







The ICL Code of Ethics includes our commitment to take responsibility for our actions and to treat others with respect. These values are the core principals of our Human Rights Policy and our pledge to conduct our business in a manner that respects the human rights of our employees, partners, and people in the communities where we operate.

ICL supports and respects internationally recognized human rights and relevant labor and employment laws for the areas in which we operate, among these the Universal Declaration of Human Rights adopted by the United Nations in 1948 and the ILO Declaration on Fundamental Principles and Rights at Work, as well as the UN Global Compact's ten principles.

All ICL employees and business partners working on behalf of ICL must adhere to the following human rights principles in addition to ICL's Code of Ethics and compliance programs. Non-Compliance with these principles can lead to disciplinary actions up to termination of employment or contract.

****Human Rights Principles:

1. Employment is Freely Chosen

ICL prohibits compulsory labor which includes prison labor, bonded labor, military labor, slave labor, and human trafficking. ICL forbids the use of economic pressure on individuals to perform labor or maintain employment. ICL believes that all workers have the right to freely terminate their employment after any legally required notice.

2. No Inhumane Treatment

ICL prohibits the use of threats or actual physical or psychological violence, abuse, harassment, intimidation or coercion.

3. No Discrimination

ICL respects the right of our employees to be treated with respect and dignity. ICL has a zero-tolerance policy for discrimination or harassment in any form, against any person based on, including but not limited to, their religion, race, ethnicity, nationality, gender, sexual orientation, age or disability. ICL supports the provision of equal opportunities to all its employees and candidates for employment.

Page 1 of 3





4. Freedom of Association and Collective Bargaining

ICL respects the rights of our employees to form, join, and/or participate in workers' organizations and to exercise their rights to engage in collective bargaining. ICL maintains an open channel of communication with our employees.

5. Safe Working Conditions

ICL is committed to eliminating Environmental, Health, Safety, and Security incidents and complying with all regulatory requirements by taking a proactive approach that empowers employees to identify at risk conditions and behaviors and to learn from them to eliminate hazards and minimize risk.

6. No Child Labor

ICL strongly believes that children and young people have the right to a quality education. ICL prohibits hiring persons under the age of 16 years of age and is committed to complying with the minimum age of employment required by the laws of the countries in which we do business.

7. Fair Wages & Benefits and Reasonable Hours

ICL believes that employees who work a standard work week should receive wages that exceed their basic needs. ICL also respects employees' need for life outside of work. To that end ICL is committed to ensuring that all applicable labor and employment laws are followed, and to ensure that all working conditions, including but not limited to wages, benefits and hours of work are always respected and adhered to.

8. Regular Employment

ICL follows all applicable labor and employment laws and practices and is committed to meeting our responsibilities for those working on our behalf by avoiding contracting, subcontracting, or other arrangements aimed to bypass legal and social obligations.

Page 2 of 3







Corporate governance mechanism

In case of a lack of clarity regarding the Human Rights policy or its application within ICL, one should contact the "Human Rights Forum" consisting of the Global Compliance Officer, relevant Regional Compliance Officer, Head of the Human Rights Committee and relevant Business Manager/Global Function. If needed, the forum can decide to escalate to Head of Legal, Head of HR and Division President/Head of relevant Global Function. The initial referral will be made to the relevant Regional Compliance Officer who will be responsible for convening and updating the forum.

ICL endeavors to make a future where all persons enjoy the principles listed above. Therefore, it is our responsibility to ensure we are not complicit in human rights abuses, even when local laws do not specifically address them.

To achieve this, the policy will be updated regularly, and employees will receive education, training, and communications related to these topics. Any violations of the Human Rights Policy should be reported to Regional Compliance Officers or to the ICL employee hotline:

www.ICLhotline.ethicspoint.com

ICL management is committed to the Human Rights Policy and pledges to allocate the resources necessary to achieve the goals of this policy.

Page 3 of 3