

Modern Slavery Statement – 2026

Croda's Human Rights Commitments

Croda is firmly committed to upholding and promoting human rights across all aspects of our operations. Our Human Rights Policy is aligned with internationally recognised standards, including the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labour Organization's Fundamental Conventions. These frameworks guide our commitment to respecting the rights and dignity of every individual connected to our business.

We maintain a zero-tolerance approach to modern slavery¹ in all its forms. We work to ensure that everyone who works for, or on behalf of, Croda benefits from a safe, fair, and respectful working environment in which their fundamental rights are protected. We continue to strengthen our efforts to identify, prevent, and mitigate risks of modern slavery within our own operations and throughout our global supply chain, and to promote responsible business conduct among all our partners.



This statement sets out the policies, processes, and actions we have taken during the 2025 financial year to uphold fundamental human rights and to ensure that modern slavery is not occurring in any part of our business or supply chains. It applies to all entities operating in all jurisdictions within the Croda International plc group of companies² (Croda) and constitutes our Modern Slavery Statement for the year ended 31 December 2025, as required under the Modern Slavery Act 2015.



Steve Foots
Chief Executive Officer
21 April, 2026³

¹ Croda defines modern slavery in line with the UK Modern Slavery Act definition: modern slavery encompasses various forms of exploitation, including slavery, servitude, forced or compulsory labor and human trafficking. It is characterized by the exploitation of individuals for personal or commercial gain, often involving coercion or force, resulting in the loss of freedom.

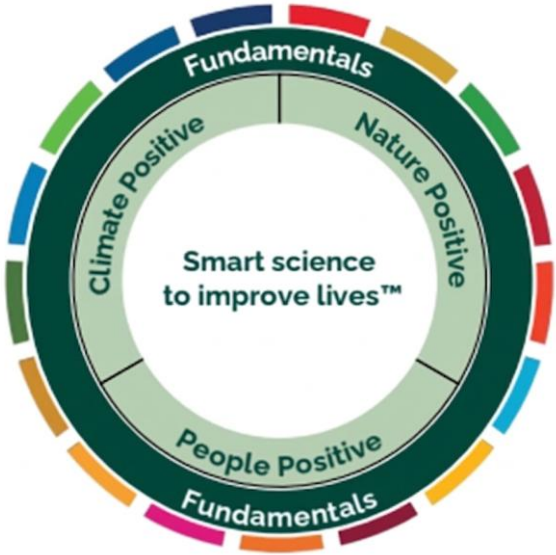
² Subsidiary companies of Croda International Plc meeting the criteria to require the preparation of an annual slavery and human trafficking statement, in accordance with section 54 of the Modern Slavery Act 2015, that are included within the scope of this Croda International Plc statement: Croda Europe Limited.

³ This Modern Slavery Statement was formally approved by the Board on 21 April 2026.

Organisation Structure, Business & Supply Chains

Who we are and what we do

At Croda, our Purpose to use smart science to improve lives™ is at the heart of everything we do. This purpose shapes not only the innovative solutions we create, but also the standards we set for how we operate as a responsible, values-led business. Improving lives is inseparable from respecting and protecting the dignity and rights of the people who contribute to our success, whether they are part of our workforce, our communities, or our global supply chain. Our commitment to human rights and to eradicating modern slavery is therefore a natural and essential extension of our Purpose.



Our distinctive, values driven culture governs how we work with each other and guides our relationships with customers, suppliers, and partners. We combine deep scientific expertise, passion, and an entrepreneurial mindset to create, manufacture, and supply specialty ingredients used by industries and consumers worldwide. As a global organisation, we recognise the responsibility that comes with our reach and influence, and we strive to ensure that the way we operate contributes positively to people’s lives and wellbeing.

Croda has clear public commitments to sustainability which include our aim to be Climate, Nature and People positive by 2030. The details of these commitments, our actions to achieve them, and our current progress are contained within the 2025 Croda Annual Report.

We operate across two core markets, Consumer Care and Life Sciences. In Consumer Care, we develop innovative and sustainable ingredients that deliver functionality to a broad range of formulations, helping customers differentiate products used daily by millions of consumers. In Life Sciences, we create components and systems that enable the delivery of Active Pharmaceutical Ingredients, supporting the advancement of next-generation biologic medicines and vaccines. We are also an innovation partner to the crop science industry, developing advanced delivery systems that meet urgent sustainability challenges and enable safer, more efficient agricultural solutions.

Across these markets, our Purpose reinforces our responsibility to ensure that the value we create never comes at the expense of fundamental human rights. This drives our ongoing efforts to identify, address, and prevent modern slavery risks, and to work collaboratively with our supply chain partners to promote ethical and responsible practices worldwide.

A complete description of our business model and values as well as our key reporting and policy statements can be found on our website at www.croda.com.

Where we operate

We operate globally⁴, with regional manufacturing facilities and local sales and innovation centres that enable us to balance efficient production with our commitment to being close to customers. Our operations include 44 principal manufacturing sites, of which 11 are larger multi-purpose facilities serving multiple businesses through shared processes and technologies. This global footprint allows us to deliver high-quality, science-led solutions across diverse markets and customer needs.



Operating at this scale also brings a responsibility to understand and proactively manage potential human rights impacts across our value chain. We recognise that some aspects of global manufacturing and sourcing can present heightened human rights challenges, including:

- Labour rights risks in regions with differing regulatory standards, such as excessive working hours, inadequate worker representation, or uneven enforcement of labour protections;
- Recruitment-related vulnerabilities, particularly where migrant or temporary workers may be at higher risk of exploitation, debt bondage, or restrictions on freedom of movement;

⁴ More information about the countries where we operate is available in our website: [Where we operate | Croda](#)

- Supply chain complexity, where multiple-tiers of suppliers across different geographies may limit visibility and increase the risk of modern slavery or unsafe working conditions; and
- Local community impacts, including health and safety risks that can affect the wellbeing and rights of neighbouring communities.

At the same time, our global presence and values-led culture create opportunities to positively influence human rights outcomes, such as:

- Embedding our strong labour and ethical standards across all sites and supplier relationships;
- Strengthening due diligence, transparency, and capability-building throughout our supply chain;
- Supporting responsible recruitment, fair working conditions, and effective worker engagement;
- Creating high-quality employment, skills development, and innovation opportunities within the communities in which we operate; and
- Leveraging our science-driven approach to develop sustainable technologies that improve lives while respecting the rights and wellbeing of people and communities.

By recognising both the challenges and the opportunities inherent in our operating model, we continue to integrate human rights considerations into our decision-making, risk management, and daily operations. This approach supports our wider commitment to ensuring that modern slavery has no place in our business or supply chains.

A global supply chain

Croda purchases directly from thousands of suppliers across the globe to meet the product and service needs of our operations. In 2025, 58.39% of Croda raw material volume was comprised of organic raw materials purchased from bio-based resources. We have an ambitious sustainable innovation target stating that, by 2030, over 75% of our raw material volumes will be sourced from renewable carbon.

This transition away from petrochemical feedstocks has a positive climate impact and avoids the release of additional fossil carbon into the atmosphere at the end of life of our ingredients. We recognise that our commitment to increase our purchases of raw materials from within global agricultural supply chains creates a high level of responsibility to ensure there are no human rights violations, including modern slavery and human trafficking, within our supplier networks.

The table below provides an overview of the main countries of origin for our top purchased bio-based feedstocks:

Feedstock	Top countries of origin
Palm	Indonesia, Malaysia ⁵
Corn	US, Canada
Rapeseed	Netherlands, US, China
Castor	India, Indonesia, China
Coconut	Malaysia, Indonesia
Soy	US, Malaysia
Wood	Netherlands

Human Rights at Croda

Our human rights governance framework

Croda's Sustainability Committee is responsible for the development, reinforcement, oversight and cascading of the Company's Code of Conduct and other policies and procedures related to the human rights programme.

The Sustainability Committee comprises six members of Croda’s Executive Committee and experts from appropriate functions. This includes the Global Compliance Director who has responsibility for the development and strengthening of our human rights programme. The Committee is chaired by the Group General Counsel, Company Secretary and President of Sustainability.

The Sustainability Committee meets quarterly in support of Croda’s culture of integrity, honesty, and openness, and to promote the importance of respecting human rights across the group and among our supply chain partners. The work of the Sustainability Committee is demonstrative of the top-level commitment to respecting and upholding human rights.

Policies relating to human rights and modern slavery

Croda is strongly committed to upholding and respecting human rights across all areas of our business. Our Code of Conduct sets clear expectations for all employees and business partners, establishing the standards that govern how we protect the rights and dignity of every person involved in our operations and supply chain. Through this Code, we commit to:

⁵ For palm-based feedstocks, the information presented reflects FY2024 data, as this represents the most recent verified information available. The FY2024 results, published in 2025, are therefore used as the latest reference point for countries of origin for palm feedstocks.

- Ensuring that no forced, trafficked, or child labour is used in any part of our operations or supply chains, supported by effective due diligence, monitoring, and auditing;
- Taking immediate and decisive action where any evidence of forced, trafficked, or child labour is identified, and supporting affected individuals to ensure appropriate remediation; and
- Providing a safe, respectful working environment that is free from bullying, harassment, and discrimination.

Our Human Rights Policy aligns with international human rights and labour standards, including the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labour Organization’s Fundamental Conventions. The policy sets out our commitment to respecting human rights in all aspects of our operations and identifies several key areas of responsibility:

- Equality and diversity
- Freedom of association and collective bargaining
- Fair wages
- Health and safety
- Labour rights
- Zero-tolerance approach to forced labour and modern slavery
- Zero-tolerance approach to child labour

To support these commitments, our Modern Slavery Policy reinforces our zero-tolerance approach and sets out the steps we take to identify, prevent, and mitigate the risk of modern slavery within Croda’s supply chains.

Our Supplier Due Diligence Policy for Modern Slavery further strengthens our approach. It formalises the requirements for supplier participation in the EcoVadis sustainability assessment process and sets clear expectations regarding supplier risk categorisation, acceptable performance levels, and the need for Corrective Action Plans (CAPs) where improvement is required. This policy enables us to assess, monitor, and improve supplier performance in a structured and transparent way.

In 2025, we revised and enhanced our Supplier Code of Conduct to further strengthen our human rights expectations. The updated Code sets out the standards we require from our suppliers and representatives, including alignment with Croda’s sustainability commitments and ethical principles. As a global business, we recognise our responsibility to work only with suppliers and partners that share our values. We expect them to uphold the same high standards that we apply to ourselves and to contribute to the protection and promotion of human rights within their own operations and supply chains.

Addressing modern slavery within Croda operations

Croda has more than 5,900 employees working at our 94 sites worldwide. Our people are a priority within our global strategy and focus on a sustainable environment.

Through our top-down and bottom-up human rights risk assessments we have identified the following areas of focus from a human rights perspective:

- Safety, health and environmental risks
- Fair wages
- Gender equality
- Freedom of association and collective bargaining
- Bullying and harassment
- Discrimination

Considering these risks, and drawing on a combination of (i) country-level risk indicators based on internationally recognised public human rights indices, and (ii) location-specific risk factors — such as ongoing construction activities, the number of human-rights-related Speak Up cases and overall employee headcount — we have identified the following countries as presenting the highest human rights risk within our operations:

- China
- Brazil
- India
- Indonesia

We take steps to manage these human rights risks within our own operations as follows:

- Our HR team play a key role in preventing human rights infringements within our own operations. The team carry out regular listening groups across the organisation in order to identify any human rights issues.
- Our Executive Committee members and senior managers conduct regular listening groups with employees from different departments and varying seniorities to identify potential improvement areas. These listening groups are planned into senior leadership travel agendas so our leadership can take the opportunity, whilst travelling, to obtain views from around the organisation.
- As a chemicals company, we have robust health and safety standards, we provide regular training on these topics, conduct regular audits and risk assessments.
- Croda is committed to creating an inclusive work environment where everyone can fulfil their potential in a workplace that recognises the value of diversity.
- We provide fair working conditions for all employees including terms and conditions of employment, remuneration, working hours, health and safety, resting time, holiday entitlements and benefits. These are applied according to territory-specific statutory requirements.
- As a result of a number of years of work carried out with the Fair Wage Network, we are a living wage employer globally and have received the relevant accreditation.

- In 2025, Croda introduced a new employee-feedback platform called Your Voice, which issues a series of monthly questions designed to gather insight into the employee experience. These surveys address a range of human-rights-related topics, are fully anonymous, and all Croda employees are encouraged to participate. As part of our human rights programme, the aggregated responses are reviewed to identify potential areas of concern or emerging risks. Relevant insights from this process will be incorporated into our human rights risk assessment where appropriate.
- In 2026, Croda's Compliance team plans to conduct bottom-up human rights risk assessments in China and India. As part of this work, the team will carry out human-rights-focused site walkarounds, engaging directly with production employees to raise awareness and understand their lived experience. The team will also meet with site leadership and relevant functional areas across the business to identify potential human rights risks and assess the effectiveness of existing mitigations.

Addressing modern slavery within Croda supply chains

Croda sources products and services from thousands of suppliers worldwide to support our global operations. We consider our supply chains to be an extension of our own business, and we therefore expect our suppliers and their representatives to uphold our values, meet our standards, and share responsibility for respecting human rights.

Our top-down and bottom-up human rights risk assessments have identified three key areas of focus:

- Safety, health and environmental risks
- Forced labour, modern slavery and child labour
- Working conditions

To determine the highest-risk countries from which we source raw materials, we use a combination of 12 internationally recognised public indicators that assess human-rights-related risks at the country level. These indicators draw on sources that measure factors such as state stability, civic and personal freedoms, prevalence of modern slavery, and other relevant human rights dimensions. Each indicator is weighted according to its relevance to human rights risk assessment, the breadth of country coverage, and the credibility of the issuing organisation. All indicators are then rescaled to a 0–100 range to ensure comparability and enable the development of a consolidated risk score.

Based on this analysis, our top ten highest-risk⁶ sourcing countries for bio-based raw materials are:

- Laos
- Burkina Faso
- China

⁶ These countries have been identified as higher risk solely on the basis of external country-level risk indicators. This assessment does not reflect the volume of bio-based raw materials we purchase from these locations, nor does it imply that our sourcing from these countries represents a higher operational or supplier-specific risk.

- Egypt
- Madagascar
- Kenya
- Indonesia
- Philippines
- Thailand
- India

We are taking steps to manage these risks within our supply chain as follows:

- Our sustainable sourcing team carry out visits to our highest risk suppliers' production facilities. During these visits they have conversations to better understand our suppliers environmental and human rights practices.
- We are in the process of rolling out human rights due diligence across our high-risk supply chains. We are starting with our palm and soy supply chains and engaging with our suppliers to better understand human rights risks. This due diligence will also help to inform our risk assessments.
- We have introduced a process to assess human rights risks among certain categories of service providers that we consider higher risk, such as construction workers, security personnel, and cleaning staff. As part of the onboarding process, these providers will be asked targeted human rights questions to help us identify potential vulnerabilities and risk indicators. We maintain ongoing scrutiny through regular listening groups and periodic service provider reviews, ensuring continuous visibility of conditions affecting these workers. What we learn from the onboarding process and ongoing scrutiny will be fed into risk assessments as appropriate.

Raw materials

Our Group risk assessment identified raw material suppliers—particularly those operating within agricultural supply chains—as a priority area from a human rights perspective. These supply chains are inherently complex, with risks often concentrated in lower tiers where visibility is limited and working conditions may be more difficult to monitor.

In 2025, Croda began implementing human rights due diligence (HRDD) across our palm and soy supply chains, starting with a pilot programme in Brazil involving a limited number of suppliers. This pilot enabled us to test and refine our HRDD methodology before global rollout, while also complementing our compliance efforts under the EU Deforestation Regulation (EUDR).

Across Brazil, we identified 21 palm and soy suppliers and conducted a preliminary assessment based on the nature of the raw materials purchased, the human rights risk profile of the country of purchase, and the risk profile of the country of origin. This assessment resulted in:

- 20 suppliers classified as high risk
- 1 supplier classified as medium risk

Eight of the highest-risk suppliers were selected for full HRDD review. As part of this process:

- Two suppliers scored above 80 in the EcoVadis Human Rights pillar, and therefore required no additional due diligence under our methodology.
- Six suppliers scored below 80, triggering enhanced due diligence steps.

The remaining suppliers requiring further review are under active assessment. Human rights questionnaires have been issued and follow-up meetings are taking place to clarify concerns and review preliminary findings. Croda is working closely with these suppliers to develop and monitor corrective action plans, with key learnings informing the continued strengthening of our human rights risk-management approach.

In 2026, we plan to expand and complete HRDD across our global palm and soy supply chains.

In line with our due diligence methodology, when a potential human rights risk area or non-conformance is identified, a corrective action plan is initiated. These actions are managed through the EcoVadis platform and shared directly with suppliers to ensure timely follow-up, ownership of improvements and measurable progress.

As part of our ongoing monitoring efforts, we track all HRDD activities carried out during the year, including decisions to implement corrective actions or to discontinue supplier engagements. These outcomes will be used as key performance indicators to evaluate the effectiveness of our broader Human Rights Programme and to guide continuous improvement.

Service providers

Our Group risk assessment identified Croda’s service providers—particularly (i) construction workers, (ii) security, cleaning and canteen staff, and (iii) logistics and transportation workers—as a high-risk category from a human rights perspective. These workers are indirectly engaged by Croda, which limits our visibility over their employment conditions and management practices, increasing the potential for human rights vulnerabilities.



Taking a risk-based approach, we have begun conducting due diligence on service provision in higher-risk countries. As part of our human rights programme, the Compliance team undertakes on-site visits to manufacturing locations to conduct human-rights-focused listening groups with service-provider employees. These discussions include targeted questions designed to identify potential vulnerabilities, indicators of risk, and gaps in protection.

In 2024, we carried out this review work in Brazil. Building on these learnings, we plan to conduct similar on-site listening groups at our larger manufacturing sites in China and India in 2026.

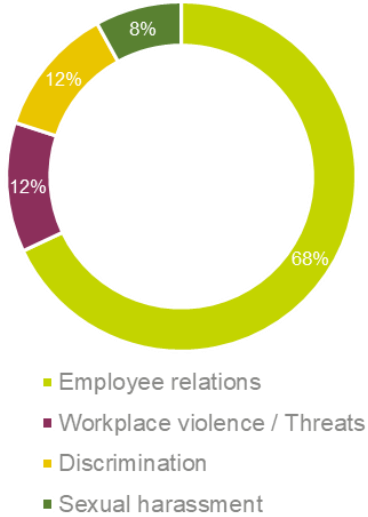
To strengthen our oversight, we have developed a process requiring service providers to respond to human rights questions during onboarding. This procedure will be rolled out globally and will be piloted in Brazil in 2026. To support this approach, we have produced guidance documents, questionnaires, and risk-assessment templates that incorporate the International Labour Organization's indicators of forced labour.

Insights from this due diligence process directly inform our risk assessments and the development of appropriate controls. As issues are identified, we will further define our remediation process for salient human rights infringements, including establishing a remediation network internally and with external expert partners. Our remediation framework is currently in draft form and will be refined as we gain operational experience. To date, Croda has not identified any significant human rights issues requiring remediation. A brief overview of Speak Up cases relating to human rights can be found in the "Routes to raise concerns" section below.

Routes to raise concerns

Croda encourages people to raise concerns and speak up, whether internal or external. Croda has several tools to help with this: Croda's grievance procedure, Croda's near-miss reporting tool, the anonymous whistleblowing system and a specific Grievance Policy for the palm derivatives sector. These tools help us to understand any human rights and modern slavery concerns. Anything reported through these tools is thoroughly investigated and where issues are found, remedial actions are taken, and mitigation steps are put in place from the learnings.

In 2025, we received 77 reports from whistleblowers. Of the 77 Speak Up reports received, 27 fell within the scope of the Speak Up system, while 50 were classified as HR-related matters. Amongst these, 25 cases were considered to have a potential impact on human rights. As of 31 January 2025, we have closed 52% of these human rights related cases after the completion of internal investigations, with 53% of cases partially or fully substantiated. These cases related mostly to employee relations.



Action taken ranged from training and changes to policies to putting in place development plans for the reported employees. The remaining cases are under investigation.

During 2025, 1 grievance related to human rights was received through Croda’s palm grievance process and is currently under investigation.

Risk assessment & management

Our human rights risk assessment methodology is grounded in the UN Guiding Principles on Business and Human Rights (UNGPs), particularly the saliency approach outlined in UNGP 24. In line with this framework, we prioritise risks based on the potential severity of harm to people rather than on business impact.

To determine saliency, we assess risks against the following severity criteria:

- Scale – the seriousness of the potential impact on an individual or group.
- Scope – the number of people who could be affected.
- Irremediability – the extent to which the harm can be restored or remedied.

Alongside severity, we also evaluate likelihood, considering the probability of the risk scenario occurring. Combining severity and likelihood enables us to identify and prioritise the most significant human rights risks across our operations and supply chains.

In 2023, Croda undertook a top-level human rights risk assessment with the support of an external provider. This exercise allowed us to identify existing human rights risks, uncover potential blind spots, and evaluate current mitigation measures. As part of this work, we assessed the likelihood and impact of key risks, providing an initial prioritisation of risks and associated corrective actions.

The assessment also enabled us to identify the stakeholder groups most likely to be affected, with a specific focus on vulnerable groups who may face heightened risks, for example, workers in lower

tiers of supply chains where visibility is more limited. Understanding who is most vulnerable supports the development of targeted due diligence, engagement and mitigation measures.

To complement this enterprise-wide, top-down assessment, Croda has begun implementing more detailed bottom-up assessments focused on high-risk locations and activities. This includes enhanced due diligence and on-site visits in higher-risk countries to build a more nuanced understanding of local conditions and potential vulnerabilities.

These assessments focus on specific facilities, activities and workforce groups, allowing us to identify more granular, context-specific risks at the operational level. Insights from local assessments feed directly into our wider Group risk assessment, ensuring that site-level findings strengthen the accuracy and relevance of our overall saliency analysis.

Croda follows a risk-based approach, beginning with countries assessed as presenting higher human rights risks. In 2024, our small compliance team conducted an on-the-ground assessment in Brazil, reviewing both internal operations and external supply chain practices. Further bottom-up risk assessments are planned for our larger manufacturing sites in China and India in 2026.

On-site audits

Croda conducts on-site audits and human-rights-focused walkarounds at our high-risk manufacturing sites. These audits enable the Compliance team to observe working practices first-hand, engage directly with production employees, and reinforce awareness of our human rights expectations. The team also meets with site leadership and relevant functions to identify potential human rights risk areas and assess the effectiveness of existing controls and mitigation measures.

To date, through the human rights due diligence processes in place, we have not identified evidence of slavery, forced labour, or human trafficking within our operations or supply chains. We recognise, however, that the ongoing roll-out of a more detailed due diligence programme may surface issues that require attention.

In line with our due diligence methodology, whenever a potential human rights risk or non-conformance is identified during an audit, a corrective action plan is initiated. These plans set clear expectations, timelines, and responsibilities, and progress is monitored to ensure that identified issues are addressed effectively and sustainably.

Croda is an active member of Sedex (Supplier Ethical Data Exchange) one of the world's leading platforms for managing and sharing sustainability and ethical-trade data within global supply chains. It provides businesses with tools to assess, monitor, and improve performance in key areas such as labour standards, health and safety, environmental practices, and business ethics.

In 2025, our manufacturing sites in Campinas, Brazil and Thane, India underwent a Sedex (SMETA) audit, for which Croda covered the full audit cost. The audits identified some non-conformances primarily related to general working-conditions practices. In line with Sedex's corrective action

framework, Croda has developed and initiated corrective action plans to address these findings, and progress is being monitored to ensure effective and sustainable improvements.

In 2026, Croda plans to undergo Sedex SMETA audits at selected manufacturing sites in Asia, specifically in Singapore, India and China.

Training and capacity building

Croda has begun strengthening organisational awareness of human rights by introducing a series of online training modules through our Sustainability Academy. These modules, assigned to key individuals across the organisation, cover a broad range of sustainability topics designed to enhance understanding of the climate, nature and societal challenges affecting people and the planet, as well as the actions being taken to address them.

In 2025, Sustainability Academy modules were assigned to 481 employees, with 56% (267 individuals) completing at least one module. These modules help build broad awareness of human rights and modern slavery issues within the organisation and contribute to strengthening a consistent baseline understanding across our workforce.

In 2026, Croda is further strengthening this capability by providing bespoke training on our human rights due diligence methodology to key functions, including procurement teams and other roles closely involved in managing supply chain risk. This targeted training is designed to enhance practical understanding of our due diligence approach and to ensure that those in critical positions are equipped to identify, assess and respond to potential human rights impacts more effectively.

Effectiveness & key performance indicators

At this stage, Croda does not yet record or track specific KPIs on the progress or effectiveness of preventive, mitigative, or remediation actions related to human rights within its own operations.

We are currently in the early phase of rolling out our human rights due-diligence methodology. As such, the development of tailored KPIs forms part of the programme's next stage of maturity. As we continue to cascade the Human Rights Programme across the business, we will identify relevant indicators to measure both implementation progress and impact, enabling more structured monitoring and reporting over time.

Our aim is to ensure that future metrics provide meaningful insights into the effectiveness of our actions and support continuous improvement in our human rights management approach.

Actions taken in the reporting year

During 2025, Croda undertook several actions to strengthen its approach to human rights and modern slavery risk management across its operations and supply chain. We updated our Supplier Code of Conduct to reinforce expectations regarding ethical conduct and human rights, ensuring

stronger alignment with our sustainability commitments. This revision reaffirms our expectation that all suppliers and representatives uphold standards consistent with those applied within our own business.

To enhance internal oversight, we introduced Your Voice, a new monthly, anonymous employee-feedback platform designed to gather insights on the employee experience, including human-rights-related themes. Insights from the survey are incorporated into our broader human rights risk assessment to help identify potential areas of concern.

We also initiated human rights due diligence (HRDD) within our palm and soy supply chains, beginning with a pilot programme in Brazil. This pilot allowed us to test and refine our HRDD methodology ahead of full global implementation and supported our compliance with the EU Deforestation Regulation.

In addition, our manufacturing sites in Campinas, Brazil and Thane, India underwent a Sedex (SMETA) audit funded by Croda. The audits identified certain non-conformances related mainly to general working conditions. We developed and commenced corrective action plans to address these issues, with progress closely monitored to ensure sustained improvements.

To support capability building, 481 employees were assigned Sustainability Academy training modules in 2025, with 56% completing at least one module. These modules help build broad awareness of human rights and modern slavery issues within the organisation and contribute to strengthening a consistent baseline understanding across our workforce.

Looking ahead – future commitments

In 2026, Croda elevated its Human Rights Programme to the status of a formal company transformation project, ensuring strengthened governance, structured oversight, and regular performance monitoring at the highest organisational levels. Defined actions, deliverables and timelines are now tracked through this framework, with oversight from the Executive Committee to monitor progress, review risks, and guide timely interventions. This approach ensures that human rights risk-management activities are systematically implemented and evaluated throughout the year.

As part of this programme, Croda plans to conduct bottom-up human rights risk assessments in China and India, including site walkarounds focused on understanding employee experience, raising awareness, and engaging with site leadership and key functions to identify potential risks and review existing controls. Similar on-site listening activities will be carried out at major manufacturing locations in both countries.

In 2026, Croda will also expand and complete human rights due diligence across its global palm and soy supply chains, building on earlier pilot work in Brazil. Selected manufacturing sites in Asia, including Singapore, India and China, are scheduled to undergo Sedex SMETA audits as part of ongoing risk monitoring.

To further build internal capability, targeted training on Croda's human rights due diligence methodology will be delivered to procurement and other functions involved in managing supply chain risk, ensuring these teams have the practical understanding needed to identify and respond to potential human rights impacts more effectively.