

CRODA



Smart science to improve lives™

**Code of
Conduct**



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Code of
Conduct

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01



Introduction from Steve Foots, Chief Executive

Croda is a company that we can all feel proud to work for. This sense of pride is underpinned by strong standards of ethical business conduct.

Our success as a business depends upon each of us preserving our corporate reputation and creating an environment where we live by our ethical principles. Every one of us has an important role in helping to maintain Croda's reputation and to create this culture.

This Code of Conduct provides us all with a compass, helping us to know the right direction to follow when making business decisions. These are the standards that my Executive team and I follow, and we expect everyone in Croda to do the same. By writing these principles in this form we hope that everyone will understand their own responsibilities.

Please read this Code of Conduct carefully and think about the implications it has for your day-to-day work. If there is anything that you don't understand or that is not clear, please talk to your line manager, local HR or Regional Counsel.

Thank you for living our values every day and helping to make this a great company.

Steve Foots
Chief Executive

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02



Overview of the Code of Conduct

Responsible and ethical behaviour is fundamental to the way we operate at Croda.

Through Our Purpose, we have set out to create a positive difference to the environment and to society. We will only achieve Our Commitment by striving to do better in all that we do.

Our Code of Conduct sets out the standards that we will work to, our expectations of each other, and confirms everyone's responsibility to speak-up and report suspected or actual breaches of our policies.

The Code is aligned with our three guiding values of 'Responsible', 'Innovative' and 'Together', underpinning how we expect every employee to behave: with integrity and in an open and respectful way.

In practical terms, the Code provides; general guidance on a range of possible situations, what policies are in place to deal with these situations, and where to go for further guidance. The Code cannot cover every eventuality. If specific situations are not covered, the spirit of the Code must be upheld by exercising common sense, good judgement and asking for further help and guidance.

Our Purpose: Smart science to improve lives™

We combine our knowledge, passion and entrepreneurial spirit to create a positive difference to the environment and to society. We have made it our purpose to use Smart science to improve lives™.



Why



Our Commitment

We will be the most sustainable supplier of innovative ingredients. We will create, make and deliver solutions to tackle some of the biggest challenges the world is facing. By 2030 we will be Climate, Land and People Positive.



What



Our Difference

Our people are our difference. Our culture and behaviours are shaped and brought to life by the three guiding values of 'Responsible', 'Innovative' and 'Together'.



How

Who does the Code apply to?

Our Code is mandated for all employees:

- Employees (including former and prospective employees), whether full time, part time, fixed term, permanent or temporary
- Interns, students, apprentices or work experience placements
- Contractors or third-party labour providers where Croda has full control
- Persons who are statutory directors or have equivalent responsibilities
- Employees of joint ventures
- Employees of new acquisitions

We also require all third-party business partners to adhere to business principles that are consistent with our own.

Failure to comply with this Code amounts to a failure to comply with Croda's policies and could have very serious consequences for both Croda and any individuals concerned.

For individuals, these consequences could include disciplinary action, up to and including dismissal without notice. For the Company, any illegal conduct could lead to significant fines, imprisonment for individuals and significant damage to our reputation.



Commitments under the code

We are committed to supporting everyone to adhere to this code by:

- providing a clear set of policies and standards;
- providing training, guidance and information about the Code;
- providing a mechanism to report actual or potential breaches of the Code and Croda's policies;
- responding to and investigating any issues raised, promptly and impartially;
- not tolerating retaliation or discrimination against anyone raising concerns; and
- encouraging our suppliers to adopt the same standards of ethical principles.



We expect everyone at Croda to:

- follow the Code at all times;
- ensure that they read and understand the Code and the associated policies;
- undertake all training related to the Code when asked to do so;
- immediately report any suspected or actual breaches of the Code in the appropriate way (see section 4 – Speaking up); and
- seek advice if they are in any doubt about any aspect of the Code or any behaviours that they have witnessed.



We expect all leaders to:

- lead by example, act with integrity and serve as a role model;
- ensure all of their team members, including any new joiners, have read the Code, complete the Code of Conduct training and know how to raise concerns;
- deliver any training or briefings related to the Code that they are required to do;
- offer support and guidance to their teams about the Code; and
- act to protect any team members that raise concerns, ensuring that they receive support and that there is no retaliation against them.



03 
ResponsibleTogether Innovative 

Our values and behaviours

It is the knowledge, passion and 'can-do' spirit of our people that brings our business to life and we believe that our culture and behaviours are what makes the Croda Difference. We are all inspired by our common purpose of contributing to a better world for everyone, and this is shaped and guided by three shared values: **Responsible, Innovative and Together.**

Responsible

We are **responsible** for our actions and take care of each other, the environment and all of our stakeholders.



We support equal and fair treatment and opportunity for all

We value the uniqueness that everyone brings to our business

We build trust amongst each other, with our customers and with the communities in which we operate

Innovative

We are **innovative**, encouraging all employees to generate and contribute to new solutions.



We create a fun, lively and stimulating environment in which to work

We encourage creativity to develop new and better ways of doing things

We are an agile and responsive business that uses entrepreneurial flair to serve our customers

Our values

The three guiding values of 'Responsible', 'Innovative' and 'Together' are an integral part of our business, rooted in Our Culture. Each value is equally important and the descriptors under each provide the spirit in how we operate.

Together



We work **together** as one global family.

We recognise everyone who makes a positive difference to our business

We have an open culture where everyone can feel included and be treated with respect

We are transparent and foster open authentic communications



How we use Our Values

Through all of our activities, our values help set the tone for the responsible and ethical behaviours expected. On a practical level, these values have been applied within key pieces of work that sit under Our Difference, including the Code of Conduct and a set of competencies that form our Competency Framework.



Our Competency Framework

The Competency Framework is a set of behaviours and skills that reflect what our values may look like in our everyday actions. The Framework is built as a tool to help guide conversations about personal growth, including areas for development and succession planning.



04

Speaking up

If you witness or become aware of any situation that you believe breaches the Code or a Company policy, you should raise your concerns with either your line manager, your local HR representative, or the legal department. Alternatively, you can also raise any concerns with senior managers within the business including any member of the Executive Committee.

If you feel unable to raise your concerns with any individual, employees are encouraged to raise their concerns through the Croda Speak Up reporting line, hosted by an independent third party, NAVEX Global. Concerns can be raised in person to an operator or via a secure web reporting facility. For web reporting, employees should go to croda.ethicspoint.com and the international contact numbers are available on the intranet.

05



Our Code of Conduct

The Code is set out over five areas that are important to the success of our business:

a) Sustainability

b) Safety and health

c) Company

d) People

e) Information

Each part of our Code details the standard of behaviour we expect every employee to adhere to, with information on why it matters and the commitments we make.



A

Sustainability





Our standard

Croda is committed to being the most sustainable supplier of innovative ingredients. We will create, make and deliver solutions to tackle some of the world's biggest challenges and have a positive impact on the environment and society. By 2030 Croda will be Climate, Land and People Positive.

Why it matters

Sustainability is embedded in our strategic thinking and is a crucial part of how we add value to our customers and other stakeholders, such as investors, employees and our local communities.



Croda commits to:

- Maximising the positive impact that its products can have in their application
- Minimising any negative impact from its operations and associated supply chains
- Being a responsible, global citizen through its provision of meaningful employment, payment of taxes, and social responsibility
- Making progress towards our external targets aligned to the United Nations Sustainable Development Goals
- Maintaining strong leadership and governance of sustainability and aligning with globally recognised ESG reporting frameworks
- Collaborating with stakeholders up and down the value chain to advance the sustainability agenda and demonstrate leadership.



Everyone must commit to:

- Understanding the contribution that Croda makes to a sustainable future for the planet by attending relevant training
- Knowing the part that they play in meeting the Company's goals
- Complying with relevant rules and policies which contribute to Croda's sustainability.



Leaders must commit to:

- Communicating about relevant sustainability matters and seeking feedback
- Encouraging new ways of progressing towards the Company's sustainability goals
- Providing relevant training and information to their teams.

Remember: there is only one planet Earth – it is our duty to look after it

For more information please refer to:

- Sustainability Report
- Local Sustainability Champions
- Group Sustainability Team
- Sustainability Committee
- The UN Sustainable Development Goals



Aligning our strategy with the sustainable development goals.



Fundamentals

Health, Safety & Wellbeing	3, 8	Knowledge Management	4
Process Safety	3, 8	Quality Assurance	12
Environmental Stewardship	6, 12, 14	Product Stewardship	3, 12, 14
Fair Income	8	Responsible Business	17
Supplier Partnership	12, 17		

B Safety & health



a) Safety & health



Our standard

We are committed to the health and safety of our employees and all those affected by our activities and products

Why it matters

We believe that all injuries and occupational illnesses are preventable. Our goal is zero harm.



Croda commits to:

- Providing places of work, where the Health and Safety of our employees, visitors and contractors is assured by robust safety management systems
- Pursuing continual improvement through open reporting, investigation of incidents, audit and management review
- Ensuring all our products comply with relevant regulations and are safe throughout their life cycle
- Defining Health and Safety responsibilities and providing information, training, coaching, supervision and assessment of competence to allow everyone to fulfil those responsibilities.



Everyone must commit to:

- Being mindful of and understanding the hazards they are likely to encounter in their work
- Being aware of and following the rules and procedures that apply to them and undertaking required training
- Behaving responsibly and complying with relevant Health and Safety rules and procedures
- Speaking up and reporting incidents openly and in a timely manner
- Getting involved with safety activities and training.



Leaders must commit to:

- Setting high expectations for their teams' behaviours and compliance with Health and Safety rules and procedures, leading by example
- Communicating openly on Health and Safety matters and seeking feedback
- Ensuring that the management of personal Health and Safety risk is part of everyone's jobs, and that relevant information and training is made available
- Promoting safety awareness and confronting poor practice
- Proactive involvement in identifying, prioritising and mitigating Health and Safety risks in their areas of responsibility.

Remember: Nothing we do is worth getting hurt for

For more information please refer to:

- Group SHE manual
- SHE Policy Statement
- Regional and local SHE representatives



b) Mental health and wellbeing



Our standard

We provide investment and support in employees' physical and mental wellbeing

Why it matters

We recognise that sometimes the workplace can cause or trigger physical or mental unwellness. We want to ensure everyone is provided with the opportunity to improve, enhance and protect their mental and physical wellbeing. This will drive an effective and safe working environment and help create good business engagement and resilience.



Croda commits to:

- Providing the resources to monitor and promote good health including access to occupational health professionals
- Creating a safe working environment, free from bullying and harassment
- Providing opportunities for agile working
- Complying with local legislation and practice regarding working hours.



Everyone must commit to:

- Behaving in a respectful and courteous manner in the work environment
- Being aware of the wellbeing of colleagues, looking out for any signs of stress
- Attending all mandated training related to health and wellbeing
- Talking to and cooperating with your line manager, HR, or occupational health if you are feeling stressed or if you are suffering from poor mental or physical health.



Leaders must commit to:

- Avoiding placing unreasonable pressure in the work environment by setting achievable goals and by ensuring regular two-way feedback
- Learning to recognise the signs of stress and mental health issues and if necessary, taking advice from HR or occupational health on the best way to support individuals in these circumstances
- Creating an open and trusting environment within your teams.

Remember: If we take care of each other we can create and enhance the sense of a Croda family

For more information please refer to:

- Group Code of Ethics
- Stress Policy
- Diversity and Inclusion Principles
- Regional and local HR representatives
- Occupational Health



C

Company





a) Anti-bribery

Our standard

We will not tolerate bribery and corruption in any part of our business

Why it matters

A breach of bribery and corruption laws may result in Croda being prosecuted, potentially leading to fines. In addition, any breach can lead to serious damage to Croda's reputation.



Croda Commits to:

- Upholding the highest standards of integrity in our business
- Ensuring that we operate in a responsible manner, complying with anti-bribery rules in each country where we do business
- Ensuring that we provide an appropriate level of anti-bribery training to all of those colleagues who need it.



Everyone must commit to:

- Completing any anti-bribery training assigned to you
- Always making it clear, internally and externally, that we have a zero-tolerance approach to bribery
- Never offering or giving a bribe or improper advantage (including facilitation payments) to any public official, other individual or third party
- Never requesting or accepting bribes or improper advantage from any third party
- Checking that third parties that we work with adhere to the same ethical standards that we do by following the Group ABC procedures
- Using the anti-bribery near miss reporting tool
- Seeking advice from the Croda Counsel in your region if there is anything you are unsure about.



Leaders must commit to:

- Setting high expectations for their teams' behaviours and compliance with relevant bribery and corruption laws
- Providing advice in a timely manner to their teams and seeking further advice from the Croda Counsel, where appropriate.

Remember: we never accept or offer money, gifts or favours to gain advantage for ourselves, a third party or Croda

For more information please refer to:



- | | |
|---|---|
| • Group Code of Ethics | • Local finance director/ manager |
| • Business Gifts and Hospitality Policy | • Regional finance director/ legal counsel |
| | • Group General Counsel and Company Secretary |
| | • Regional HR representative |

b) Competition law



Our standard

We will comply with competition and anti-trust rules in the countries in which we operate

Why it matters

Failure to comply with competition rules (sometimes referred to as anti-trust rules) can result in significant fines, financial damages to third parties, legal costs and damage to Croda's reputation. Criminal sanctions may also apply.



Croda commits to:

- Ensuring that we operate in a responsible manner, complying with competition rules in each country where we do business
- Ensuring that we provide an appropriate level of competition law training to all colleagues who need it.



Everyone must commit to:

- Completing any competition law training assigned to you
- Complying with competition law and ensuring your actions do not pose a competition law risk to the Group
- Seeking advice from the manager and Croda Counsel in your region if you have any questions or if there is anything that you are unsure about.



Leaders must commit to:

- Setting high expectations for their teams' behaviours and compliance with competition laws
- Providing advice in a timely manner to their teams and seeking further advice from the Croda Counsel where appropriate.

Remember: we must learn about, and comply with, the competition and anti-trust laws in all of the countries that we operate

For more information please refer to:

- Group Code of Ethics
- Competition Law Guidance
- Competition Law Policy
- Regional Croda legal counsel
- Group General Counsel and Company Secretary
- Regional HR representative



c) Gifts and hospitality



Our Standard

We will only give and receive gifts and hospitality that are legitimate and proportionate to our business activity

Why it matters

Although hospitality and the giving and receiving of gifts can play a positive role in building relationships with customers, suppliers and other third parties, it can be abused, leading to a breach of bribery and corruption laws or actual or perceived conflicts of interest.



Croda commits to:

- Providing a register for recording the giving and receiving of gifts and hospitality
- Providing training on gifts and hospitality.



Everyone must commit to:

- Disclosing the giving or receiving of gifts or hospitality (regardless of whether accepted) on the Gift Register in a timely manner
- Never accepting gifts or hospitality if you are involved with an active tendering process, or in the period preceding the award of a contract or a pricing discussion
- Following the pre-approval procedure in the Business Gifts and Hospitality Policy before offering a gift or hospitality to a customer, supplier or other third party.



Leaders must commit to:

- Ensuring everyone in their teams is aware of Croda's policy regarding the giving and receiving of gifts and hospitality and that any mandatory training is completed
- Providing advice in a timely manner to their teams about the giving and receiving of gifts and seeking further advice about any areas of uncertainty.

Remember: all gifts and hospitality, other than low value stationery, must be recorded in the Gifts Register, which is available on SharePoint

For more information please refer to:

- Group Code of Ethics Policy
- Regional Croda legal counsel
- Group General Counsel and Company Secretary
- Regional HR representative



d) Conflicts of interest



Our standard

We expect everyone at Croda to act with integrity and to either avoid or manage, with the agreement of the Company, any actual or perceived conflicts of interest

Why it matters

Conflicts of interest, real or perceived, can raise doubts about the quality of business decisions and the integrity of persons making these decisions.



Croda commits to:

- Setting standards to explain what a conflict of interest is and how to manage it
- Providing training for all employees to be able to recognise a potential conflict of interest and know how to manage it.



Everyone must commit to:

- Avoiding any relationship that will impair, or appear to impair, your ability to make decisions in a fair and objective manner and in the interests of Croda. Examples include:
 - working for a competitor, customer or supplier of Croda
 - being part of a recruitment process or directly managing a family member, friend or romantic partner
 - using and/or selecting third party suppliers who include family members, personal friends or a romantic partner
- Promptly reporting any situation that cannot be avoided or already exists to your line manager, with a copy to the regional Croda legal representative, and submitting a 'Conflict of Interest' report
- Promptly taking whatever action is necessary to remove or mitigate the risk of a conflict of interest.



Leaders must commit to:

- Ensuring that everyone in their team is aware of Croda's policy regarding conflicts of interest and that any mandatory training is completed
- Providing advice in a timely manner to their teams about actual and potential conflicts of interest and seeking further advice about anything that is not clear.

Remember: you must promptly disclose any potential conflict of interest and take whatever action is required of you to mitigate the conflict

For more information please refer to:

- Group Code of Ethics
- Conflict of Interest Policy
- Company Secretariat
- Regional Legal representative
- Regional HR representative



D

People



a) Diversity & inclusion



Our standard

We will create an inclusive work environment where everyone can fulfil their potential in a workplace that recognises the value of diversity

Why it matters

Broad diversity of thought can create greater business success by enhancing the ideas we have and the way in which we deliver them.



Croda commits to:

- Building a workplace where everyone feels welcome and can give their best
- Providing training and education on D&I topics for all employees
- Understanding any potential biases in our processes and working to reduce them.



Everyone must commit to:

- Treating everyone fairly, equitably and free from bias on the basis of race, ethnicity, gender, sexual orientation, physical or mental ability, religion, political views or any other of the protected characteristics defined by Croda
- Communicating respectfully with all colleagues, regardless of who they are or their position in the organisation
- Recognising that not everyone shares the same ideas and beliefs, and what is acceptable to one person, may not be acceptable to another
- Challenging bias and encouraging different perspectives in decision making.



Leaders must commit to:

- Ensuring that all people decisions made are free from discrimination and bias
- Seeking to bring in broad diversity of thought and different perspectives to discussions and respecting and listening to the opinions and thoughts of others with an open mind
- Promoting mutual respect between all employees, helping each other to understand difference
- Encouraging constructive feedback, both giving and accepting, as an important part of people development and inclusive work practices.

Remember: our customers and the consumers they serve are diverse. To best serve them, we need to reflect who they are and understand their perspectives.

For more information please refer to:

- Croda's Principles of Diversity and Inclusion
- Local employment policies
- Company Secretariat
- Regional Legal representative
- Regional and local HR representative



b) Fair treatment



Our standard

We are committed to ensuring all those who work for Croda are treated with dignity and respect whilst working for Croda, and acts of unfair treatment will not be tolerated

Why it matters

When someone feels that they have been treated unfairly, it can lead to decreased motivation, low morale, poor performance, stress, anxiety and unhappiness. It can also negatively impact Croda's reputation as a great place to work.



Croda commits to:

- Ensuring that employees are treated fairly, equitably and free from bias
- Protecting employees from any form of bullying or harassment
- Respecting employee rights to join a trade union or other collective employee-representative body
- Providing fair wages that meet or exceed the minimum legal or industry standards
- Providing fair and transparent policies and procedures to manage employee concerns or disciplinary matters.



Everyone must commit to:

- Treating everyone with courtesy and respect and behaving in a respectful way that preserves the dignity of colleagues and any other contacts in your day-to-day work
- Not engaging in any direct or indirect behaviour that is offensive, intimidating, malicious or insulting. This includes any form of harassment or bullying.



Leaders must commit to:

- Acting as a role model and always behaving in a respectful and courteous manner
- Acting quickly and appropriately to deal with any situations of bullying and harassment.

Remember: Croda's business success depends on everyone being treated fairly and with respect so that they can give their very best

c) Human rights



Our standard

We will seek to protect the human rights of every person involved in our operations and supply chain

Why it matters

We believe that business can only flourish where human rights are respected, upheld and advanced. We have a moral and legal responsibility to help create a fair and more equal world.



Croda commits to:

- Ensuring that no forced, trafficked or child labour is used in any of our operations or supply chain through effective monitoring and auditing
- Taking immediate action if any evidence of the use of forced, trafficked, or child labour is found, and supporting the victims of these situations
- Creating a safe working environment free from bullying and harassment.



Everyone must commit to:

- Treating everyone with courtesy and respect and behaving in a way that preserves the dignity of colleagues and anyone else you meet as part of your day-to-day work
- Not engaging in any direct or indirect behaviour that is offensive, intimidating, malicious or insulting. This includes any form of harassment or bullying
- Being alert to any instances of the use of forced, trafficked, or child labour and report any instances immediately
- Completing any mandatory training relating to human rights.



Leaders must commit to:

- Acting as a role model and always behaving in a respectful and courteous manner
- Immediately acting on reports of forced, trafficked, or child labour and taking further advice as required.

Remember: acting to prevent abuses of human rights within our operations or supply chain is central to Croda's values and the maintenance of our reputation

For more information please refer to:

- Group Code of Ethics
- Group Policy on Modern Slavery
- Group Sustainability Committee
- Head of Global Supply Chain
- Company Secretariat
- Regional Legal representative
- Regional HR representative



d) Living wage



Our standard

We will strive to ensure that everyone who works for Croda either directly, as a contractor or through our supply chain earns, a wage sufficient to live a decent life

Why it matters?

Our commitment to the UN Sustainable Development Goals includes a pledge to do what we can to reduce income inequalities and to promote better inclusion.



Croda commits to:

- Providing a framework to assess what a Living Wage is across our global locations
- Working towards all who are directly employed by Croda earning this Living Wage, and to ensuring that it is maintained at this level over time
- Working towards ensuring that everyone who is employed in our supply chain earns a living wage, working with our suppliers to persuade them to meet these requirements.



Everyone must commit to:

- All Croda employees working with suppliers will support our ambition to ensure a Living Wage is paid throughout our supply chain.



Leaders must commit to:

- Holding themselves and suppliers to account for ensuring that a Living Wage is paid to all employees, contractors and everyone working in our supply chain.

e) Performance & development



Our standard

We will provide all employees with timely and constructive feedback about their job performance and provide opportunities for development, training and education

Why it matters

Sincere feedback, provided in an appropriate way, is a good motivational tool and helps ensure that we are working towards the same goals. Development, in whatever form, demonstrates an investment by Croda to help individuals meet their career goals and help ensure they can realise their potential and contribute fully to the success of Croda.



Croda commits to:

- Ensuring that all Croda locations worldwide complete the 'My Croda' appraisal process annually and within the prescribed timetable
- Ensuring that all employees have training to use 'My Croda' effectively and new hires are provided with induction to the process and system.



Everyone must commit to:

- Completing the 'My Croda' objective setting and performance process in a timely and positive manner
- Engaging in performance and development discussions openly, honestly and constructively
- Taking advantage of training and development opportunities provided and proactively seeking opportunities for training and development in line with objectives.



Leaders must commit to:

- Ensuring that the 'My Croda' objective setting and performance process is completed in a timely and positive manner
- Providing fair and constructive feedback and listening to any feedback given
- Providing training and development opportunities that meet the specific needs of an individual.

Remember: performance discussions are a two-way conversation for everyone to give and receive feedback to help engagement, development and productivity

For more information please refer to:

- My Croda site on SharePoint
- Regional and local HR representative
- Regional Learning and Development representative



f) Community & charity involvement



Our standard

We will make a positive social and economic contribution to the communities in which we work and live

Why it matters

Positive community involvement enhances the reputation of Croda, supports our sustainability agenda, provides development opportunities and helps foster one global family.



Croda commits to:

- Providing opportunities for every employee to be involved in supporting their local communities
- Ensuring that all Croda locations worldwide publicise and encourage involvement especially through the 1% Club and Croda Foundation
- Ensuring all Croda locations worldwide contact local community groups and individuals, especially direct neighbours, listening to and, if possible, acting on any concerns
- Establishing and funding the Croda Foundation.



Everyone:

- Must seek approval for any involvement, activity or funding for charity and/or community work
- Is encouraged to look for ways to support local communities through fund raising and volunteering.



Leaders must commit to:

- Ensuring involvement is with organisations that share the same values as Croda
- Supporting and encouraging charity and community work through the 1% Club
- Abiding by the Authorities to Act matrix before committing to any donations.

Remember: the 1% Club enables everyone to donate 1% of their working time to a charity or community group of their choice

For more information please refer to:

- 1% Club information on SharePoint
- Croda Foundation sharepoint site
- Regional and local HR representatives
- Local SHE representatives



E

Information



a) Personal data & privacy



Our standard

We will comply with all relevant data protection laws and regulations and ensure that all personal information is handled appropriately

Why it matters

Everyone has an expectation that we will guard their personal data and use it only for legitimate business reasons. Moreover, there are laws protecting personal data in many of the countries in which we operate.



Croda commits to:

- Providing training and guidance to ensure the secure and appropriate management of data
- Only allowing people and third parties with a valid business reason to access or process personal information held in our care
- Keeping personal data up-to-date, responding to data subject access requests and correcting any inaccurate data
- Only gathering and processing such information that is required for a legitimate business reason, within the boundaries of the consent given by the individual data subject and safely destroying information when it is no longer needed
- Not sharing information, internally or externally, except to individuals that have legitimate business reasons to have access to this data.



Everyone must commit to:

- Understanding and acting upon data protection regulations in the countries in which we work, appropriately for the nationality of the citizens involved
- Taking all reasonable care to safeguard and secure all personal information collected from loss, disclosure or misuse
- Completing any data privacy training that you are assigned.



Leaders must commit to:

- Ensuring everyone in their team is aware of Croda's policy regarding personal data and privacy
- Acting at all times to ensure that any personal data that they hold or have access to is managed in compliance with Croda's policies and procedures.

Remember: only use and hold personal data that you are authorised to have and destroy it safely as soon as you no longer require it

For more information please refer to:

- Data Privacy Policy
- Regional and local IT and HR representatives
- Data Governors, Owners and Stewards



b) Confidential information & intellectual property



Our standard

We will protect our own company information and that of our partners, customers and suppliers

Why it matters



As an innovative, science-based company, information and knowhow are some of our most valuable assets. Our intellectual property (IP), trade secrets and other sensitive commercial information must be kept confidential. Any inappropriate disclosure can lead not only to loss of business, but may also lead to fines or claims by third parties, as well as reputational damage.



Croda commits to:

- Providing a system to classify and manage confidential information and intellectual property
- Providing the necessary training and guidance to employees to ensure that they understand how to protect confidential information and intellectual property.



Everyone must commit to:

- Understanding how to classify and manage confidential information and intellectual property in an appropriate manner
- Respecting the intellectual property rights of other companies and individuals
- Not disclosing confidential information to any third party without the consent of your manager

- Taking care that when using publicly available text, images, videos and music that you are not breaching any copyright.



Leaders must commit to:

- Ensuring everyone in their team is aware of Croda's policy regarding confidential information and intellectual property.

Remember: if you are unsure, take advice on what is confidential information and IP

For more information please refer to:



- IP Policy
- Information Classification Policy
- Intellectual property department
- Regional and local IT and HR representatives
- Data Governors, Owners and Stewards
- Regional legal representatives

c) Social media



Our standard

We will encourage everyone to use social media in a positive way that promotes Croda and its products and enhances our reputation

Why it matters

Social media is an established tool used to brand and market companies, products and services, and is increasingly being used as a tool to promote careers and recruit into vacant roles. The positive representation of Croda and everyone associated with us via company and personal social media accounts, is a key component to maintaining the reputation of the company.



Croda commits to:

- Providing a clear policy and guidance regarding the acceptable use of social media
- Providing training to ensure that everyone can adhere to these standards.



Everyone must commit to:

- Obtaining formal approval from your manager before undertaking social networking for business purposes
- Being clear when using social media whether you are acting in a personal or professional capacity
- Never posting insulting, harassing, derogatory, libellous, obscene, sexually explicit, racist, abusive or discriminatory content
- Never disclosing company confidential or insider information
- Only using social media accounts on external networks designated to Croda if you have been authorised and trained to do so
- Getting the express permission from any employee before posting or publishing personal information about them.



Leaders must commit to:

- Ensuring that everyone in their team understands how to use social media in a positive way and how Croda's reputation could be damaged if inappropriate messages are posted.

Remember: think carefully before you post anything on social media that is related to or can be associated with Croda and our business activities

For more information please refer to:

- Group Policy – Social Media Policy
- Regional and local HR representatives
- Local SHE representatives



d) Acceptable use policy



Our standard

We will ensure that our IT assets are used appropriately and responsibly and are safeguarded from loss, disclosure or misuse

Why it matters

Information and communication are integral parts of Croda's business activities and essential to our business success. We protect these systems to keep personal and company information secure and to ensure that it is used legally and appropriately by ourselves and where appropriate by approved customers and third parties.



Croda commits to:

- Formally authorising staff to access the Croda computing and communications associated with their jobs
- Only monitoring, recording, inspecting or removing material from IT assets to the extent permitted by local law.



When using Croda devices, everyone must commit to:

- Only using passwords and other sign on credentials allocated to you
- Choosing strong passwords and keeping them secure and confidential
- Being vigilant for phishing attacks and notifying IT of any of these attacks promptly
- Refraining from disabling, defeating or circumventing security features or connecting unauthorised equipment to Croda's network
- Only using approved or provided software and network

- Not deleting, destroying or modifying IT systems or software
- Abstaining from accessing, storing, sending or posting material that is pornographic, sexually explicit, indecent or obscene, or that promotes violence, hatred, terrorism or intolerance.



Leaders must commit to:

- Ensuring that everyone in their team understands how to use IT assets in a safe and secure manner.

Remember: you should use and protect the Croda information and IT devices assigned to you responsibly

For more information please refer to:

- Group Policy - Standard Acceptable Use of Croda Computing and Communication Resources
- Regional and local IT representatives



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Facilitation payment

Unofficial payment made to a public official to secure or speed up the performance of a routine action; these payments are illegal in most countries.

Inside information

Confidential information about the company that, if made public, would impact Croda's share price.

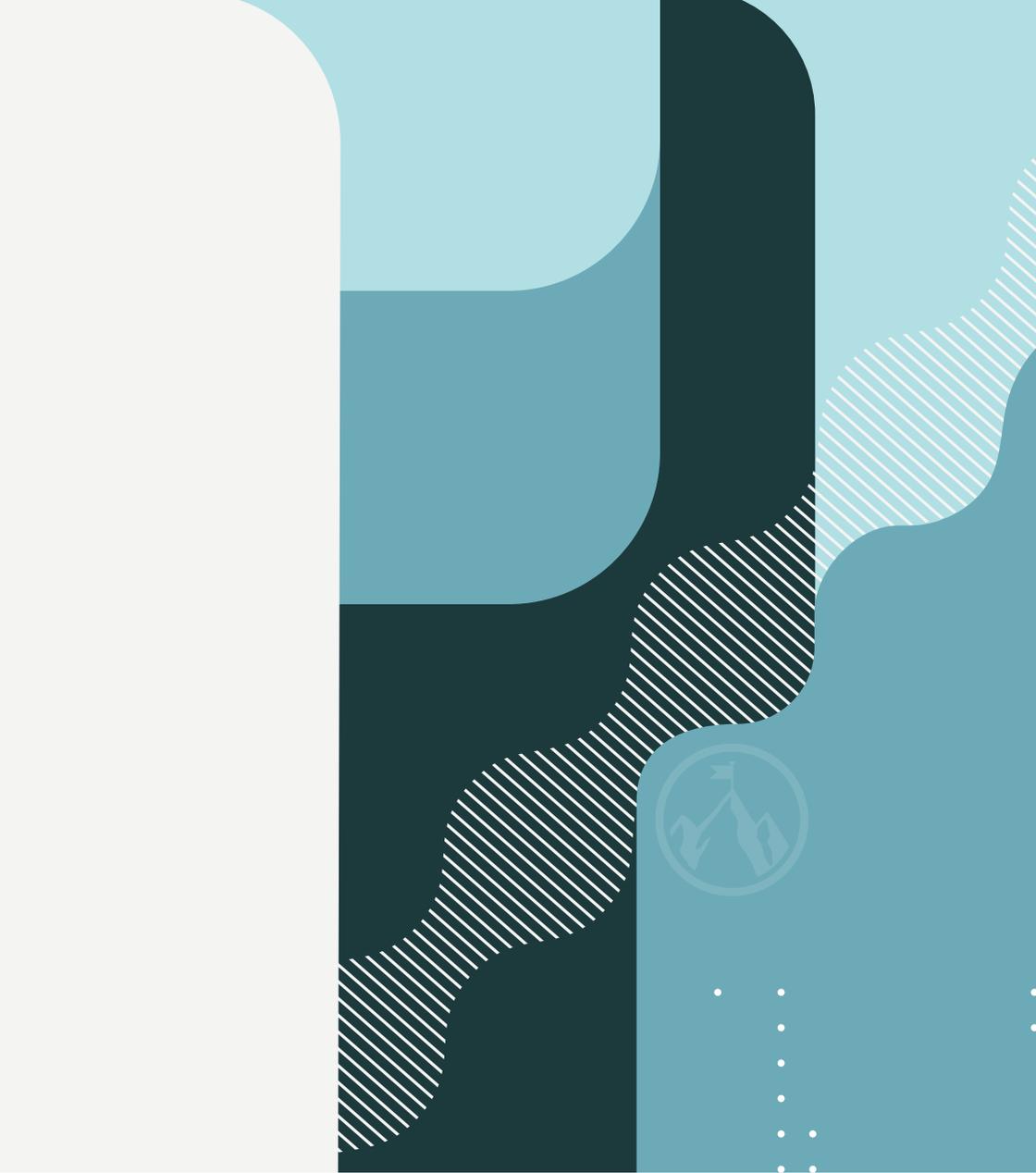
Improper advantage

The offer of a gift which may be perceived as intended to cause the recipient to act in favour of the giver.

Employee

Someone with a direct employment relationship with Croda and includes:

- Employees (including former and prospective employees), whether full time, part time, fixed term, permanent or temporary
- Interns, students, apprentices or work experience placements
- Contractors or third-party labour providers where Croda has full control
- Persons with statutory director roles or equivalent responsibilities
- Employees of joint ventures
- Employees of new acquisitions.



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