

Croda International Plc Anti-Facilitation of Tax Evasion Statement

Introduction

This policy statement, approved by the Board of Croda International Plc, is published with reference to the obligations placed upon the business under the UK's Criminal Finances Act 2017 (the "Act"). It sets out Group's commitment to preventing its associated persons (as defined by the Act), from engaging in the criminal facilitation of tax evasion in the UK, or in any foreign country in which the Group operates.

Our principles

The Group operates to the highest ethical standards of financial integrity and transparency and has zero tolerance for any activity relating to the criminal offence of tax evasion. We expect all our employees and associated persons to adhere to the same high standards, always aligned to Our Purpose and Values.

At all times, our business will be conducted in a manner such that the opportunity for, and the incidence of, tax evasion is prevented. Employees and associated persons must not undertake any actions which either cause the Group to commit a tax evasion offence or facilitate a third party committing a tax evasion offence.

Risk Assessment

Due to the nature of what we do, and how we operate, these Corporate Criminal Offence (CCO) risks are considered to be low for the Group. Notwithstanding that, the Group has a risk management framework in place which provides a structure to identify and mitigate these risks. This is supported by a strong internal control framework and an internal audit programme which considers all our compliance obligations, including those relating to the Act.

This assessment is regularly revisited, with an oversight from Group's Ethics Committee, in order to ensure that the controls and monitoring remain appropriate to the level of risk.

Training and Awareness

We are committed to ensure that the prevention policies and procedures are communicated, understood and embedded throughout the organisation, through internal and external communication, including but not limited to the Supplier Code of Conduct, and Contractor and Consultant agreements. Relevant employees are required to complete the CCO awareness training and are supported with a refresher course at appropriate intervals. Further tailored training is provided depending on an employee's position within the Group, and their role and responsibilities.

The Group has a well-established whistleblowing policy, including the Croda Speak Up reporting line to enable any employee or associated person that wishes to report a suspected wrongdoing is able to do so in confidence, without fear of repercussions. Any disclosure is investigated appropriately.

Declaration

The Board and the Group are committed to acting professionally, fairly and with integrity in all business dealings and relationships. We will implement and enforce effective policies and procedures to counter the facilitation of any tax evasion activities, and we will continually monitor and assess the appropriateness of these policies and procedures.

Formally adopted by the Board of Croda International Plc on 3 November 2021