

Through Our Purpose, Smart Science to Improve Lives™, we are working to ensure we create a positive impact on the environment and to society. We are committed to upholding high standards of ethical behaviour that ensure our employees and our stakeholders are safe and not negatively impacted by our activities or products.

Sometimes, things do not always seem 'right'. As an ethical company, we believe that all employees should feel able to speak up about anything that would be considered to be in conflict with Croda's policies, procedures or guidelines.

To achieve this, it is important that we have a number of mechanisms that you can use to address any concerns or issues that you might have. These mechanisms include:

- Local grievance procedures
- Line manager discussion
- Discussion with other senior managers or your local HR Team
- Independent and confidential reporting service SpeakUp
- Discussion with the Group General Counsel and Company Secretary, or any other member of the executive committee

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Our people are our difference. Our culture and behaviours are shaped and brought to life by our three guiding values of 'Responsible', 'Innovative' and 'Together'.



Working as one global family means we are transparent and encourage open communication. Having our employees feel able and supported enough to speak up helps Croda to do better. This is core to our guiding value of 'Together'.

By reporting our concerns we can work on those issues to develop a better way of doing things and create a fun, lively and stimulating environment in which to work. This supports our guiding value of 'Innovative'.

Taking responsibility for our own actions and working to build trust amongst our colleagues, our customers and the communities we operate is an integral part of the guiding value 'Responsible'.

In practice, this means acknowledging that the decisions we make on behalf of the organisation should always conform with any local laws, any Croda policy, or any standard that is set at both local and global levels.





Although we encourage you to report concerns to your line manager or to other senior managers within the business, we recognise that there are times when you may feel uncomfortable doing this, or it may just not be the appropriate channel for you.

SpeakUp is a confidential way to raise serious concerns. We use an external independent company called Navex Global who provide us with a confidential reporting service called EthicsPoint. Reports can be made anonymously.

The SpeakUp service has been available for a number years and was introduced to support employees in upholding our Code of Conduct and Code of Ethics, as a part of our whistleblowing policy and procedure. Our whistleblowing policy protects our employees and Croda against misconduct and negligence in the work place that could have a negative impact on our employees, customers and our reputation and subsequently our business itself.

Mechanisms addressing serious concerns which help you feel supported enough to speak up are key to building a culture of trust and openness. In turn this will foster a better way of doing things and protect others in future. This relates directly to all three of our values.

# ♥■? What should I report through the Croda SpeakUp Service?

The SpeakUp service should be used to report wrong-doing within Croda, such as unlawful conduct, financial malpractice, unethical activities or dangers to society or the environment.

Here is a list of examples that a report could be about:

- Fraud / corruption
- Illegal or unethical activities
- Improper accounting
- Theft, damage or misuses of company property
- Other criminal matters
- Collective bullying, harassment, discrimination and abusive behaviour in the workplace
- Health and safety risks
- Environmental damage
- Damage to Croda's reputation



We encourage and support all employees to report any issue causing concern. You should feel comfortable to use all the available routes to address your concerns.



# What is the difference between Speak Up reporting (whistleblowing) and Grievance reporting?

Distinctions need to be drawn between whistleblowing, which is a procedure for allowing employees to raise concerns with management about the conduct of others that is in some way damaging to our organisation, and raising a grievance, which is a procedure for employees to complain about the conduct of management or fellow employees towards them personally.

### Grievance

### Matter of personal interest.

No affect on the wider public.

### Whistleblowing

General concern about workplace wrongdoings

Has the potential to affect the wider public.

The Croda SpeakUp line should not be used to raise a grievance issue, which should be pursued through your line manager in accordance with your local grievance procedures. However, if you feel unable to talk to your line manager or that you are getting an unfair result from those discussions, please use the SpeakUp line.

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## How do I make a report through the Speak Up service?

If you have any concerns you can use the Croda SpeakUp service in two ways:

By telephone – via a call-handler (telephone numbers are listed on page 8)

Dial the free phone number then listen to the easy-to-follow instructions. You can speak to a specially-trained person (English speaking only -but a translator is available) to tell them your concerns.

Some countries (Chile, Turkey and Vietnam) require 2 stage dialling to be completed to reach a call handler, this is due to the country not having a direct freephone line.



Via the Navex Global EthicsPoint website

You can send a confidential report by going to the Navex Global EthicsPoint website at Croda.ethicspoint.com. You can click 'Make a Report' on the left hand side of the screen by choosing from the drop down menu which country you are located in and where the violation took place. Click 'continue' and you will then be able to record the details of your report in your own language by typing the details into the message boxes.

Whichever way you choose to contact Croda SpeakUp, you will be given a unique case number which you will need to keep safely enabling you to receive feedback. The Croda SpeakUp service is available at any time, 24 hours a day, and 7 days a week.

Please note that you are unable to leave a voicemail by telephone.

There is some additional helpful guidance on how to make a report on the EthicsPoint website on the left hand side under FAQs.

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Please be prepared to provide the following information:

- What is happening/ has happened;
- Dates and times the incident(s) occurred;
- Who has been involved;
- Where the incident(s) are occurring;
- How have you come to be involved;
- Any files or documents you think we need to see (you can upload these easily through the website).

You will also be asked whether you would like to remain anonymous or to provide your name and contact details. There is no requirement to provide your name or any other personal information.

We do not expect you to have absolute proof of any misconduct or negligence that you report. However, we would like you to give comprehensive reasons for your concern. This will help us to investigate fully. If you report your concern



via the website we will be able to leave messages for you if we need more information. If you do leave your name then we may contact you directly via email or telephone, however please be assured that your name will remain confidential.

We will investigate all legitimate whistleblowing matters that are reported.

# What happens after I have raised my concerns through Speak-Up?

After submitting a report via the telephone or through the website, messages are sent promptly to our Group General Counsel and Company Secretary who will act on it without compromising any individual. You will receive a response within 5 working days to let you know that we are looking into your concerns and we may request further information.

We will raise your concerns with whoever we feel is the most appropriate person. This might be someone within the business, or with an independent person outside the company. Please be assured that anyone involved in investigating your concern will hold your information in complete confidence. It sometimes may not be possible to investigate a matter fully without identifying you, in this circumstance we will always ask your permission first and put together appropriate support



# I am worried about leaving a message and what might happen to me?

Our policy is that a person who has made a report in good faith and following the Group's whistleblowing procedure will not suffer any reprisals and will be protected against repercussions or disciplinary action. The Croda SpeakUp service is confidential.

## Page 1. How do I pick up the response to my message?

The Croda SpeakUp service you use to report your concern, either telephone or by the web, is the one you will need to use each time you re-contact the Croda SpeakUp service to pick up your reply or to leave further information. All you need to do is enter your unique case number that you will be given when you leave your first message. It's simple and secure.

If you have left your name and contact details we may contact you directly. However, if you have requested that you do not want us to know who you are SpeakUp will not pass on your details. So unless you choose to identify yourself, there is no way of us knowing who has left a message.





# Protecting your anonymity

When calling the free phone number, anything you discuss with the callhandler is held in the strictest of confidence. Your telephone number is not captured by the service.

The call handler will seek clarification, where necessary, and agree notes of the concern you have raised. This will be reported to us.

When using the messaging service via the Navex EthicsPoint website, the information you provide will form a written report. Your email address is not captured by the service and there will be no attempt to identify you.

Please remember when reporting that it is very difficult to assess whether or not an anonymous report is genuine or malicious. Consequently, while all anonymous reports will be considered, it may be more difficult for us to undertake a meaningful investigation.

At all times, if you have asked for your identity to be protected, we will not disclose it without your consent and acknowledgement.





# Numbers to call

### **Standard Phone Lines**

	<b>.</b>
Country:	Telephone Number:
Argentina	0800 345 4864
Australia	1 800 841325
Belgium	0800 74 658
Brazil	0800 764 5022
Canada	(833) 628-0153
China	400 120 9046
Colombia	01-800-5189218
Czech Republic	800 144 342
Denmark	80 8304 31
Finland	(844) 514-1551
France	0 805 98 78 77
Germany	0800 0972 111
Ghana (access code 0-2424-26-004)	(833) 628-0153
Hong Kong	800 963 911
Hungary	80 088 357
India	000 800 0502 219
Indonesia	0800 1503 164
Iran	+44140586225
Italy	800 729 264
Japan	0800 888 2609
Kenya	0800211221
Malaysia	1-800-81-2477
Mexico	800 681 5394
Netherlands	0800 0227 369
Peru	(0800) 781 41
Poland	0 0 800 141 0115
Russia	8 800 301 45 84
Singapore	800 492 2315
South Africa	080 099 5190
South Korea	080 812 1291
Spain	900 999 367
Sweden	020 88 85 80
Taiwan	00801 49 1531
Thailand	1 8000 145 57
Tunisia	980-500-7468
UAE	800 032 0909
UK	0800 048 8996
US	(833) 628-0153
	(000) 020-0100

## 2 Stage Dialing Phone Lines

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Country:		Telephone Number:
Chile		(Telmex-800)800-225-288
Chile		(Telefonica) 800 - 800 - 288
Chile		(ENTEL) 800-360-311
Chile		(ENTEL) 800-360 - 312
Chile		(Easter Island) 800 - 800-311
Chile		(EasterIsland) 800 - 800 - 312
Turkey		0811-288-0001
Vietnam		1-201-0288
Vietnam		1-201-0288

Webpage: Croda. ethicspoint.com



