



# **Anti-Bribery & Corruption Policy** ("ABC Policy")



## Summary Of policy

-  ICL will not engage in bribery or corruption in any form, whether it involves private companies or public officials;
-  ICL will not directly or indirectly accept, request, agree to receive, promise, offer or give a bribe or other improper payment; and
-  ICL will not tolerate employees or business associates who pay or receive bribes or otherwise violate this policy.

### Our Values

As stated in our Code of Ethics, ICL sets high ethical standards which apply to all our business transactions throughout the world and the behaviors of everyone employed or engaged by us when conducting business on our behalf. It demonstrates our commitment to maintaining our first-class reputation for ethical business behavior. We are direct, honest, transparent and fair in all our business dealings.

ICL is committed to conducting its business based on quality and integrity. The integrity of our employees, officers, directors ("**Employees**") and our business associates (e.g. partners or any third party engaged by us to do business on our behalf) ("**Third Parties**"), is critical to our success and our reputation.

Accordingly, bribery and any other forms of unethical business practice are strictly prohibited. When working for ICL, all Employees and Third Parties are required to uphold this commitment by understanding the requirements of this ABC Policy and the ABC Handbook and by always following ICL's standards, instructions and processes. Bribery not only violates our ABC Policy and Code of Ethics, it violates the law and can have very serious consequences.



## Objective

Most countries around the world have laws which prohibit bribery of customers or other business relations, bribery of government officials and bribery of foreign government officials. It is important that we protect ICL, its brand and its Employees from the risks associated with bribery and corruption.

In addition, tackling bribery and corruption is now a high priority for most countries; for example, the UK has introduced the Bribery Act 2010 ("Bribery Act"), which allows the prosecution of companies for any act of bribery committed by persons acting on behalf of the company anywhere in the world, where the company "carries on business in the UK". The US has also steadily increased prosecutions using the Foreign Corrupt Practices Act 1977 (as amended) ("FCPA"). As a result, the number of enforcement actions globally are increasing, and countries are working together to detect and prosecute bribery and corruption wherever it is committed in the world. Many of the largest global organizations have violated these laws and have been penalized with very substantial fines and imprisonment.

ICL therefore prohibits any act of bribery or corruption and applies a "zero tolerance" approach to violations of the ABC Policy by anyone employed or engaged by us to conduct business on our behalf. Any breach will be treated seriously and may result in disciplinary action, dismissal or termination of contract.

The ABC Policy is based on internationally accepted best practice guidelines and applies in all jurisdictions where ICL does business. All ICL business activities must be conducted in full compliance with the ABC Policy and the ABC Handbook, and all applicable anti-bribery and corruption laws including, but not limited to, the Bribery Act and the FCPA.



## Application

THE ABC Policy applies to everyone who is employed by, or is engaged to work for and on behalf of, ICL in whatever capacity. For these purposes, this includes our Employees and Third Parties.

The ABC Policy must be adhered to in all ICL business dealings and transactions in all countries in which ICL, our Employees and Third Parties operate, in transactions with domestic or foreign government / public officials and transactions with private companies or persons.

All of ICL's Employees and Third Parties are individually responsible for complying with this ABC Policy and any breach may lead to disciplinary action, dismissal or termination of contract.

This ABC Policy will be communicated to all entities and Employees within ICL, as well as relevant Third-Party individuals and entities.

Further information and guidance can be found in the ABC Handbook.