

## Group Code of Conduct

Croda International Plc recognises that all its employees are representatives of the Company and, as such, the reputation of Croda as an employer, customer, supplier, neighbour, business partner, and investment opportunity will be judged, at least in part, on the actions of its employees.

The Company recognises it has a responsibility for all the actions of its employees in connection with the activities of the organisation. In view of this, the Company has drawn up a Code of Ethics that it believes demonstrate that the Company operates in a way that avoids any suggestion of improper or personal motives or actions. This Code of Conduct is intended to enhance the Company's good reputation by operating in conjunction with the Code of Ethics.

Therefore, all employees are expected to conduct themselves in accordance with this Code at all times.

The Company believes that all its stakeholders wish to be associated with an organisation that expects its employees to conduct themselves to high standards in all that they do, in particular:-

- To follow the Croda Vision
- To place the best interests of the Company and your colleagues above personal motives or interests
- To show consideration and respect for your colleagues and ensure there is no discrimination, bullying or harassment, nor tolerate others doing so
- To treat others as they themselves would wish to be treated
- To use behaviour that is appropriate to the local culture
- Be mindful and considerate of the environment in which we operate and show respect towards our neighbours
- Make decisions based on sound, defensible reasons
- Abide by the Company rules and any rules that may be specific to the location you are working at or visiting
- To work to the best of your ability to fulfil your contract of employment
- To be open and honest in everything you do
- To act in a manner consistent with the Company's CSR Policy and aims.

The Company may reasonably be expected to:-

- Nurture and develop the abilities of all employees
- Allow access to training for all employees and provide practical support
- Ensure the safety and wellbeing of all employees in the workplace

- Provide pay and benefits that are timely and in line with local market rates
- Communicate, consult, listen and respect the points of view of employees
- Provide stimulating and challenging work
- Provide an environment without discrimination, bullying or harassment

In case of uncertainty in interpretation, employees should seek clarification from their line managers. Sector Presidents are expected to ensure compliance with this Code of Conduct. Any employee who feels that this Code is being breached may raise the matter with the appropriate manager using the Grievance Procedure. Other relevant policies include, amongst others, the Group Code of Ethics, Disciplinary and Grievance Policy, Attendance Policy, Dress Code Policy and the Bullying and Harassment Policy.

This Code will be applied in the same fair and consistent way to all employees and in accordance with all other relevant policy documents. Failure to adhere to this Code may result in disciplinary action which, in turn, may lead to termination of employment. This Code will be reviewed and updated periodically by Group Human Resources.