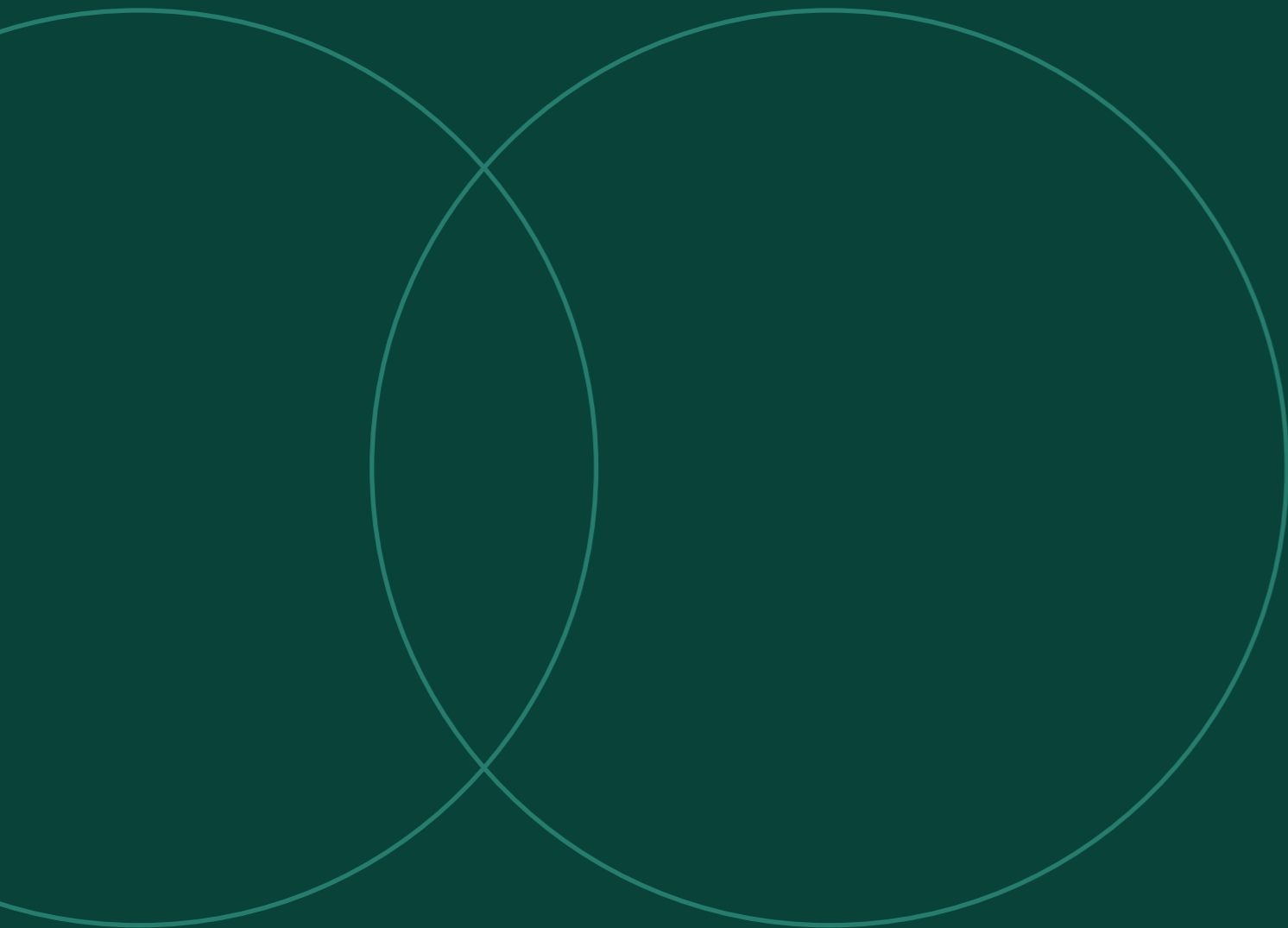


# Code of Business Ethics

dsm-firmenich 



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# Foreword from our Leadership

Dear colleagues,

A warm welcome to our dsm-firmenich Code of Business Ethics!

Together, we’re setting out to become the innovators in nutrition, health, and beauty. And we want to start as we mean to go on: with the right mindset, values and behaviors. Across our company, we’re all responsible in setting the highest standards of honesty, fairness and integrity. And, of course, to keep in mind the importance of protecting our people, our business, and the planet.

This Code of Business Ethics is a reference document, a guidebook, and a day-to-day manual: compliance with its principles is an obligation for each and every one of us. It highlights our shared dsm-firmenich principles about how we do business (and how we don’t). It clarifies key issues and helps us do the right thing.

The Code’s shared principles are based on our values and our commitments to each other, our communities, and our planet. In addition, it underlines how we expect everyone at dsm-firmenich to act with integrity in our daily work – so please read the Code carefully!

If you have any comments or questions about the Code, please reach out to your line manager, our Human Resources colleagues, or the Compliance department. And if you ever feel a principle in the Code is being breached, please use the Speak Up framework on our company website. This resource is available 24/7, letting you raise any concerns without fear of retaliation.

Thank you in advance for keeping the Code in mind at all times. Together, we can make integrity key to how we bring progress to life.

**Thomas Leysen**  
Chairman of the Board of Directors



**Dimitri de Vreeze**  
Co-CEO



P.S. In the coming months, we’ll be drafting further policies and procedures building on this Code, which will be available through our usual channels.

May 8, 2023



# About the Code

- **Our Code is universal. It applies to everyone in our company. And it applies everywhere: at our offices, sites, warehouses, and any other dsm-firmenich location.** Compliance with our Code, standards, policies, and procedures is required of all employees and company trainings are mandatory. In addition, we must also comply with all relevant laws, regulations, and industry standards wherever we operate. Otherwise, the consequences could include anything from disciplinary action, up to and including dismissal, to potential legal consequences.
- **The Code is here as a resource for when you are in a situation where you might be unsure about the appropriate course of action.** It outlines our principles of conduct at work and offers guidance for difficult scenarios.
- Given that we operate across a diverse range of economic sectors and in over 100 countries, **the Code is designed to support you in navigating the challenges you might face around different regulations, political systems, and cultures for example.**
- **However, it is important to recognize that the Code cannot offer a solution for every scenario and that it is not a replacement for our policies and procedures.** It is also important to remember that where the Code differs from a relevant law, the more stringent requirement will take precedence. If you are unsure about anything, please speak to management, Human Resources, or the Compliance department.
- **It is important that you read the Code carefully.** Keep it close at hand, refer to it frequently in your work, use good judgment, and – if you need it – ask for guidance.
- We have translated the Code into a number of local languages. Please be aware that the English version is the official version.

# Our purpose and values

We are here for a reason – to bring progress to life for our customers, consumers, business partners and society at large. And we make it our purpose by combining the essential, the desirable, and the sustainable.

As innovators in nutrition, health, and beauty, our values guide how we want our employees to act. It helps us understand what doing the right thing means at dsm-firmenich.

## Shape the future

We are curious and open-minded. We're cutting-edge scientists, breakthrough innovators, and passionate creators with more than a century of expertise. We take joy in building a way forward with our customers. We are a beacon. When others want to know how to change the world, they look to us.

## Be a force for good

For us, integrity is the only way forward. We are responsible and purpose-led, with a legacy to prove it. We are passionate about constantly raising the bar. Because caring about customers, communities, people, and the planet is the right thing to do. And it's the only way to grow an enduring, profitable business.

## Own the outcome

We make bold commitments to customers and each other. And we go above and beyond to fulfil them. The thing to remember is that we're part of the solution. We're empowered to make courageous decisions at the right level. And we hold each other accountable – individually and collectively.

## ... Together, with our customers

We are one team – customers and stakeholders included. We're inclusive. We value our differences. And we learn from each other. We remove barriers that separate us. We look after each other's safety and well-being. We set each other up for success and we help each other grow. Plus, we have fun doing it.

Our purpose and values guide our decisions and activities. Our business principles provide further clarification on what we mean by doing the right thing.

# Our principles

## People

Inclusive. Enduring. Profitable.

That is the business we are growing, and we all have an important role in nurturing it. Better yet, we can all make a positive impact on the communities in our value chain. These are the responsibilities you will find at the heart of dsm-firmenich's values.



What does this mean in practice?

- Maintaining the highest standards of health and safety and human rights
- Driving business as a force for good across the whole company
- Focusing on diversity, equity, and social inclusion for all our colleagues.

### 1. Human rights

Respecting human rights, protecting nature, and supporting the safety of the communities where we operate – these are all key priorities for us. They inspire our efforts to contribute to the UN's Sustainable Development Goals (SDGs). Across our activities, and the activities of our broader value chain, we make a positive impact and always remain committed to the highest standards in human rights.

#### Forced labor, child labor, modern slavery, and excessive working hours

We prohibit any form of child labor, forced labor, or modern slavery. We promote decent work in global supply chains. And we work with our suppliers toward this goal.

#### Fair remuneration and living wage

We care for our employees and their families by securing a decent standard of living. That is why we pay a living wage. A living wage is the wage required to purchase the goods and services needed to meet a minimum acceptable living standard for workers and their families. This includes proper access to health, food and nutrition, housing, and education.

#### Land rights

We respect the rights and titles to property and land. This applies to individuals, indigenous people, and communities across all our operations worldwide. We demonstrate this respect through our relationships with other businesses and the communities where we operate.

## 2. Diversity, equity, and inclusion

### Preventing discrimination, harassment, and bullying

We strive for diversity – it is another key priority for us. Together, we create an environment where we respect everyone’s unique nature, and where everyone feels a sense of belonging. We treat everyone equally, regardless of:

- Gender
- Gender identity
- Gender expression
- Age
- Race
- Ethnicity
- Religion
- Sexual orientation
- Experience
- Socio-economic status
- Abilities
- Whether or not they are married
- Any other protected categories.

As employees of dsm-firmenich, we are all responsible for respecting the dignity and diversity of everyone at our company. We all have a duty to create a truly inclusive environment, in which discrimination, harassment, and bullying are completely unacceptable. Therefore, every day we live and uphold respectful behaviors.

### Equal opportunity employer

We provide fair and equal opportunities. We only offer opportunities based on a person’s competences to do specific work. This applies to recruitment, compensation, training, and performance management.

### People development

We support our employees in their growth and personal development. By investing in regular training, coaching, and mentoring, we grow their knowledge and skills and support their long-term employability. We support a flexible and hybrid working model while always expecting strong collaboration – so, when required, hybrid-working employees must come to work in person. We recognize performance and aim to pay competitive salaries.

### Open dialogue and trust

We create an open environment where our employees are closely involved in developing and achieving our business objectives. We encourage employee feedback and provide channels where people can share their thoughts. We respect the right of our employees to freedom of association and their right to form labor unions.

## 3. Safety, health, and security

Safety, health, and security in the workplace: three key priorities for us. We always promote them, and we are always looking to improve them. We are committed to achieving an accident-free work environment by maintaining the highest standards of:

- Safety
- Security
- Physical health and well-being
- Mental health and well-being.

We expect our employees, contractors, and supply chain partners to embrace and respect the same high standards. Moreover, we seek to maintain strong community connections on Safety, Health, and Environment (SHE) topics wherever we work.

And in a world where the unexpected happens more and more often, mental health and well-being depends on how we respond in times of high workload or crisis. The right mindset, values and behaviors, and the way we collaborate are essential to underpin our resilience, both as individuals and as a company, allowing us to thrive whatever comes our way.



# Our principles

## Business

dsm-firmenich is a trustworthy partner to its customers, suppliers, and other business stakeholders. This trust is earned over time – and to keep it, all our employees need to act with integrity.



## 4. Fair business

### Business integrity

We do business honestly, transparently, and ethically. We comply with all applicable laws and regulations wherever we operate.

### Antitrust/Competition laws

We are committed to succeeding in a competitive business environment honestly, transparently, fairly, and ethically. And this applies to everything we do – no matter where we operate or who our counterpart is. We do not take unfair advantage of business partners or competitors and respect the law. That means the following behaviors are never allowed:

- Abuse of confidential or proprietary information
- Misrepresentation
- Abuse of power
- Any other unfair dealing.

### Contractual obligations

We honor our commitments and meet our contractual obligations. We do not engage in any arrangement or transaction that might be connected to illegal business practices or other illegal activities.

## 5. External communication

### Marketing and advertising

We do not make unfair or dishonest claims in our communications. We also do not use unethical or forceful selling techniques.

### Social media

We are all ambassadors of dsm-firmenich, and our online activities reflect this fact. Whether we are using corporate, business, or personal channels, we use them appropriately. We keep in mind that our communications can affect the reputation and business interests of dsm-firmenich. A team of experts manages our external communications, including our company's official social media channels. Employees should only discuss sensitive business topics through appropriate channels – and never through personal social media.

## Financial and non-financial reporting

We are a company that seeks to be a force for good and we earn the trust of all our stakeholders through constantly providing transparency on our financial and non-financial performance. We ensure reliable reporting in line with mandatory requirements and selected voluntary reporting standards. And wherever possible we also have our non-financial reporting checked by our auditors.

## Public dialogue, political activities, and lobbying

We seek constructive dialogue with politicians and society in pursuing our legitimate business. When engaging in public dialogue, we base our arguments on our publicly stated positions – positions that are always grounded in facts and scientific research. We value our independence and respect the different views and opinions of our stakeholders. Our business activities and public positions are strictly non-political in all circumstances. We do not publicly endorse, financially support, or donate to any political party, candidate, or any religious organizations. dsm-firmenich respects our employees' right to engage in the political process – but only on an individual basis, not as representatives of our company.

# 6. Protection of company information and assets

## Intellectual property and company information

We protect our company's property, tangible or not. In particular, we protect company's intellectual property and do not infringe enforceable intellectual property rights of third parties.

## Privacy and confidentiality

We protect the personal data of our employees and third parties. We take good care of confidential information and never disclose it unless authorized to do so.

## Cybersecurity

We all play a critical role in helping to stop malicious cyberattacks. We are extremely careful to avoid falling for phishing scams and other forms of cybercrime. We do not click on links or open attachments in suspicious emails, and we stay alert to urgent unusual requests received electronically. We are expected to take full responsibility for updating and protecting our passwords and devices.

## Conflict of interests

We expect anyone working for dsm-firmenich to avoid situations where their interests conflict with the interests of our company – or where there may appear to be such a conflict. If any such situation occurs, it must be properly disclosed.

## Insider trading

People with access to share-price-sensitive information must not trade in company securities, such as shares and options. Nor should they advise or encourage other people to trade in company securities.

Additional restrictions apply to specific target groups and are described in our insider policy. People will be notified separately on this.

# 7. Preventing bribery and corruption

Bribery and corruption are illegal and unethical. They have a negative impact on the individual, the business, and wider society.

We operate with integrity. We strictly prohibit the direct or indirect solicitation, acceptance, or payment of bribes. Likewise, we prohibit requesting, accepting, or making any other improper payments (such as kickbacks or facilitation payments) to or from suppliers, customers, or public officials, including individuals in an important public position or people closely connected to them.

We do not tolerate bribery or any form of corruption in our business.

## Gifts and entertainment

We do not offer, give, or accept any gift or favor to improperly obtain or retain business, secure an unfair advantage, or otherwise affect the neutrality of our decisions. We do not engage in any activity that may create the impression of misconduct, regardless of our intent.

## 8. Quality and product safety

We strive to design, manufacture, and supply only high-quality products and ingredients that meet the highest standards of product safety and quality.

## 9. Product stewardship

We actively identify the risks attached to our products. The same goes for the potential impact of our products on people and the environment. We look for opportunities to reduce these risks and impacts in our own production processes and throughout the entire product life cycle. We provide our customers and the general public with clear information about the safety aspects of our products and production processes. We also strive to provide clear information on potential environmental and other impacts.

## 10. Responsible sourcing

We source responsibly and ask our suppliers to respect the same ethical and legal standards that we uphold at dsm-firmenich. This includes acting transparently.

## 11. Embargoes and trade controls

We comply with all relevant trade laws and regulations to ensure none of our employees engages in a prohibited transaction.



# Our principles

## Planet

Sustainability is very high on the agenda for our business. We want to protect the environment and contribute to the health of our planet. This goal drives us to make a positive and measurable environmental impact by providing sustainable end-to-end solutions.



## 12. Nature and biodiversity

We are committed to contributing to no net loss of biodiversity. This includes promoting regenerative agriculture, restoration activities, and animal welfare.

## 13. Low-carbon transition

We see the transition to a low-carbon economy as vital for addressing climate change. We use science-based principles to improve our production processes and supply chains, and aim to deliver innovations that reduce the environmental footprint of our business and its value chains.

## 14. Energy, materials, and waste

We strive to use energy and materials efficiently. That means always looking for ways to minimize our environmental impact – through waste reduction initiatives, for example. We endeavor to use circular economy solutions, helping to create a safe and clean environment and unlock more value from our planet's limited resources.

## 15. Water security

We are committed to using water responsibly at our production sites and in our supply chains. By minimizing water consumption, we help to preserve sustainable access to adequate quantities of acceptable-quality water. These efforts contribute to sustainable livelihoods, human well-being, and socio-economic development.

## 16. Deforestation

We are committed to transitioning to deforestation-free primary supply chains.

# “Stop and think” check

When faced with the typical daily decisions at work, it is likely that only a few of them are truly difficult. This may be due to the fact that they do not involve ethical considerations or because the suitable course of action is obvious. However, there may be instances where the appropriate path is less clear. In such cases, the Code serves as a valuable resource for making informed decisions. It is recommended that the Code be consulted thoroughly, as it explains what to do in a wide range of situations.

However, the Code does not cover all eventualities. To address such situations, the following “stop and think” questions should be considered to help your decision-making:

1. **Are you sure your decision will not involve a violation of any law, regulation, internal procedure, value, or standard?**
2. **Are you certain your decision will not involve dishonesty, being untruthful, or acting without integrity?**
3. **Would you feel comfortable if your colleagues, business partners, family, and friends knew about your decision?**
4. **Would you take the same decision again in five years’ time, or would you make a different choice?**

If **NO** is the answer to one or more of these questions, and/or you are still not comfortable with the situation at hand, please reconsider your decision and/or seek advice from local management, Human Resources, or the Compliance department.

# Speaking up

At dsm-firmenich, every voice matters.

We all have a responsibility to speak up if we have a concern. In the event that you are unsure about a particular matter, or if you have witnessed behavior that contradicts our values, it is vital that you raise it!

Of course, we recognize that speaking up can be challenging at times, but we are here to help. Please do not hesitate to speak up and seek guidance if something does not feel right.

We are currently developing new global reporting channels to facilitate the reporting of genuine concerns in a safe setting. Until then, please report your concerns using our existing reporting processes, available at [dsm-firmenich.com](https://www.dsm-firmenich.com).

Please rest assured that any investigation will be conducted impartially, respecting the principles of confidentiality and presumption of innocence. Of course, any investigation will also comply with all relevant local legislation.

## Zero tolerance for retaliation

We do not tolerate any form of retaliation against individuals who, in good faith, seek guidance, raise a concern of misconduct, or cooperate in an investigation. We have zero tolerance for retaliation, no matter the circumstance. Disciplinary action will be taken against anyone who engages in retaliatory behavior towards those who have spoken up in good faith.

# Living by our values

The Code of Business Ethics we have established serves a dual purpose. In addition to taking positive steps toward making the world a better place, it's also about avoiding any negative situations that may arise.



That means performing acts of kindness, a genuine effort to empathize with our colleagues, and treating others with the same level of respect we expect in return. It is vital that our Code's principles are consistently adhered to, its regulations honored, and the potential impact we can have in the world is always at the forefront of our minds.

To learn more about our policies and procedures, please check [dsm-firmenich.com](https://www.dsm-firmenich.com).