cultural heritage. However, pre-construction studies for the camp did not identify such potential. The operating company reviewed this issue during the planning phase of the “Campamento Albemarle” infrastructure project. A dedicated cultural heritage assessment was commissioned, and a systematic archaeological evaluation was conducted under the supervision of a qualified archaeologist. The methodology included bibliographic research, GPS-based georeferenced field surveys, and classification of potential findings using distributional archaeology principles. The study concluded that no archaeological materials were present in the area. Nevertheless, the report establishes mitigation measures in case of findings, such as perimeter fencing, clear signage, induction training for personnel, and established protocols for surface collection and documentation, in compliance with Chilean Law No. 17.288.

The company has also implemented a Chance Finding Procedure and incident protocols for paleontological and archaeological discoveries, requiring work stoppage and internal notification.

Despite these strengths, the company's framework does not fully meet IRMA 3.7 Chapter criteria due to the following gaps:

**Mitigation Hierarchy:** The company procedures do not explicitly define a structured mitigation hierarchy for tangible, replicable, or non-replicable cultural heritage, nor does it detail procedures for in situ restoration, relocation, or compensation based on community use.

Professional Standards: While qualified professionals were involved in the Campamento project, the instructive does not consistently require that all mitigation activities be conducted by professionals adhering to international standards (e.g., UNESCO, ICOMOS, IRMA).

Transparency and Stakeholder Access: The reviewed documentation does not confirm that cultural heritage assessments, management plans, or mitigation procedures are made available to Indigenous Peoples or other stakeholders upon request, representing a gap in transparency and access.

Albemarle demonstrates a degree of commitment to cultural heritage protection through preventive protocols, stakeholder engagement, and professional archaeological screening. However, formalizing key elements such as mitigation hierarchies, expert involvement, and stakeholder access would strengthen alignment with IRMA's cultural heritage management standards and contribute to the credibility and effectiveness of the company's approach.

## 4.4 Principle 4: Environmental Responsibility

During the previous audit, this principal received an overall score of 84.9 %. The summaries below indicate in general the overall status of these chapters, relative to the previous audit.

### Chapter 4.1—Waste and Materials Management

Chapter 4.1 was partially audited during the surveillance audit. Five requirements from this chapter were audited, including four critical requirements (4.1.4.1, 4.1.5.1, 4.1.5.6, 4.1.8.1), and one requirement which did not achieve a Fully Meets rating at the initial audit. Of this chapter's four critical requirements, 4.1.5.1 and 4.1.8.1 were rated as *fully meets* in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior ratings for these critical requirements. Critical requirements 4.1.4.1, and 4.1.5.1 were rated as *substantially meets*. Progress on these critical requirements is summarized in Section 3.5.

In February 2025, the mine completed a large-scale mapping and verification study to update their inventory of stockpiles ('acopios'), and verify the accuracy of stockpile locations and their labelling. The review included surveying technology using ArcGIS Pro And drones to document stockpile boundaries, centroid coordinates and surface areas. Historical data from 2017 to 2025 was used to understand the performance of the stockpile facilities and validate compliance with authorized limits. In the study, several stockpiles were found to exceed their authorized limits, prompting proposals to expand or rectify their designated zones.

The study also reviewed the regulatory history of acopio approvals, tracing resolutions from 2003, 2017, and 2018. These documents revealed discrepancies in coordinates and naming conventions, which were resolved by aligning spatial data with the year of each

Volume assessments across all 30 acopios showed varying degrees of compliance. A detailed comparison of permitted, used, and proposed volumes highlighted areas of overuse and underutilization. These findings informed proposals to adjust and expand acopio zones to better reflect operational realities and provide better regulatory alignment.

Stockpile information is verified by external sustainability checks, however stockpile information is not currently shared with communities.

Minor opportunities were observed during the site tour at the waste storage area managed by a third party. A few fluorescent lamps were observed stored broken in the stockpile used for electronic and electric waste. Additionally, the emergency eyewash located at the waste storage area had no water pressure, although it was marked as inspected.

## Chapter 4.2—Water Management

Chapter 4.2 was partially audited during the surveillance audit. Eight requirements from this chapter were audited, including two critical requirements (4.2.4.1., 4.2.4.4.), and six requirements which did not achieve a Fully Meets rating at the initial audit. Both critical requirements, were fully met in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for these critical requirements.

Previous complaints related to water management were documented and addressed through stakeholder and rightsholder engagement forums, including the Mesa Técnica and Mesa Ampliada. Actions taken included additional monitoring of groundwater and surface water levels, sharing results with communities, and incorporating feedback into adaptive management plans to ensure transparency and responsiveness.

Since the initial audit, stakeholders and Indigenous rightsholders raised concerns about the company's water consumption and management practices, particularly regarding potential impacts on water availability for surrounding communities. To address these concerns, the company supported community-led monitoring by providing equipment and training for independent sampling. Reports indicate that communities compare their own monitoring results with those collected by the company, and findings have been consistent.

The mine has continued to submit monthly reports to regulatory authorities under the Plan de Alerta Temprana (PAT) initiative. Since the initial audit, reports were submitted for locations in Alerta Norte north of the site (L5-10, L4-12), Alerta Nucleo south of the site (Phase 1 and 2 activation in 2024) and Alerta Acuífero south of the site.

Environmental monitoring extended beyond hydrology to include biotic components through the Plan de Manejo Biótico (PMB). This plan encompassed flora, fauna, microbial mats, and sediment quality, with over 160 monitoring stations deployed across terrestrial and aquatic ecosystems. The monitoring of lagoon water levels and surface areas was conducted monthly and semiannually, respectively.

Since the initial audit, the mine introduced the “Un viaje por el agua” initiative to provide accessible learning materials on hydrological cycles, water quality, and governance to stakeholders and rightsholders. These were structured into three cycles, each accompanied by videos, brochures, and surveys to assess understanding.

In 2024, the site published its ninth annual Plan de Seguimiento Ambiental Hídrico (PSAH) report, detailing modifications to the solar evaporation pond system.

However, interviewed stakeholders and rightsholders have continued to raise concerns about water availability in the area, indicating that further engagement is required with relevant stakeholders and rightsholders on water management strategies, performance and adaptive management issues. This will be further assessed during the next onsite audit.

## Chapter 4.3—Air Quality

Chapter 4.3 was partially audited during the surveillance audit. Six requirements from this chapter were audited, including critical requirement 4.3.2.1., and five requirements which did not achieve a Fully Meets rating at the initial audit. Critical requirement 4.3.2.1. was rated as Not Relevant in the initial audit and the surveillance audit confirms this.

In December 2024, Albemarle published the Air Quality Compliance and Monitoring Report, which presents a comprehensive summary of air quality monitoring, emissions declarations, and regulatory compliance for Albemarle Limitada's operations at the Salar de Atacama. The findings are based on multi-year data collection from 2022-2024, national reporting systems, and site-specific environmental controls.

Air quality at the site was evaluated using both continuous and periodic monitoring of dust and gas pollutants. Monitoring stations are located at Campamento Andino, L2-25, and LZA7-2, and are supported by a weather station that helps model how pollutants spread and confirm baseline conditions. Air quality data referenced in this report is obtained from public monitoring stations and incorporated into Albemarle's internal compliance reports. The Albemarle mine is located in an area without a Pollution Prevention and Decontamination Plan (PPDA), which means they are not required to conduct their own air monitoring. This was confirmed during the surveillance audit.

Three types of particulate matter: PM10, PM2.5, and sedimentable particles (MPS). All results showed that daily and yearly levels were within Chile's legal limits. The only exceptions were two brief periods at the LZA7-2 station in February 2020 and November 2022 (both prior to the initial audit) when MPS levels temporarily exceeded limits. These were officially recognized as "latency episodes" under Chilean regulations and are being addressed through mitigation plans. No further exceedances were reported since the initial audit.

Gas pollutants were also monitored. Sulfur dioxide (SO<sub>2</sub>) and carbon monoxide (CO) levels were consistently within safe limits.

Importantly, no dust emissions were detected from drilling or blasting activities.

The mine continues to monitor its fixed sources of emissions (124 generators to power well pumps). These contribute to NO<sub>2</sub>, CO, and particulate matter. Albemarle reports these emissions annually through Chile's RETC system using the F138 format. Reports for 2021 to 2024 have been submitted and certified, confirming compliance. Each generator follows a maintenance schedule and has emission certifications. Annual reports containing emissions inventories, pollutant transfer records, and weather data are publicly available on the Ministry of Environment RETC (Emissions and Pollutant Transfer Register) website. The mine also continues to participate in monitoring under DASUSPEL, SIDREP, SINADER, and the Registro Único de Emisiones Atmosféricas.

## Chapter 4.4—Noise and Vibration

Chapter 4.4 was partially audited during the surveillance audit. Three requirements from this chapter were audited which did not achieve a Fully Meets rating at the initial audit.

Since the initial audit, an acoustic assessment was conducted as part of the environmental baseline and impact evaluation for Albemarle's TED Project (The Transition to Direct Lithium

Extraction), which focuses on transitioning to direct lithium extraction and brine reintegration in the Salar de Atacama. At the time of the surveillance audit, the report was still being drafted. The study forms part of the Environmental Impact Assessment (EIA).

Noise measurements were carried out on October 10 and 11, 2024, following the protocols established in D.S. N°38/2011 by the Ministerio del Medio Ambiente (MMA). These measurements were taken during both daytime and nighttime periods using slow-response sound level meters. For fauna receptors, data were collected in one-third octave bands without frequency weighting, ensuring sensitivity to wildlife-specific acoustic impacts. The sound level meters were positioned 1.5 meters above ground and at least 3.5 meters away from reflective surfaces to minimize distortion.

Sensitive receptors were identified based on proximity to project activities and potential exposure to noise emissions. These included both human populations and fauna, with receptor locations mapped and described in detail. The selection criteria prioritized representativeness and relevance to the anticipated operational footprint of the TED Project.

The results of the acoustic monitoring confirmed that all measured values were below the regulatory thresholds. Consequently, there are no plans to continue routine noise monitoring at existing receptor sites. Future monitoring will be limited to areas surrounding newly developed hydrology wells, where potential changes in environmental conditions may warrant continued oversight.

This assessment was supported and involved coordination with Albemarle's Community Relations team, including the Head of External Affairs, Community Relations Manager, and Deputy Manager of Community Relations for receptor selection. Community considerations were integrated into the evaluation process.

In 2023, 22.2% of the complaints registered through the grievance mechanism were related to noise. However, no complaints concerning noise have been recorded in the grievance mechanism in subsequent years.

## Chapter 4.5—Greenhouse Gas Emissions

Chapter 4.5 was partially audited during the surveillance audit. Three requirements from this chapter were audited, including critical requirement 4.5.1.1, and two requirements which did not achieve a Fully Meets rating at the initial audit. Critical requirement 4.5.1.1 was rated as substantially meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement.

The company obtained ISO 50001 certification in 2024.

Energy consumption data for facilities continues to be tracked across operational areas, with distinctions between diesel and electricity use. In recent years, electricity has accounted for the majority of energy consumption, representing 83% in the most recent analysis, while diesel comprised 17%. This shift toward electrification is consistent with Albemarle's broader decarbonization goals and supports reductions in Scope 1 emissions. Consumption trends show a reduction in total energy use from approximately 56 million kWh in 2024 to 36 million kWh in 2025.

Detailed breakdowns by process area, such as wells and machinery, reveal that wells are the highest energy-consuming segment, accounting for over 34% of total use. Albemarle tracks both actual and projected energy consumption, enabling the calculation of energy intensity indices (IEE and IDE) and monthly variation percentages. These metrics are used to evaluate performance against targets and identify areas for operational improvement. For example, the potash plant maintains monthly records of dry tonnage production, operating hours, and energy intensity, with color-coded indicators to highlight positive or negative deviations from projected values.

Generator-level data is also monitored, including both fuel input and energy output across multiple sites and months. This allows for efficiency assessments and supports Scope 1 emissions accounting.

All of this data is reviewed monthly with the site Manager. These meetings serve as a platform for evaluating trends, discussing anomalies, and planning corrective actions where needed.

## Chapter 4.6—Biodiversity, Eco. Serv. and Protected Areas

Chapter 4.6 was partially audited during the surveillance audit. Fifteen requirements from this chapter were audited, including four critical requirements audited (4.6.2.1., 4.6.4.1., 4.6.5.3., 4.6.5.4.), and eleven requirements which did not achieve a Fully Meets rating at the initial audit. Critical requirement 4.6.2.1. was rated as substantially meets in the initial audit. Evidence reviewed by auditors during the surveillance audit confirmed the prior rating for this critical requirement. The remaining critical requirements were rated as Not Relevant, which was confirmed at the surveillance audit.

Albemarle has prepared annual Plan de Manejo Biótico (PMB) reports and specialized studies to assess biodiversity, ecosystem services and the impact of industrial activities on protected areas, including the most recent 2024 final report on Andean flamingos.

Monitoring data since 2023 demonstrates Albemarle's ongoing efforts to track ecosystem dynamics in the Salar de Atacama under its Biotic Management Plan (PMB). Seasonal campaigns conducted during late winter 2023 and summer 2024 have assessed vegetation, fauna, microbial mats, soil conditions, and aquatic biota, including water quality and sediment characteristics. These studies, documented in the PMB Annual Report No. 8, were carried out by Albemarle in coordination with specialized third-party experts.

Results confirm the presence of diverse species across reptiles, birds, and mammals, alongside microbial mat evaluations and limnology studies. The monitoring program applies standardized methodologies for sampling, measurement, and analysis to evaluate compliance with regulatory requirements and IRMA principles. In addition to technical assessments, Albemarle has implemented recommendations from previous audits, including increased active engagement with local communities to support conservation initiatives and maintain transparency in biodiversity management. In December 2024, a study was published on Andean, James, and Chilean flamingos in the Salar de Atacama. The study, made in collaboration with stakeholders from local universities and conservation groups, revealed important ecological and social considerations. Recent analyses indicate a sustained decline in the reproductive population of Andean flamingos, linked to reduced water

availability and habitat changes. Local research highlights that maintaining stable water levels and physicochemical conditions is critical to reversing this trend. Recommendations from the report include continued monitoring, including dietary and physiological studies of flamingos and their prey, and active engagement with Atacameño communities through worktables and socialization of results to support conservation strategies. At the time of the surveillance audit, it was not confirmed what actions were taken as a result of this report.

In August 2025, Albemarle is expected to finalize the 2022 ecosystem services report, which will include updates on permit changes, regulatory service requirements, and impact assessments related to permit modifications. Stakeholders and rightsholders consulted during the report include local communities, individual citizens, the Institute of Ecology and Biodiversity (IEB), and the University of Antofagasta, with ongoing partnerships supporting scientific research and community education. However, finalization of the report was still pending at the time of the surveillance audit.

One notable recent initiative is the Planta Salar greenhouse nursery project, which involves the cultivation of 5,000 native plants and is operated by Albemarle collaborators that live in local communities.

## Chapter 4.7—Cyanide Management

Chapter 4.7 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue to not be applicable at the mine. Because cyanide is not used in any of mine's processing activities, this chapter is considered not relevant.

## Chapter 4.8—Mercury Management

Chapter 4.8 was marked as not relevant during the initial audit. At the surveillance audit, the audit team verified whether the issues addressed in the chapter continue to not be applicable at the mine. Because the mine does not use thermal processes to treat any material containing mercury, this chapter is considered not relevant.

## 5. Performance on Critical Requirements

Critical requirements consist of a set of 40 requirements that have been identified by the IRMA Board of Directors as being core requirements that any mine site claiming to be following good practices in mining should be meeting. Mines seeking to achieve RMA 100 must fully meet all critical requirements, and mines achieving IRMA 50 or IRMA 75 must substantially meet all critical requirements, demonstrate progress over time, and fully meet all critical requirements within specified time frames.

During the surveillance audit, the current status of critical requirements was reviewed by auditors. This review included assessing progress of corrective actions for all critical requirements that were not fully met as well as changes to site operations that impact the performance of all critical requirements.

A snapshot of achievement against the critical requirements, as determined by the audit firm during the prior assessment and this surveillance audit, is provided below. More information can be found in the corrective action plan progress assessment described in Section 3.5 and the outstanding gaps described in Section 6.1.

*Table 5-1 Review of Ratings for Each Critical Requirement*

### Principle 1: Business Integrity

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
1.1.1.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
1.2.2.2.	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
1.3.1.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
1.3.2.1.	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
1.3.3.3.	Not Relevant	Not Relevant	This critical requirement is not applicable
1.4.1.1.	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
1.5.5.1.	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

## Principle 2: Planning for Positive Legacies

Req #	Previous Audit Rating	Current Rating	Comment from Auditor
2.1.3.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
2.2.2.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.4.7.1	Not Relevant	Not Relevant	This critical requirement is not applicable
2.5.1.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
2.5.2.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
2.6.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.2.6	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
2.6.4.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

## Principle 3: Social Responsibility

3.1.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
---------	-------------	-------------	--

3.1.3.3	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
3.1.5.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.7.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.7.3	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
3.2.4.1.a, b	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
3.3.1.1	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
3.4.2.1	Not Relevant	Not Relevant	This critical requirement is not applicable
3.5.1.2	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

## Principle 4: Environmental Responsibility

4.1.4.1	Substantially Meets	Fully Meets	Corrective action plan completed, see progress report in Section 3.5.
4.1.5.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.1.5.6	Substantially Meets	Substantially Meets	Corrective action plan on track, see progress report in Section 3.5. and outstanding actions
4.1.8.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.2.4.1.a -e	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.

4.2.4.4	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.3.2.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.5.1.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.2.1	Fully Meets	Fully Meets	Evidence reviewed in this assessment confirms the previous rating.
4.6.4.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.6.5.3	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.6.5.4	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.7.7.1	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.8.2.3	Not Relevant	Not Relevant	This critical requirement is not applicable.
4.8.2.2	Not Relevant	Not Relevant	This critical requirement is not applicable.

# 6. Next Steps

## 6.1 Corrective Action Plans

The following critical requirements were reviewed during the surveillance audit to assess progress on corrective actions proposed following the initial audit. These requirements, along with the initial audit finding, the proposed corrective action, and the outcome of this audit, are summarized in Section 3.5 of this report.

The summaries below represent the performance gaps that remain for these requirements to be fully met according to IRMA guidance. Per IRMA protocols, one of the criteria that must be met for the site to maintain their current achievement level is to successfully complete these corrective actions and be verified as fully meeting the requirement at the time of the renewal audit, which must be completed within 36 months of the publication of the initial audit.

### Principle 1 Outstanding Corrective Action

#### ***Critical requirement 1.1.1.1. – Legal Compliance***

While the company has made progress regarding exploration of new sources of water supply, and the international arbitration dispute between CORFO and the mine was terminated, there has been no resolution issued in the SII (Servicio de Impuestos Internos) tax lawsuits. Additionally, a sanctioning process initiated by the Environmental Superintendency (SMA) from March 2022 remained unresolved at the time of the audit (July 2025).

#### ***Critical requirement 1.2.2.2. – Stakeholder Engagement***

The company has taken initial steps to assess and improve practices by contracting an external consultant to carry out a diagnostic study of its communication and engagement procedures, however there is no evidence that a formal engagement plan has been developed or implemented as a result of this study. Interviews with community members continue to reveal limitations in the current engagement mechanism via Permanent Working Groups (Mesas de Trabajo Permanente – MTP), including flow of information and representativeness of the MTP and CPA structures.

#### ***Critical requirement 1.3.2.1 - Assessment of Human Rights Risks and Impacts***

While Albemarle has updated its Human Rights Risk Analysis in 2025, it is unclear if a process is in place to periodically update the assessment. Additionally, not all affected parties were given the opportunity to review and provide feedback on the results of the 2025 assessment.

### ***Critical requirement 1.4.1.1 - Access to Operational-Level Complaints and Grievance Mechanism***

Interviews with external stakeholders and rightsholders suggest that while progress has been made to implement a mechanism for community complaints and grievances, further efforts are needed to ensure that the grievance mechanism is fully understood, including strengthening the dissemination of the mechanism and its operation, as well as introducing new outreach methods to reach a broader audience.

## **Principle 2 Outstanding Corrective Action**

### ***Critical requirement 2.1.3.1 - Scoping***

The site has made substantial progress in implementing a comprehensive evaluation of environmental impacts, however, further documentation is needed to confirm full implementation of social impact assessments and internal screening/scoping procedures across all project areas.

### ***Critical requirement 2.5.1.1 – Emergency Response Plan***

While the company has developed a comprehensive emergency response plan in June 2025, it is unclear how all UN APELL goals have been met, including how communities have been consulted, how their feedback has been incorporated into emergency planning, and confirmation that updated plans have been shared with affected stakeholders and rightsholders. External stakeholders and rightsholders have reported not being aware of any formal emergency response plans.

### ***Critical requirement 2.5.2.1 - Community and Worker Consultation***

The evidence provided does not yet confirm that community members were consulted during the development of the emergency plan, nor that their feedback was incorporated into its design. External stakeholders and rightsholders interviewed indicated that they had not been consulted during the planning process nor had they participated in any emergency drills conducted in the region.

## **Principle 3 Outstanding Corrective Action**

### ***Critical requirement 3.3.1.1 - Health and Safety Risk and Impact Scoping***

The mine hired an external consultant service to provide a proposed procedure to develop the social impact assessment, however the process has not yet started.

## **Principle 4 Outstanding Corrective Action**

### ***Critical requirement 4.1.5.6. - Mitigation of Risks and Management of Mine Waste Management Facilities***

The mine has completed a study of stockpiles in 2025 to evaluate the performance of the facilities and inform updates to risk management processes. The implementation of these actions will need to be further verified at the next audit.

## 6.2 Timing of Future Audits

In the IRMA system, a surveillance audit is a mid-point between full audits. The next required activity will be a renewal audit, which must be completed within 36 months of the publication date for the previous full audit.

## 6.3. Focus Areas for Next Audit

During the surveillance audit, progress was noted in addressing previously identified corrective actions. However, several gaps remain, particularly in relation community representation in current engagement mechanisms, awareness and understanding or grievance mechanisms and emergency response, and the integration of community feedback into human rights assessments and emergency planning.

The open tax lawsuit and environmental sanctioning process, updated social impact assessment and mine waste risk assessments and management of mitigation of risk will be further reviewed at the next onsite audit.

Further engagement directly with Indigenous Peoples will be required regarding the ongoing validity of their Free, Prior and Informed Consent (FPIC), especially for FPIC related to new activities once new projects reach a defined stage. Engagement should also focus on the clarification of territorial authority in areas with overlapping claims, and a verification of on whether remediation measures for past impacts are adequately addressed and accepted by community representatives.

These topics will be considered priority focus areas in the next renewal audit, where the audit team will evaluate both the completion of outstanding corrective actions and the effectiveness of measures taken to address identified gaps.

Following the initial audit, ERM CVS received comments from the Earthworks organization regarding the rating of a number of requirements in the initial audit report (Complaint #IRMA-2024-002). While these comments were acknowledged by ERM CVS, the limited scope of the surveillance audits does not include a re-assessment of ratings for non-critical requirements. The performance of the Albemarle Planta Salar against all requirements in the IRMA Standard, will be fully re-assessed at the renewal audit, with consideration of the feedback raised in the Earthworks complaint.

Finally, during the previous assessments, certain indigenous communities were only included in the stakeholder engagement through interviews conducted with CPA leaders. This includes communities located to the north of the Salar, farther from the mine, as well as some communities located to the south of the Salar near mine operations. Direct engagement with these communities and with municipal authorities (including the

departments of environment, health, and culture) will be considered a priority at the next onsite audit.

# Appendix A: Revised Corrective Action Plan

The following plan was authored by the mining company in response to this Surveillance Audit.

Requirement	Next Steps
<p><b>1.1.1.1</b> – The operating company shall comply with all applicable host country laws in relation to the mining project.</p>	<p>1) Firstly, the aim is to reach an agreement that will put an end to the proceedings with the Internal Revenue Service (SII), with the objective of establishing guidelines that provide certainty regarding the interpretation criteria that said body will apply to Albemarle's operations.</p> <p>If it is not possible to reach such an agreement, the plan will be to continue with the litigation to the appropriate instance.</p> <p>2) Given that the SMA does not engage in settlement or negotiation within the framework of its sanctioning procedures, the strategy is to continue pursuing the corresponding judicial and administrative remedies available for the defense of Albemarle's interests.</p>
<p><b>1.2.2.2.</b> The operating company shall foster two-way dialogue and meaningful engagement with stakeholders by:</p> <ul style="list-style-type: none"> <li>a. Providing relevant information to stakeholders in a timely manner;</li> <li>b. Including participation by site management and subject-matter experts when addressing concerns of significance to stakeholders;</li> <li>c. Engaging in a manner that is respectful, and free from manipulation, interference, coercion or intimidation;</li> <li>d. Soliciting feedback from stakeholders on issues relevant to them; and</li> <li>e. Providing stakeholders with feedback on how the company has taken their input into account.</li> </ul>	<p>1) To accompany, within the context of the current ALB-CPA Agreement, the processes of design, formulation and execution of projects, promoting participatory, bidirectional and timely management aligned with territorial development, reinforcing a direct relationship plan with each member of the agreement.</p> <p>2) To jointly promote between ALB and CPA the implementation of a Digital Agreements Platform based on the 2016 Agreement, which will allow for transparency regarding the status of project portfolios and agreements reached within the MTP.</p> <p>3) Implement a Communications Plan of local scope, aimed at making visible the company's actions and initiatives in the local ecosystem, through traditional and digital media, strengthening transparency and equitable access to information for the communities and actors of the Salar de Atacama.</p>

Requirement	Next Steps
<p><b>1.3.2.1</b> The operating company shall establish an ongoing process to identify and assess potential human rights impacts (hereafter referred to as human rights “risks”) and actual human rights impacts from mining project activities and business relationships. Assessment of human rights risks and impacts shall be updated periodically, including, at minimum, when there are significant changes in the mining project, business relationships, or in the operating environment.</p>	<p>4) Establish mechanisms for early and voluntary information on new company projects, aimed at regional and local actors, to clarify concerns, collect questions, and strengthen transparency and territorial trust.</p> <p>1) Share the human rights report with Indigenous communities and any other affected parties to receive their feedback.</p> <p>2) Decide on the frequency of the human rights assessment at the Salar Plant.</p>
<p><b>1.4.1.1</b> The operating company shall ensure that stakeholders, including affected community members and rights holders (hereafter referred to collectively as “stakeholders”) have access to an operational-level mechanism that allows them to raise and seek resolution or remedy for the range of complaints and grievances that may occur in relation to the company and its mining-related activities</p>	<p>1) Improve the visibility and dissemination of the complaints and claims channel on the company's web platforms in terms of design.</p> <p>2) Design a QR code for the complaints and claims channel and incorporate it into all presentations made by the company to its stakeholders, as well as in external newsletters.</p> <p>3) Establish a single, permanent contact telephone number to receive and channel complaints and claims received by the company. This telephone number will be communicated to interested parties in the dissemination of actions of the complaints and claims channel.</p>
<p><b>2.1.3.1.</b> The operating company shall carry out a scoping process to identify all potentially significant social and environmental impacts of the mining project to be assessed in the ESIA.</p>	<p>1) Constantly verify the application of the procedure and use of records in completed projects to confirm full implementation of social impact assessments and internal screening/scoping procedures.</p> <p>2) Analyze and review the need to incorporate modifications and improvements in the implementation of screening and scoping. If necessary, update the procedure “Socio-</p>

Requirement	Next Steps
	<p>environmental screening/scoping and indigenous socialization/consultation.” If necessary, update based on current regulatory requirements.</p> <p>3) Ensure that all project development areas are familiar with the procedure and implement it.</p> <p>4) Evaluate with the Compliance area the need to document the review of human rights/social impact issues.</p> <p>5) Evaluate the effectiveness of screening/scoping in all instances indicated by the procedure.</p>
<p><b>2.5.1.1</b> All operations related to the mining project shall have an emergency response plan conforming to the guidelines set forth in United Nations Environment Programme, Awareness and Preparedness for Emergencies at the Local Level (APELL) for Mining</p>	<p>1) Verify that current Emergency Response Plan is aligned with the current APELL requirements</p> <p>2) Formalize an APELL coordinator and promote an institutional committee with the affected stakeholders. This committee must have clear objectives, roles, and meeting frequencies.</p> <p>3) Execute a structured consultation plan, after preparing and disseminating the content.</p> <p>4) Update the emergency plan, incorporating feedback from interested parties.</p> <p>5) Final dissemination of the Emergency Plan to stakeholders.</p>
<p><b>2.5.2.1.</b> The emergency response plan shall be developed in consultation with potentially affected communities and workers and/or workers’ representatives, and the operating company shall incorporate their input into the emergency response plan, and include their participation in emergency response planning exercises.</p>	<p>1) Conduct a drill that includes stakeholders both on and off site.</p> <p>2) Receive formal feedback from stakeholders who participated in the drill.</p> <p>3) Update the Emergency Response Plan with the feedback received.</p> <p>4) Update the drill plan for the current year and continue to conduct the drills, and continue to update the emergency response plan through consultation with affected communities</p>

Requirement	Next Steps
<p><b>3.3.1.1.</b> The operating company shall carry out a scoping exercise to identify significant potential risks and impacts to community health and safety from mining-related activities. At minimum, the following sources of potential risks and impacts to community health and/or safety shall be considered:</p> <ul style="list-style-type: none"> <li>a. General mining operations;</li> <li>b. Operation of mine-related equipment or vehicles on public roads;</li> <li>c. Operational accidents;</li> <li>d. Failure of structural elements such as tailings dams, impoundments, waste rock dumps (see also IRMA Chapter 4.1);<sup>131</sup></li> <li>e. Mining-related impacts on priority ecosystem services;<sup>132</sup></li> <li>f. Mining-related effects on community demographics, including in-migration of mine workers and others;</li> <li>g. Mining-related impacts on availability of services;</li> <li>h. Hazardous materials and substances that may be released as a result of mining-related activities;<sup>133</sup> and</li> <li>i. Increased prevalence of water-borne, water-based, water-related, and vector-borne diseases, and communicable and sexually transmitted diseases (e.g., HIV/AIDs, tuberculosis, malaria, Ebola virus disease or others) that could occur as a result of the mining project.</li> </ul>	<ul style="list-style-type: none"> <li>1) Add the development of the Social Impact Assessment considering the sources of potential risks and impacts to community health and/or safety.</li> <li>2) Development of the Community Health and Safety Risk Management Plan</li> </ul>
<p><b>4.1.5.6.</b> On a regular basis, the operating company shall evaluate the performance of mine waste facilities to:</p> <ul style="list-style-type: none"> <li>a. Assess whether performance objectives are being met (see 4.1.4.2.a and 4.1.5.5);</li> <li>b. Assess the effectiveness of risk management measures, including critical controls (see 4.1.5.3);</li> <li>c. Inform updates to the risk management process (see 4.1.4.1.c) and the OMS manual (see 4.1.5.7); and</li> <li>d. Inform the management review to</li> </ul>	<ul style="list-style-type: none"> <li>1) Update the “Operation, Maintenance, and Monitoring Manual for Salt Stockpiles” and the “Salt Harvesting Procedure.”</li> <li>2) Implement start- and end-of-harvest Stockpile Checklists to ensure compliance with current regulations (boundaries, slopes, roads, closures, etc.).</li> <li>3) Establish a monitoring and progress-update program using Geographic Information Systems (GIS) to ensure that the salt stockpiles remain within the boundaries established in the Regularization Plan.</li> </ul>

Requirement	Next Steps
-------------	------------

facilitate continual improvement (see 4.1.5.8).

4) Add the evaluation of the effectiveness of risk management measures, including critical controls (Albemarle One).

# Endnotes

---

<sup>1</sup> All versions will be posted on the IRMA website: <https://responsiblemining.net/>. The most recent version (IRMA Certification Body Requirements, v.1.0) is available at: [https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements\\_v1.0.pdf](https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf)

<sup>2</sup> See IRMA Certification Body Requirements, v.1.0, pp. 18-19, and Annex A. [https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements\\_v1.0.pdf](https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf)

<sup>3</sup> See IRMA Certification Body Requirements, v.1.0, p 32. [https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements\\_v1.0.pdf](https://responsiblemining.net/wp-content/uploads/2020/01/Certification-Body-Requirements_v1.0.pdf)