

Croda International Plc Human Rights Policy

1. Overview

Croda is committed to respecting everyone's human rights in all aspects of our operations. We believe that we have a responsibility to ensure that human rights are understood and observed in all the countries that we operate.

We support the principles set out in the following international standards:

- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- The International Labour Organization's Fundamental Conventions

2. Scope

This policy applies to everyone within the Croda Group, including all directors, officers, employees (whether employed on a temporary, fixed term, permanent or part-time basis), workers and contractors. It is expected that suppliers, comply with the law as a minimum and should do their utmost to comply with the principles of this policy.

3. Enforcement

Any breach of this policy may result in an investigation under the local relevant Discipline and Grievance policy (if applicable) and may result in disciplinary action being taken; for non-employee's other enforcement action may be taken. Employees should consult their local HR teams for more information.

4. Policy

We strive to respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. It is every employee's responsibility to maintain a work environment that reflects respect for human rights and that is free from all discrimination and harassment.

If any employee believes that someone working at Croda, one of our suppliers, or a contractor is violating this Human Rights Policy and/or the law, they are asked to report it immediately to their line manager, local HR representative, or through the Whistle-blower process.

We expect our suppliers and contractors to also have in place processes to enable their own staff to report any concerns, and we reserve the right to monitor these as appropriate.

5. Key Policy Areas

We have identified the following main areas of responsibility:

a. Equality and Diversity

Our commitment is to provide a safe and inclusive working environment where all people are treated fairly and with respect. We require our suppliers and contractors to comply with any local legislation that applies to equality and diversity, as well as adhering to our behaviours and values, supporting us in the delivery of 'Our Commitment'.

b. Freedom of Association and Collective Bargaining

We respect the right of our employees to join, or not to join, a trade union and as such, they are free to join an organisation of their choice to represent them in line with local legislation.

Collective Bargaining is allowed and operates at a number of our global sites. We require our suppliers and contractors to respect their employees' right to freedom of association.

c. Labour rights

We provide fair working conditions for our employees including terms and conditions of employment, remuneration, working hours, resting time, holiday entitlements, maternity/paternity/adoption leave and benefits; we comply with all applicable legislation. We require our suppliers and contractors to comply with all applicable local legislation, as well as adhering to our behaviours and values, supporting us in the delivery of Our Commitment.

d. Wages

Croda is committed to ensuring that their direct employees are not paid lower than that required by law and aspires to be a "Living Wage" employer globally. We require our suppliers to comply with all applicable legislation or, if there is no applicable local law in the country in which they operate, ensure that their employees' pay will not be less than the level paid generally within that industry.

e. Forced Labour (Slavery)

Croda has a policy of zero-tolerance towards acts of modern slavery that are unlawful and are a violation of fundamental human rights. We require our suppliers and contractors to comply with all applicable local legislation, as well as adhering to our behaviours and values, supporting us in the delivery of Our Commitment.

f. Safe and Healthy Workplace

We are committed to delivering high standards of health and safety management and aim to continually improve our performance, always seeking to reduce risk. We believe in always doing the right thing and in doing it safely, without unnecessary risk to people's health and will comply with all relevant legislation. We require our suppliers and contractors to comply with all applicable legislation, as well as adhering to our behaviours and values, supporting us in the delivery of Our Commitment.

g. Child Labour

All Croda locations must comply with all relevant legislation regarding Child Labour; we will not employ young persons under the age of 18 in a hazardous role, or at night. We do not tolerate the use of child labour and require that our suppliers do not use children in their operations (including in their value chain).

6. Training and awareness

All staff receive regular relevant mandatory training in a range of Human Rights issues including Anti-Bribery, Health and Safety and Diversity and Inclusion.

7. Control

This policy will be monitored through regular auditing and/or workplace inspections as appropriate. Supplier on-boarding assessments will ensure human rights are adequately respected, and their ongoing audit and/or review (as appropriate) will ensure continued compliance with this policy.

The effectiveness of this policy will be measured through supplier data, as well as any relevant reports via the whistle-blower process and/or our regular meetings held with elected representatives.

8. Review

This policy does not form part of any employee's contract of employment and may be amended at any time.

9. Definitions

Supplier – This term refers to any business or company employed by Croda to deliver a service, carry out work within Croda's undertaking, provide products / goods / materials to Croda.

Legislation – Acts, Regulations and Orders for the jurisdiction/country in which Croda or a supplier operates.

Our Commitment – This is a set of guiding targets set out under Our Purpose, Smart Science to Improve Lives, and is part of our drive to be the most sustainable supplier of chemical ingredients.

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Document History

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