

## Whistleblower Policy

Consistent with our Code of Business Conduct and Ethics, it is our policy to promote high standards of integrity by conducting our affairs in an honest, ethical, and legal manner. The integrity and reputation of Innophos depends on the honesty, fairness and integrity brought to the job by each person associated with Innophos.

### ***Reporting Responsibility***

This Whistleblower Policy is intended to encourage and enable employees and others doing business with Innophos to report misconduct, raise concerns over fraud, questionable accounting, internal control or auditing matters, bribery, kickbacks, substance abuse, harassment, discrimination, unsafe work conditions, threats of violence or any other violation of our Code of Business Conduct and Ethics, or laws or regulations that govern our operations.

### ***No Retaliation***

Employees and other persons doing business with Innophos may report breaches of our Code of Business Conduct and Ethics and other misconduct, raise issues or simply ask questions without fear of dismissal or retaliation of any kind.

### ***Where to Report***

Innophos has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If an employee is not comfortable speaking with your supervisor or you are not satisfied with your supervisors' response, you are encouraged to speak with any personnel within Innophos' HR or Legal Departments. It is the responsibility of Innophos supervisors and managers to report any complaints to Innophos' Chief Legal Officer (the Compliance Officer under Innophos' Code of Business Conduct and Ethics), who has the responsibility to investigate all reported complaints.

Employees and other persons doing business with Innophos also have the option of utilizing our Convercent™ reporting solution, which offers anonymous reporting services and is available 24-hours a day, seven days a week.

### ***Convercent Reporting Procedures***

Convercent offers two easy options to anonymously report issues via a toll-free hotline or the internet.

- Anonymously report issues via the internet at [www.convercent.com/report](http://www.convercent.com/report). Options are available to display the report form in your preferred language.
- Anonymously report issues via a whistleblower hotline.
  - For those in the United States, call toll free 1-800-461-9330 to report the issue with the help of a Convercent call center representative.
  - For those outside the United States, place a collect call to +1-720-514-4400 to report the issue with the help of a Convercent call center representative and language interpreter. The call center supports more than 300+ languages. Additional international dialing instructions can be displayed in your preferred language at [www.convercent.com/report](http://www.convercent.com/report).

***Confidentiality***

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. When using Convercent, the user will be provided a confidential issue access number and asked to provide a personal password and security question. The access number and password allow you to check the status of the report on the Convercent website ([www.convercent.com/report](http://www.convercent.com/report)), as well as send and receive anonymous messages pertaining to your report at any time. If you provided an email address, you will also receive email notifications from Convercent as the report status is updated.

***Handling of Reported Violations***

Once your report has been submitted, it will be immediately forwarded to the appropriate individuals within our organization for review and investigation. Innophos' Chief Legal Officer is responsible to ensure all reports are promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.