Policy on Gifts & Entertainment
## Introduction

- Purpose, scope and responsibilities
- Firmenich commitment
- Seeking advice
- Principles
- Definition of gifts and entertainment

## Offering and accepting Gifts & Entertainment

- Prohibitions and restrictions
- General standards
- Public officials
- Registration and approval
- T&E claims
- Valuation of gifts and entertainment
- Gifts to colleagues

## Additional information

- Related policies and documents for gifts and entertainment
- Policy owner
- Effective date
- Anti-retaliation
Introduction

Purpose, scope and responsibilities
This document outlines the Firmenich Policy on gifts and entertainment.

The Policy applies to every employee, officer and director of Firmenich, its subsidiaries and affiliates worldwide, as well as third parties acting on behalf of Firmenich.

For Firmenich employees, officers and directors, violations of this Policy may lead to disciplinary action, up to and including termination of employment.

Any employee with knowledge or suspicion of violations of this Policy must report his/her concerns (as allowed by local law) to the VP Legal Compliance and Integrity (« LC&I »), to a Firmenich Legal Counsel, or to COMPLIANCE@firmenich.com.

Firmenich commitment
This Policy reinforces our commitment to adhering to the highest ethical standards of conduct in all of our business activities by acting in a manner that enhances Firmenich’s reputation, as set forth in the Code of Ethics and Business Conduct and the Global Anti-Corruption Policy.

Seeking advice
You may find additional information in the Guidance on Gifts and Entertainment and the Process Map.

If you are not able to find information on a particular question, do not assume that your action is permitted. Always consult with your manager, a Firmenich Legal Counsel or with LC&I using COMPLIANCE@firmenich.com.

Principles
Gifts and entertainment should never be offered or accepted with the intention to influence – or appear to influence – business decisions or relationships in any way.

Gifts and entertainment, offered or received, will only be acceptable if they are:
- Reasonable
- Appropriate
- Legal
- Not intended to influence
- Provided in accordance with this Policy and associated documents (Guidance on Gifts and Entertainment and Process Map)

Definition of gifts and entertainment
Gifts and entertainment include (but are not limited to):
- 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

Please refer to the related Guidance on Gifts and Entertainment for further examples.
Offering and accepting Gifts & Entertainment

Prohibitions and restrictions
Unless otherwise expressly permitted, gifts and entertainment may only be offered to individuals with whom Firmenich has a business relationship, excluding spouses, family members, or friends of such individuals.

Tobacco products, cash or cash equivalents (such as gift cards, gift certificates or “red packets” commonly offered in Asia) must never be offered or accepted.

The giving of alcohol as a business gift must always be considered carefully.

Firmenich employees must ask potential recipients whether any rules or restrictions apply to them and ensure that any more restrictive limits are followed.

Firmenich employees may receive gifts or entertainment from business partners but they should always be reasonable, never lavish and must not give the impression that the gift or entertainment is intended to influence. If it may be considered generous by an onlooker you should politely refuse or seek guidance.

Under certain circumstances, when rejecting an inappropriate gift or entertainment is not possible, the guidance of your GM should be sought. All gifts or entertainment received above CHF 10 need to be recorded in the Firmenich Gift Register.

General standards
Firmenich must only be associated with gifts or entertainment involving third parties if:

- For legitimate business purposes
- Not solicited
- Not given to create, or give the appearance of, an implied obligation that the person offering is entitled to preferential treatment
- Not extravagant
- Reasonable and appropriate
- Not offered as a bribe, payoff or kickback

Firmenich employees may pay for occasional meals and refreshments, as well as reasonable travel and accommodation when these are (i) modest in nature, (ii) the cost is judged according to local standards, and (iii) are provided in connection with legitimate education or business purposes.

If you are ever in doubt please consult the Guidance on Gifts and Entertainment, the Process Map or ask your manager or with LC&I at COMPLIANCE@firmenich.com.

Public officials
Offering gifts or entertainment or indeed giving the impression of doing a favor for a Public official is prohibited, unless prior written approval from a Firmenich Legal counsel or the VP LC&I is obtained.

Only Firmenich Corporate Branded Gifts may be provided to Public Officials, in small quantities and not repeatedly.
Firmenich employees must ensure compliance with the following when offering or accepting gifts or entertainment:

**Registration and approval**

Firmenich employees must comply with more restrictive local requirements, if lower limits exist.

**T&E claims**

All expense (“T&E”) claims for gifts or entertainment offered to business partners must be accompanied with evidence of (i) registration, (ii) approval (if required), and (iii) original receipts.

**Valuation of gifts and entertainment**

Firmenich employees should determine the value of gifts and entertainment according to the following principles:

- Exercise good judgment to determine the value, and
- The value must be deemed to be the full market value, not a value discounted for bulk purchases or special offers.

**Gifts to colleagues**

Employees may provide gifts (including gift cards) to fellow colleagues as long as the gifts are in good taste, reasonable and appropriate, and paid for by the employee and not expensed to Firmenich.

Personal gifts to employees should not be provided as performance awards. Performance awards should be provided to employees under the approved HR programs, such as a Spot Award.

Gifts or entertainment offered to or received from fellow colleagues do not need to be registered in the Gift Register.

**Additional information**

**Related policies and documents for gifts and entertainment**

- Code of Ethics & Business Conduct
- Global Anti-Corruption Policy
- Safe Disclosure (Whistleblower) Policy
- Guidance on Gifts and Entertainment
- Process Map

**Policy owner**

VP Legal Compliance & Integrity

**Effective date**

December 1st, 2017

**Anti-retaliation**

Firmenich prohibits any form of retaliation against anyone for reporting an alleged violation of this Policy in good faith.