

Group Trans Gender Policy

Croda International Plc recognises that there are sometimes differences between physical sex and gender identity/expression. It is the Company's aim to create an inclusive community where people are treated as individuals and are able to express themselves. This policy outlines how the Company will manage circumstances of transexualism and gender reassignment. It forms part of the Company's commitment to equal opportunity and should be read in conjunction with the policies on equal opportunity, diversity, discrimination and bullying and harassment.

A transsexual person is someone who experiences a profound and long-term conflict between their physical sex and their mental gender. Gender reassignment is a process that is carried out under medical supervision for the purpose of reassigning a person's sex by changing physiological or other characteristics of sex, and includes any part of such a process.

Transsexualism is recognised as a genuine medical condition. The Company will afford the same treatment and support to employees with this condition as if they suffered from any other treatable medical condition. They are entitled to be treated with respect and permitted to perform their jobs free from harassment and unfair discrimination. **They also have the right to maintain confidentiality about their personal characteristics at all times.**

The Company will seek not only to eliminate all discrimination on grounds of gender identity, but also to create a working environment based on good relations between all employees. All employees are entitled to receive equal support and protection and the Company will not tolerate any form of bullying or harassment. Any employee found to be doing so would be dealt with using the Company disciplinary policy and procedure.

Once a person (who has been living in their new gender for over two years) applies for a Gender Recognition Certificate, they gain additional privacy protections under the Gender Recognition Act 2004. Section 22 of the Gender Recognition Act 2004 makes it a criminal offence for any person to inappropriately disclose information which they have acquired in an official capacity about an individual's application for a Gender Recognition Certificate, or about the gender history of a successful applicant. If a person has a Gender Recognition Certificate or it could be assumed they might have a Gender Recognition Certificate, then this cannot normally be disclosed further in a way which identifies the person involved without that person's express consent or, more exceptionally, a specific order by a court or tribunal.

If any employee believes that they or another employee has been unfairly treated, they should make a complaint in writing to a senior manager who will treat it as a grievance and initiate the grievance procedure.

This Policy will, as a minimum, comply with all local legislative requirements. In the absence of any local legislation, this policy shall determine the standards to which the Company and its employees will operate. Where there is a conflict, current local legislation will always prevail. Unless referred to in a written statement of terms and conditions of employment, this policy does not constitute and should not be construed as a binding contract of employment or a promise of continued employment between Croda and the employee.

This Policy will be applied in the same fair and consistent way to all employees. It will be reviewed and updated when necessary by Group Human Resources, and any new legislation will be incorporated appropriately.