

**RESPONSIBLE BUSINESS POLICY**

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## 1. Purpose and Scope

IperionX aims to be the leading American titanium metal and critical materials company – using patented and proprietary metal technologies to produce high performance titanium alloys from titanium minerals or scrap titanium, at lower energy, cost, and carbon emissions.

Responsible business conduct and sustainability is an essential part of IperionX's mission. This Responsible Business Policy is formulated in accordance with the UN Global Compact Principles, UN Declaration of Human Rights, Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

This Responsible Business Policy applies to IperionX employees, directors, business partners, and other stakeholders directly linked to its operations. This policy is publicly available on the IperionX website and is communicated internally and externally to all personnel, business partners, and other relevant parties. The commitments in this policy are reflected in IperionX's operational policies and procedures throughout the business.

This Responsible Business Policy is a complement to the other IperionX policies listed below, which are available on the IperionX website:

- Code of Conduct
- Anti-Bribery and Corruption Policy
- Securities Trading Policy
- Risk Management Policy
- Continuous Disclosure Policy
- Social Media Policy
- Compliance Reporting Policy (aka Whistleblower Policy)
- Supplier Code of Conduct

IperionX executive management and the Board of Directors have approved this Responsible Business Policy.

## 2. Respect for our Employees and Fundamental Human Rights

IperionX acknowledges the responsibility to respect human rights as outlined in the UN Guiding Principles on Business and Human Rights. Specifically, IperionX will comply with all national and international laws and regulations, and will respect internationally-recognized human rights in all operational locations. The following sections outline IperionX's specific commitments in relation to human rights.

### Compliance with Labor Laws and Regulations

IperionX will comply with all applicable national and international labor laws and regulations.

## Prohibition of Child Labor

IperionX prohibits the use of child labor in any form in its operations and in its supply chain. IperionX will comply with all local and international standards regarding minimum work age. IperionX's operations require the minimum age of employment to be 18 years old, which will be verified at the time of employment by the Human Resources team.

## Prohibition of Forced Labor

IperionX prohibits the use and does not condone forced labor, compulsory labor, or any form of modern slavery or human trafficking in its operations or in its supply chain.

Specifically:

- Employees/candidates are not required to pay any fees, deposits, or bonds to ensure employment;
- Employees are not required to lodge their identity documents with the company;
- All workers are free to leave employment after reasonable notice and at the end of their shift;
- Overtime work is agreed to in advance as part of employment terms;
- No deposits are taken from workers for workplace essentials;
- Verification that any recruitment agencies operate under a valid business license;
- No recruitment fees or costs are borne in whole or in part by workers or jobseekers;
- Terms of employment outlined at the time of recruitment do not differ from what is provided at the company (including type of work stated); and
- Workers are informed prior to employment of the key employment terms and conditions in writing via an employment agreement.

## Equal Opportunity

IperionX is an Equal Opportunity employer and will provide equal opportunities for jobs, training, and promotions without discrimination.

## Zero Tolerance for Discrimination and Harassment

Every IperionX employee shall be treated with respect and dignity. There shall be no physical, sexual, psychological, or verbal harassment or abuse at the workplace. Gestures, language, and physical contact that is sexually coercive, threatening, abusive, or exploitative is prohibited. IperionX has a zero-tolerance policy for discrimination and harassment based on any characteristic, including but not limited to race, gender, religion, or disability.

## Regular Working Hours and Overtime

Regular working hours, excluding overtime, are defined by employment agreements and applicable laws, and shall not exceed 40 hours per week. Overtime work is agreed to in advance via employment agreements. Non-exempt employees (paid hourly) are compensated for overtime hours worked beyond 40 in a workweek at a rate of 1.5 times their regular hourly rate for all overtime hours,

per federal and state requirements. The total hours worked (regular working hours and overtime) shall not exceed 60 hours in any seven-day period. Employees are allowed at least 24 consecutive hours of rest in every seven-day period.

### Fair Wages and Benefits

IperionX pays all employees fair wages, equal to or exceeding legal federal and state minimum wage requirements, and provides reasonable benefits to all employees, including paid holidays, paid sick leave, and paid time off. Deductions from wages as a disciplinary measure is not permitted.

### Freedom of Association and Collective Bargaining

IperionX respects the rights of its employees to join or form labor unions, to engage in collective bargaining, and to engage in peaceful assembly, without fear of reprisal.

IperionX currently operates in "right-to-work" states (Virginia, Tennessee, and Utah), which prohibit the requirement of union membership or the payment of union fees as a condition of employment.

### Safe and Healthy Work Environment

IperionX is committed to providing a safe, healthy, and respectful work environment for all employees, free from unmitigated hazards. This includes providing safe buildings (including adequate lighting, heating, and ventilation), fire protection, electrical safety, machine safety, safe use of hazardous materials, and correct use of adequate personal protective equipment (PPE) which is provided to employees by the company at no charge. IperionX takes appropriate measures to provide for adequate health of all workers, by avoiding working in excessive heat and thus taking measures to adapt to a changing climate.

IperionX has established health and safety policies and procedures that all employees are trained on as applicable to their job function. Health and safety trainings are conducted on a regular basis.

### Chemical Safety and Management of Substances of Concern

IperionX is committed to the safe and responsible use of chemical substances and the elimination or reduction of any toxic chemical from our operations. IperionX complies with all Restricted Substances Lists (RSLs) as required by regulation or our customers' requirements.

## 3. Respect for the Environment

### Environmental Management Policy

IperionX is committed to responsible environmental stewardship across all our operations. We prioritize the protection of air, water, land, and biodiversity by implementing robust environmental management systems, complying with all applicable U.S. environmental laws, and continuously improving our performance. Through proactive monitoring, risk mitigation, and the use of sustainable technologies, we aim to minimize our environmental footprint and contribute to the long-term health of the environments where we operate.

## Protected Areas

IperionX is committed to respecting and safeguarding federally, state, and tribally designated protected areas. We do not explore or operate in areas where mineral extraction is legally prohibited and assess all potential impacts when operating near protected zones. Our approach includes strict compliance with environmental regulations, engagement with relevant stakeholders, and the application of best practices to avoid, minimize, or mitigate harm to sensitive ecosystems and cultural heritage.

## Water and Wastewater Management Policy

IperionX recognizes the human right to safe, clean, accessible, and affordable water as fundamental to the dignity and well-being of all people. We are committed to managing water resources responsibly across our operations, ensuring that our activities do not compromise the availability or quality of water for local communities, Indigenous Peoples, or ecosystems. We engage with stakeholders transparently, monitor water use and impacts, and support sustainable water stewardship in line with U.S. regulations and international best practices.

IperionX works to identify, control, and reduce wastewater produced in our operations. We conduct routine monitoring of overall water performance, including water intake and performance of its wastewater treatment systems. IperionX implements a systematic approach to prevent contamination of stormwater runoff and prevents illegal discharges and spills from entering storm drains, the public water supply, or public bodies of water.

## Air Management Policy

At IperionX, we are committed to managing our air emissions responsibly across our operations, ensuring that our activities do not compromise the air quality for local communities, Indigenous Peoples, or ecosystems. We monitor our air emissions and impacts and comply with all U.S. and local air quality regulations.

## Energy Management Policy

At IperionX, we are committed to managing our energy consumption across our operations, promoting more efficient use of energy, and procuring renewable energy when possible for our operations.

## GHG Management Policy

At IperionX, we are committed to managing our greenhouse gas (GHG) emissions across our operations, to reduce our company's and our products' impacts on climate change. We track and calculate our Scope 1, 2, and select Scope 3 GHG emissions and report them in our annual sustainability reports.

## Waste Management Policy

At IperionX, we are committed to managing and reducing our waste across our operations, including the reduction or elimination of any hazardous wastes. As a company that recycles titanium, we actively work to reduce the waste of our customers through the recycling of titanium that otherwise would be destined for landfill.

## Biodiversity Policy

At IperionX, we are committed to having a net positive impact on biodiversity at our operational locations. We aim to ensure that our infrastructures incorporate the conservation of local ecosystems and the improvement of biodiversity, such as the creation of varied habitats, the sustainable management of green spaces and the enhancement of local flora. We have constructed beehives to promote pollinator habitats at our Virginia and Tennessee locations.

## 4. Respect for our Communities

### Community Relations & Engagement Policy

IperionX is committed to building respectful, transparent, and mutually beneficial relationships with the communities where we operate. We engage early and continuously with local stakeholders to understand their concerns, priorities, and aspirations. Our approach is grounded in open dialogue, cultural sensitivity, and shared value creation, with a focus on minimizing negative impacts and maximizing local benefits through employment, procurement, and community investment.

### Respecting Indigenous Rights

At IperionX, we are committed to respecting the rights, cultures, and sovereignty of Indigenous Peoples. We recognize their deep connection to the land and strive to engage in meaningful, early, and ongoing consultation with any affected Indigenous communities. Our operations prioritize transparency, mutual benefit, and the protection of cultural heritage, in line with the principles of Free, Prior, and Informed Consent (FPIC) and all applicable U.S. laws and tribal agreements.

### Security Providers

IperionX does not anticipate the need for private security providers. If they are needed, IperionX will undertake all reasonable measures to ensure that the actions of its security providers respect human rights, taking into account the Voluntary Principles on Security and Human Rights.

## 5. Responsible Business Activities

### Supply Chain Transparency and Accountability

IperionX is committed to a transparent and responsible supply chain and guarantees the origin of its products via appropriate documentation. IperionX requires its suppliers to comply with the IperionX Supplier Code of Conduct.

## Conflict-Free Minerals Policy

IperionX is committed to sourcing minerals responsibly. Currently we do not source any conflict minerals, which refer to the mineral precursors of the metals tantalum, tin, tungsten, and gold (also known as "3TG"). If IperionX does source any 3TG minerals in the future, we will ensure we are not sourcing conflict minerals that fund armed groups in the Democratic Republic of Congo and adjoining countries. If we source minerals from this region, including cobalt and mica, we will perform supply chain due diligence to only source minerals from legitimate mining operations that are certified to be conflict-free. Our compliance and procurement teams are responsible for ensuring compliance with this policy. IperionX suppliers are required to implement similar policies and provide information about the source of minerals they supply.

## Cybersecurity and Privacy Practices

IperionX is committed to acting in a responsible and ethical manner regarding the use of our and our customer's intellectual property (IP), Personally Identifiable Information (PII), and private data. IperionX will use PII in a manner consistent with reasonable expectations and in compliance with applicable laws and regulations. IperionX responsibly manages and safeguards our computing environment using appropriate technical and organizational data security controls. Any cybersecurity incidents affecting IperionX's computing environment will be reported to affected stakeholders within 24 hours of knowledge of the incident.

## Political Contributions Policy

IperionX maintains a position of political neutrality and prohibits the use of corporate funds or resources for political contributions to local, state, or federal political candidates, political parties, political organizations, or political action committees (PACs). Examples of prohibited political contributions include, but are not limited to:

- Purchase of tickets for political fundraising events.
- Use of company facilities, vehicles, mailing lists, or communication platforms for political campaign purposes.
- Sponsorship of political advertisements or endorsements.

## Export Controls and Sanctions

IperionX products are subject to a variety of export controls and sanctions laws and regulations. IperionX will fully comply with all applicable laws and regulations governing economic sanctions, export controls, and other international trade regulations. Specifically, IperionX is committed to complying with the DOD Industrial Security Regulation (DOD 5220.22-R), the Arms Export Control Act ("AECA"), the International Traffic in Arms Regulations ("ITAR"), and the Export Administration Regulations ("EAR").

## Commitment to Fair Competition

IperionX is committed to conducting business in full compliance with U.S. antitrust and competition laws. We prohibit all forms of anti-competitive behavior, including price fixing, bid rigging, market allocation, and abuse of market dominance. We promote fair, transparent, and ethical competition and expect all employees and business partners to uphold these principles in every aspect of our operations.

## Managing Conflicts of Interest

IperionX requires all employees, officers, and directors to disclose any actual, potential, or perceived conflicts of interest as soon as they arise. Disclosures must be made to the appropriate supervisor or to [compliance@iperionx.com](mailto:compliance@iperionx.com). Once disclosed, the company will assess the situation and determine appropriate actions, which may include recusal from decision-making, reassignment of duties, or termination of conflicting relationships. Regular training and annual disclosures are conducted to ensure ongoing awareness and compliance.

## Money Laundering

IperionX is committed to ensuring compliance with anti-money laundering laws and regulations. We have procedures to verify the identity of our customers, suppliers, subcontractors, partners and other business relations and shall ensure the filtering of transactions, taking into account the applicable thresholds, the means of payment and the origin of payments.

## 6. Implementation and Oversight

### Governance Structures

The Nominating and Governance Committee of the Board, along with IperionX executive management, is responsible for overseeing compliance with this Responsible Business Policy and ensuring its implementation throughout the business.

### Training and Awareness

IperionX will provide training and awareness programs to its employees and Board regarding this Responsible Business Policy and human rights principles and expectations.

### Supply Chain Responsibilities

IperionX requires companies in its supply chain to conduct their business in a responsible manner, including respect for human rights. IperionX's expectations for supplier responsibility and human rights due diligence are outlined in the IperionX Supplier Code of Conduct.

## Grievance Mechanism

Any grievances from workers or community members can be anonymously reported following the Compliance Reporting Policy available on IperionX's website.

## 7. Transparency and Continuous Improvement

### Regular Reporting

IperionX will report on its conformance with this Responsible Business Policy as part of its annual financial and sustainability reporting.

### Corrective Action Process

IperionX is committed to timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review. The corrective action will be managed by the internal compliance team with oversight from the Nominating and Governance Committee of the Board.

### Continuous Improvement

IperionX is committed to continuous improvement in its approach to responsible business and human rights and will adapt to changing circumstances and regulations or requirements.

### Annual Review

This Responsible Business Policy will be reviewed on an annual basis and updated as needed.

### Document History

Date	Revision#	Details
August 2025	0	Initial Issue