



# We are ICL

At ICL, we do the right thing, in the right way, every day, by embracing the UN Sustainable Development Goals (SDG's) as our guiding principles, and implementing them in everything we do, driven by care for our people, business partners, communities and the planet.



# Our Code of Conduct serves as **our North Star** for doing the right thing in the right way, by following the guidelines of the UN Sustainable Development Goals. This is how we do it, every day:



We encourage our people to speak up, and care about what they have to say.



We responsibly use our physical, digital and intellectual property, in order to safeguard our ability to grow and thrive.



We put safety as our highest priority. When it comes to protecting our employees, their families, our suppliers, our customers, and our communities we will not compromise.



As a publicly traded company, we uphold the principles of providing truthful, accurate, and transparent financial information and external communications. Additionally, we ensure equitable dissemination of information to the public, thereby ensuring that all our stakeholders are treated fairly and can depend on reliable and timely information regarding our performance and impact.



We strive to create a diverse and harmonious environment where every individual, regardless of their background, can truly feel a sense of belonging.



We respect everyone's freedom and human rights as a cornerstone within our pursuit for a more equitable and inclusive world, free of discrimination and harassment.



We take a stand and say NO to bribery and corruption because we understand that eliminating corruption can lead to more equitable and prosperous societies, and thereby break the chain of poverty.



We touch millions of people with our products and actions every day. **We are ICL. We do the right thing, in the right way, every day.**





## This is how we do it, every day:



We do business with fairness and integrity, by competing vigorously and fairly, following global trade laws and collaborating responsibly with third parties.



We interact responsibly and transparently with our diverse stakeholders, upholding elevated standards of corporate governance and cultivating a culture of honesty and openness.



We foster a culture of innovation that continually exceeds conventional norms, unwaveringly rejuvenating and redefining every aspect of our operations.



We lead in nourishing the world and contributing to food security for a hunger free world.



We lead in energy storage and in safety solutions, in the fight against climate change and for a safe, green and sustainable future.



We give back to our communities and create social impact through meaningful contributions, volunteer work and social development programs.



We touch millions of people with our products and actions every day. **We are ICL. We do the right thing, in the right way, every day.**



Dear partners,

At ICL, our mission is to create impact for a sustainable future. We achieve this purpose by upholding our commitment to doing the right thing, in the right way, every day.

Collectively, we have nurtured a company culture that champions leadership in sustainability. Given this, it's only natural that we decided to embrace the UN Sustainable Development Goals (SDGs) as our guiding principles. The SDGs encapsulate our vision for a better future, and serve as a lighthouse, steering us towards making the right choices in every dimension of our operations, driven by care for our people, business partners, communities, and the planet.

Our new inspiring Code of Conduct reflects our dedication to these guidelines and outlines our expectations as to acceptable behavior and social norms we as individuals, and ICL as a company, should follow, every day. By following these guidelines, we ensure that our actions not only resonate with our own needs, but also contribute to global objectives such as eliminating hunger, promoting environmental sustainability, and fostering social equality.

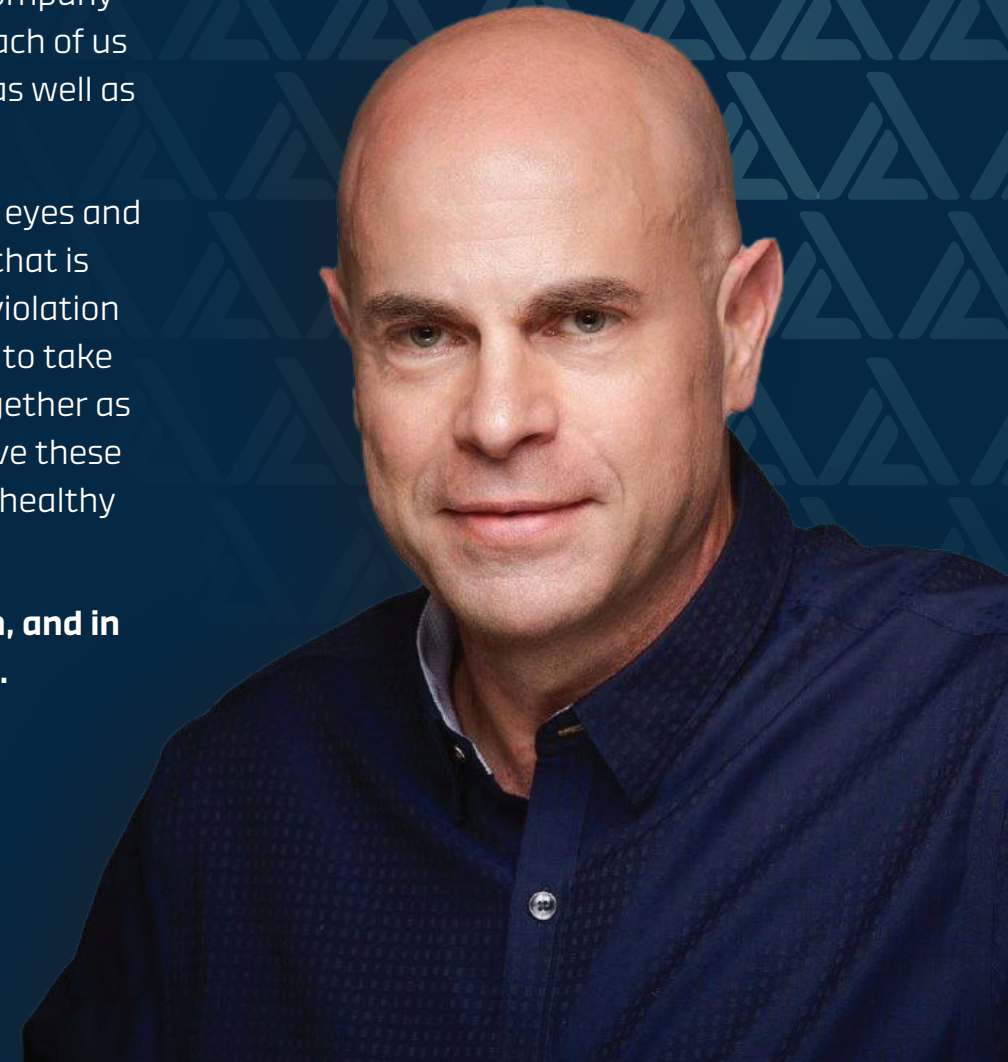
The ICL code is your code. It is our common North Star. It is tailored to equip you with valuable and practical tools to handle ethical and other dilemmas you may encounter in your day-to-day work. But most importantly, it is designed to encourage you to take ownership of ethical behavior. Our ability as a company to reach our ambitious goals is dependent on each of us and our personal responsibility for our actions, as well as for the actions of our colleagues.

I expect each and every one of you to open your eyes and ears, listen, and speak up if you see something that is not right, that seems unsafe or that may be in violation of our Code, our policies, or the law. I expect you to take ownership and lead by example. Clearly only together as a team we will be able to truly succeed to achieve these guidelines and make a global impact for a safe, healthy and sustainable future.

**Thank you for your partnership in this mission, and in our collective journey towards a better future.**



**Raviv Zoller**  
ICL President & CEO



**ICL's Code is Your Code ..... 6**  
What Is the Code and Why Do We Have It? ..... 7  
What is My Personal Responsibility? ..... 7  
Use the Code to Make the Right Decisions ..... 8  
We Lead by Example ..... 9

**We Care About What You Have To Say ..... 10**  
We Encourage Speak Up ..... 11  
ICL Speak Up Line ..... 12  
How Do We Handle a Reported Concern or Issue? ..... 13

**We Care About Our People ..... 14**  
*We Want our Employees to Grow with Us*  
Our People ..... 15  
Your Safety is Our Mission ..... 16  
We Foster Diversity, Inclusion and Belonging ..... 17  
We Do Not Tolerate Discrimination and Harassment .... 18  
We Protect Human and Labor Rights ..... 19  
Political Activity ..... 20  
We Respect Data Privacy ..... 21

**We Care About Our Company ..... 22**  
*We Do What's Right*  
We Care About Our Company Resources ..... 23  
Digital Assets and Cyber Security ..... 24  
We Safeguard Company Information ..... 25  
We Do Not Engage in Insider Trading ..... 26  
We Avoid Conflicts of Interest ..... 27  
How to Disclose a Conflicts of Interest? ..... 28  
We Use Social Media Responsibly ..... 29

**We Care About Our Business Partners ..... 30**  
*We Do Business with Integrity*  
Never Compromise Honesty and Integrity ..... 31  
We have Zero Tolerance for Bribery and Corruption .... 32  
We Collaborate Responsibly with Third Parties ..... 33  
Giving and Receiving Gifts and Entertainment ..... 34  
We Comply With Global Trade Regulations ..... 35  
We Are Committed to Preventing Money Laundering (AML) ..... 36  
We Are Committed to Responsible Marketing ..... 37  
We Compete Fairly ..... 38  
We Interact Responsibly and Transparently with Regulators and Governmental Entities ..... 39

**We Care About Our communities and planet ..... 40**  
*We Impact for a Sustainable Future!*  
We Impact for a Sustainable Future ..... 41  
We Impact through Innovation and Excellence ..... 42  
Our Social Impact ..... 43  
We Donate and Contribute to our Communities Ethically and Responsibly ..... 43



ICL's Code of Conduct is reviewed periodically and shall be amended from time to time, as required.



# ICL's Code is Your Code

No matter what your role is at ICL or where you are located, our guiding principles and our Code should be at the heart of what you do.

**Our Code applies to everyone in our company, everywhere.**





# What is the code and why do we have it?

The Code is our North Star for doing the right thing, in the right way, every day.

ICL's Code expresses our guiding principles and outlines how we do business around the world. By following our Code and always acting with integrity, you play an integral role in supporting our culture of ethical excellence.

**At ICL,** we are committed to complying with the laws, rules and regulations of the countries where we operate.

Global laws and regulations are complex; following our Code and policies will help ensure your compliance with applicable local laws and assist us in fostering a culture of compliance.

## What is my personal responsibility?

### **Act with Integrity and follow our Code.**

- Act in accordance with ICL principles and follow the requirements of this Code and Company policies.
- Act lawfully, honestly, ethically and in the best interests of ICL at all times.
- Complete required training, use the Code and Speak Up when you have a question or concern.
- Cooperate with Company investigations.
- Never retaliate against anyone who raises a concern in good faith about a possible violation of the Code, ICL policies or the law.





# Use the code to make the right decisions

We make decisions every day. Making the right decision is not always easy. Our Code is here to guide you and support you in doing the right thing, in the right way, every day.

Our Code does not explicitly cover every circumstance we might face in our work. Instead, it describes the guiding principles that are our North Star and help to address all situations that may arise.

**We expect all our business partners such as contractors, suppliers, and vendors to follow the principles set forth in this Code. Further information on the guiding principles for our business partners can be found in our Supplier Code of Conduct.**

## Faced with an ethical dilemma? Stop and consider the following:

- Do I have all the information I need to make an informed decision?
- Is this the right thing to do? Is that the right way to do it? and am I leading by example?
- Is my action in accordance with our guiding principles, the Code, our policies, and the law?
- If this becomes known to the public, how will it be perceived by others, and will I still stand by my decision?
- Have I understood the impact of my action, including on ICL's reputation?






## Unsure?

Seek guidance from your manager, Legal and Compliance Department, HR or any other trusted resource. Our Ethics & Compliance Portal is also a resource for you to find information and guidance.

## We lead by example

If you manage people, you have an even greater responsibility. Lead by example, using the qualities of an ICL leader: Dare, Care, Grow and Winning Spirit. Make sure your team members are familiar with our guiding principles and understand how they relate to them and to our Code, which is a resource for them.

**If you are a leader or manager, you are expected to serve as a positive role model and inspire others to embrace our Code by:**

-  Rewarding integrity.
-  Encouraging ethical decision-making.
-  Creating an open work environment where team members feel comfortable voicing opinions freely without concern of retaliation.
-  Preventing retaliation against those who Speak Up.
-  Seeking help in resolving and escalating issues when they arise.





# We care about What you have to say

## Speak Up!

We encourage you to take ownership of **ethical behavior** and to **Speak Up** if you have concerns.

It is **your responsibility** to ask questions and raise concerns when ethical issues arise.

It is **our responsibility** to gain your trust, provide you with a safe environment and treat your concerns professionally, objectively and promptly.



# We encourage speak up

At ICL, we foster a speak-up culture and welcome hearing from anyone, whether they are employed, contracted or engaged with ICL or not, to raise questions and concerns.

A voluntary report demonstrates integrity, honesty, and transparency which we value in our employees.

If you are ever unsure how to apply our standards in any given situation or suspect a potential violation, you can and should Speak Up.

You do not have to know all the facts to Speak Up. If you honestly suspect inappropriate or unlawful conduct, report it.



## How can I report?

To share your concern or report a violation, you can reach out to any of the following channels - there is no order, sequence, or preference:



Your Manager



The supervisor of your Manager



Human Resources



Legal and Compliance Department



ICL Speak Up Line - also anonymous



Trust Person (if available at your site)



# ICL speak up line



Simple and easy reporting tool



Report in the language of your choice



Available 24/7



Operated by an independent third party



Secure and Confidential



Handled by internal or external professionals



Anonymous (if you want)

## You can report anonymously!

If you feel more comfortable raising a concern anonymously, you can do so by using the ICL Speak Up Line. In reviewing concerns, ICL takes all appropriate action to protect the identity of the individual that submitted the complaint and we respect the various cultural norms and customs of ICL's diverse workforce.

## How do I report to the Speak Up line?

### Going Online to:

[www.ICLhotline.ethicspoint.com](http://www.ICLhotline.ethicspoint.com)  
or using your mobile device by scanning the following QR code:



### Calling the ICL Speak Up Line Tollfree:

The ICL Speak Up Line is available 24/7, 365 days a year. The operator will ask you the same information as if you were completing the form online.

## We Do Not Retaliate

ICL encourages you to Speak Up and in turn, we are committed to protecting your rights and the rights of those who report a concern or issue, in good faith, through any of our reporting channels.

ICL will not retaliate or permit retaliation against a person who in good faith:

- Reports what he, she, or they believe is a violation of our Code, our policies, or the law.
- Raises a question or seeks advice about a particular business practice, decision, or action.
- Cooperates in an investigation of a potential violation.

Making a false report, failing to cooperate with, or obstructing an investigation, is in violation of our Code, which may result in disciplinary action.

# How do we handle a reported concern or issue?

All reported concerns will be reviewed by the designated person or function, in accordance with our procedure for handling complaints.

## The investigator will



Act objectively and independently in establishing and reviewing the facts through document review or relevant interviews.



Conclude the investigation and when appropriate, make recommendations for corrective actions or disciplinary measures.



Inform the reporting person that the investigation has been concluded. It may not always be possible to share more details due to confidentiality.

## As an employee, you must cooperate fully with any investigation.



When you violate our Code, our policies or the law, know that this may result in disciplinary measures, that may include specific training, a performance improvement plan, or even termination of your employment. When you break the law, it may also result in civil or criminal penalties, imposed by a (local) court.

 **More information:** ICL's Global Procedure for Handling of Complaints



## How should managers handle a concern reported to them directly?

Our leaders are expected to act according to our leadership behaviors in all situations. If someone comes to you with a concern or question, you have a special responsibility to listen and act. Handling concerns appropriately is critical to preserving trust and protecting ICL. Respond respectfully and take every concern seriously. If you are unsure how to act, you may seek further advice from our Legal and Compliance department.

# We Care About Our People

We want our employees to **grow with us**

Our success is attributed to the **talent, diligence, diversity, and dedication of our employees.**

We value our employees and believe you are our biggest strength.





# Our people

Our success is based on people. This is why we want to empower our people, recognize their achievements and respect their rights.

We support, develop and take care of our people by enabling them to grow, innovate and build our future together. We provide our people with career development opportunities and support their performance with clear and transparent goals.

Our guiding principles navigate us to the behavior we need in order to succeed.

## We care about our contractors' employees

Contractors' employees include employees on a service contract or from a third party that the company engages to perform non-core services on its premises. We consider contractors' employees and service providers who work alongside us our partners, respect their legal rights, and treat them with respect, courtesy, and fairness.

## At ICL, we:

Treat every person with respect, regardless of role, position, employment status or tenure.

Do not insult, bully, disparage, shame or mock others, and stay vigilant for signs that others are being harassed or bullied.

Consider the needs and perspectives of others and how our words and actions might be received.

Do not retaliate against others – everyone should feel comfortable to raise concerns without fear.

Never threaten, act violently toward or harass others, including sexually.

Dress appropriately to contribute to creating a respectful and professional environment.

Speak Up about anything that may violate ICL's respectful working environment.



# Your safety is our mission!

We care about the health and safety of our employees, visitors, contractors, and business partners and we are committed to providing a safe, healthy, and hazard-free work environment for all the people who take part in our operations.

We do so by following workplace safety regulations and contractual requirements.

We have embedded sound safety and health practices into our operations and decision-making.

## We keep our workplace safe by:



Following the law, safety procedures, our Code, and our policies.



Valuing the safety of our coworkers, our visitors, our contractors, and all those who work for or with us.



Implementing HOP approach and being proactive in finding ways to make our workplace safer.



Recognizing (potential) workplace risks and attending to them with the right protocols and defenses.



Identifying, reporting, and escalating safety issues, unsafe working conditions, or "near-miss" events that we can learn from, in order to strengthen our approach to a safe workplace. When you want to promote or initiate a safety solution.



## When should I speak up?

You have been assigned a task that you think is **unsafe or harmful to you** and your surroundings.

You have been tasked with a job you believe you **have not been properly trained for**.

A piece of equipment is **not operating** properly and **may be unsafe**.

You notice an unsafe condition or non-routine change that may cause a potential **danger to yourself or your surroundings**.



# We foster diversity, inclusion and belonging

ICL is committed to offering equal employment opportunities, and advancing diversity, equity, and inclusion by respecting the dignity of every individual, thus maintaining a work environment where everyone has a true sense of belonging.

We define diversity by both visible and invisible characteristics that shape us as individuals, such as race, ethnicity, personality, work experience, lifestyle, age, education, cultural background, sexual orientation, gender identity, ability, religion or beliefs, and political affiliation.

We count on you to help create an inclusive workplace, in the office, on-site, and online, where everyone feels valued and respected for their contributions and is free from exclusion, discrimination, intimidation, harassment, violence, and abuse.

**We are Proud of You!**

 **More information:** ICL's Diversity and Inclusion Policy

## You can contribute and be an ally by:



**Speaking up**  
when something  
is not right



**Voicing your opinion** and  
freely sharing your views  
and experiences



**Keeping an open  
mind** to different  
points of view



**Listening to others**, creating  
an environment of dialogue,  
inclusion, and mutual respect



**Showing patience** with those  
that may have difficulty  
expressing themselves





# We do not tolerate discrimination and harassment

At ICL, we do not tolerate harassment, discrimination, and abuse.

Our Code prohibits discrimination, offensive behavior, or harassment of any kind.

You must never engage in workplace harassment, which includes unwelcome verbal, visual, physical, or other conduct of any kind that creates an intimidating, offensive, or hostile work environment. This is true for our employees, contractors, and any others working for or with ICL.

This contradicts the nature of the work environment that ICL strives to create.

Be respectful and attentive to the cultural differences that are present in our global, diverse workforce.

Remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.

**If you or someone else is the subject of discrimination or harassment, *Speak Up!***

 **More information:** ICL's Global Anti-Harassment and Anti-Discrimination Policy.



## Harassment only involves sexual conduct, right?

**No!** Harassment can be based on gender identity, race, sex, religion, national origin, age, disability, sexual orientation, etc., and can be in the form of offensive language, jokes, derogatory comments, or any other means.

# We protect human And labor rights

We believe that business can only thrive in organizations that protect and respect human rights. At ICL, we are committed to internationally recognized human rights standards including the United Nations Universal Declaration of Human Rights, the UN Guiding Principles, and the ILO Declaration on Fundamental Principles and Rights at Work.

In addition, in 2022 ICL endorsed the UN Global Compact's ten principles to further demonstrate our commitment to honoring and supporting human rights.

We believe in our employees' right to organize and unionize, to fair and equal pay and treatment, and to care for their well-being, quality of life, and health. We do not allow child labor or forced labor in any of our operations.

ICL has a strong commitment to avoid causing or contributing to human rights violations in our business operations and in the communities in which we operate.

We expect the same commitment to respecting and upholding these fundamental principles of human and labor rights from our business partners.

## What is my responsibility for protecting human rights?

Familiarize yourself with ICL's Human Rights Commitment and Principles.

Be aware of how your work impacts the human rights of people in our operations, value chain and communities.

Understand how to recognize potential human rights risks in your work and decision-making.

Speak Up when you become aware of any potential human rights or labor violations.

 **More information:** ICL's Human Rights Policy.





## Political activity

ICL does not endorse or provide support to political parties or politicians. However, we recognize the right of our employees and third parties operating on our behalf to participate in political activities as private individuals.

### Refrain from:

- Political arguments and confrontations in the workplace.
- You should express your opinions respectfully.
- Engaging in political activity on behalf of ICL, directly or indirectly
- Using ICL funds or resources for personal political activity

## We respect data privacy

Data privacy is a fundamental right.

Just as everyone has the right to express their opinion freely, everyone has the right to decide for themselves about the collection and processing of their personal data within the framework of the law.

At ICL, we believe protecting data privacy rights is essential to maintaining a foundation of trust in business and employee relationships. Data privacy protection and data protection with technology are closely intertwined, as the responsible and secure handling of personal information in the digital age relies on advanced technological solutions to safeguard individuals' sensitive data.

In your role at ICL, you may encounter personal data about our employees, business partners, and other individuals.

If you, or anyone on our behalf, access, or process data in the course of performing your job, you are expected to comply with ICL's privacy policy, principles and procedures as well as all applicable laws and regulations, to ensure that such data is processed in a lawful, transparent, fair, and secure way.

 **More information:** ICL's Data Privacy Policy and Procedures.



**What personal data does ICL collect that must be protected?** ICL must protect all personal data it holds, including personal data regarding our employees, directors, suppliers, contractors, customers, and shareholders. Examples of personal data include but are not limited to, names, identification numbers, email addresses, individual phone numbers, photos, IP addresses, device IDs, or location data.



# We Care About Our Company

## We Do What's Right

We value our company. This is the place where we work, invest time and effort. It is important we safeguard our company's assets and maintain the integrity of our organization.



## We care about our company resources

We responsibly use and protect ICL's assets and resources, so we can create real value and impact for a sustainable future. We must safeguard ICL's assets, whether physical, data, financial, technical or intellectual.

### Physical assets

You are responsible for the proper use of the property and resources you are provided with to do your job, from tools and equipment to company funds.

When you safeguard the company's assets, you safeguard our ability to grow and to thrive. Never lend, sell or give them away unless you are authorized to do so. You must avoid misusing company resources in all forms, including taking products or supplies for personal use, charging personal expenses on company credit cards, using company vehicles for unauthorized personal transportation needs, or using or reselling waste materials or other company property without permission.

### Does your position come with financial approval authority, such as approval of expense claims or budget management?

You must be diligent and ensure that (i) any required (pre-) approval is obtained before approving or incurring the expense, (ii) expenses submitted for reimbursement are appropriate, business-related, properly documented, and comply with our policies, and (iii) the funds are properly used for the intended purpose.





# Digital assets and cyber security

ICL protects its digital assets and data by keeping our systems safe from inappropriate access.

Cyber security plays a crucial role in enhancing the resilience of ICL.

A strong cyber security capability gives ICL a competitive edge and builds trust with all stakeholders. We all have the responsibility to be cyber safe and make sure we understand how to protect our networks, systems, devices, and the information that we use daily. Through comprehensive analysis of threats and risks, we employ globally recognized best practices to effectively mitigate potential vulnerabilities and ensure robust security measures.

We focus on assessing technology solutions and business processes on an ongoing basis to understand the associated cyber risks and how these can be appropriately mitigated. We work to ensure the resilience and protection of our IT and the security of operations as new processes and technology capabilities are developed, and the threat landscape evolves.

## More information:

- ICL's Information Security Policy
- ICL Global Security Policy, Organizational Structure Responsibility, and Authority Procedure

## We count on you to:

Protect ICL information, as well as the technology, devices, and equipment entrusted to you.

Be aware of and understand any specific cyber security responsibilities for your role, such as sensitive information handling and processing; secure system development; or secure operation and maintenance of technology systems.

Be vigilant for signs of potential threats to the security of our information and technology systems.

Make sure you are working safely by following all IT Cyber Security guidance and acceptable use policies provided by ICL.



# We safeguard company information

In the fast-paced and competitive business environment of today, every bit of information we encounter during our work may hold significant value to our competitors, investors, and the general public. Safeguarding all company information from unauthorized disclosure plays a vital and direct role in our achievements. It is imperative that you consistently exercise necessary measures to ensure the protection of confidential information pertaining to ICL, our customers, suppliers, and business associates.

## We lead with financial integrity

We create and maintain accurate and transparent financial and business records, so that we and others in the market can rely on trusted and timely information about ICL's performance and impact.

Accurate, clear and complete records are essential to making the best business decisions, preserving our reputation for financial integrity, and meeting our obligations as a public company. Our investors, regulators and other stakeholders rely on the information we provide to understand our financial results and measure our success as a company.

 **More information:** ICL Securities Policy - immediate and periodic reports

## We expect you to:

Record, maintain and file financial transactions and business records truthfully, accurately, on time, and with the appropriate detail, including supporting documentation.

Manage budgets and handle Company financial resources carefully and honestly, including cash, and corporate credit cards.

Prevent fraud and misleading representations by carefully checking the truthfulness and accuracy of financial information, such as on expense claims, supplier invoices, and operational reports.

Only keep documents for as long as they are needed for their legitimate business purpose, as required by law, or as directed by the Company.

Follow ICL's records retention policies and appropriately dispose or delete the records.









# We do not engage in insider trading

ICL is a publicly traded company on the Tel Aviv Stock Exchange and New York Stock Exchange. While performing your duties, you may come across or have access to confidential information. Inside Information is defined as information, which is not known to the public and which, if it became known to the public, might cause a significant change in the price of the company's securities. Inside Information might be used either by providing Inside Information to another person or by performing a transaction in the security of a company, while in possession of Inside Information. The purpose of the prohibition of insider trading is to prohibit the unfair trade advantages of those who hold inside information compared to other investors.

## To avoid using ICL inside information:

-  Do not disclose material non-public information about ICL for purposes of trading securities or providing insider tips.
-  Recognize that engaging in insider trading is not only unethical but also against the law.
-  Note that the prohibition on insider trading also applies to your family, household and anyone who received inside information.
-  Speak up if you become aware of any violation related to securities laws.

The rule on insider trading also applies to **your family members or anyone else living in your household**. Anyone who trades on material non-public information or tips such information to another, is subject to serious criminal liability, which can include high fines or even imprisonment.



# We avoid conflicts of interest

Acting with integrity as an employee means acting for the benefit of the Company, and putting its interests first.

We all have relationships, activities, and interests outside our work.

However, it is crucial to be aware of potential conflicts of interest that may arise when our personal interests or activities conflict, or appear to conflict, with the business interests of ICL. Here are some examples of situations where a conflict of interest may arise:

- Having a close romantic or familial relationship within ICL or with a business partner, supplier, or customer.
- Engaging in outside employment or conducting personal business with an ICL business partner, supplier, or customer.
- Having a financial interest in an ICL business partner, supplier, or customer.

 **More information:** ICL Global Prevention of Conflict of Interests Procedure

To find out if you have a conflict of interest that should be disclosed, these questions can guide you:

Do I personally **benefit, or appear to benefit**, from my involvement in this situation?

How would **people look at this situation** if it became public knowledge?

Would it **look bad** on me or the company?

Could people question my **decision-making**?

Do my **personal interests** influence, or appear to influence, my ability to make sound business decisions?

Could my participation in this (personal or outside) activity **interfere**, or appear to **interfere**, with my ability to do my job?

Is the situation causing me to put **my own interests ahead** of ICL's interests? Does it appear to?

If you responded with Yes to any of these questions, you may have a potential conflict of interest that should be disclosed. In this case, you should contact your manager or the Legal and Compliance Department.



# How to disclose a conflict of interest?

You must disclose any potential or possible conflict of interest situation. Having a conflict of interest doesn't always require you to stop the activity. By disclosing it and following recommended steps, you can manage or resolve the conflict.

Remember, not disclosing a conflict of interest is a violation, whereas having a conflict itself is not. Transparency is key.

## I'm concerned I may have a conflict of interest - What should I do?

If you think a personal interest or activity may interfere, or have the appearance of interfering, with ICL's interests, you are required to:

Complete and submit a conflict of interest form attached to the Conflict of Interest procedure

OR

Go online to the ICL Conflicts of Interest disclosure form using this QR code



Be sure to provide all required information.







# We use social media responsibly

**We support and encourage the activity and free expression of our employees on social media.**

By sharing on social media, we enhance the visibility of our company's activities and strengthen our reputation and employer branding. However, it is important to exercise caution when participating online, as posting on social media channels may have unforeseen consequences that could affect both you and ICL.

Before engaging on social media, please remember the following:

-  You act in **your own name**. Do not misrepresent yourself or the company or speak on behalf of the company.
-  Never **disclose personal information** about employees, customers, or third parties we engage with, or proprietary, sensitive, or confidential information about ICL or its business partners. Also, do not post any pictures **without consent**.
-  **Avoid** posting **defamatory, abusive, or explicit content**. Be sensitive to your surroundings and respect global cultures. Remember that all posts can remain on the internet indefinitely.
-  **Speak Up if you see misleading or damaging information about ICL on social media.** Refer to ICL's External Communications Function and refrain from responding.

 **More information:** ICL's Global IT Acceptable Use Procedure





# **We Care About** **Our Business** **Partners**

We Do Business with Integrity

Our ability to operate, achieve and preserve our long-term success depends on our business partners.

You must treat our partners with fairness, honesty, and respect while complying with all applicable laws wherever we do business.





# We never compromise honesty and integrity

Each of us is responsible for helping deter and defend the Company from fraud.

Fraud is any intentional act or omission designed to deceive others, resulting in the company suffering a loss or the perpetrator achieving a gain. Fraud may be motivated by the opportunity to gain something of value or to avoid negative consequences.

## Speak Up!

Any activity that you believe constitutes potential or actual fraud should be reported immediately.



### More information:

- ICL Fraud Prevention Manual for Operations
- ICL's Global Fraud Risk Management Policy and Program Framework





## We have zero tolerance for bribery and corruption

We, and any third party representing us, must never pay bribes, directly or indirectly, for any reason, anywhere. You should never offer anything of value to gain or retain business, influence decisions, or obtain an unfair advantage. It is also prohibited to accept anything of value that could compromise your objectivity in performing your job.

By conducting business responsibly and doing the right thing, the right way, we uphold our reputation for acting with fairness and integrity. The anti bribery and corruption requirements apply to you, regardless of your location or your position.

### Special care is needed when:

- Working with third parties and particularly with government officials or government-owned businesses.
- Giving or receiving any gift, entertainment, or promise of something of value, to or from third parties, and particularly government officials or employees.

 **More information:** ICL's Anti-Bribery and Corruption Policy and Handbook





## We collaborate responsibly with third parties

ICL has a risk-based, third-party anti-corruption due diligence procedure in order to identify any red flags that could signal a potential risk to our company. You should only engage with a third party when there is a legitimate business need and where due diligence does not reveal any unmanageable risks.

**Follow the requirements of ICL's third party due diligence policy before engaging any third party that acts on behalf of ICL or in furtherance of our business, including agents, representatives, distributors, and resellers.**

### Working with third parties

When it comes to bribery and corrupt practices, the actions of our business partners affect us directly, both reputationally and legally.

We need to make sure that anyone who furthers ICL's business, especially anyone who interacts with government agencies or officials on our behalf, will act in accordance with legal requirements and our standards of business conduct.

 **More information:** ICL's Third Party Due Diligence Policy.





## Giving and receiving gifts and entertainment

We responsibly invest in our business relationships but never offer or accept gifts, entertainment or anything else of value to improperly influence people. Showing appreciation for a customer or third party strengthens our business relationships when done appropriately. Exchanging gifts, entertainment or hospitality to improperly influence business decisions undermines trust and may result in harm to the Company.

### Before exchanging gifts and entertainment, make sure that:

- It is **not intended to influence** a specific business decision.
- It is **without risk** of reputational **harm**.
- It is **permitted** under our **policies and procedures**.

You should do so by using the Gifts and Entertainment approval form, which you may access with this QR code:



 **More information:** ICL's Gift and Entertainment Policy



# We comply with global trade regulations

As a global company, ICL's technologies, materials, and products regularly move among countries and cross-national borders.

Sanctions and embargoes may restrict or block our ability to transact business with certain countries, companies, or people.

Our Trade Compliance policies and procedures apply to all our business transactions throughout the world conducted by you and everyone working on our behalf.

These policies and procedures will help you to navigate these complex regulations and are designed to ensure that we comply with all applicable trade and sanctions regulations.

ICL mitigates sanctions risk through a comprehensive global screening process that aims to deter ICL's engagement with sanctioned entities at any point in its supply chain.



 **More information:** ICL Trade Compliance Policy



# We are committed to Preventing Money Laundering (AML)

We support the global effort against financial crime and are committed to preventing money laundering in our business. Money laundering is the attempt to conceal the origin of illegal funds. Be proactive in spotting and reporting financial transactions that are outside the normal process, and Speak Up about anything suspicious.

## You can minimize the AML risk if you make sure you:

- Get **reliable information** about the identity of your customer.
- Fully document **every** business **transaction**.
- **Monitor** ongoing business **relationships** for suspicious or unusual activity.
- Do not accept being paid in cash and do not pay in cash or crypto assets.
- Do not make payments to unknown or unassociated third parties.
- Do not make payments to third parties to accounts in a country where the third party is not located unless there is a legitimate business reason.



### More information:

- ICL's Anti-Money Laundering Policy and Handbook
- Applicable finance procedures

## We are committed to responsible marketing

Every stage of the product life cycle has an impact on society and the environment cycle, from product design to usage and eventual disposal.

At ICL, our marketing strategy is part of our entire sustainability plan, and we are committed to practicing responsible marketing.



 **More information:** ICL Responsible Marketing Policy



Impact for a sustainable future



# We compete fairly

We support free and fair competition in our industries and are committed to complying with all requirements under the law and regulations relating to fair competition.

When you interact with competitors or potential competitors (even if they are our suppliers or customers), you should only do so for legitimate business purposes.

You should be aware that ICL can be considered to have a significant market share in certain markets or for certain products, requiring special attention to make sure we do not inadvertently misuse our position.

You must make sure that you do not share or discuss ICL competitively sensitive information and that you do not receive such information from a competitor.



 **More information:** ICL Competition Policy & Handbook

## What is competitively sensitive information?

ICL's **confidential business information** which can provide a strategic or competitive advantage to a competitor if it is made available to them.

Examples: **pricing information, new products, production capacity or market initiatives, tenders, discount policies**, etc.

You should never discuss such topics with a competitor, even in an informal setting such as a trade show or social event.

# We interact responsibly and transparently with regulators and governmental entities

We interact constructively, transparently, and responsibly with governmental bodies and regulators to further ICL's mission of impacting for a sustainable future.

ICL engages in ongoing dialogue with governments and authorities at the local, regional, and global levels on an ongoing basis. When working with governments and authorities, we are consistent, respectful, and upright in our positions and messages.

This also means we follow ICL internal policies and all applicable regulations concerning engagement with government representatives, and allow only those people with the necessary authority to contact government officials about our matters.





# **We Care About** **Our Communities** **and Planet**

**We Impact for a Sustainable Future!**

Igniting Hope, Inspiring Change & Building a Sustainable World for all

We work to promote and practice innovative sustainable solutions for the environment and the communities around us.





# We impact for a sustainable future

As a global company that operates around the world, we are committed to creating responsible solutions to humanity's sustainability challenges in the global food, agriculture, and industrial product markets. We adhere to the highest environmental standards and utilize the best available technologies to develop sustainable approaches.

We are also committed to creating social impact in our communities and society, by building sustainable partnerships, empowering social entrepreneurship, innovation, and excellence, and by utilizing our products, resources, and expertise.

## What Do We Do?

- We contribute to food security
- We create impactful solutions and products to the world's sustainability challenges
- We act to reduce our environmental impact, by reducing GHG emissions, saving water, increasing circular economy, enlarging our share of renewable energy consumption etc.
- We promote sustainable procurement
- We support our communities by contributing to social development programs and community Initiatives
- We promote personal social responsibility and volunteering among our employees
- We foster diversity, inclusion and belonging
- We adhere to high standards of corporate governance





## We impact through innovation And excellence

We champion ingenuity and foster innovation and excellence in all our work practices. We encourage you to think out of the box, be creative, and introduce new ideas, innovation, and modern technologies into the organization and our R&D process of new products.

We strongly believe this improves our impact on the environment, society, and the communities where we operate. We are always open to suggestions and new initiatives that can take us forward.

Visit the ICL Portal to learn about how you can submit your innovative suggestions and ideas.



## Our social impact

We are committed to creating social impact in our communities, by building sustainable partnerships and shared values that shape and establish networks of social good.

By empowering entrepreneurship, innovation, and excellence, and by utilizing our products, resources, and expertise, we build sustainable, lasting partnerships and establish networks that will be a driving force for change.

ICL fosters its employees' engagement with the local communities in order to make a significant impact on people's lives, and makes a continuous effort to offer new opportunities and support our volunteers, wherever they choose to make an impact and create meaning.

### We Donate and Contribute to our Communities transparently and Responsibly

We encourage direct engagement with the communities where we operate through lawful and transparent means. In certain circumstances, it may be recommended and appropriate for us to support local initiatives through donations, charitable contributions, or community investments.

All donations and charitable activities require compliance with our internal procedures and proper due diligence of the third parties involved.



#### More information:

- Procedure of Social Engagement, Community Relations, and Donations
- ICL's Social Investment (Impact) and Community Relations Policy
- ICL Global Volunteering Policy





# We are ICL

WE DO THE RIGHT THING,  
IN THE RIGHT WAY. EVERY DAY



**ICL Global Legal and Compliance Department**

For general inquiries, or to report a possible  
violation of our Code of Conduct, contact

**[Compliance@icl-group.com](mailto:Compliance@icl-group.com)**