



# ICL Responsible Marketing Policy

## 1. Introduction

At ICL Group, we are committed to conducting our marketing activities in an ethical and responsible manner. This Responsible Marketing Policy outlines our guidelines and principles to ensure transparency, honesty, and respect in all our marketing efforts. We strive to build trust with our customers, protect consumer rights, promote fair competition, and contribute positively to society. All employees and stakeholders are expected to adhere to this policy.

## 2. Purpose

This policy sets rules and expectations for ICL’s Global Marketing Communication executive to ensure that ICL, its subsidiaries and affiliates, including controlled joint ventures (“ICL”) complies with the ICL Code of Conduct, ICL’s Human Rights policy and the principles of Responsible Marketing as set forth hereinafter.

Our Responsible Marketing approach is driven by our general approach of doing the right thing, in the right way, every day, by embracing the UN Sustainable Development Goals (SDG’s) as our guiding principles and implementing them in everything we do. Our work on responsible marketing supports the following SDG’s:



## 3. Scope and Applicability

This policy applies to all employees and officers of ICL in all of ICL’s operations, as well as independent contractors who interact with customers and/or suppliers on behalf of ICL including distributors of ICL products (“Employees”).

## 4. Reference

- 4.1. Applicable documents
  - 4.1.1. ICL Code of Conduct
  - 4.1.2. ICL Human Rights policy
- 4.2. Laws and Directives

As set forth in our Code of Conduct, ICL is committed to compliance with applicable laws, rules and regulations. To further this commitment, ICL has established this Responsible Marketing Policy to engage with stakeholders in responsible marketing channels and manners.

## 5. Responsible Marketing principles

- 5.1. Integrity and Transparency

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We will provide accurate information about our products and services, ensuring that our marketing communications, advertising and sales are clear, transparent, and free from misleading or deceptive information.

Any claims made in our marketing materials will be supported by factual evidence and will not exaggerate or misrepresent the benefits or features of our offerings.

Disclosures of any limitations, conditions, or potential risks associated with our products or services will be clearly communicated to customers.

5.2. Customer Protection

We will respect and protect customer privacy by obtaining proper consent for the collection, use, and storage of personal data in accordance with applicable law.

Our marketing activities will not exploit vulnerable groups, and we will comply with all relevant laws and guidelines regarding advertising.

We will promptly address and resolve any customer complaints or concerns related to our marketing activities, demonstrating our commitment to customer satisfaction.

5.3. Fair Competition

We will compete fairly and adhere to all laws related to competition, including antitrust and anti-competitive practices. ICL’s Compliance Program on Competition Law will provide guidance and support to the business on these issues.

Our marketing efforts will not include false, misleading, or disparaging statements about our competitors or their products and services.

We will respect intellectual property rights and refrain from any unauthorized use or infringement of copyrighted materials, trademarks, or patents.

5.4. Social Responsibility

We will conduct our marketing activities in a socially responsible manner, respecting diversity, inclusivity, and cultural sensitivities.

Our marketing materials will not contain content that is offensive, discriminatory, or promotes harmful behaviors.

We will strive to minimize the environmental impact of our marketing activities and adopt sustainable practices, such as reducing paper waste and promoting digital channels whenever feasible.

5.5. Responsible Advertising

Our advertisements will comply with applicable laws, as well as industry standards and guidelines set by relevant advertising self-regulatory bodies.

We will ensure that our advertising content is accurate, verifiable, and does not make false or misleading claims.

Advertisements involving testimonials or endorsements will clearly disclose any material connections or relationships between the endorser and our company.

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5.6. Monitoring and Accountability

All customer complaints relevant to ICL marketing activities will be treated by ICL’s internal audit and upon receipt of such complaint will immediately inform the responsible executives. ICL Speak Up line as our reporting channel is open to everyone providing a confidential, anonymous if required, grievances mechanism, which is operated by a third-party vendor under the auspices of the Company’s Internal Audit (IA) and compliance unit. IA will further monitor and evaluate the implementation of this Policy.

Employees will receive appropriate training to ensure awareness and understanding of this policy, and any violations will be addressed through a disciplinary process.

We will encourage feedback and complaints from customers and stakeholders and promptly address any concerns raised.

5.7. Continuous Improvement


This Responsible Marketing Policy will be reviewed periodically to ensure its continued relevance and alignment with evolving societal expectations, emerging marketing practices, and regulatory changes.

We will actively seek opportunities to enhance our marketing practices, incorporating feedback, and striving for continuous improvement in our ethical and responsible conduct.

By adhering to this Responsible Marketing Policy, we demonstrate our commitment to maintaining the highest standards of integrity, accountability, and respect in all our marketing endeavors. This policy serves as a guide for employees, stakeholders, and partners to uphold our shared values and contribute positively to our business and the communities we serve.

**6. Speak-Up**

ICL promotes a culture of Speak Up that sees great importance in allowing ICL employees and external stakeholders to raise their voices and speak up without any fear of retaliation. Accordingly, ICL requests anyone who knows, or suspects, any violation is taking place of this Policy, ICL’s Code of Conduct, or any other potential misconduct – to speak up and report it. By speaking up, our stakeholders give ICL the opportunity to address the issue, improve and do the right thing, in the right way, every day. Reports can be made through any of ICL’s speak up channels, including via the ICL’s anonymous and confidential Speak Up line. ICL will never retaliate against anyone who submitted a report or concern, in good faith, through any of our reporting channels.

  
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Raviv Zoller  
ICL CEO & President

  
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Maya Grinfeld  
ICL’s Global Marketing  
Communication VP

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