



**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

**FORM SD
Specialized Disclosure Report**

ICL GROUP LTD.

(Exact name of registrant as specified in its charter)

Israel	001-13742	Not Applicable
(State or other jurisdiction of incorporation or organization)	(Commission File Number)	(IRS Employer Identification No.)

Millennium Tower, 23 Aranha St.
Tel-Aviv 6120201 Israel

(Address of principal executive offices)

Aya Landman
VP, Chief Compliance Officer & Corporate Secretary
Tel: +972 (3) 6844440

(Name and telephone number, including area code, of the person to contact in connection with
this report)

Check the appropriate box to indicate the rule pursuant to which this form is being filed:

☐ Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting
period from January 1 to December 31, 2024.

☒ Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year
ended 2024.

SECTION 1 – CONFLICT MINERALS DISCLOSURE

Item 1.01 Conflict Minerals Disclosure and Report

Not applicable

Item 1.02 Exhibit

Not applicable

SECTION 2 – RESOURCE EXTRACTION ISSUER DISCLOSURE

Item 2.01 Resource Extraction Issuer Disclosure and Report

Disclosure of Payment by Resource Extraction Issuers.

The information required under Item 2.01(a)(3) is set forth in Exhibit 2.01 attached to this Form SD.

SECTION 3 – EXHIBITS

Item 3.01 Exhibits

The following exhibit is filed as part of this report on Form SD.

Exhibit Number	Description
2.01	Disclosure of Payment by Resource Extraction Issuer

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

ICL GROUP LTD.

(Registrant)

By: /s/ Aviram Lahav

Name: Aviram Lahav

Title: Chief Financial Officer

September 25, 2025

(Date)

EXHIBIT 2.01

Disclosure of Payment by Resource Extraction Issuer Payments made during the fiscal year ended December 31, 2024 (\$ Thousands) ⁽¹⁾

Major Political National and Subnational Jurisdiction of the Project	Project name ⁽²⁾⁽³⁾	Payee	Taxes	Royalties	Fees	Infrastructure improvements	Total	Notes
Israel	Dead Sea HaDarom (Potash and Industrial Products segments) ⁽⁵⁾	Local Municipalities (HaDarom)	29,468	-	-	-	29,468	Ministry of Infrastructure and Innovation Authority and Ministry of Tourism
		Israel Ports (HaDarom)	-	-	12,095	-	12,095	
		Government offices	1,093	-	-	4,818	5,911	
		Mekorot Water Company Ltd.	-	-	7,369	-	7,369	
		Israel Electricity	-	-	50,188	-	50,188	
		State Treasury	-	68,297	-	20,492	88,789	
		Tax Authority ⁽⁴⁾	41,946	-	-	-	41,946	
	Total Dead Sea		72,507	68,297	69,652	25,310	235,766	
	Rotem Mines HaDarom (Phosphate Solutions segment)	Local Municipalities (HaDarom)	7,559	-	-	-	7,559	Mainly Ministry of Energy and Infrastructure
		Israel Ports (HaDarom)	-	-	4,251	-	4,251	
		Government offices	401	13,847	4,360	-	18,608	
		Mekorot Water Company Ltd.	-	-	23,432	-	23,432	
		Israel Electricity	-	-	3,824	-	3,824	
		Tax Authority	1,200	-	-	-	1,200	
	Total Rotem Mines		9,160	13,847	35,867	-	58,874	

Disclosure of Payment by Resource Extraction Issuer
Payments made during the fiscal year ended December 31, 2024 (Thousands) ⁽¹⁾

Major Political National and Subnational Jurisdiction of the Project	Project name ⁽²⁾⁽³⁾	Payee	Taxes	Royalties	Fees	Infrastructure improvements	Total	Notes
United Kingdom	Boulby England (Growing Solutions segment)	Redcar & Cleveland Borough Council	1,516	-	-	-	1,516	
		North York Moors National Park Authority	1,301	-	271	-	1,572	
		The Crown Estate	-	1,938	-	-	1,938	
		Environmental Agency	-	-	140	-	140	
	Total Boulby		2,817	1,938	411	-	5,166	
Spain	Cabanassas (Potash segment)	Catalan Water Agency (ACA)	-	1,131	1,012	7,966	10,109	
		Catalonian Government	-	-	745	-	745	
		Súria and Sallent councils	438	-	-	-	438	
		Barcelona Port	-	821	-	-	821	
		Tax Authority	-	133	52	-	185	
	Total Cabanassas		438	2,085	1,809	7,966	12,298	
China	Haikou (Phosphate Solutions segment)	Kunming Xishan District Natural Resources Bureau and Kunming Water Supplies Bureau	-	456	793	-	1,249	
		Tax Authority	36,874	4,267	139	-	41,280	
		Kunming Electricity	-	-	6,677	-	6,677	
	Total Haikou		36,874	4,723	7,609	-	49,206	
Total			121,796	90,890	115,348	33,276	361,310	

- (1) All payments are reported in US dollars (USD) which is the reporting currency of the consolidated financial statements of ICL.
Payments in England, Spain and China were made in GBP, Euro and RMB, respectively, and translated using the relevant average annual rate of USD.
- (2) Resource subject of commercial development - Dead Sea: potash, magnesium and bromine; Rotem Mines: phosphate; Boulby: polyhalite; Cabanassas: potash; Haikou: phosphate.
- (3) Method of extraction - Dead Sea: evaporation ponds; Rotem and Haikou Mines: Open pits; Boulby and Cabanassas: underground mines.
- (4) The income tax payments are based on estimated amounts. The amounts presented for 2024 do not include a \$39 million refund of overpaid taxes related to the prior year.
- (5) Dead Sea project - payments by segments:

Payments by Segments - Dead Sea project
Payments made during the fiscal year ended December 31, 2024 (Thousands) ⁽¹⁾

Segment name	Payee	Taxes	Royalties	Fees	Infrastructure improvements	Total
Industrial Products (IP)	State Treasury	-	23,484	-	-	23,484
	Local Municipalities (HaDarom)	7,797	-	-	-	7,797
	Mekorot Water Company Ltd.	-	-	2,800	-	2,800
	Government offices	358	-	-	-	358
	Tax Authority ⁽⁴⁾	4,206	-	-	-	4,206
Total IP		12,361	23,484	2,800	-	38,645
Total Potash		60,146	44,813	66,852	25,310	197,121
Total Dead Sea		72,507	68,297	69,652	25,310	235,766