



VERSION 2



EFFECTIVE DATE: 05.12.2019

OWNER OF THE POLICY: VP Business Ethics

GIFTS & ENTERTAINMENT POLICY

TABLE OF CONTENTS

I. PURPOSE 2

II. SCOPE 2

III. POLICY STATEMENTS 2

IV. DEFINITIONS OF GIFTS AND ENTERTAINMENT 2

V. REGISTRATION AND APPROVAL 3

VI. PROHIBITIONS AND RESTRICTIONS 3

VII. ROLES & RESPONSIBILITIES 4

VIII. DOCUMENT MANAGMENT 4

IX. REFERENCES 4

X. ANNEXES 6

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 include:

- 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.

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
BUSINESS PARTNER	
G&E (except meals and refreshments) above CHF 50	General Manager
G&E (except meals and refreshments) above CHF 200	DG Member
PUBLIC OFFICIALS	
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 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 or donation 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 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. DOCUMENT MANAGAMENT

Questions and feedback regarding this policy should be submitted to the Business Ethics function via ethics@firmenich.com

Policy Change Log:

Nº	Date of Issue	Effective Date	Purpose of Change
1	Dec 1, 2017	Dec 1, 2017	<ul style="list-style-type: none"> • New Policy release
2	Dec 1, 2019	Dec 5, 2019	<ul style="list-style-type: none"> • Update of the scope, registration and approval thresholds • Alignment of the Policy with the related Guidelines

IX. REFERENCES

- Code of Ethics and Business Conduct
- Global Anticorruption Policy

- Conflicts of Interest Policy
- Travel & Entertainment Policy
- Whistleblowing Policy
- Gift Register

X. ANNEXES

1. Further definitions

G&E DEFINITIONS

Appropriate G&E: appropriate G&E in the light of the nature of the business relationship, timing, context, purpose, venue and position of the recipient.

Business Partner includes anyone with whom Firmenich has a business related relationship (other than public officials).

Gift Register: electronic tool to manage the registration and approval of G&E that can be received or offered by any person described in the scope of this Policy and in accordance with the provisions of this Policy.

Occasional G&E: not regular or repetitive.

Public official is a broad concept with different meanings in different regions. It largely includes:

1. An employee, officer, official of, or consultant to a: governmental national, state, regional, provincial or local level; government agency, public authority or other public body; state owned or state controlled entity (may include universities or hospitals); international public organization (for example the United Nations and their agencies or related bodies; or
2. A politician at any level of government, whether they had political office or not, political candidates, political parties and anyone working for them; or
3. Members of royal or other ruling families.

Reasonable G&E: non-lavish, non-extravagant, of low value and in accordance with local standards of living.

Rydo: Firmenich corporate travel and expense management solution, available here.

Sponsorship: any arrangement where Firmenich provides financial support, products, services or anything of value to a third party (including charitable organizations) to participate in an event, associate our brand with an activity or to receive some other lawful benefit.

Third Party includes Business Partners and Public Officials.

2. Gifts and Entertainment Guidelines