

Speak Up Policy

1. Purpose

At Croda, we are committed to conducting our business with honesty and integrity, and we expect all of our employees and business partners to maintain high standards of behaviour in accordance with our Code of Conduct, Code of Ethics, our Purpose and our Values. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness, transparency and accountability is essential to prevent such situations occurring and to address them when they do occur.

We rely on our employees alerting us if they become aware of circumstances which are not in compliance with our policies, our Purpose or our Values. We also encourage our business partners and other third parties that we work with to alert Croda of suspected wrongdoing within Croda or our supply chains.

The aims of this policy are:

- To encourage our employees and business partners to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated appropriately, and that their confidentiality will be respected.
- To provide our employees and business partners with guidance as to how to raise concerns.
- To reassure our employees and business partners that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

2. Scope

Whole group.

This policy covers all Croda employees (including former and prospective employees) and Croda's business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

3. What is whistleblowing?

Whistleblowing is the disclosure of information which relates to suspected wrongdoing or dangers at work. Examples may include:

- criminal activity (fraud, corruption, bribery etc.);
- unethical activities;
- failure to comply with any legal or professional obligation;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;



- financial fraud or mismanagement;
- improper accounting;
- theft, damage or misuses of company property;
- breach of our Code of Conduct;
- conduct likely to damage our reputation or financial wellbeing;
- unauthorised disclosure of confidential information;
- the deliberate concealment of any of the above matters.

A whistleblower is a person who raises a genuine concern relating to any of the above.

This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work, and you should follow your local grievance procedure or anti-harassment and bullying policy or contact your local HR representative in respect of these types of matters.

If you are uncertain whether something is within the scope of this policy you should seek advice (in confidence) from the Group General Counsel and Company Secretary or the Compliance Department, whose contact details are at the end of this policy.

4. How to raise a whistleblowing concern

There are a number of ways that you can confidentially raise concerns or issues that you might have. These are detailed in the Speak Up Procedure that applies to your location (if applicable).

To summarise, options include contacting the following (either discussion or in writing):

- Your line manager;
- The Group General Counsel and Company Secretary;
- The Group Compliance Director; or
- Any other member of the Executive Committee.

Contact details are set out at the end of this policy in appendix 1.

Alternatively, you can use the independent Croda Speak Up reporting line, details of which can be found in the Speak Up Procedure applicable to your location.

5. Investigation and Outcome

The Speak Up Procedure for your specific location details the investigation procedure that will be followed where a concern has been raised. That document also details the process should you not be satisfied with any part of the procedure and/or the outcome.

6. Confidentiality and Anonymity

It is possible to make disclosures anonymously using the Croda Speak Up reporting line. Although we hope that you will feel able to voice your concerns openly under this policy. At all times, if you have asked for your identity to be protected, we will not disclose it without your consent and acknowledgement.



Where possible, we prefer you not to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible.

If you are concerned about possible reprisals if your identity is revealed, you should come forward to the Group General Counsel and Company Secretary or one of the other contact points listed in Appendix 1 and appropriate measures can then be taken to preserve confidentiality.

7. Protection and support for the persons reporting their concerns

It is understandable that persons reporting their concerns are sometimes worried about possible repercussions. We aim to encourage openness and will support everyone who raises genuine concerns under this policy, even if they turn out to be mistaken.

Whistleblowers must not suffer detrimental treatment as a result of raising a concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Group General Counsel and Company Secretary or the Compliance Department immediately.

We are committed to taking all reasonable steps to protect you from detrimental treatment as a result of making a report under this policy. Any Croda employee involved in any kind of detrimental behaviour against those reporting genuine concerns may be subject to disciplinary action.

8. Local requirements

Where there is a conflict between the content of this policy and any local legislation and/or local procedures, the local legislation and any local procedures (set out in the appropriate Speak Up Procedure) will prevail.

9. Responsibilities

The Board has overall responsibility for this policy. The Board has delegated responsibility to the Audit Committee for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

The Group General Counsel and Company Secretary has day-to-day operational responsibility for this policy and must ensure that all managers and other staff who may deal with concerns or investigations under this policy receive regular and appropriate training.

It is the responsibility of the Business Presidents, Vice Presidents and Functional Heads to ensure staff are aware of the standards expected and know the procedure to use if they want to report suspected fraud, corruption or other wrongdoing.

All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing.



Speak Up Policy

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Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the Group General Counsel and Company Secretary or the Compliance Department.

Document Owner: Tom Brophy (Group General Counsel, Company Secretary and President Sustainability)

Document Administrator: Carolina Valea (Group Compliance Manager)

Document History

Date Issued	Version Number	Reason for change
April 2014	v1	Original
November 2017	v2	Combination of Policy and Processes. Update to job roles/titles.
November 2017	v3	Update to Appendix 2
July 2018	v4	Complete revision of policy
November 2018	v5	Update to Appendix 2
October 2020	v6	Update to Appendices 1 and 2
April 2021	v7	Update to Appendices 1 and 2
May 2021	v8	Update to Appendix 2
January 2024	v9	Separation of Policy and Procedure. Update to job roles / titles.



Appendix 1 – contacts

<p>Group General Counsel, Company Secretary and President Sustainability</p>	<p>Tom Brophy T: 01405 863279 M: 07921 280792 Tom.brophy@croda.com</p>
<p>CEO</p>	<p>Steve Foots T: 01405 863231 M: 07768 646289 Steve.foots@croda.com</p>
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