

Group Code of Ethics

It is the policy of Croda International Plc to conduct its business at all times and throughout the world with honesty and integrity. In the Croda Vision the Company has pledged that, “we will continue to be an ethical and responsible company.”

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 believes that the ethics demonstrated by our employees should give all customers, shareholders, suppliers, colleagues, business partners and regulators confidence that the Company operates in a way that avoids any suggestion of improper or personal motives or actions.

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 ethical organisation which publicises and upholds high standards in all that it does, in particular:-

- We will comply with the law in each country in which we do business including laws relating to unfair competition/anti-trust.
- We will not offer to pay, solicit or accept bribes in any form whether directly or indirectly. This includes payment or receipt of “facilitation payments” which are small payments or gifts made as common practice in some countries to obtain approvals, permits, etc more speedily – they are still bribes. Croda promotes measures to eliminate these types of payment. Employees should ensure they comply with all local laws and regulations. If you are requested to make a payment which you believe may be a facilitation payment you should consult your line manager.
- We will only give or receive gifts and entertainment that are not material or regular. Local management in each country will establish guidelines reflecting local custom as to the maximum permitted value and the circumstances in which such gifts and entertainment are acceptable.
- We will record in our published accounts all material assets and liabilities and not maintain secret accounts.
- We will not make political donations anywhere in the world.
- We will not engage in commercial espionage or covert surveillance of our competitors.

Agents and distributors in countries where Croda is not directly represented are expected to comply with this Code in all matters in which they are acting on Croda’s behalf. Local management are expected to monitor compliance and to report any significant breach to the Company Secretary of Croda International Plc. In case of uncertainty in interpretation, employees should seek clarification from their line managers.

All employees have the right to make confidential reports direct to the Company Secretary of Croda International Plc at Cowick Hall, Snaith, East Yorkshire DN14 9AA, United Kingdom, without fear of detrimental action being taken against them. **Failure to adhere to this Code may result in disciplinary action.**

This Code will be applied in the same fair and consistent way to all employees and in accordance with all other relevant policy documents.