



EFFECTIVE DATE: 01. 11. 2020

OWNER OF THE POLICY: GENERAL COUNSEL & SECRETARY OF THE BOARD

# CORPORATE GIFTS & ENTERTAINMENT POLICY

VERSION 3

FOR INTERNAL AND EXTERNAL USE

## CONTENT

### I. *PURPOSE*

The aim of this Policy is to set the principles and framework related to the giving or receiving of gifts and entertainment (hereinafter, "G&E") to ensure compliance with legal requirements and with our commitment to adhering to the highest ethical standards of conduct in all of our activities.

### II. *SCOPE*

The Policy applies to every employee, officer and director of Firmenich as well as to temporary employees. The Policy also applies to G&E exchanged on behalf of Firmenich by third parties, such as agents and customs brokers. For Firmenich employees, violations of this Policy can lead to disciplinary actions.

### III. *POLICY STATEMENTS*

Firmenich does not encourage exchanges of G&E. While the Company accepts that giving or receiving appropriate G&E is common business practice, G&E should never be offered or accepted with the intention to influence, or appear to influence, business decisions or relationships in any way. Regardless of their value, G&E must:

- be in line with all applicable laws,
- be for legitimate business or educational reasons,
- be unsolicited,
- be reasonable, appropriate and occasional,
- not create a conflict of interest,
- not be offered as a bribe, payoff or kickback.

### IV. *DEFINITIONS OF GIFTS AND ENTERTAINMENT*

Gifts and Entertainment shall include for the purpose of this Policy:

- Corporate branded items,
- Cultural courtesies,
- Business gifts,
- Travel or accommodation associated with a business conference, meeting or event,
- Business meals and refreshments,
- Tickets to sports, music or cultural events,
- Anything else of value offered or received without payment in return, other than a donation or a sponsorship.

For further definitions please refer to Annex I.

#### V. REGISTRATION AND APPROVAL

- Offered G&E must be recorded and approved in the Gift Register, available [here](#), prior to being offered. In the event prior registration is not possible due to the circumstances of the situation, the G&E should be registered without delay.
- Received G&E should be recorded and approved in the Gift Register as soon as possible after being received.
- You are required to comply with the below limits when offering or receiving G&E:

Category and threshold	Approver
<b>BUSINESS PARTNER</b>	
G&E (except meals and refreshments) above CHF 50	General Manager
G&E (except meals and refreshments) above CHF 200	DG Member
<b>PUBLIC OFFICIALS</b>	
G&E (including meals and refreshments) below CHF 200	Legal Director and General Manager
G&E (including meals and refreshments) above CHF 200	Legal Director and DG Member

- G&E to Business Partners: Employees seeking reimbursement for (i) G&E not exceeding the value of CHF 50 or/and (ii) all meals and refreshments should use Rydoo.
- Gifts to fellow colleagues do not need to be registered. They can only be expensed (via Rydoo) to Firmenich if given by the head of the function as part of a formal business events or exceptional personal events.

Any third party needing to exchange G&E on behalf of Firmenich should contact the Business Ethics function via [ethics@firmenich.com](mailto:ethics@firmenich.com) beforehand.

#### VI. PROHIBITIONS AND RESTRICTIONS

- If you need to offer a gift to a Public Official, please provide only Firmenich corporate branded items, in small quantities and occasionally. Meals/Refreshments/Entertainment should only be offered when necessary and low in value.
- Never give or accept cash gifts, vouchers that can be exchanged for cash or cash equivalents (such as gift cards, gift certificates or “red envelopes”) and drugs or tobacco products.
- Reject all offered G&E that may be considered generous or extravagant by an independent party. Under certain circumstances, when rejecting an inappropriate G&E is not possible, the guidance of your GM, Legal Counsel or the Business Ethics team should be sought.
- Ask potential recipients whether any rules or restrictions apply to them and ensure that more restrictive limits are followed.

- For any meals or entertainment provided to a third party, a Firmenich employee must be in attendance.
- Never give a financial contribution of any kind to any political candidate, political parties or religious organizations on behalf of or in the name of Firmenich. Please note that charitable contributions through The Firmenich Charitable Foundation are covered separately and governed in accordance with the Foundation's Articles of Incorporation/Bylaws.

## VII. ROLES & RESPONSIBILITIES

### General Manager

- Ensures, together with the local management, the implementation of this Policy and compliance with it in their respective affiliate
- Approves G&E requests as per this Policy

### DG member

- Approves G&E requests as per this Policy

### Legal Director

- Approves G&E requests as per this Policy

### Business Ethics function

- Develops training and communication initiatives regarding this Policy
- Provide guidance related to this Policy to management and employees, as needed

## VIII. EXCEPTIONS

Exceptions to this Policy must be approved by the Policy owner.

## IX. POLICY MANAGEMENT

Questions and feedback regarding this Policy should be submitted to the Business Ethics function via [ethics@firmenich.com](mailto:ethics@firmenich.com)

Policy Change Log:

Version	Date of issue	Effective date	Purpose of change
1	01 12 2017	01 12 2017	<ul style="list-style-type: none"> <li>• New Policy release</li> </ul>
2	01 12 2019	05 12 2019	<ul style="list-style-type: none"> <li>• Update of the scope, registration and approval thresholds</li> <li>• Alignment of the Policy with the related Guidelines</li> </ul>
3	01 11 2020	01 11 2020	<ul style="list-style-type: none"> <li>• Updates reflecting the introduction of the Corporate Donation &amp; Sponsorship</li> </ul>

**X. SUPPORTING DOCUMENTS**

- Code of Ethics
- Corporate Anticorruption Policy
- Conflicts of Interest Policy
- Travel & Entertainment Policy
- Hotline (Whistleblowing) Policy
- Gift Register
- Gifts & Entertainment Guidelines
- Corporate Donation & Sponsorship Procedure

**XI. ANNEXES**

1. [Further definitions](#)