



## CODE OF ETHICS

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# living our fundamentals

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December 2022

Since our creation in 1895, Firmenich has always been more than a company, we are a family with a unique legacy of responsible business.

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# 01 OUR FUNDAMENTALS

## What do we stand for?

OUR  
PURPOSE  
Create positive emotions to enhance wellbeing, naturally.  
How do we achieve it?  
Our Fundamentals

### Customers

We fragrance and flavor our customers' products for our **MUTUAL SUCCESS**. Our customer intimacy is unique as we partner with our customers to transform their ambitions into reality. We anticipate consumers' desires, continuously reinventing the world of taste and smell. We deliver value through innovative products and services, placing decision-making as close as possible to our customers.

### People

Our people are at the heart of our company. They are recognized for their **PASSION, TALENT and COMMITMENT**. We strictly maintain the highest levels of personal integrity and ethical behavior. We value diversity and create an environment in which each colleague is empowered and encouraged to grow, enabling us to shape our future with confidence and imagination. We unite the finest talents and nurture an entrepreneurial team spirit to attain our strategic goals.

### Creativity

Creativity is our **ESSENCE**. We create fragrances and flavors that inspire moments of pleasure and delight for consumers worldwide. We lead our industry in research and innovation, constantly driving incremental and breakthrough winning ideas and technologies. We apply our creativity to improve all parts of the business.

### Sustainability

Our integrity and sense of individual and collective responsibility ensure our **LONG-TERM SUCCESS**. We practice a sustainable business model for the well-being of present and future generations. We engage all our partners to build a responsible, traceable value chain. We strictly comply with all regulatory requirements and strive to achieve the highest international standards on quality, safety and the environment.

### Legacy

Our **INDEPENDENCE** gives us the freedom to control our destiny. We are a family owned company, committed to our independence. We take a long-term view of our business. We pursue a policy of financial strength, profitable growth and return on assets.

OUR CODE. Our Fundamentals underpin our Code and our purpose, helping us understand what doing the right thing means at Firmenich. Wherever you are, whatever your role is, our Code is here to help.



Dear Colleagues,

Welcome to Firmenich's Code of Ethics. At Firmenich, we work hard to make sure we do the right things, the right way with agility and transparency befitting our great company.

Our Code connects us with our Fundamentals, our guiding values towards our Customers, our People, our Creativity, Sustainability, and our Legacy. The Code is essentially an outline that sets clear expectations about how to do the right thing, the right way, every day.

As we embark on our next phase of growth it is up to each of us, as Firmenich employees, to continue to enhance our reputation by holding ourselves to the highest standards of honesty, fairness and integrity, and by protecting our people, our products and the planet. And that's where the Code can help.

The Code wasn't created as a 'rule book' to catch you doing the wrong thing. It was created to serve as an active, vibrant document that

can help us, in the simplest terms, do the right thing. Think of it as a guidebook, to be consulted as you go about your job.

If you need any clarification, your Firmenich management and colleagues, including our Human Resources, Business Ethics and Legal Departments, are always there for you. The Speak Up platform (Hotline) is also available, 24/7. If you do so with honest intention, you have my commitment that you will be protected from retaliation.

Thank you for your close attention to our Code, for upholding our Fundamentals and for all your efforts to drive Firmenich's success with the highest level of integrity.

Sincerely,  
Gilbert Ghostine

A handwritten signature in blue ink, appearing to read 'Gilbert Ghostine'. The signature is stylized with a large, sweeping initial 'G' and a long, horizontal flourish extending to the right.

# 03

## ABOUT OUR CODE

### What is the Code?

Our Code embodies our Fundamentals: our purpose and values. It will help you find and understand the principles, standards and policies that apply to your work with Firmenich.

All of us should live by our Fundamentals – not just the rules, but the spirit and the values behind them.

It is divided into four chapters, which set out our responsibilities to each other, to Firmenich, to our business partners (which include, amongst others, our clients, suppliers, agents and distributors) and to the environment and society. Many of the issues discussed affect more than one of these stakeholder groups. Throughout our Code you will find information about where to go for help or further clarification.

Although our Code does not offer an answer for every situation and does not replace our policies and procedures, it will help you navigate them. Make sure you familiarize yourself with the contents. Refer to it often in your work, use good judgement, and always ask for guidance if you need it.

## Who does it apply to?

Our Code applies to all Firmenich employees around the world, including all members of the Board of Directors, as well as external staff, such as temporary personnel.

The Code is also relevant to our business partners each of whom can have a direct impact on our reputation. We only want to do business with those who respect the law, share our values and adhere to the Principles as outlined and explained in each chapter of this Code.

**Q Do I have any additional responsibilities if I am a manager or supervisor?**

**A** If your role involves managing or supervising others, you are responsible to set the example. To do this, you need to be familiar with the Fundamentals and our Code, to live by the Principles and to create a positive work environment where everyone feels comfortable asking for advice and raising concerns. You also need to ensure your team members are familiar with the Fundamentals and the Code, know how to comply with them and participate in periodic training.

Always ask for advice if you are not sure how to handle or respond to an issue or concern raised to you by team members, or what action to take if you believe that one of your team members has been retaliated against for raising a concern of misconduct.

## What happens when there is a breach of our Code?

At Firmenich, each of us is required to comply with our Fundamentals, our Code, policies and standards, and with all applicable laws, regulations and industry standards. Failure to do so may result in disciplinary actions for the individuals concerned, up to and including dismissal, as well as potential civil and criminal liability. We also must complete related mandatory training activities made available by Firmenich.

In cases where our business partners have not met our expectations and/or fail to meet contractual obligations, we will take appropriate measures that may include termination of the business relationship.

**Q Different laws might apply in different countries. Is our Code applicable worldwide?**

**A** Firmenich has a global presence with operations in over 100 markets. Our Code applies in each of these locations. When a standard within our Code differs from applicable laws, the stricter standard prevails.

In case of doubt, we encourage you to raise the matter to local management, Human Resources, the Legal Department or contact the Business Ethics function via [ethics@firmenich.com](mailto:ethics@firmenich.com)

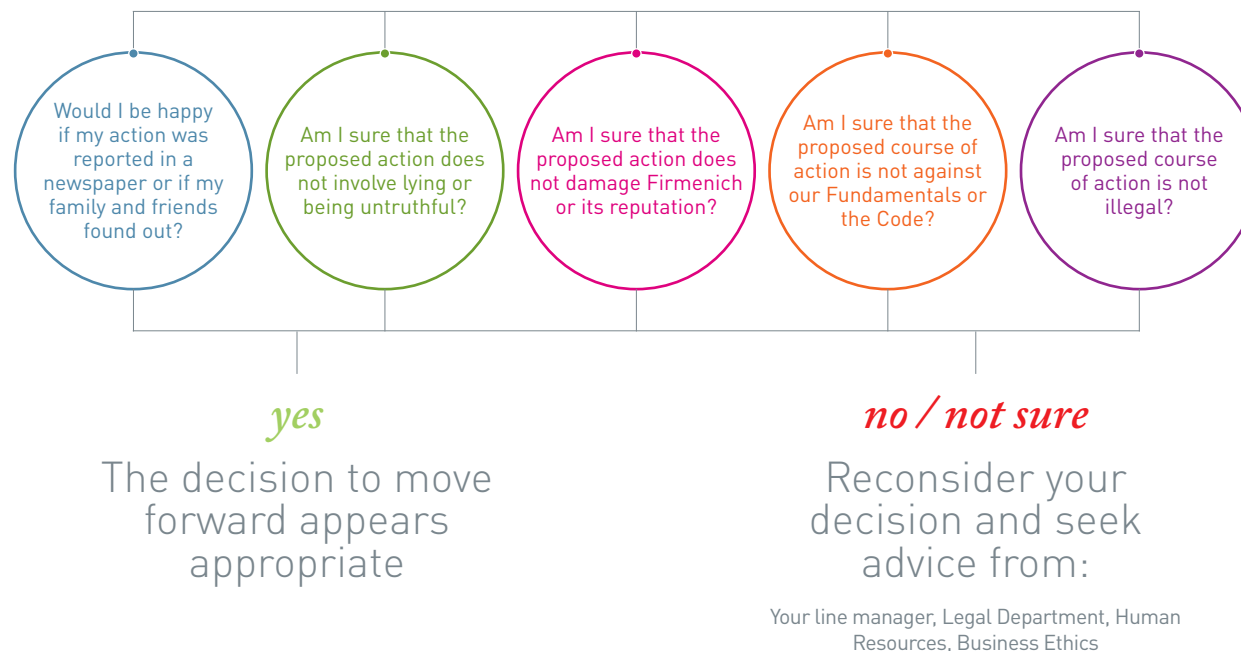
While local language translations of the Code are available, the original English version remains the official version.

# 04

## 'STOP AND THINK' CHECK

The Code cannot cover every situation in which you may find yourself. The following model provides some questions to ask yourself that can help you take the right decision. If the answer to any of these questions is 'NO', or if you are not sure about the best course of action, you should reconsider it.

When faced with a situation that you are not sure how to resolve, stop and think.



# 05

## SPEAKING UP

### How and when to speak up

Each of us has a responsibility to speak up if we are unsure about something, have a concern, or see anything that is not in line with our values. You can speak with the Head of Business Ethics -or email [ethics@firmenich.com](mailto:ethics@firmenich.com)-, local or HR management, or use the Speak Up platform (Hotline).

The Speak Up platform (Hotline) is an independent and confidential 24/7 telephone and web-based service, available to our employees and business partners. Firmenich's 'Speak Up' framework is designed to reassure you that raising concerns is safe and the right thing to do, and to enable you to do so at an early stage and in the right way. Your concerns will be treated confidentially, to the fullest extent permitted by law.

We will consider each concern raised and, where required, we will allocate an investigator to examine the issues raised to establish the underlying facts. Depending on the investigation findings, any action required to address the concerns raised will be taken, regardless of the position of the person concerned. We will provide you with feedback after the conclusion of the investigation in accordance with the Speak Up Policy.

### Zero tolerance for retaliation

Retaliation against anyone who, in good faith, seeks advice, raises a concern of misconduct or cooperates in an investigation is strictly prohibited. Anyone found to have retaliated against someone who has raised a concern in good faith will face disciplinary actions.



#### ADDITIONAL INFORMATION

[Speak Up Policy](#)

[Speak Up platform \(Hotline\)](#)

# 06

## OUR RESPONSIBILITIES TO OUR COLLEAGUES

‘People’ are the heart of our company; they are a pillar of our Fundamentals. We want everyone at Firmenich to feel committed and proud to work for Firmenich. Our colleagues are our greatest asset and key drivers of our success.

## WE RESPECT EACH OTHER AND WE VALUE DIVERSITY

**PRINCIPLE:** We treat each other professionally, honestly and in the way we would like to be treated. We recognise that by understanding and valuing differences, we work better together and create value for our stakeholders.

**FIRMENICH’S COMMITMENT:**  
At Firmenich we treat everyone equally, regardless of their gender, age, race, ethnicity, religion, marital status, sexual orientation, gender identity, experience, socio-economic status, abilities, and other protected categories.

Firmenich provides an inclusive working environment in which everyone can grow and where relationships are based on respect and professionalism.

**YOUR RESPONSIBILITY**  
Avoid any attitude or behavior that might be perceived as discrimination, harassment or bullying. Examples include inappropriate jokes, disrespectful or abusive language (both in person and online), unwelcome physical contact, marginalization, recurring exclusion of colleagues from meetings and conversations or display of offensive materials.

Be mindful of people’s sensitivities: a funny joke for you might be perceived as bullying or harassment by somebody else.

Challenge someone if you find their behavior abusive, intimidating, humiliating or disrespectful. You should not hesitate to talk to your line manager, Human Resources, Business Ethics or use the Speak Up platform (Hotline) if you have such concerns.

**Q** I overheard a colleague making poor-taste comments about homosexuality in the presence of other colleagues. I think he was only trying to be funny, but it still made me feel uncomfortable. What should I do?

**A** We want to create an open, respectful and inclusive working environment. Disrespectful comments and conduct are not acceptable. This behavior is highly likely to make other colleagues feel upset, marginalized or disrespected. If possible, you should confront the colleague engaging in this behavior and make it clear that their actions are not acceptable. If they do not apologize and stop straight away, and refrain from repeating the behavior in future, or you do not feel comfortable confronting the person, you should report the behavior to your line manager, Human Resources, Business Ethics or use the the Speak Up platform (Hotline).

### ADDITIONAL INFORMATION

Corporate Diversity and Belonging Policy  
Code of Ethics Guide for Managers

## WE MAKE SAFETY, SECURITY AND HEALTH IN THE WORKPLACE A PRIORITY

**PRINCIPLE:** We prioritize the safety, health, wellbeing and security of our employees, their families and our business partners.

**FIRMENICH'S COMMITMENT:** Firmenich takes its duty of care towards everyone seriously and actively pursues continuous improvement to achieve and maintain best in class safety, health, wellbeing and security standards.

### **YOUR RESPONSIBILITY**

Report to work fit for duty without impairment from drugs, alcohol, medication or other influences.

Maintain a clean and orderly workplace.

If you see a situation that might pose a safety, health, wellbeing or security hazard, intervene immediately.

Report all improper safety, health and security practices, including all injuries, incidents and near-misses via your line manager, designated internal procedures or the Speak Up platform (Hotline). Situations that might seem insignificant at first glance could have serious consequences if not addressed promptly.

Comply with all applicable regulations and follow your affiliate's specific Health & Safety and Security procedures.

Talk to your line manager when you are unsure how to proceed, or if any health and safety requirement is unclear.

**Q** I have a strong suspicion that a colleague may be turning up for work under the influence of alcohol. What do I do?

**A** In this case, you should report your suspicions immediately to the line manager of the person you are concerned about or to your line manager to properly address the situation.



#### ADDITIONAL INFORMATION

Corporate Occupational Health and Safety Policy  
Firmenich 'Safety at Work' webpage  
Firmenich QHSE Charter

## WE MAINTAIN HIGH STANDARDS OF PRIVACY AND TRUST

**PRINCIPLE:** We want to be a trustworthy partner for everyone. Therefore, we handle personal data we are entrusted with carefully, confidentially and in compliance with local laws.

**FIRMENICH'S COMMITMENT:** Firmenich maintains technical and organizational safeguards to protect personal information against loss, theft, unauthorized access, disclosure, copying, use or modification. We limit access to those who have a legitimate business-related need to know, thus ensuring that appropriate processes are in place to minimize the risk of breaches to privacy and confidentiality, as well as ensuring that there is an appropriate response strategy in the event that a breach does occur.

### **YOUR RESPONSIBILITY**

Familiarize yourself with the standards in the Corporate Employee Personal Data Protection Policy. For example, you should only collect or process employee data when there is a legitimate business

need or contractual requirement, or if legally required to do so.

Be careful not to disclose confidential information or personal data, for example on the phone or by leaving documents containing sensitive information unattended.

Ensure that business partners you work with are familiar with Firmenich's standards.

Participate in any compulsory privacy training.

**Q** I have unintentionally sent a file with employee data to the wrong recipient. I contacted this person and kindly asked him/her to erase the file. As this has been taken care of, I decide not to inform anyone else at Firmenich.

**A** This is not appropriate. According to our Corporate Employee Personal Data Protection Policy, we need to ensure that only authorized employees or third parties (e.g. payroll service providers) have access to employee data for legitimate business purposes. Unauthorized access could entail a personal data breach and a violation of applicable data protection regulations, which could lead to severe fines. If you become aware of an actual or suspected personal data breach, you should report it immediately to Firmenich's Chief Information Security Officer at [is.security@firmenich.com](mailto:is.security@firmenich.com). If in doubt, you may also contact your Human Resources manager or Data Privacy Director at [data.privacy@firmenich.com](mailto:data.privacy@firmenich.com).



#### ADDITIONAL INFORMATION

Corporate Employee Personal Data Protection Policy  
Corporate Policy on Protecting Confidential Information

## OUR RESPONSIBILITIES TO FIRMENICH

The 'Legacy' in our Fundamentals emphasizes the importance of our long-term vision and our independence. We lead our industry by investing in research and innovation, constantly driving breakthrough winning ideas and technologies. By protecting the company from damaging losses, we preserve its independence and ensure long-term success.

## WE PROTECT TANGIBLE AND INTANGIBLE COMPANY ASSETS

**PRINCIPLE:** Company assets are critical to help meet business objectives. We value our work and treat Firmenich's tangible and intangible assets, and assets of others, responsibly and with respect.

 **FIRMENICH'S COMMITMENT:**  
We protect all our assets, as well as the confidential and proprietary information of others. We ensure that our company tangible and intangible assets are correctly acquired, recorded, maintained, used, and disposed of.

 **YOUR RESPONSIBILITY**  
Use Firmenich's tangible and intangible assets and resources with care and for business purposes only.

Keep accurate books and records and respect applicable laws and regulations when dealing with them.

Protect company assets against loss, damage, misappropriation, misuse theft, and do not get involved in fraudulent activities.

Be mindful of the value and the sensitivity of Firmenich intellectual property, as well as other proprietary information.


Comply with all relevant IS policies and with the Corporate Policy on Protecting Confidential Information.


Do not disclose confidential information, except as authorized.

Do not share company assets with a third party, unless prior authorization has been obtained.

Never improperly obtain or use third party tangible or intangible assets, including third party intellectual property, without proper licenses or approvals.

If you witness any indication of a security threat or incident, such as sensitive information that may have been leaked, immediately contact the Security Operations Centre (SOC) team by raising a ticket via START and/or send an e-mail to IS.SOC@firmenich.com and/or call the SOC hotline.

 I have a friend who has funded a biotech start up and would like to know more about Firmenich innovation pipeline in this area to evaluate business opportunity.

 Sharing information with a third party about Firmenich innovation activity could seriously harm Firmenich for two reasons. Firstly, as a Firmenich employee it would be a breach of the confidential obligation with respect to any proprietary information from Firmenich. Moreover, it could jeopardize the possibility for the company to protect its intangible asset by disclosing un-protected information.



### ADDITIONAL INFORMATION

Corporate IS Security Policy  
Corporate Records Retention Policy  
Corporate Policy on Protecting Confidential Information  
Insider Policy

## WE PUT OUR COLLECTIVE INTERESTS BEFORE OUR PERSONAL ONES

**PRINCIPLE:** We avoid situations where our conduct could be (or gives the impression of being) unduly influenced by personal interest.

**FIRMENICH'S COMMITMENT:** Firmenich is committed to addressing conflicts of interest and to minimizing the risks which occur when a private interest conflicts with professional duties.

### **YOUR RESPONSIBILITY**

If you find yourself in a conflict of interest situation (or a situation that might be perceived as such), avoid it or disclose it, so that it can be assessed and addressed.

While waiting for the assessment of disclosed facts, you should remove yourself from the possibly conflicting activity.

### **EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST:**

You, as a manager, are involved in a hiring decision regarding a closely related person (e.g. a friend, a cousin).

You supervise a person that you have an intimate relationship with.

Your family member works for a competitor.

You are thinking about accepting outside employment or engaging in activities where timing would interfere with your job at Firmenich.

You are planning to conduct business on behalf of Firmenich with a closely related person (e.g. your brother).



#### **ADDITIONAL INFORMATION**

Corporate Conflicts of Interest Policy

Conflicts of Interest Guidelines for Employees

## WE ARE DILIGENT AND RESPECTFUL IN OUR COMMUNICATIONS AND USE OF SOCIAL MEDIA

**PRINCIPLE:** Our communications channels are an important way for us to engage with our customers and other external stakeholders. We use our corporate communications, business communications and personal channels appropriately and we are always mindful of the impact our communications can have on the reputation and business interests of Firmenich.

**FIRMENICH'S COMMITMENT:** Firmenich has a network of experts to manage its external communications, including official social media channels for the company. This network selectively engages with the media, leveraging dedicated spokespersons to present a consistent message on behalf of Firmenich. In line with our external communications Policy, the Communications network ensures that our communications are accurate to amplify and protect our reputation.

### **YOUR RESPONSIBILITY**

Be a brand ambassador for Firmenich by sharing only appropriate communication online and via social media posts. Remember, you may be regarded as a representative of Firmenich online even though you are not an official company spokesperson.

Discuss sensitive business topics only through appropriate channels. Avoid using personal social media to do so.

Respect confidentiality. Do not publish confidential or proprietary information of Firmenich or of others (e.g. a business partner or competitor). This includes text, photos, videos and visual content.

**Q** Today Firmenich signed a prestigious new contract which I played a crucial role in securing. Can I post about it on my LinkedIn account?

**A** Before you share any information about Firmenich's business activities online -particularly about recent business developments- you should check with your line manager and with the Communications staff whether it is appropriate to do so. If the contract is not yet public knowledge, then you should absolutely not discuss it online under any circumstances.



#### **ADDITIONAL INFORMATION**

Corporate External Communication Policy

## OUR RESPONSIBILITIES TO OUR BUSINESS PARTNERS

We deliver value to all our business partners, including our 'Customers', through innovative products and services meeting the highest quality and ethical standards. Our Fundamental 'Creativity' allows us to inspire moments of pleasure and delight for consumers worldwide. As we lead our industry in research and innovation, we look to our business partners to support us and together apply our creativity to improve all parts of the business.

## WE COMPLY WITH OUR CONTRACTUAL OBLIGATIONS AND COMPETE FAIRLY

**PRINCIPLE:** We seek competitive advantage through superior performance, not through unethical or illegal business practices. We communicate with our business partners openly and honestly. We share and expect to receive all relevant information as needed.

**FIRMENICH'S COMMITMENT:** Firmenich is committed to succeeding in a competitive business environment through fair and legal means in all markets around the world, complying with competition laws and other applicable regulations globally and locally. At Firmenich, we respect the contractual obligations to which we have committed. Firmenich does not endorse unfair or dishonest marketing claims, and we do not use unethical or forceful selling techniques.

### **YOUR RESPONSIBILITY**

Act in a manner that shows that you are competing vigorously and independently at all times, and in accordance with competition/ antitrust laws and regulations. Remember: The most serious antitrust offences include agreements among competitors to fix prices or terms of sale, to allocate customers or territory or product markets, or to boycott someone, as well as agreements with distributors to restrict reselling prices.

Do not take unfair advantage of business partners or competitors through abuse of confidential or proprietary information,

misrepresentation or abuse of power or any other unfair-dealing.

Always make sure that the information you provide to business partners is truthful.

Follow the Contract Lifecycle Policy and related Procedures.

If you have concerns about one of Firmenich's marketing campaigns and business activities, speak to your line manager or send a message through the Speak Up platform (Hotline).

**Q** I am having a drink with a friend who works for a competitor of our company. The conversation turns to work. He asks me several sensitive questions about pricing and materials and tells me some information about his company.

**A** This conversation could be considered a violation of antitrust laws, or even a breach of contractual commitments with other business partners and could undermine Firmenich's business prospects by disclosing commercially sensitive information to a competitor. Even if this person is a close friend and the conversation is conducted outside of working hours, disclosing confidential information to a competitor in any context is not permitted. You should politely tell your friend that he should not be sharing his company information with you. Please be aware that even the appearance of non-compliant behavior may already be sanctionable.

### ADDITIONAL INFORMATION

Corporate Policy on Compliance with Competition Laws  
Guideline on Compliance with Competition Laws  
Contract Lifecycle Policy  
Contract Lifecycle Procedures

## WE ENSURE THE HIGHEST STANDARDS OF QUALITY AND PRODUCT SAFETY

**PRINCIPLE:** Firmenich is dedicated to manufacturing and supplying only the highest quality products and ingredients which meet the highest safety standards.

**FIRMENICH'S COMMITMENT:** Firmenich exercises extreme care in ensuring we follow the highest standards of product safety and quality.

### **YOUR RESPONSIBILITY**

Follow the Firmenich quality and safety standards.

Maintain a high level of quality awareness to ensure that your actions do not compromise the quality and/or the safety of our products.

Source materials and services that comply with the highest and most consistent quality standards set by Firmenich.

Support the product and food protection programs that include food safety, food fraud and food defense.

If you become aware of any practice within Firmenich that may compromise the quality or safety of

our products, tell your line manager or speak up via the appropriate internal procedure or through the Speak Up platform (Hotline).

**Q** My Quality Control team is working behind schedule and we are likely to miss our output target for the day. Can I instruct them to spend less time getting ingredient measurements 100% accurate in order to speed up production?

**A** No. This could have a severe effect on the quality or safety (or both) of our products. Raise the matter with your line manager and discuss the possibility of rearranging the deadlines.



#### ADDITIONAL INFORMATION

Corporate Quality and Product Safety Policy

Responsible Sourcing Policy

QHSE Management Principles and Operational Codes

## WE SOURCE RESPONSIBLY

**PRINCIPLE:** We seek to create an equitable and sustainable supply chain, engaging our suppliers and partners and ensuring they live up to the ethical and legal standards we require of ourselves.

**FIRMENICH'S COMMITMENT:** Firmenich's 'Inclusive Capitalism' business model aims to grow our business while creating long-term value for all our stakeholders along the value chain.

At Firmenich, we treat our suppliers with trust and respect.

We engage our suppliers and partners in achieving our sustainability objectives, requesting them to acknowledge and align to our Responsible Sourcing Policy as part of their commitment to operating in the most traceable, sustainable and ethical value chain possible.

### **YOUR RESPONSIBILITY**

Follow company policies and qualification processes when selecting a supplier.

If you suspect or become aware of illegal or unethical practices, such as forced labor, modern

slavery or non-compliance with environmental regulations at any point in Firmenich's supply chain, speak up without delay with your line manager or use the Speak Up platform (Hotline).

**Q** I have received information indicating that there may be issues with labor conditions at a prospective raw materials supplier that Firmenich is considering doing business with, including excessive working hours and hygiene problems. What should I do?

**A** You should report your concern to your line manager or the Purchasing Department, along with the evidence on which it is based. Firmenich will then have to conduct enhanced due diligence and refrain from engaging in business with the supplier until we have ascertained that working conditions are sufficiently appropriate and ethical.



#### ADDITIONAL INFORMATION

Corporate Purchasing Policy

Direct Purchasing Procedure

Indirect Purchasing Procedure

Responsible Sourcing Policy

Human Rights Policy

## WE DO BUSINESS WITH INTEGRITY

**PRINCIPLE:** We operate with integrity in the marketplace and do not bribe. Bribery and corruption are illegal, unethical, and have a devastating impact on the individual, the business, and society.

**FIRMENICH'S COMMITMENT:** Firmenich does not bribe, does not allow third parties to bribe on our behalf, and respects all applicable anti-bribery laws.

### **YOUR RESPONSIBILITY**

Do not offer, promise, give, or accept money or anything of value, to or from anyone, to improperly obtain or retain business, secure an improper advantage, or to otherwise influence or be influenced.

Do not use third parties to take actions that you should take yourself.

Only receive and give gifts and entertainment in accordance with the Corporate Gift & Entertainment Policy and get them approved as required by the policy.

Do not engage in any activity which may create the impression of impropriety, regardless of your intent.

Always consult Business Ethics or a Legal Counsel when you are in doubt.

**Q** We hired a local consultant to help us obtain a permit we need from a local government to start production. The agent has asked us for a small extra fee to 'help move the process along with the local administration'. What should I do?

**A** This is likely to be a 'facilitation payment', which is against our policy. You should refuse the request and disclose the offer within 24 hours to a Legal Counsel, the VP Business Ethics, or [ethics@firmenich.com](mailto:ethics@firmenich.com). If a facilitation payment is made in a situation of duress, please also immediately report such payment.



### ADDITIONAL INFORMATION

Corporate Anticorruption Policy  
Corporate Gifts & Entertainment Policy  
Conflicts of Interest Policy  
Donation & Sponsorship Procedure

## 09

## OUR RESPONSIBILITIES TO THE ENVIRONMENT AND SOCIETY

'Sustainability' is one of our Fundamentals. Since our first public environmental commitment to sustainable business three decades ago, we have been committed to conducting responsible business for present and future generations. Protecting nature, the safety of the communities we operate in and respecting human rights sit at the core of our business strategy.

## WE CARE ABOUT THE ENVIRONMENT AND SEEK TO REDUCE OUR IMPACT ON IT

**PRINCIPLE:** We maintain high standards of environmental stewardship. We tackle environmental challenges and lead real environmental change.

**FIRMENICH'S COMMITMENT:** Firmenich is committed to reducing and mitigating our impact on the environment and to be a leader in terms of environmental management.

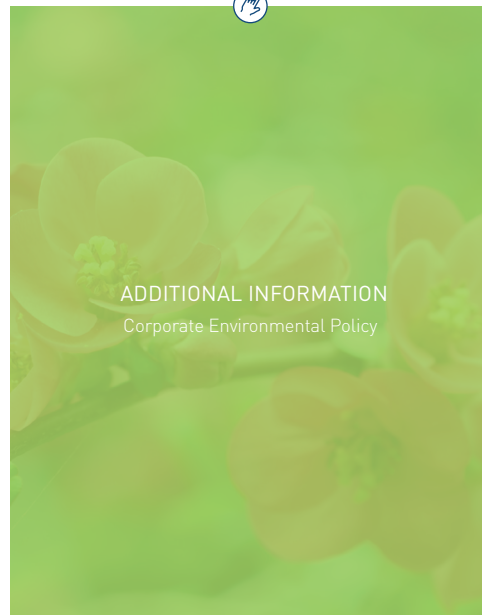
### **YOUR RESPONSIBILITY**

Measure, limit and reduce the impact you and the activities you are responsible for have on the environment.

If you observe wasteful practices which cause more environmental harm than necessary, point this out to your line manager. You can also be proactive and suggest a better technique or course of action.

**Q** How does Firmenich measure and reduce its environmental impact?

**A** As of 2020, all Firmenich's operations worldwide became powered by 100% renewable electricity. An industry first, this significant milestone supported Firmenich's climate change, science-based targets aligned with limiting global temperature rise to 1.5°C. Firmenich is committed to reducing our 'own' greenhouse gas emissions (i.e. emissions from owned and controlled energy sources, or emissions from purchased energy) by 55%, and emissions from the raw materials we purchase by 20% by 2030 vs. 2017. Your contribution to help us on this journey is critical.



ADDITIONAL INFORMATION  
Corporate Environmental Policy

## WE RESPECT HUMAN RIGHTS AND WANT TO GENERATE A POSITIVE IMPACT ON THE PEOPLE WE WORK WITH AND THE COMMUNITIES IN WHICH WE OPERATE

**PRINCIPLE:** We are committed to respecting human rights and upholding the UN Guiding Principles on Business and Human Rights across our activities and those of the broader value chain.

**FIRMENICH'S COMMITMENT:** Firmenich adopts a due diligence approach to human rights whereby we identify and prevent human rights risks and track the effectiveness of our actions.

Firmenich focuses on the human rights that are most at risk as a result of the severity of impact or where a delayed response would make the risk impossible to cure. Firmenich closely monitors the human rights impact of its own activities and business relationships.

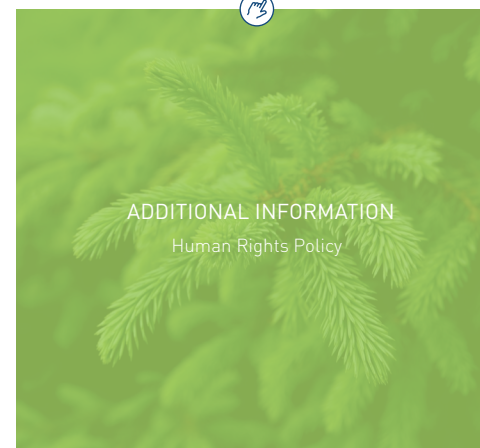
### **YOUR RESPONSIBILITY**

Conduct your day-to-day business activities and operations in a manner that is respectful of human rights.

If you suspect or become aware of a violation of human rights in the workplace or in Firmenich's supply chain, promptly report it to Human Resources or use the Speak Up platform (Hotline).

**Q** Are human rights the same in all countries?

**A** Human rights are universal – everyone is entitled to be treated with the same standards regardless of where you work or live. This stems from the Universal Declaration of Human Rights, the foundation of international human rights law. Employees are expected to abide by national legal requirements on human rights. Where national law and international law differ, we aim to follow the stricter requirement. Philanthropic commitments and activities are not assimilated to human rights risk management.



ADDITIONAL INFORMATION  
Human Rights Policy

## WE ONLY ENDORSE AND DONATE TO POLITICALLY NEUTRAL ORGANISATIONS

**PRINCIPLE:** We value our independence and respect our stakeholders' different views and opinions. We do not publicly endorse or financially support any political party or candidate, in Switzerland or anywhere else.

**FIRMENICH'S COMMITMENT:** Firmenich respects everyone's personal views and our business activities and public stance are strictly non-political in all circumstances. Our charitable donations are never in favor of political parties or religious organizations, and we do not campaign on behalf of any political party or candidate.

**YOUR RESPONSIBILITY** Make sure that you do not make any financial contribution or donation of any kind to any political candidate or to political parties on behalf of, or in the name of, Firmenich.

Make sure that whenever you endorse a particular political stance or religious belief, this is done in

your personal capacity and you do not give the impression of advocating a political opinion on behalf of Firmenich.

**Q** I am planning to run for local political office in my town. Can I mention my employment at Firmenich on my promotional leaflets and posters?

**A** No. Unfortunately, this would be considered inappropriate because it may be misconstrued as a formal endorsement of your campaign by the company.



### ADDITIONAL INFORMATION

Corporate Donation & Sponsorship Procedure

## WE DO NOT ENGAGE IN FINANCIAL CRIME AND RESPECT ECONOMIC SANCTIONS

**PRINCIPLE:** Financial crime harms society and can adversely affect our business and reputation. We do not get involved in financial crime and actively manage risk related to it. We comply with applicable sanctions measures and export controls rules and regulations.

**FIRMENICH'S COMMITMENT:** Firmenich does not evade tax or facilitate tax evasion by anyone that we work with.

We do not tolerate money laundering. We have policies and processes in place to help ensure none of our employees engage in a prohibited transaction.

**YOUR RESPONSIBILITY** No matter your position within Firmenich, it is your responsibility to adhere to the company's commitment and speak up if you have suspicions about financial crime related to our business.

Watch out for potential red flags that might point

to suspicious activities, particularly with regards to money laundering activities and other forms of financial crime.

If you have a concern about a possible sanction or export control risk, notify the Trade Compliance team immediately.

### EXAMPLES OF POTENTIAL FINANCIAL CRIME RED FLAGS:

A distributor has asked me to wrongly classify the products they purchased on their invoice, which will reduce taxes or duties that are due.

A supplier asked me to redirect the payment to an offshore bank account registered to a different company that I am not familiar with.



### ADDITIONAL INFORMATION

Corporate Treasury Procedure

Corporate Global Trade Compliance & Dangerous Goods Policy

**Antitrust/Competition Laws** are regulations that monitor the distribution of economic power in business, making sure that healthy competition is allowed to flourish by preventing collusion, price fixing and other anti-competitive practices.

**Business partners** means, for the purpose of this document, anybody we do business with, including suppliers, agents, distributors, clients, subcontractors, logistics partners, consultants and anybody else that Firmenich engages with in a commercial capacity.

**Bribery** refers to any offer, promise, give or accept money or anything of value to or from anyone to improperly obtain or retain business, secure an improper advantage or to otherwise influence or be influenced to act improperly.

**Company assets** are anything tangible or intangible that is owned or paid by Firmenich, such as machinery, equipment, IT devices, products and production materials, intellectual property, confidential and other proprietary information, including company data.

**Conflict of interest** refers to a situation in which one's personal interests are or appear to be put before the interests of Firmenich and where they could unduly influence one's business judgement or actions.

**Corruption** is the abuse of entrusted power for private gain.

**Discrimination** means treating a person or particular group of people differently, especially in a worse way from the way in which you treat other people, because of some inherent characteristic they have (e.g. their skin color, gender, sexual orientation, age).

**Economic sanctions** are restrictions or prohibitions of business dealings with specified individuals, entities or countries.

**Export controls** are restrictions or prohibitions of the export or import of certain goods or services.

**Facilitation payments** are financial payments made to a government official to facilitate or expedite a routine, non-discretionary government activity that the official is required to perform as a matter of course.

**Fraud** is wrongful or criminal deception intended to result in financial, commercial or personal gain.

**Gifts & Entertainment** include, for the purposes of this document, 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, and anything else of value offered or received without payment in return.

**Harassment** is generally defined as unwelcome conduct that might reasonably be expected or perceived to cause offence or humiliation to another person.

**Human rights** are rights inherent to all human beings, whatever their nationality, place of residence, gender, national or ethnic origin, skin color, religion, language, or any other status.

**Intellectual property** includes patents, designs, trademarks, trade secrets and copyrights, as well as scientific and technical knowledge and know-how.

**Money laundering** is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.

**Proprietary and confidential information** is everything the company does or creates, whether or not protectable as a form of intellectual property and includes, among other things, manufacturing processes, computer programs, business information, information about present and future products, customer and supplier identities, sources of raw materials information, and financial and operating information.

- P.13 Antitrust, Competition laws
- P.10-11 Confidential and proprietary information, intellectual property, company assets, expenses
- P.12 Conflicts of interest
- P.15 Corruption, bribery, facilitation payments
- P.17 Donations
- P.17 Economic sanctions, export controls
- P.15-16 Environmental responsibility
- P.17 Financial crime
- P.15, 17 Gifts & Entertainment
  - P.9 Harassment, bullying, diversity, inclusion, discrimination
- P.10 Health, safety, security
- P.16 Human rights
- P.13 Marketing, claims, contractual obligations
- P.17 Money laundering
- P.10 Privacy
- P.14 Product safety and quality
- P.14 Responsible sourcing, supply chain
- P.12 Social media, external communications