



## ICL UK Sales Limited [the “Company”] SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION FROM THE GENERAL MANAGER

ICL UK Sales Limited is firmly committed to preventing modern slavery and human trafficking in all its forms. We recognise that modern slavery is a serious crime and a violation of fundamental human rights, and we are dedicated to acting ethically and with integrity in all our business relationships. Our commitment stems from our deeply held belief that every individual deserves to be treated with dignity and respect, and that businesses have a moral obligation to protect the most vulnerable. As an organisation with an annual turnover of more than £36m GBP, ICL UK Sales Limited is required under Section 54 of the Modern Slavery Act 2015 to publish an annual statement setting out the steps we take to prevent modern slavery in our operations and supply chains.

Modern slavery is a global issue affecting millions of people worldwide, including within developed economies such as the United Kingdom. It can take many forms, including forced labour, debt bondage, human trafficking, and exploitation. We recognise that no sector or industry is immune from these risks, and that vigilance is required across all areas of our business and supply chain.

This statement relates to the financial year ending 31 December 2025. It describes the actions we have taken during this period and reflects our ongoing commitment to identifying and addressing modern slavery risks within our organisation and throughout our supply chain.

This report has been approved by the Board of Directors of ICL UK Sales Limited on 20 March 2026.

### ABOUT ICL UK SALES LIMITED

ICL UK Sales Limited is a Mining and Minerals Processing facility, which mines and processes Polyhalite for use in the fertilizer industry. Our business is organised into two distinct sections: Mining and Minerals Processing. ICL UK Sales Limited is wholly owned by ICL, which has its headquarters in Tel Aviv, Israel, and has operational sites across the globe. ICL UK Sales Limited has an annual turnover in excess of £36m.

ICL UK Sales Limited is part of the wider ICL Group. ICL places high emphasis on its corporate and social responsibilities towards its employees, shareholders, customers, suppliers, communities, and other stakeholders. As one of the world’s leading specialty minerals companies, ICL’s awareness of corporate responsibility has evolved and deepened, leading us to substantially increase our environmental, social, and governance activities, and to embed a deeply-rooted culture of responsibility that permeates every level of our organisation, guiding our decision-making and daily operations. This culture is built on a foundation of transparency, accountability, and unwavering commitment to ethical conduct. This commitment is driven from the top, with ICL’s CEO, Global Compliance Officer, and senior management leading by example, ensuring that these values and ethical standards are cascaded throughout our organisation.



Examples of ICL's commitment to corporate and social responsibility can be found in ICL's Corporate Responsibility Report on the ICL Group website at: <https://www.icl-group.com/sustainability/>

## OUR SUPPLY CHAINS

Our supply chains include the sourcing of raw materials, goods and services which allow us to undertake our activities in mining and producing our products.

## OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. To achieve this, we have implemented a range of policies and procedures that set clear standards for our employees, suppliers, and business partners. These policies require compliance with all applicable laws and regulations, including those relating to human rights and labour standards. We implement and enforce effective systems and controls to ensure that slavery and human trafficking is not taking place anywhere in our operations or supply chains. Our key policies relevant to modern slavery are set out below:

- ⚠ **ICL Code of Conduct:** The ICL Code of Conduct serves as our guiding principles for doing the right thing, in the right way, every day. It sets out the ethical standards expected of all employees and business partners, including requirements to act with integrity, comply with applicable laws, and uphold human rights. The Code sets clear expectations for ethical behaviour, and employees at all levels are required to abide by it. The complete ICL Code of Conduct can be found at: <https://www.icl-group.com/our-code-of-conduct/>
- ⚠ **ICL Human Rights Policy:** The ICL Human Rights Policy sets out ICL's commitment to respecting internationally recognised human rights, in line with the UN Guiding Principles on Business and Human Rights. This includes express prohibitions on forced labour, human trafficking, child labour, and inhumane treatment. The policy applies across all ICL operations and business relationships. The complete ICL Human Rights Policy can be found at: <https://www.icl-group.com/wp-content/uploads/2022/03/Human-Rights-Policy.pdf>
- ⚠ **Speak Up Policy:** The Speak Up Policy provides confidential channels for employees, business partners, and other stakeholders to report concerns, including potential instances of modern slavery. Employees are strongly encouraged to report any concerns through various channels, including anonymously via the Company's Speak Up Line. All concerns raised will be investigated, and appropriate action will be taken. The complete Speak Up Policy and reporting channels can be found at: [www.ICLhotline.ethicspoint.com](http://www.ICLhotline.ethicspoint.com)
- ⚠ **ICL Business Partners Code of Conduct:** The ICL Business Partners Code of Conduct sets out our expectations for suppliers, distributors, and other business partners. It includes requirements to uphold human rights and ethical employment practices, protect internationally recognised human rights, eliminate forced labour and human trafficking, and ensure fair treatment and non-discrimination. Business partners must ensure that their affiliates, employees, sub-contractors, and supply chains comply with these standards. The complete ICL Business Partners Code of Conduct can be found at: <https://www.icl-group.com/commercial-terms/#suppliers>



⚠ **Recruitment and Employment Policies:** Our internal recruitment and employment policies ensure fair and lawful employment practices within ICL UK Sales Limited. This includes verification of right to work documentation for all employees, payment of fair wages in compliance with applicable minimum wage requirements, and adherence to working time regulations. These policies help mitigate modern slavery risks within our own operations. Further information can be found at: <https://www.icl-group.com/sustainability/our-people/>

## **DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING**

ICL respects and observes internationally recognised human rights and complies with all relevant labour and employment laws for the areas in which it operates. This commitment reflects our fundamental belief that upholding human dignity is not merely a legal obligation, but a core pillar of our organisational values and culture of responsibility. ICL adheres to the following principles:

### ⚠ **Freedom of association**

ICL employees are free to form, join and/or participate in workers' organizations and exercise their right to engage in collective bargaining. ICL maintains an open channel of communication with its employees.

### ⚠ **Forced or compulsory labour**

ICL does not use forced, prison or indenture labour in any form. ICL prohibits the use of threats of or actual physical or psychological violence or measures of economic pressure to force employees to perform labour or maintain employment.

### ⚠ **Child labour**

ICL complies with the minimum age of employment required by the laws of the countries in which we do business.

### ⚠ **Discrimination and Harassment**

ICL employees are treated with respect and dignity. ICL has no tolerance for discrimination or harassment in any form, against any person based on, including but not limited to, their religion, race, ethnicity, nationality, gender, sexual orientation, age or disability. ICL supports the provision of equal opportunities to all its employees and candidates for employment.

### ⚠ **Salaries and working hours**

ICL follows, at a minimum, country requirements regarding minimum wage, fringe benefits, working hours, overtime, sick leave and vacation. ICL pays its employees fair wages and respects their need for life outside of work.

### ⚠ **Legal Employment**

ICL employs only those with valid documents proving their right to work in the relevant countries in which ICL operates.

### ⚠ **Health and Safety**

ICL complies strictly with occupational safety and health standards prescribed by local laws as well as international and local standards. ICL invests heavily in employee education and occupational safety and health measures not only to be in strict compliance with industry



standards and local safety rules, but more importantly to prevent exposure of its employees and the surrounding communities to dangerous products and processes at all its locations.

## **BUSINESS PARTNER ADHERENCE TO OUR STANDARDS**

We have zero tolerance for slavery and human trafficking. This unwavering stance reflects ICL's culture of responsibility and our belief that ethical conduct must extend throughout our entire value chain. Our Business Partners Code of Conduct requires all suppliers, distributors, and other business partners to uphold human rights and ethical employment practices. This includes requirements to protect internationally recognised human rights, eliminate forced labour and human trafficking, and ensure fair treatment and non-discrimination. Business partners must ensure that their affiliates, employees, sub-contractors, and supply chains comply with these standards. We view our business partners as extensions of our own operations, and we expect them to share our commitment to the highest ethical standards. Where we identify any violation of these requirements, including any instance of modern slavery or human trafficking, we will investigate and take appropriate action, which may include termination of the business relationship.

## **TRAINING**

ICL provides regular training to employees on legal and regulatory requirements and ICL policies, including the Code of Conduct. This training is a cornerstone of our efforts to embed a culture of responsibility throughout our organisation. Training emphasises each employee's responsibility to act ethically, to recognise potential indicators of modern slavery, and to report any concerns through the appropriate channels. By fostering awareness and vigilance at every level, we empower our workforce to be active participants in upholding our values and protecting human rights. Relevant employees involved in procurement and supply chain management receive additional guidance on identifying and mitigating modern slavery risks.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the current financial year.

  
Howard Clark  
Director  
ICL UK Sales Limited  
Date:

13/4/20