

Vendor Code of Conduct

December 2023

I. Purpose

Lithium Americas Corp. (“LAC” or the “Company”) is committed to a culture of honesty, integrity and accountability, and maintain the highest level of ethical standards in how we conduct business. Our reputation for ethical practices and integrity is an essential aspect of our daily operations and for the success of our business.

II. Scope

We commit to respect the rights of all persons at our operations, including our *Workforce* and *Vendors*, in addition to the members of the local communities where we operate. We will enforce this policy within our company and communicate our commitments and expectations to our contractors and vendors, as well as to any other external partners we engage with.

III. Definitions

“**Director**” means a member of the Board.

“**Financial Executive**” means the Chief Financial Officer (“**CFO**”) and their direct reports responsible for financial or internal audit functions of the Company, holding the title of Executive Vice President, Senior Vice President and Vice President.

“**Forced Labour**” includes slavery, forced prisoner labour, bonded and indentured labour.

“**Management**” means LAC employees who directly report to the Chief Executive Officer (“**CEO**”) or CFO, have an Executive Vice President or Senior Vice President title, or other Officers of the Company.

“**Officer**” means a LAC employee appointed by the Board or CEO in accordance with the Company’s Articles.

“**Workforce**” means all LAC employees, consultants and anyone working at a LAC project, operation or office.

“**Vendors**” means any person, corporation or other legal entity that provides goods or services to or on behalf of the Company. Vendors includes consultants, suppliers, contractors, subcontractors and agents.

IV. Specifics of the Human Rights Policy

A. Employees and Contractors

Our Workforce are the people who make up our company. We aim to be an employer of choice, earning their respect and trust by promoting and protecting their human rights. Beyond that, we aim to foster an equitable, diverse and inclusive workplace, so that all persons feel welcome and enjoy working with us. To that end, we commit to:

- i. Oppose any form of child labour, forced labour or human trafficking in or around our operations;
- ii. Ensure equal remuneration for employees that hold the same or similar positions commensurate with equal qualifications required for the role and work performed in equivalent jurisdictions;
- iii. Promote fair and honest treatment of our workers, guaranteeing reasonable hours consistent with local laws, the job performed, rest breaks and resources to perform the required job duties;
- iv. Prohibiting charging back recruitment costs to employees;
- v. Ensure freedom of movement, by not withholding documents such as identity documents or bank cards and allowing employees to leave the workplace or employer provided accommodation (if any) except where lawful or necessary for security, health and safety;
- vi. Continue to make available the Company's confidential whistleblower channels for workers to communicate their grievances so that the Company may prevent, mitigate and remedy any and all incidents; and
- vii. Reject any kind of discrimination, harassment or misconduct to provide a safe space for our Workforce, as per the Company's Respectful Workplace Policy.

B. Supply Chains and Vendors

Our Vendors are a key part of our business and we aim to ensure our supply chain is compliant with the applicable rules and regulations, as well as the human rights standards that we hold ourselves to. To ensure consistency across our operations and throughout the lifecycle of our product, we commit to:

- i. Establish processes for human rights due diligence as to potential vendors, on a risk-appropriate basis;
- ii. Clearly communicate our Human Rights Policy expectations to all potential vendors;
- iii. Vendors will have a process to communicate these Code requirements through their supply chain and to require suppliers to adopt management systems and practices for compliance with this Code or requirements materially consistent with this Code. Upon request, vendors will provide evidence of efforts to cascade this Code or requirements materially consistent with this Code through their supply chains.
- iv. Conduct human rights risk assessments of our supply chain, in addition to our internal operations; and
- v. Establish processes so that our vendors may also convey any grievances they have that we will address and remedy where appropriate.

C. Local Communities

Much like the environment where we work, the local communities are impacted by our presence. We aim to ensure that impact is positive and long lasting, improving livelihoods during and after our operations. In order to ensure our local communities are protected and respected, we commit to:

- i. Utilise the processes and systems in place for our workers and suppliers to ensure that our local communities can also communicate any and all incidents where the Company can help to prevent, mitigate or remedy human rights violations;
- ii. Promote community participation in our operations through transparent communications and open dialogue channels;
- iii. Encourage economic development and job opportunities, hiring locally where possible and providing training to local communities, putting special emphasis on historically disadvantaged groups such as indigenous populations and women; and
- iv. Respect local culture and traditions, protecting their peace, health and safety.

D. Occupational Safety

Vendors will maintain a program of occupational safety and environmental protection, including training. This will be documented and audited periodically. Deficiencies will be reported to the Company along with steps taken to remedy. Any accidents or discharges will be reported to regulatory authorities and to the Company.

E. Integrity

Vendors will not tolerate corruption, bribery, money laundering, embezzlement, extortion, or fraud in any form. This includes giving or receiving anything of value, including money, gifts, or unlawful incentives to improperly influence negotiations or any other dealings with governments and government officials, customers, or any other third parties. Vendors will implement monitoring, record keeping, and enforcement procedures to comply with anti-corruption laws.

Vendors will respect intellectual property rights. Transfer of technology and know-how must be done in a manner that protects intellectual property rights, and customer and supplier information must be safeguarded.

Vendors will protect the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Vendors will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

Vendors will comply with all applicable restrictions on the export, re-export, release or other transfer of goods, software, services, and technology; all applicable economic sanctions restrictions involving certain territories, entities and individuals (to include conducting appropriate due diligence on third parties); and all other similar trade-related laws and regulations.

Vendors will uphold the highest standards of integrity in all business interactions, including standards of fair business, advertising, and competition. Vendors will avoid conflicts of interest and operate honestly and ethically throughout the supply chain and in accordance with applicable law, including those laws pertaining to anti-competitive business practices, respect for and protection of intellectual property, company and personal data, and export controls and economic sanctions. Vendors will require that their employees avoid and disclose situations where their financial or other interests conflict with job responsibilities, or situations giving any appearance of impropriety.

F. Governance

The Company commits to ensure that we meet the aforementioned standards at all levels of the company and at all of our operations globally, ensuring our Workforce and Vendors are aware of our commitments and expectations. We aim to do so through regular trainings, periodic assessments and independent audits.

Our executive leadership is responsible for the governance of our Human Rights Policy and the ESG team is responsible for administering and ensuring its implementation and success. Reporting to the Board Safety and Sustainability Committee will be done annually, or as needed.

V. Interaction with Other Policies

This Human Rights Policy supplements and should be read in conjunction with the Company's other policies that may be applicable to our Workforce and Vendors, including without limitation the Company's Code of Conduct; Procedure for Handling of Complaints – Whistleblower; Corporate Disclosure, Confidentiality and Securities Trading Policy; Vendor Code of Conduct and Ethics; Health and Safety Policy; Environmental Policy; Respectful Workplace Policy; Diversity, Equity and Inclusion Policy; and others that may be adopted and as listed on the Company's Governance website.

VI. Amendments

This policy will be reviewed from time to time and may be updated or replaced with the authorization of Management or the Company Board of Directors or its committees.

Effective Date: December 22, 2023

Approved by: Chief Executive Officer