



ALICE

BUSINESS PARTNERS CODE OF CONDUCT



**We Do the Right Thing,
In the Right Way, Every Day** **3**

Purpose of the Code 4
Scope of the Code 4
Compliance with Laws 5
Compliance with this Code 6
Acknowledgment of the Code of Conduct..... 6

**We Expect Our Business Partners
to Uphold Compliance and
Ethical Practices** **7**

Our Commitment 7
Expectations for Our Business Partners 8
 Zero tolerance for bribery and corruption..... 8
 Competing Fairly 9
 Compliance with global trade regulations 9
 Protection of ICL's Assets and Preventing Fraud..... 10
 Avoiding conflicts of interest..... 11
 Accurate recordkeeping 12
 Prevention of money laundering and other financial crimes 12
 Data protection and information security 12
 We prohibit trading in ICL shares 12

**We expect our Business Partners
to Uphold Human Rights & Ethical
Employment Practices** **13**

Our Commitment 13
Expectations for Our Business Partners 14
 Protecting Human Rights 14
 Fair Treatment and Non-Discrimination 14
 Diversity, Inclusion, and Belonging 14
 Child Labor & Young Workers 15
 Ethical Employment Practices..... 15

**We expect our Business Partners
to Uphold Health and
Safety Standards** **16**

Our Commitment 16
Protecting Human Life and Workplace Safety 17
Health and Safety Management 17
Workforce Health 18
Training and Preparedness 18
Systematic Evaluation and Continuous Improvement 19
Safe Use and Disposal of Chemicals 19

**We expect our Business
Partners to Uphold
Environmental Responsibility** **20**

Our Commitment 20
Expectations for Our Business Partners 21
 Sustainability and Resource Efficiency..... 21
 Climate Action 21
 Responsible Sourcing & Humane Practices..... 22
 Continuous Improvement 22

**We Expect Our Business
Partners to Speak Up** **23**

We Care about What You Have to Say..... 24
We Do Not Retaliate 24

We Do the Right Thing, In the Right Way, Every Day.

At ICL, we touch millions of people with our products and actions every day. Our mission is to create impact for a sustainable future by upholding our commitment to **doing the right thing, in the right way, every day.**

We achieve this goal by fostering a corporate culture of ethical excellence that champions leadership in sustainability and embracing 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 toward making the right choices in every dimension of our operations, including in our entire value chain, as expressed in our Code of Conduct.



Purpose of the Code

ICL is committed to doing business responsibly and with the highest ethical standards. This commitment depends not only on our people but also on building relationships with Business Partners who uphold similar commitments. The purpose of this Business Partners Code of Conduct (the "Code" or the "Partners Code") is to outline our principles and expectations, ensuring that ICL and its Business Partners share and uphold the same high ethical standards in their business relationships.



Scope of the Code

This Code applies to all suppliers, distributors, resellers, agents, vendors, service providers, and partners ("Business Partners") providing products or services to ICL. It forms an integral part of any agreement between a Business Partner and ICL. Business Partners must ensure that their affiliates, employees, sub-contractors, and supply chains, as well as any entities acting on their behalf, comply with this Code and uphold its standards in all dealings with ICL.



Compliance with Laws

Business Partners must comply with all applicable laws, rules, standards, and regulations in the countries where they operate, including those related to environmental protection, health and safety, labor practices, working conditions, and human rights. Business Partners are expected to implement appropriate measures, such as monitoring systems and training programs, to ensure ongoing compliance.



Where local laws are less stringent, Business Partners are expected to adhere to this Code. Where local laws impose additional requirements, these must be met alongside the obligations of this Code. We encourage Business Partners to exceed the Code's requirements by promoting best practices and continuous improvement across their operations.



Compliance with this Code

Business Partners must continuously ensure compliance with the obligations outlined in this Code and be prepared to document their processes for meeting each obligation upon ICL's request. With prior notice, ICL reserves the right to monitor and inspect Business Partners to verify adherence to this Code. Any violations or non-compliance may lead to the termination of the partnership or contract with ICL.

Business Partners must ensure that their affiliates, employees, sub-contractors, and supply chains, as well as any entities acting on their behalf, comply with this Code and uphold its standards in all dealings with ICL.

Acknowledgment of the Code of Conduct

By entering into any agreement or contract with ICL, all Business Partners acknowledge that they have reviewed, understood, and agree to comply with the standards and principles outlined in this Business Partners Code of Conduct.



We Expect Our Business Partners to Uphold Compliance and Ethical Practices

Our Commitment

At ICL, our commitment extends beyond compliance; it reflects our dedication to fostering a culture that prioritizes integrity, ethical conduct, transparency and accountability in all aspects of our business practices. Compliance isn't just about meeting regulations - it is deeply embedded in our operational culture, with compliance practices seamlessly integrated into our daily activities.

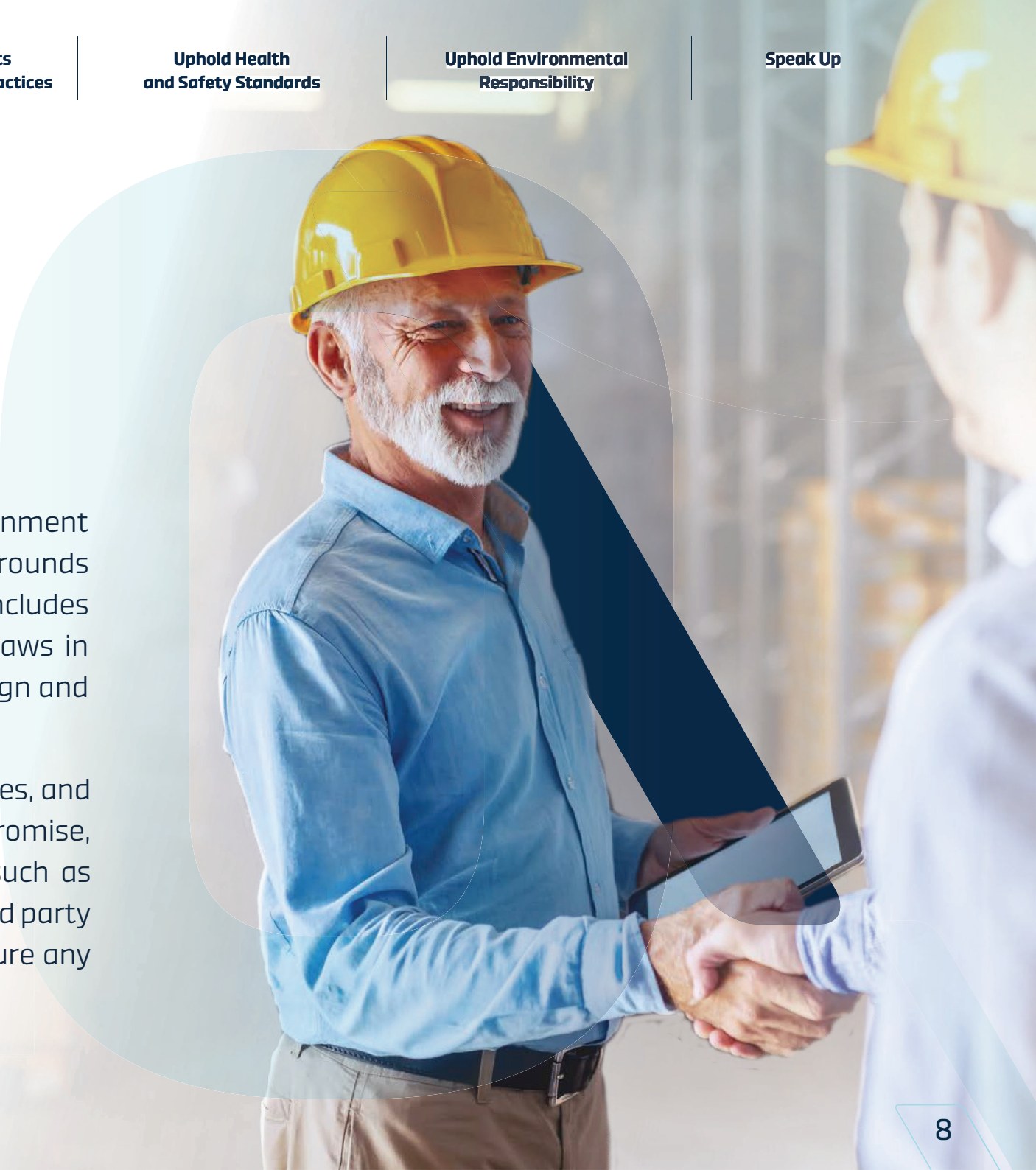


Expectations for Our Business Partners

Zero tolerance for bribery and corruption

Business Partners are required to ensure that all interactions with government officials and other business partners are conducted on legitimate grounds and free from any attempts to improperly influence decisions. This includes full compliance with all applicable anti-corruption and anti-bribery laws in any jurisdiction where Business Partners operate, including both foreign and local regulations.

Business Partners are expected to ensure that their directors, employees, and third parties acting on their behalf do not directly or indirectly offer, promise, give, or accept any bribes or make or accept improper payments (such as facilitation payments or kickbacks) to government officials or other third party to obtain new business, retain or promote an existing business or secure any other improper advantage, for any reason, anywhere.



Competing Fairly

ICL strictly prohibits anti-competitive agreements or conduct, including fixing prices, bid rigging, market allocation, or any other practices that distort or restrict fair competition. Business Partners are prohibited from entering into or attempting to enter into, formal or informal agreements with competing companies that unlawfully restrict trade, regardless of whether such attempts are successful.



Compliance with global trade regulations

Business Partners must comply with all applicable laws regulating trade, as well as local import, export laws, regulations and sanctions.

Business Partners must also ensure the appropriate classification of supplied materials and communicate it accurately to government officials and ICL.



Protection of ICL's Assets and Preventing Fraud



Business Partners must conduct all activities with integrity and strictly prohibit any form of fraud, including deception, misrepresentation, or theft. Protecting ICL's assets and maintaining honesty in all dealings are fundamental to building a trustworthy and sustainable business relationship.



Business Partners must have internal controls designed to detect, prevent, and respond to fraud. Transactions should be accurately recorded and subject to regular review.



Any potential fraud that may impact ICL must be reported immediately to your ICL contact person or by using our Speak Up line (anonymously).



Avoiding conflicts of interest



Business Partners must promptly disclose any existing, potential, or perceived conflict of interest involving ICL or its stakeholders. This includes, but is not limited to, situations where the personal interests of a Business Partner, their employees, close relatives, friends, or associates, may conflict with ICL's interests.



Business Partners may not offer, accept, or solicit any gifts or entertainment to or from ICL employees or third parties, if they could improperly influence business decisions or create an unfair advantage.



To disclose a conflict of interest, please reach out to your ICL contact person or the Compliance department via mail: Compliance@icl-group.com.

Accurate recordkeeping

Business Partners are expected to develop and maintain records, both financial and otherwise, that fully reflect the nature of their transactions and activities in compliance with applicable laws and standards.

Prevention of money laundering and other financial crimes

Business Partners must not engage in or assist third parties in any activities that could potentially facilitate money laundering or other financial crimes.



Data protection and information security



Business Partners must uphold strict confidentiality regarding all personal data and proprietary information provided by ICL. Business Partners are required to manage personal and sensitive information with the utmost care and use it only for essential business purposes.



Business Partners are expected to establish necessary security measures, including appropriate access controls, security protocols, and incident reporting procedures.



When using technologies such as artificial intelligence (AI), Business Partners must ensure data privacy and security are maintained.

We prohibit trading in ICL shares.

Our Business Partners may not trade in securities, or encourage others to do so, using confidential information received from ICL.

A photograph of several business professionals in a huddle, with their hands stacked in the center. The image is rotated 45 degrees clockwise and is set against a dark blue background.

We Expect Our Business Partners to Uphold Human Rights & Ethical Employment Practices

Our Commitment

We are committed to upholding and respecting internationally recognized standards of human rights, fairness, and ethical employment practices across our supply chain. This includes adherence to frameworks such as the United Nations Universal Declaration of Human Rights, the UN Guiding Principles, and the International Labor Organization (ILO) standards. We expect our Business Partners to share this commitment, ensuring their operations and supply chains reflect these values.

Expectations for Our Business Partners

Protecting Human Rights

Business Partners must protect internationally recognized human rights in their operations and supply chains. They must take proactive steps to prevent and mitigate potential human rights impacts, ensuring they are not complicit in any violations.

Fair Treatment and Non-Discrimination

Business Partners must guarantee that no one is treated unfairly or discriminated against based on legally protected characteristics, including but not limited to race, gender, gender identity, gender expression, sexual orientation, age, ethnicity, disability, religion, veteran status, marital or family status, or any other protected category. All forms of harassment, including sexual harassment, bullying, and intimidation, are strictly prohibited.

Diversity, Inclusion, and Belonging

Business Partners are expected to foster a diverse and inclusive environment that respects all individuals, by actively promoting a culture of inclusion, seek diverse perspectives, and ensure that everyone feels a sense of belonging, striving to reflect the diversity of the communities in which they operate.



Ethical Employment Practices

Employment must be voluntary, free from coercion and exploitation. Business Partners must eliminate forced labor, human trafficking, and similar practices. They are expected to respect workers' rights to freedom of association and collective bargaining, ensure fair compensation, and provide safe working conditions.

Child Labor & Young Workers

Business Partners must comply with international labor standards and local laws regarding child labor, ensuring that any work for young workers is age-appropriate, does not interfere with education, and adheres to legal working hour restrictions. Effective controls must be in place to verify the age of all workers and prevent the unlawful employment of minors.



We Expect Our Business Partners to uphold Health and Safety Standards

Our Commitment

Anchored by our mission — Caring Every Day, Everywhere, for Your Safety — we prioritize the safety and health of our people, visitors, contractors, and business partners. We are committed to maintaining a safe and sustainable supply chain, focusing on hazard-free workplaces, emergency preparedness, and stringent Environmental, Health, and Safety (EHS) standards. This includes ongoing risk mitigation, worker readiness, and continuous improvement in health and safety practices.



Protecting Human Life and Workplace Safety

Business Partners must actively work to prevent accidents, injuries, and hazardous conditions in their operations, maintaining a zero-tolerance approach towards unsafe practices.

Health and Safety Management

Business Partners shall provide a safe and healthy workplace for all employees, contractors, and visitors in compliance with all relevant international standards and EHS laws and regulations.

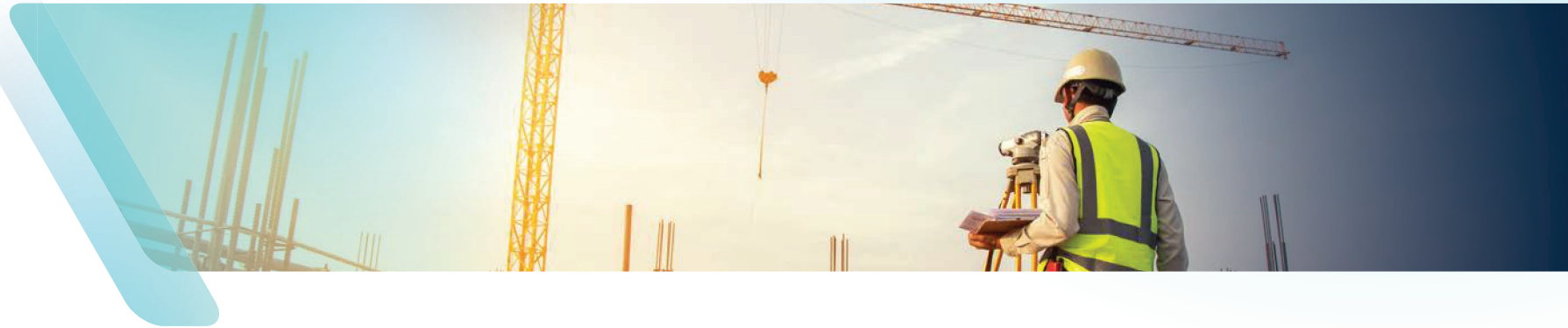
They must implement comprehensive health and safety management systems, including controls and procedures to mitigate risks, prevent incidents, and ensure employees have the right to refuse unsafe work or report unhealthy conditions. Business Partners are encouraged to align with certified management systems like ISO 45001 to enhance their practices.





Workforce Health

Business Partners should ensure the health and safety of their workforce by conducting mandatory medical checkups as required by local regulations and providing necessary personal protective equipment (PPE). They must also ensure access to Safety Data Sheets (SDS) and other relevant health and safety information.



Training and Preparedness

Business Partners must provide comprehensive health and safety training that covers potential risks, mitigation actions, and emergency procedures. Additionally, they should implement effective emergency plans, regularly update them, and coordinate with relevant stakeholders to ensure readiness and effective crisis management.

Systematic Evaluation and Continuous Improvement



Business Partners should proactively manage EHS risks through regular audits and assessments, continuously improving their performance to meet or exceed industry standards.

Safe Use and Disposal of Chemicals



Business Partners must ensure the safe use, storage, and disposal of chemicals to minimize environmental and health risks. They should implement best practices for hazardous materials management to ensure the safety of workers, the community, and the environment.



A large, diagonal graphic element runs from the top left towards the bottom right. It features a dark blue gradient at the top, transitioning into a bright teal color, and then into a detailed, layered texture of brown and tan, resembling a cross-section of a mineral or fossil. The graphic has rounded ends.

We Expect Our Business Partners to Uphold Environmental Responsibility

Our Commitment

As a global company, we are dedicated to addressing sustainability challenges and adhering to the highest environmental standards. We continuously strive to reduce our environmental impact, foster sustainable practices, and promote transparency by disclosing our Environmental, Social, and Governance (ESG) performance. We expect our Business Partners to share this commitment and support our efforts toward a sustainable future.

Expectations for Our Business Partners

Sustainability and Resource Efficiency

Business Partners are expected to adopt sustainability principles and integrate environmental responsibility into their operations. This includes obtaining and maintaining necessary environmental approvals, permits, and licenses, minimizing negative environmental impacts, and optimizing resource efficiency such as energy and water use. Business Partners should implement water-saving measures, reduce waste, prevent pollution, and embrace circular economy principles. They are encouraged to transition to renewable energy, increase energy efficiency, and develop systematic approaches to sustainability management.

Climate Action



Business Partners are encouraged to align with our goals to reduce greenhouse gas (GHG) emissions and support the transition to a low-carbon future. They should measure, monitor, and report their GHG emissions in accordance with the GHG Protocol and international standards, ensuring adherence to data quality standards. Business Partners should set reduction targets in line with the Paris Agreement, actively work to reduce their GHG emissions, and develop mitigation plans to manage climate-related risks.



Responsible Sourcing & Humane Practices

Business Partners must adhere to ethical sourcing practices, particularly in avoiding conflict minerals, and comply with the OECD's guidelines for responsible supply chains. They should also demonstrate efforts to use natural resources efficiently and ethically. This includes ensuring humane practices, such as minimizing animal testing where possible and complying fully with industry guidelines when animal testing is necessary.



Continuous Improvement

Business Partners are expected to commit to the continuous improvement of their ESG performance by identifying and addressing the most material environmental and sustainability topics relevant to their operations.



We Expect Our Business Partners to **Speak Up**



www.ICLhotline.ethicspoint.com



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)

Going Online to:

www.ICLhotline.ethicspoint.com
or using your mobile device by
scanning the following QR code:



We Care about What You Have to Say

At ICL, we foster a speak-up culture and encourage anyone - whether or not they are directly employed, contracted, or engaged with ICL - to raise questions or concerns. If you genuinely suspect any violation of laws, regulations, or this Code, or observe inappropriate or unlawful conduct, we expect you to report it.

You can share your concerns or report a violation by reaching out to your ICL contact person. Alternatively, if you prefer to raise a concern anonymously, you may do so via the ICL Speak Up Line: **www.ICLhotline.ethicspoint.com**

The ICL Speak Up Line is available 24/7, 365 days a year, and supports multiple languages. All concerns are reviewed by the designated person or function in line with ICL's complaint handling procedures.

We Do Not Retaliate

We will not permit retaliation of any kind against individuals who, in good faith, report potential violations of this Code, ICL policies, or the law, or who cooperate in investigations by ICL or relevant authorities. We hold our Business Partners to the same standard, expecting them to maintain a non-retaliation policy and protect individuals from any penalties for reporting concerns or cooperating in investigations.



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 Business Partners Code, contact
Compliance@icl-group.com