

INFORMATION SECURITY POLICY

Allkem Limited (**Allkem** or **Company**) is committed to pursuing high standards in relation to information security where information, in all its forms, is considered a valuable asset which deserves to be managed and protected.

For this reason, the Board of Allkem has approved this Information Security Policy (**Policy**) with mandatory application throughout Allkem and its subsidiaries. This Policy applies to:

- Allkem and each of its wholly owned subsidiaries in the Allkem Group of companies;
- All employees, directors, contractors, consultants, temporary, and other workers within the Allkem Group for those operations where we have management control (together, the “**Employees**”);
- Our suppliers and service providers, who through obligations in their supply arrangements, commit to meeting the commitments and objectives set out in this Policy; and
- Our Joint Venture partners and Joint Venture operations – in relation to which Allkem is committed to cooperating with and exploring opportunities to adopt the commitments in this Policy.

This Policy is aligned with both the ISO/IEC 27001 and the COBIT 5.0 standards. In line with these standards, Allkem will strive to:

- promote measures that protect the confidentiality of the Company’s information, preventing Employees, individuals, entities, or processes that do not have the proper authorisation from accessing it.
- implement actions which protect the information from unauthorised modifications, manipulations, or reproductions.
- maintain the availability of information and critical services, so that authorised users can access them whenever needed.
- certify the authenticity of the information, striving to ensure that it comes from a reliable source and ensuring its flow from sender to receiver.
- comply with all applicable legal requirements, including those under the Australian *Privacy Act 1988* (Cth) the Argentinian *25.326 Personal Data Protection* law, the Canadian *Personal Information Protection and Electronic Documents Act* (S.C. 2000, c. 5) and any other jurisdictions where the Company operates or stores its data.
- define and assign the functions and responsibilities of all Allkem Employees and third-party service providers in relation to compliance with this Policy.
- implement data categorisation (based on its relevance to the Company) to establish protection levels and assign physical and digital controls to them - as required in terms of security, accessibility, maintenance, storage, retention, and destruction.
- deploy Information Security training and education (including in relation to this Policy) to all Employees of the Company.
- identify and implement detection, prevention and response tools and controls for the protection of the Company’s data and information assets against cyber-risks.
- implement segregation of duties and isolate the environment of development, test, and production to protect data against unauthorised access and disclosure.
- specify the system development and maintenance controls based on good market practices.

To fulfil the aims and objectives of this Policy, the Company’s Information Security Committee will aim to:

- regularly review the Policy and make recommendations to the Board in relation to any modifications or replacements to it;
- implement systems and controls to minimise the potential risks in relation to information security;
- review and monitor any possible incidents or threats in relation to information security and report these appropriately;

- make recommendations in relation to and carry out any approved improvement initiatives in relation to information security.
- provide guidance and technical expertise to the Company to protect its information, based on the principles outlined above.

Allkem has also developed and implemented a Cybersecurity Strategy, based on appropriate information security standards and good market practice, with the objective of mitigating any potential cyber risks or information security incidents.

The Board of Directors of Allkem Limited commits to ensuring the availability of resources (as necessary) for implementing this policy. This policy has been approved by the Board of Directors of Allkem Limited.



Martin Perez de Solay
Managing Director / Chief Executive Officer
Allkem Limited
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