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## ICL Global Anti-Harassment and Anti-Discrimination Policy

<b>Approved By:</b>	<b>Inspected By:</b>	<b>Updated by:</b>	<b>Description</b>	<b>Date</b>	<b>Rev.</b>
Albert Cohen, Global Compliance Officer	Albert Cohen	Vincent Brugge, Michal Ramon	Binding Edition	May 2020	Draft Ver. 2

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## Message from ICL Management

ICL values the importance of creating a safe, respectful workplace free of harassment and discrimination. We are committed to fostering a work environment that reflects the vibrant diversity of our company, as well as the spirit of ICL’s Core Values and our Code of Ethics. These values are vital for our continued growth and success. For this reason, we comply strictly with the anti-harassment laws in all countries and territories where we do business.

All ICL employees have an important role in ensuring the Company’s adherence to anti-harassment laws. Employees, contractors, and business partners are expected to treat one another with dignity and respect. Concerns about workplace bullying and harassment should be reported immediately to a supervisor, member of the Human Resources Department, a Legal or Compliance team member, or one of the other resources outlined in this policy. These concerns will be investigated in a confidential and timely manner to prevent unacceptable behaviour from recurring and to preserve dignity, respect and safety in our workplace. Contact information and additional details about the reporting process are provided in the attached ICL Anti-Harassment Policy.

Please let us know if you have any questions about the materials in this Policy or about our Anti-Harassment Program. Our door is always open.

Thank you for your cooperation and assistance in complying with ICL’s Anti-Harassment Policy.

***ICL Management***

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## 1. Introduction

ICL has zero tolerance for harassment or discrimination of any form in the workplace. ICL is committed to providing all individuals with a work environment that is safe, productive, respectful, and free from harassment or discrimination. In keeping with this commitment, harassment and discrimination will not be tolerated.

This policy explains ICL's expectations regarding the prevention of harassment and discrimination and sets forth the options for filing harassment and discrimination complaints.

The purpose of this policy is to guarantee ICL employees a safe and respectful working environment by:

- Defining what constitutes harassment and discrimination
- Providing proper measures to prevent harassment and discrimination
- Making sure employees know how to respond to incidents of harassment or discrimination should they occur
- To set the tone at the top and the middle and define expectations from management

## 2. Scope and Applicability

The provisions of this policy apply to all ICL employees and contractors who are employed or contracted at ICL companies globally. This policy applies to every instance of harassment or discrimination among anyone employed by or contracted with ICL. The Global Compliance Officer is the person responsible for the policy, its revision and distribution.

## 3. Definitions

### 3.1 Definition of Harassment:

Harassment is unwanted, unwelcomed and uninvited behavior that creates an intimidating, hostile or offensive working environment.

ICL defines sexual harassment as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when such conduct is made either explicitly or implicitly. Examples of sexual harassment include:

- Non-verbal: leering, sexual gestures
- Verbal: whistling and cat calls; making derogatory or sexual comments, epithets or jokes, repeated and unwelcome comments about someone's physical appearance
- Physical: unwelcome physical contact; threatening conduct, including assault or blocking someone's movement
- Visual: displaying sexually suggestive objects or pictures, cartoons, calendars, magazines or posters; inappropriate emails or posts on social media that are public to other members of the company

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### 3.2 Definition of Discrimination:

ICL prohibits harassment on the basis of the race, color, religion, gender, sexual orientation (i.e. LGBTQ), national origin, age, disability, veteran status, or any other legally protected characteristic of an individual.

## 4. Preventing Harassment and Discrimination

ICL is committed to ensuring harassment and discrimination do not occur. To achieve this, employees will receive education, training and communications related to these topics, per an annual training plan developed by the Global Compliance Department.

## 5. Reporting Concerns

Anyone who believes that they have been harassed or discriminated against or who has witnessed what they believe to be harassment or discrimination are strongly encouraged to report such to their immediate supervisor. If for any reason you believe that the harassment cannot be reported to the immediate supervisor, you should report the activity to the next level of management. As an alternative to reporting to an immediate supervisor or higher level of management, you may report concerns to anyone listed below:

- Global Anti-Harassment Compliance Manager
- Human Resources Representative
- General Counsel in your region
- Your Regional Compliance Officer
- Your Regional Anti-Harassment Compliance Manager/Anti-Harassment Coordinator
- ICL Global Internal Audit
- The ICL Employee Hotline: [www.ICLhotline.ethicspoint.com](http://www.ICLhotline.ethicspoint.com)

Complaints brought to the attention of the Company, whether as a formal complaint by the complainant or as an informal complaint by any person who has knowledge of the situation, will be investigated promptly and impartially. To the extent appropriate, such investigations will be kept confidential. If ICL determines that the complaint is valid, the person engaging in harassment in violation of this policy will be subject to disciplinary actions up to and including termination. ICL will take such other remedial actions as it deems appropriate. However, intentionally making false claims will be treated as a violation of this Policy or of ICL's Code of Ethics.

## 6. Managerial Responsibility

It is the obligation of every ICL manager to act and perform his/her role by setting a personal example and conducting him/herself in a principled and appropriate manner. A manager must treat all employees with respect and sensitivity, while respecting their privacy as much as possible. It is their responsibility to help create an appropriate work atmosphere that is not threatening or degrading.

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Managers are required to take an active and leading role in the prevention of sexual harassment and retaliation. Managers and supervisors have a responsibility to report all instances of harassment and discrimination within the company as soon as they become aware of it. They must report these instances to management, to the Global Compliance Officer, or to any of the above-mentioned channels.

**Professional conduct and romantic relationship with subordinates:**

ICL's view is that romantic relationships between managers and their direct or indirect subordinates, due to their nature, inherently cause a conflict of interest for managers, which inevitably impact their ability to properly carry out their role and could harm ICL and employees at large.

Such relationships are therefore unacceptable, as they are against ICL's culture and policies, including the ICL Code of Ethics and COI procedure, even when local laws do not specifically address or prohibit such relationships.

ICL expects its managers to act as role models, adhere to the highest standards and to strictly follow its policies. This rule regarding romantic relationships applies to all employees worldwide.

**7. Policy of Non-Retaliation**

ICL will not retaliate against any employee who reports a concern in good faith, regardless of the outcome of the investigation.

**8. Appendix**

**8.1. Appendix A:** Compliance & HR Contact List

**8.2. Appendix B:** Flowchart

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## Appendix A

### Compliance and HR Contact List

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## Appendix B

### “Where do I turn?” Decision Map

