LithiumAmericas

Vendor Code of Conduct

June 2024

I. Objective

This Vendor Code of Conduct ("**Code**") reflects the commitment of Lithium Americas Corp. ("**LAC**" or the "**Company**") to a culture of honesty, integrity and accountability, and outlines the basic principles, policies, and business practices with which the Company's Vendors are expected to comply.

II. Scope

We require the highest standards of professional and ethical conduct from our Vendors. Our reputation for honesty and integrity is important for the success of our business. We expect our Vendors will satisfy contractual requirements and comply with applicable laws, regulations and the Company policies and procedures. We will enforce this Code within our Company and communicate our commitments and expectations to our Workforce, and we will engage with Vendors and any other external partners in a manner consistent with principles of this Code.

III. Definitions

"**Consultant**" means any person retained to provide professional consulting services to the Company and/or regularly works from the Company's offices.

"**Contractors**" means any person working on a temporary or short-term basis for the Company.

"**Director**" means a member of the Board of Directors of the Company.

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

"**Management**" means LAC employees who directly report to the Chief Executive Officer or Chief Financial Officer, have an Executive Vice President or Senior Vice President title, or other Officers of the Company.

"**Materials**" means any products, byproducts, samples, equipment, raw materials, developmental samples, warehoused items that are owned and/or produced by LAC on Site or otherwise.

"**Officer**" means a LAC employee appointed by the Board or Chief Executive Officer of the Company in accordance with the Company's Articles.

"**Site**" any of the Company's project sites, operations and/or office locations.

"**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, service providers, contractors, sub-contractors, and agents.

"**Workforce**" means all LAC Directors, Management, Officers, Employees, Consultants, Contractors and anyone working at a LAC project, operation or office, or for LAC from another remote location.

IV. Specifics of this Code

1. Health and Safety

The Company is committed to the achievement of high standards for health and safety management. Our goal of zero workplace safety incidents is enforced through regular safety training and ensuring that every person working at a Site is provided a clean, healthy and safe working environment that meets or exceeds regional legal standards. Refer to the Company's Drug and Alcohol Policy for full information about the Company's commitment to provide a safe, efficient and productive work environment, including eliminating substance abuse and its effects on Site.

Vendors are required to demonstrate they have safety training for their workers and subcontractors, procedures in place to enforce a goal of zero workplace safety incidents, and tools in place to track safety performance.

Vendors will promptly communicate any safety concern related to any Site or from the handling of any Materials related to LAC. Safety concerns or suggestions can be made at any time to any Company representative, or through the Company's anonymous reporting channel. Refer to the Company's Whistleblower Policy for full contact details.

2. Environmental

The Company expects our Vendors to continually strive to protect the communities and environments where they operate. This includes respecting the environment by adhering to applicable local, national and international environmental laws, as well as international industry standards to ensure their operations meet best practices, conducting environmental impact assessments and developing, monitoring and implementing mitigation tools to prevent environmental risk.

The Company encourages Vendors to go beyond compliance obligations to integrate additional environmentally sustainable practices throughout their company. Vendors are also encouraged to take measures to increase innovation and efficiency throughout their companies and reduce their carbon footprint, energy use, water use, material use, wastes and other emissions. Vendors should have a sustainable procurement policy in place to communicate sustainability expectations through their supply chain.

3. Human Rights

The Company expects all suppliers to have policies and processes in place to prevent, mitigate and take effective measures to remediate adverse human rights impacts. Including committing to respect the foundational principles identified in the International Bill of Human Rights and the International Labour Organization Conventions and to cascade similar expectations throughout their own supply chain.

The Company requires our Vendors to have processes in place to adhere to the Company's Human Rights Policy, including but not limited to:

A. Foster an equitable, diverse and inclusive workplace, so that everyone feels welcome and enjoys working with us as per the Company's Diversity, Equity, and Inclusion Policy;
B. Abstain from the use of any form of child labour, forced labour or human trafficking in or around their operations;
C. Promote fair and honest treatment of their workers, guaranteeing reasonable hours consistent with the job performed, rest breaks and resources to perform the required job duties; and
D. Reject any kind of discrimination, harassment, or misconduct, and ensure no one is subject to any form of abuse to provide a safe work environment space, as per the Company's Respectful Workplace Policy.

Vendors will keep and provide to the Company upon request, exact records of all matters related to human rights cases and suspected or actual violations relating to the Vendor's business with the Company.

4. Business Integrity

A. Ethics

The Company is committed to the highest standards of ethical conduct and seeks to do business only with Vendors who share these values, including standards of fair business, advertising and competition. We conduct our business transactions fairly, properly and impartially and expect the same from our Vendors. 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, export controls and economic sanctions. Vendors will also 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.

B. Anti-Corruption/Anti-Bribery

Vendors will comply with the Company's Integrity Policy and all applicable laws regarding fair competition and anti-trust and not engage in or tolerate corruption, bribery, money laundering, embezzlement, extortion, knowingly accept funds acquired through illicit means or fraud in any form. This includes giving or receiving anything of value, including money, gifts or unlawful incentives to improperly influence actions or any other dealings with governments and government officials (including close family members), customers or any other third parties. These standards apply both to the Vendor's direct and indirect actions through agents, sub-contractors or other third parties. Vendors will implement monitoring, record keeping and enforcement procedures to comply with anti-corruption laws and policies.

C. Recordkeeping and Disclosure of Information

Vendors will accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation and performance in accordance with applicable regulations. All of the Vendor's business dealings will be transparently performed and accurately reflected in their business books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable. Vendors will keep and provide to the Company upon request, exact records related to fair competition and accurate accounting of all matters related to the Vendor's business with the Company.

D. Privacy

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. Any 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.

E. Responsible Minerals Sourcing

We recognize the importance of mitigating any inadvertent adverse impact that the Company demand for minerals from Vendors may cause to the environment, society and people in regions where the minerals are extracted or processed. The Company understands that certain minerals predominantly originate from Conflict Affected and High-Risk Areas, including the Democratic Republic of Congo ("**DRC**") and its adjoining countries, where there are heightened concerns that proceeds from minerals could be used to contribute to armed conflict or human rights abuses. These minerals include tin, tungsten, tantalum, gold, mica and cobalt ("**3TG Minerals**") that are extracted or processed in certain areas and contribute to armed conflict in the DRC and its adjoining countries.

The Company's goal is to avoid sourcing minerals in a way that contributes to armed conflict or human rights abuses. The Company requires that its Vendors undertake risk-based due diligence in minerals sourcing, and any supplier sourcing 3TG Minerals for the Company shall implement due diligence and management practices in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from designated Conflict Affected and High Risk Areas, in order to address responsible mineral sourcing. If the Company determines that a supplier has not fulfilled responsible sourcing requirements, we will endeavor to obtain an acceptable remediation including directly communicating with Vendors and making available compliance education and training. We may also reassess our business relationship with a Vendor if identified violations are not remedied.

F. Export Controls and Economic Sanctions

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.

V. Application, Reporting and Compliance with this Code

A. Application and Implementation

The application of this Code in any country or jurisdiction shall conform to all applicable laws, directives or regulations. In cases where the Code principles set forth exceed the requirements of the law, Vendors are required to follow the Code where it is legally permissible.

Vendors will implement systems and controls to promote compliance with applicable laws and the principles set forth in the Code, including policies, processes, training, monitoring and auditing mechanisms, along with maintaining the necessary documentation to demonstrate compliance with the Code. Vendors are expected to communicate these Code requirements to their workers and subcontractors. Vendors are also expected to apply this Code, or similar principles, to their sub-contractors and vendors they work with in providing goods and services to the Company.

Upon request, Vendors will provide evidence of efforts to cascade this Code or requirements materially consistent with this Code through their supply chains.

B. Reporting and Remediation

Subject to any restriction posed by law, Vendors will promptly inform the Company of any concern related to issues governed by this Code and collaborate with the Company in subsequent investigations. The Company prohibits retaliation against any person reporting such a concern. To report a concern, Vendors are encouraged to speak directly to their

Company representative. In addition, employees, contractors, suppliers and others may report concerns of misconduct affecting the Company through the Company's anonymous reporting channels. Refer to the Company's Whistleblower Policy for full contact details.

When potential adverse impacts are discovered, Vendors are expected to investigate, and where appropriate, will engage with potentially affected stakeholders and/or their representatives with the aim of identifying mutually agreeable solutions or remedies and providing for or cooperating in their remediation through legitimate processes. Vendors will cascade this expectation through their own supply chains.

C. Compliance and Questions

Non-compliance with this Code may result in the Company working with the Vendor to implement mutually agreed corrective and prompt actions. If the Vendor is unwilling to correct its non-compliance, this may result in contract termination without notice and/or the Vendor is precluded from future business opportunities. Vendors must promptly implement corrective actions and the Company expects its Vendors to cooperate with such requests should they arise.

Violations of this Code may also constitute violations of law and may result in civil or criminal penalties for the Vendor.

If Vendors have any questions or require further information concerning this Code, please contact your Company representative.

VI. Interactions with Other Policies

This Code supplements and should be read in conjunction with the Company's other policies that may be applicable to Vendors, including without limitation the Company's Code of Conduct; Whistleblower Policy; Corporate Disclosure Policy; Securities Trading Policy; Integrity Policy; Human Rights Policy; Respectful Workplace Policy; Diversity, Equity and Inclusion Policy, and others that may be adopted and as listed on the Company's Governance website.

VII. Amendments

This Code 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: *June 27, 2024*

Approved by: *Chief Executive Officer*