LithiumAmericas

Integrity Policy

(Anti-Corruption and Anti-Money Laundering)

May 2024

I. Objective and Scope

Lithium Americas Corp. and its wholly owned-subsidiaries (collectively, "**Lithium Americas**" or the "**Company**") are committed to doing business with integrity and according to the highest anti-corruption standards. This Integrity Policy ("**Policy**") prohibits, among other things, the bribery of Government Officials (as defined below), private-sector (commercial) bribery, extortion and money laundering. All Personnel are expected to conduct themselves with honesty, fairness and high ethical standards, to abide by all anti-corruption and money laundering laws and to avoid the perception of impropriety. Corruption violates our stakeholders' trust, threatens economic and social development, hurts fair trade and could have devastating impacts on the Company. The severe consequences of corruption may include:

- Criminal penalties imposed against the Company, including severe fines and/or imprisonment for the individual Personnel involved;
- Claims from the third parties disadvantaged by the bribery;
- Reputational harm for the Company; and
- Unwillingness of third parties to do business with the Company.

This Policy establishes the Company's standards regarding the prevention of corruption, bribery, extortion and money laundering. If applicable domestic and international laws have stricter requirements, those laws supersede the requirements stated in this Policy. All Employees are required to read, understand and comply with this Policy, and all Vendors are expected to abide by these terms or equivalent terms in their own policies, and Employees and Vendors may from time to time be requested to certify their compliance with this Policy.

II. Definitions and Key Contacts

"**Board**" means the Company's Board of Directors.

"**Bribe**" for purpose of this Policy includes "**anything of value**" under the anti-corruption laws, which can be any benefit promised, offered, paid or authorized to a Government Official to obtain, retain or direct business to a person or to obtain any other improper business advantage, or to improperly influence an official action or decision. These benefits can take on many forms and may include but are not limited to:

- Cash or cash equivalents, Kickbacks, loans, gifts (i.e., any present, whatever the form: money, services, goods, exclusive advantages) or prizes;
- Commission or payments not prescribed by law;
- Favorable terms on a concession, permit, product or service;
- Travel, entertainment or hospitality (including lunch, dinner and accommodation) for personal benefit and invitations in respect of the same;

- Use of vehicles, vacation homes or private club access;
- In-kind help or services or personal favours, including personal favours for a recipient or their business(es) or anyone with whom the recipient has a Family Relationship, such as an employment opportunity, immigration assistance, education or other assistance or favorable treatment;
- Donations to a charity supported or recommended by a Government Official; and
- Employment or private contracts to Government Officials or family members of Government Officials.

"**Consultant**" means any person retained to provide professional consulting services to the Company and/or regularly works from the Company's offices, but who are not Employees.

"**Contractors**" means any person working on a temporary or short-term basis for the Company who is neither a Consultant nor Employee.

"**Employees**" means any individual hired directly by the Company or one of its subsidiaries.

"**Family Relationship**" means relatedness or connection by blood, marriage or adoption and includes, but is not limited to:

- a marriage/common law spouse;
- parent and grandparent;
- child and grandchild;
- sibling;
- aunt and uncle;
- niece and nephew;
- first cousin; and
- any "step", "common law", or "in law" variations of the above relationships.

"**Government Official**" is defined broadly, and includes:

- Any officer, employee or representative of any level of government (including national, provincial, state, regional, territorial and local governments, and any tribe, aboriginal group or First Nation);
- Any person holding a legislative, administrative or judicial position of any kind;
- Any officer, director, employee or representative of any state-owned or -controlled enterprise;
- Any officer, employee or representative of a government department, agency or instrumentality;
- Any officer, employee or representative of any public international organization;
- Any officer or representative of a political party;
- Any candidate for a political office; and
- Any other person acting on behalf of any of the foregoing persons.

It is also prohibited to improperly influence a Government Official indirectly by offering or providing personal favour or anything of value to:

- their close friends, associates or business partners;
- those who have Family Relationship with the Government Official, and anyone who shares the same household;
- a company in which the individual has a direct or indirect ownership interest; and
- an organization with which the individual is associated (e.g. a charity).

"**Kickback**" means a payment or benefit returned or redirected in whole or in part to induce an action or improperly influence a decision.

"**Management**" means Company employees who directly report to the President and Chief Executive Officer ("**CEO**") or Executive Vice President and Chief Financial Officer ("**CFO**"), have an Executive Vice President or Senior Vice President title, or other Officers of the Company. The Company's Senior Vice President, General Counsel and Corporate Secretary is referred to on this Policy as "**General Counsel**".

"**Officer**" means a Company employee appointed by the Board or CEO in accordance with the Company's Articles.

"**Personnel**" means all Management, Officers, Employees, Vendors and anyone working at a Company project, operation or office, or for the Company from any remote location.

"**Vendors**" means any person, corporation or other legal entity that provides goods or services to or on behalf of the Company. Vendors includes Consultants, Contractors, subcontractors and agents.

Key Contacts

Reference is made throughout this Policy to requirement for Employees to report to, receive approval from, or otherwise contact one or more members of the Management team. Refer to the Company's Contact List on the Intranet site to access the direct contact information for Management.

III. Corruption Involving Government Officials

Lithium Americas Personnel must comply with all applicable laws prohibiting improper payments to domestic and foreign Governmental Officials. These laws include all applicable federal, state and provincial legislation prohibiting payments to domestic officials and also include federal legislation prohibiting payment foreign officials such as the *Corruption of Foreign Public Officials Act* (Canada) ("**CFPOA**") and the *Foreign Corrupt Practices Act of 1977* (United States) ("**FCPA**"). Personnel may not promise, offer, give, accept or authorize the giving or receiving of a Bribe to any Government Official at any level, in order to improperly influence any act or decision, to obtain, retain, or direct business to a person, or to secure any other improper advantage for the Company. The prohibition applies equally to direct benefits provided to a Government Official and those conveyed indirectly, such as through an intermediary or individuals who have a close friendship of Family Relationship with a Government Official. This Policy also mandates that the Company establish and maintain accurate books and records and adequate internal controls.

Agents, Consultants and Other Third Parties

Agents, Consultants and other third parties are prohibited from providing corrupt benefits or payments on the Company's behalf. This prohibition also applies to subcontractors hired by third parties to perform work on the Company's behalf. If corruption "red flags" are encountered, please contact the Legal Department to arrange additional due diligence. See Schedule "A" for a non-exhaustive list of corruption "red flags".

Extortion

Bribery may involve extortion, which in all forms constitutes a violation of this Policy. Extortion may include attempting to obtain funds, property or other benefits through the use of actual or threatened force, violence or fear. Examples of extortion can include, without limitation, inflicting bodily injury on anyone, accusing anyone of a criminal offense to gain wrongful leverage, exposing any secret tending to subject any person to contempt or ridicule, threatening to impair credit or business reputation, in order to induce any benefit from a third party.

We are expected to act with integrity at all times in dealings with commercial interests, government officials and other stakeholders. Any demand or observation of extortion must be reported to the Company's CFO or General Counsel immediately, absent physical or technological impossibility, and payment shall only be made in response to an extortive demand if necessitated as a duress payment (see Duress Payment sectionbelow). Any duress payments must be accurately described and recorded in the Company's books and records.

Charitable and Political Contributions

It is never permissible to provide a charitable donation to improperly influence a Government Official in exchange for any improper benefit. While donations to charitable organizations may constitute good corporate citizenship, those made to organizations in which Government Officials possess a role relating to decisions involving the Company raise concerns under this Policy and anti-corruption laws. In addition, donations made to a charity associated with a Government Official are considered a benefit for that Government Official and subject to the terms

of this Policy. Any donation made to a charity associated with or endorsed by a Government Official must be approved by the Company's Vice President, Government and External Affair.

Political parties and candidates are considered Government Officials. Therefore, while employees may participate in political or charitable activities on an individual basis when not otherwise in violation of this Policy, political contributions may not be offered or made on behalf of the Company, unless pre-approved by the Company's Vice President, Government and External Affairs. It may be permissible to make donations directly to a government agency (rather than to an individual Government Official) as part of a charitable effort, so long as the contribution has been pre-approved and is consistent with the terms of this Policy.

Travel and Lodging

From time to time, third-party guests including Government Officials are invited to visit the Company's facilities. The Company permits the payment of certain reasonable travel and accommodation expenses for guests if it:

- Is for legitimate business purposes (and is not excessive in view of those purposes);
- Does not include any unreasonable or non-business-related side-trips; and
- Does not contain any per diem cash allowance.

Whenever possible, travel should be booked directly by the Company and be pre-approved by the Company's Vice President, Government and External Affairs.

Duress Payments

Duress payments are payments that are necessary to ensure the health or safety of Employees or third parties associated with the Company, including payments to avoid imminent physical harm or imminent illegitimate detention. This type of payment is a narrow exception to corruption standards. If possible, obtain approval from the Company's CFO or General Counsel before making such a payment, and report any duress demand immediately, whether or not you seek to make a payment, unless it is not possible to do so. If it is not possible to report the demand and seek approval for any payment as just described, the incident must be reported to the Company's CFO within one (1) business day, absent physical or technological impossibility, and reported as a duress payment in financial records.

Recordkeeping

This Policy and anti-corruption law mandates that all payments and other entries must be properly recorded in the Company's books and records. False, misleading or incomplete entries in the Company's books, records and other business documents are prohibited. Circumventing or evading the Company's internal accounting controls, or any attempt to do so, is prohibited. All payments on behalf of the Company must be approved and supported with appropriate documentation. No payments shall be made with the intention or understanding that all or any part of the payment is to be used for any purpose other than the specific purpose described by the documents supporting the payment.

Payments or compensation made to other parties must be customary and reasonable in relation to the services provided and accurately documented in the Company's books and records. These payments must not be made in cash, or to bank accounts that are not in the other party's name, without prior written approval from the Company's CFO or the Senior Vice President, Finance and Administration.

Support Agreements

When providing business-related support to a Government Official, such as travel support, it is requiredto enter into a written agreement with the recipient organization restricting the use of funds and clarifying that support shall not be used for personal benefits. Please contact the General Counsel or the Vice President, Government and External Affairs for assistance.

IV. Commercial Bribery

In addition to the prohibitions against bribing Government Officials discussed above, Personnel and the Company directors are prohibited from receiving, requesting, offering, providing, promising or authorizing corrupt payments and other advantages to or accepting the same from Vendors, customers or others in connection with business on behalf of the Company. Such payments constitute commercial bribery, and often take the form of a Kickback. It is not permissible to accept or provide gifts, meals, travel or entertainment in the course of conducting the Company's business unless authorized under the procedures below.

The Company recognizes that when handled appropriately, informal interactions and exchange of modest gifts or other offerings with a variety of stakeholders may be an important part of building goodwill and developing relationships with communities, partners and suppliers and, in many contexts, may be an accepted and appropriate business protocol and custom. However, if handled inappropriately or to achieve an improper purpose, gifts, travel, entertainment and other offerings, may violate this Policy and applicable laws. All gifts or other benefits received or provided must be modest, transparent and consistent with this Policy, to avoid a perception of impropriety.

General Principles for Receiving or Providing Gifts

Gifts or other benefits received from another party, or provided to another party, must be consistent with the following general principles ("**General Principles**"), unless specifically approved by Management:

- Modest and reasonable in value, appropriate to the occasion and appropriate to the position and management levels of the provider and recipient.
- Related to a legitimate business goal or purpose, which can include providing reasonable business courtesy (i.e., generally, something of value that is provided to customers and potential customers as a means of developing a legitimate relationship with that customer, which includes meals, entertainment, discounts on products and services not readily available to the general public, payment of travel expenses, personal favors, and token gifts).
- Designed so as not to influence the recipient, nor create a perception of influence.
- Provided and received in an honest and transparent manner.
- Reported in a transparent and accurate manner to the Personnel's supervisor, and documented accurately in expense reports.
- Not provided in cash or cash equivalents.
- Occasional, so that repeated or frequent gifts to or from another party not raise any actual or perceived conflicts of interest or impropriety.
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- If travel-related or entertainment-related, compliant with the Company's Travel and Entertainment Policy.
- Compliant with domestic laws and regulations.

Avoiding Conflicts of Interest - Restrictions on Requesting Anything of Value

A conflict of interest can arise when your interests or activities affect, or have the appearance of affecting, your judgement, objectivity or independence. This could include receiving anything of value from Vendors, customers or other third parties doing, or proposing to do, business with the Company.

It is prohibited to request, demand or accept cash and cash equivalents, gifts, hospitality, entertainment or other favours or benefits from anyone you are evaluating in a bid, tender or other commitment involving the Company, unless approved in advance by a member of Management. It is also prohibited to facilitate the making of any such payments or benefits to third parties for their benefit.

V. Money Laundering

The Company prohibits money laundering of any form in connection with its business. Money laundering is the concealment of an illegal source of income or the disguise of illegal income to make it appear legitimate. Countering money laundering is of critical importance as it ensures that illegal funds do not remain hidden and do not get integrated into legal business and consequently into the legal economy.

We must conduct business only with reputable customers who are involved in legitimate business activities. Personnel must be alert to money-laundering risk "red flags" that could signal questionable financial transactions, and shall report to the Company's CFO or General Counsel to arrange additional due diligence and review, prior to completing any flagged transaction. See Schedule "A" for a non-exhaustive list of money-laundering risk "red flags."

VI. Employee Responsibilities

Training and implementation standards will be provided on a periodic basis to ensure Personnel are aware of and familiar with this Policy and its application. Suspected violations should be reported immediately to the Company's CEO, CFO or General Counsel, or through the Whistleblower hotline. Employees should contact the Company's CFO or General Counsel with any questions or guidance regarding the interpretation of this Policy.

Personnel who see something suspicious are required to say something, even if it is their manager or other superior who may be violating this Policy. Any report will be fully investigated, documented and logged, and the Company will evaluate responses. The Company will use its best efforts to keep the identity of those involved confidential without the permission of those who were the target of or who witnessed the incident, and only then if the Company determines there is a bona fide business or other purpose for doing so.

We prohibit retaliatory action against any person who, in good faith, reports a possible violation; however, it is unacceptable to file a report knowing it to be false.

Failure to comply with this Policy or related laws will subject Personnel to disciplinary measures, up to and including discharge from the Company. Legal violations also may result in civil or criminal penalties for you, your supervisors and/or the Company.

VII. Governance

The Company commits to ensuring that we meet the standards of this Policy at all levels of the Company, at all of our facilities and wherever we transact, and ensuring our Personnel are aware of our commitments and expectations. We aim to do so through regular trainings, certifications and periodic assessments.

Our Management is responsible for the governance of this Policy and for administering and ensuring its implementation and success. Reporting to the Board's Governance and Nomination Committee will be done annually, or more frequently as required.

VIII. Interactions with Other Policies

This Policy supplements and should be read in conjunction with the Company's other policies that may be applicable to our Personnel, including without limitation the Company's Code of Conduct; Whistleblower Policy; Vendor Code of Conduct, Respectful Workplace Policy, and Corporate Disclosure Policy, Security Trading Policy and others that may be adopted and as listed on the Company's Governance website.

IX. Amendments

This Policy will be reviewed from time to time and may be updated or replaced with the authorization of the Board as recommended by the Governance and Nomination Committee.

Effective Date: May 24, 2024

Approved by: Board of Directors of the Company

Schedule A

Corruption "Red Flags"

Transactions and other business arrangements generally may not proceed if there are any "red flags" that have not been resolved and/or properly evaluated by the Company's Vice President, Government and External Affairs, following consultation with the Company's CFO and General Counsel. Where you wish to proceed with a transaction or business arrangement that raises any "red flags," you must resolve the "red flags" and/or refer the transaction or business arrangement to the Company's Vice President, Government and External Affairs for review and guidance, as appropriate under Company's policies and procedures. The following non-exhaustive list presents examples of such "red flags." All Personnel must beware of any circumstances of each business opportunity or interaction that could indicate additional "red flags" for corruption or Bribery.

a) The other party has a reputation for bribery and/or corruption.

b) The other party has refused to promise that it will comply with anti-bribery laws and/or anti-corruption laws.

c) The other party has refused to warrant in a commercial agreement that it has not paid Bribes or engaged in corruption.

d) The other party seeks a commission that is excessive, is paid in cash or cash equivalent, or is otherwise irregular.

e) The other party seeks payment to an account in the name of another party or at a location unrelated to the transaction (for example, an offshore account).

f) The other party is owned in part by a Government Official or his or her family member or otherwise has close ties to a Government Official.

g) A Government Official suggests hiring a particular adviser to help obtain a government contract or address an issue that is within the jurisdiction of that official.

h) The other party has requested that the Company prepare false invoices or any other type of false documentation.

i) The other party is related to a Government Official who is in a position to grant a business advantage, or is involved in a business in which such official owns an interest.

j) The other party insists that his or her identity not be disclosed to a government agency or enterprise.

k) The other party refuses to identify its owners, partners or principals.

l) The Company is informed that a donation to a specific charity is needed to generate or facilitate government action.

m) The justification for hiring a new agent or other intermediary is that he/she can obtain preferential treatment from a Government Official.

n) The hiring of an agent or other intermediary is suggested to perform tasks that require no special knowledge or skills, or could easily be performed by the Company's Personnel.

o) There is substantial or extravagant "wining and dining" of Government Officials.

p) There is sponsored travel for Government Officials and/or family members where there is no clear and legitimate business purpose.

q) Relatives of important Government Officials are on the payroll of the other party.

r) The other party has relevant expenses that cannot be explained or that lack supporting documentation.

s) The other party has “off the books” receipts or expenses that are relevant to the contemplated transaction.

t) The other party has poor internal controls or record-keeping practices that are relevant to the contemplated transaction.

Money Laundering Risk Red Flags

As with corruption standards, “red flags” may indicate the potential for a money-laundering risk. These “red flags” include but are not limited to:

a) A vendor or customer is reluctant to provide the Company with requested information or provides insufficient, false or suspicious information.

b) An agent or intermediary declines to provide the identity of its client or principal.

c) Unusual pricing discounts without any legitimate explanation.

d) Complex or unusual payment or transactional structures.

e) Payments involve a refund component (e.g., payment by credit card, followed by a wired refund).

f) Request for payment through an unrelated country or party.

g) Ties to high- or medium-risk countries for money laundering by the Financial Action Task Force on Money Laundering (“**FATF**”), as described below.

The FATF, which identifies countries at risk for money laundering and sanctioned countries, should be consulted when unusual jurisdictions are implicated in a potential transaction. When implicated, no potential transaction should be undertaken without the approval of Company’s CFO and General Counsel.