

Croda International Plc - Our Compliance Statement

Croda International Plc is a manufacturer of speciality chemicals with over 5500 employees and 92 sites worldwide. Our Purpose is to use Smart science to improve lives™, enabled by our distinctive values-led culture, which brings together our in-house knowledge, passion and entrepreneurial spirit. This governs how we interact with our customers, how we work with each other, and guides our relationships with partners. We strive to conduct our business at all times in accordance with applicable laws and regulations, including the following:

Antitrust compliance: Competition laws are intended to ensure that businesses compete fairly to maximise consumer welfare by delivering products and services at the best possible prices and to ensure that businesses are free to operate fairly in the market. At Croda we compete fairly to ensure higher quality products, wider choice and more innovation.

Compliance with bribery and corruption regulations: Bribery occurs where there is an intent to give someone a financial or other advantage to encourage that person to perform their functions or activities improperly or reward that person for having already done so. It is an inducement for an action which is illegal, unethical or a breach of trust, and can take the form of gifts, loans, fees, rewards or other privileges. At Croda we have a zero-tolerance approach towards bribery and corruption.

Data privacy compliance: Croda commits to complying with all the relevant data protection laws and regulations and ensuring that all personal information is handled appropriately.

Respecting human rights: Croda is strongly committed to upholding and respecting human rights. Our Human Rights Policy supports principles set out in the UN Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the International Labour Organization's Fundamental Conventions and states the commitment to respecting everyone's human rights in all aspects of our operations.

Tax compliance: Croda operates to the highest ethical standards of financial integrity and transparency and has zero tolerance for any activity relating to the criminal offence of tax evasion. We expect all our employees and associated persons to adhere to the same high standards, always aligned to Our Purpose and Values.

Our success as a business depends upon us preserving our reputation and creating an environment where we live by our ethical principles. Any breach of the applicable laws and regulations can lead to serious damage to our reputation. In addition, a breach of these laws and regulations may result in Croda or individuals being prosecuted, potentially leading to fines and/or imprisonment.

Our standard

Through our Purpose, Smart science to improve lives™, we are firmly committed to upholding the highest standards of integrity and ethical behaviours in our business dealings in all our global activities, and we will not tolerate non-compliances with the applicable laws and regulations in any part of our business, in any country.

Our compliance principles

- To have a senior management team that demonstrate strong ethical leadership, setting high standards of integrity for themselves and their teams and provides a visible example in their commitment to ethics.

- To comply, as a minimum, with all anti bribery and corruption, competition, human rights, data privacy and anti-facilitation of tax evasion laws and regulations in the countries in which we operate, but in addition to set our own demanding internal standards which we will strive to comply with across all our global businesses.
- To establish, implement and maintain an ethical management system, incorporating policies and procedures to prevent non-compliances in any part of our business.
- To identify and assess compliance risks associated with our business and prioritise and control such risks.
- To define and communicate responsibilities for prevention of non-compliances to our employees and associated third parties.
- To provide appropriate information, training, coaching and supervision for our employees and associated third parties in order to enhance their awareness of and prevent non-compliances.
- To review compliance with and the effectiveness of our ethical management system and use incident investigations and audits to stimulate continual improvement.
- To monitor and evaluate our performance through a balanced set of leading and lagging indicators.

It is my belief that our zero-tolerance approach towards non-compliance is essential to preserve our corporate reputation and is vital to ensure the long-term future of Croda. I firmly believe that adherence to these principles will assist us in living up to our Purpose and our high ethical standards and I am personally committed to providing the leadership and resources.



Steve Foots, CEO – December 2023