

## ICL Global Speak Up Policy

ICL is committed to doing the right thing, in the right way, every day by adopting the UN Sustainable Development Goals (SDGs) as our guiding principles and implementing them. We adopt the UN Sustainable Development Goals (SDGs) as our guiding principles and implement them in everything we do. 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**, driven by care for our people, business partners, communities, and the planet.

The ICL Global Speak Up Policy (the “**Policy**”) supports the following SDG’s:



Our Code of Conduct (the “**Code**”) reflects our dedication to these guiding principles and outlines our expectations regarding acceptable behavior and social norms we, as individuals and ICL as a company, should follow.

As part of our commitment, we foster a speak-up culture and welcome hearing from anyone, whether employed, contracted, or engaged with ICL, to raise questions and concerns. We believe that voluntary reporting demonstrates integrity, honesty, and transparency, which we value in our employees and business partners.

If you see something that is not right, that seems unsafe, or may violate our Code, our policies, or the law, we expect you to **Speak Up!**

You do not have to know all the facts to Speak Up. If you honestly suspect inappropriate or unlawful conduct, report it. By Speaking Up, you provide ICL the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and undermine trust.

### Who can Speak Up?

- anyone! Whether you are employed, contracted, or engaged with ICL in any other way, you are welcome to raise questions, concerns, or complaints.

### When Should You Speak Up?

- If you ever suspect a potential violation of our Code of Conduct or any other policy, you can and should Speak Up. For example, if a procedure isn’t being followed, or if you feel you are being discriminated against, or if you feel the behaviors of others are affecting your well-being, or that of your colleagues, or anyone else you work with.



➤ **Examples of concerns that can be raised using this Policy are:**

- ✓ Fraud
- ✓ Discrimination or harassment
- ✓ Conflicts of interest
- ✓ Bribery and corruption
- ✓ Environmental, health and safety issues
- ✓ Human rights violations
- ✓ Violations of competition laws and rule
- ✓ Money laundering or violations of sanction laws
- ✓ Inadequate financial or non-financial Recordkeeping
- ✓ Improper use of ICL's resources
- ✓ Insider trading
- ✓ Disclosure of confidential information
- ✓ Violations of any of our (other) policies
- ✓ Retaliation against anyone for speaking up in good faith.

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

### **Do not use this Policy in the following situations**

- To report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your local authorities or your country's emergency phone number.
- For any grievances you may have concerning your terms of employment,
- To settle personal or legal disputes.
- Make accusations that you know are false. Doing so may lead to disciplinary measures.

### **How to Speak Up?**

Our Speak Up Policy allows you to raise concerns or report a violation through various channels, **in person, by phone, or in writing** (including email) and via the ICL Speak Up Line. You can raise your questions and concerns using the channel that you feel most comfortable with; there is no order, sequence, or preference:

- Your Direct manager
- The supervisor of your manager
- Human Recourses
- The Legal and Compliance Department
- Trust person – when available at your site
- ICL Speak Up line.

**You can report anonymously!** If you feel more comfortable raising a concern anonymously, you can use the ICL Speak Up Line.



## How to Use the Speak Up Line?

The ICL Speak Up Line is available 24/7, 365 days a year.

You can report to the Speak Up line by going online to [www.ICLhotline.ethicspoint.com](http://www.ICLhotline.ethicspoint.com) or using your mobile device by scanning the following QR code:



You can also report by calling the ICL Speak Up Line toll-free number. The operator will ask you the same information as if you were completing the form online.

### Follow up on your Speak Up Line report!

- After submitting the report, you may need to follow up.
- When you submit the report, you will be issued a 'Report Key' and a password of your choice, to follow up on your report and provide more information, as needed.
- Your follow-up is even more crucial when submitting a report anonymously, as this is the only way the investigator can reach out to you in the event of further questions.

## What kind of information do you need to provide?

- You do not have to know all the facts to Speak Up. When you file a report (in person, in writing, online, or by phone), please provide as many details as you can to allow ICL to assess and investigate your concern. Such details can include background, circumstances, history, names, dates, places, and any other relevant information and documentation that may support your report.

## Do reports remain confidential?

- All reports will be treated confidentially. This means that information about your concern will be shared only with a limited number of people on a strict need-to-know basis. Information will only be disclosed if required by law or if an important public interest is at stake.

## Will your privacy be safeguarded?

- ICL is committed to protecting the privacy of everyone involved. ICL takes all necessary measures to safeguard personal data from unauthorized access and processing and maintains this commitment throughout the investigation process. Any personal data obtained as part of this Policy will only be used for the purposes explained in this Policy or to comply with the law.

## Non-retaliation

- ICL encourages Speak Up and, in turn, is committed to protecting the rights of those who report a concern or issue in good faith through any of the reporting channels.
- ICL will not retaliate or permit retaliation against a person who in good faith:
  - Reports what they believe to be 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, will be treated as a violation of the 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 (ICL-Comp-29).
- ICL takes every report of possible misconduct seriously. When you submit a report, you will receive a confirmation of receipt.
- Your report will undergo an initial review, and it will be appropriately investigated if necessary. Please note that we will not be able to give you full details of the outcome of a report (or related actions taken) for reasons of confidentiality, privacy, and the legal rights of all concerned.

## Review and investigations

- ICL will assess the concern and decide if further review and investigation are required.
- The investigator will:
  - Act objectively and independently in establishing and reviewing the facts through document review or relevant interviews. You may be approached for additional information.
  - 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.

## What is expected of you in connection with investigations?

- If you become involved in an investigation, you must cooperate fully and answer all questions completely and honestly. All parties involved are entitled to confidentiality to avoid unnecessary damage to their reputation. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

## Questions About this Speak Up Policy

If you have any concerns or questions regarding this Policy, please contact ICL's Compliance team at [Compliance@ICL-Group.com](mailto:Compliance@ICL-Group.com)

**Raviv Zoller**

**ICL President & CEO**

**Lilach Geva Harel**

**EVP, ICL Chief Legal and  
Sustainability Officer**

**Ilana Fahima**

**EVP, Chief People Officer**