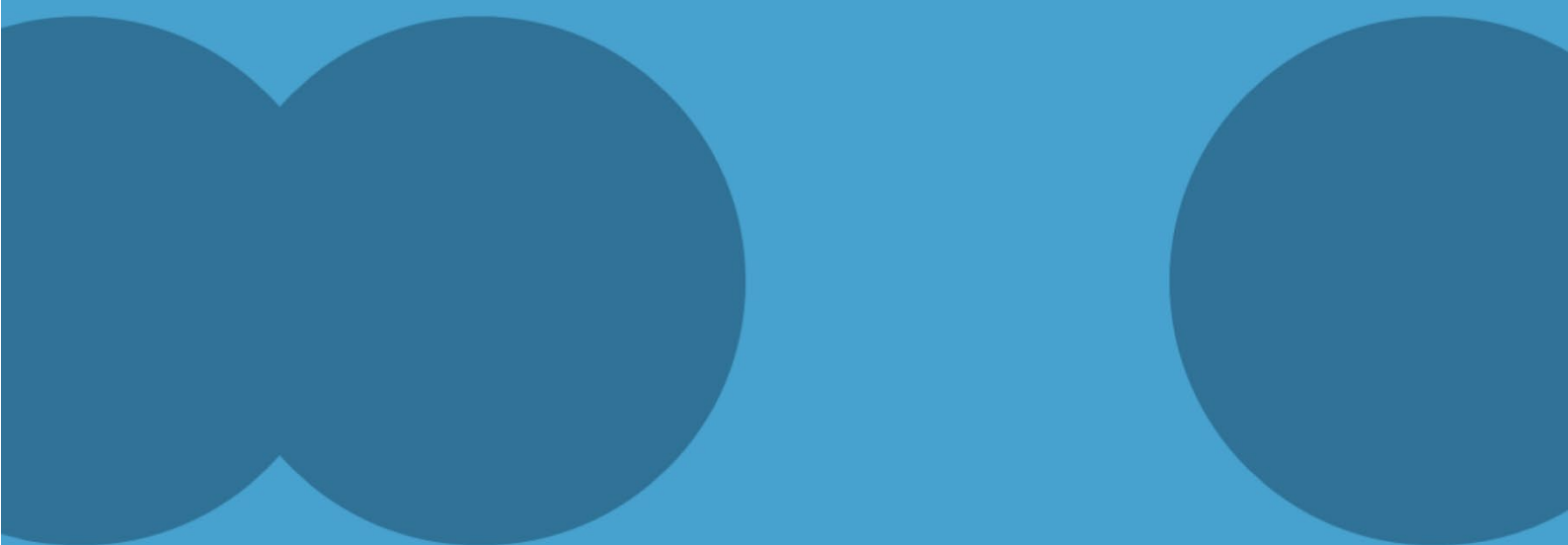


Group Policy

Group Anti-Bribery and Corruption Policy

Owner: Chief Legal, Regulatory, Risk & Compliance Officer

Effective date: March 19, 2024





1. Purpose

Bribery and corruption are illegal and unethical. They have a negative impact on the individual, the business, and wider society. Corruption may take many forms and some actions, such as a donation or gifting, could constitute “hidden” corruption. As reflected in our [Code of Business Ethics](#), dsm-firmenich applies a zero tolerance policy on corruption and bribery and only wants to engage with others who share and operate with the same standards.

The purpose of this Anti-Bribery and Corruption Policy (the “ABC Policy”) is to ensure that dsm-firmenich business activities are compliant with all applicable anti-bribery and corruption laws and regulations -wherever we operate-, and to set the dsm-firmenich Group provisions in this regard.

This Policy provides a general framework to fight against bribery and corruption and states a global, minimum standard -in the event a country has more restrictive rules, we must comply with them as well.

2. Scope

This Policy applies to everyone working for and with dsm-firmenich:

- employees, officers, directors and members of the executive and management committees of the dsm-firmenich Group and its entities worldwide (either full owned or with a majority ownership or control) (“Employees”). If present in companies/joint ventures where it does not have a control position, dsm-firmenich will share the present Policy and encourage to apply a similar standard to its operations.
- where appropriate, business partners conducting dsm-firmenich business and to whom the [dsm-firmenich Supplier Code](#) is applicable.

3. Policy statement

We operate with integrity and do not tolerate bribery or any form of corruption in our business. We strictly prohibit the direct or indirect solicitation, acceptance, or payment of bribes.

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. Moreover, we do not allow third parties to bribe on our behalf.

At dsm-firmenich we are always committed to do the right thing the right way. This means that when faced with the choice of acting honestly or giving up business, we will always choose to act honestly. We believe ethical conduct is at the heart of our continued success.

4. Policy requirements

The below requirements are based on risk areas related to corruption.

Facilitation payments

dsm-firmenich prohibits facilitation payments by Employees or any third party on its behalf.

A facilitation payment is a payment made to secure or expedite routine governmental actions that are part of the regular tasks of public officials. These payments relate, for instance, to situations in which a person applies to obtain something such person is entitled to from a government authority (e.g. visa, certificate, service, approval, permit or licence) but the person wishes to get it faster than normal and therefore pays the public official to accelerate the process. In contrast to a facilitation payment, an official payment made directly to the official institution such as a standard "rush fee" /"fast lane", is permissible evidenced by a written receipt.

Gifts and entertainment

At dsm-firmenich we do not encourage exchanges of gifts and entertainment¹.

We do not offer, give, or accept any gift or favor -whether monetary or not- 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.

We understand however sometimes gifts can help to build understanding and improve working relationships. In those cases, gifts and entertainment have to be reasonable, proportionate and appropriate in the circumstances, will never be in cash or cash equivalent (such as gift certificates or vouchers) and should follow the applicable internal standards.

¹ This Policy does not apply to gifts and entertainment that are given to or exchanged between Employees. However, these gifts and entertainment will always have to comply with the general requirements stated in this section (reasonable, proportionate and appropriate) and be in line with applicable internal standards.



Sponsorships and donations

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.

Giving donations and providing sponsorships on behalf of dsm-firmenich is allowed and should aim to generate a positive impact on the communities in which we operate. Receiving donations and sponsorships is also permitted under certain circumstances. In any case, donations or sponsorships –given or received– should follow the applicable internal standards.

Conflicts of interest

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 according to the applicable internal standards.

Relationship with third parties, intermediaries and associated persons

dsm-firmenich regularly engages third parties, including, but not limited to, agents, distributors, consultants and suppliers. This is one of our biggest areas of risk as dsm-firmenich can be held responsible for any improper actions of third parties. Anti-bribery and corruption laws do not distinguish between a company and those acting on its behalf. They expressly prohibit corrupt practices, even when carried out through third parties.

When you select, engage and monitor third parties, follow the relevant standards.

To manage third party risk, third parties engaged by us must by contract agree to comply with as a minimum, applicable laws, the dsm-firmenich Supplier Code, and the present Policy. They also need to be vigilant not to conduct business with anyone directly or indirectly, owned or controlled by a person or entity that is or will be designated by any economic sanctions. See more guidance in the Trade Compliance Policy.



Record keeping and accurate recording to combat bribery and corruption

As full transparency is the best way to combat bribery and corruption the principles below should be applied, in addition to all relevant internal policies and standards:

- All dsm-firmenich books and accounts must be accurate and credible and must fairly reflect all transactions and other business engagements.
- All amounts paid to/received from any third party must be appropriately described/represented.
- Never create off-the-book funds or assist any third party in creating them.
- Do not enter into any agreement, arrangement or understanding that has not been evidenced in writing and approved in accordance with dsm-firmenich policies and standards.

Consequences of breach and suspected violations of the Policy

Any act or omission by an Employee contrary to this Policy shall be regarded as a breach of it and of the dsm-firmenich Code of Business Ethics. Violations of this Policy may lead to disciplinary action up to and including termination of employment or service. Moreover, dsm-firmenich may terminate its relationship with a third party that has been involved in bribery or corruption.

Anyone having knowledge or suspicion of violations of this Policy must report his/her concern as soon as possible. dsm-firmenich offers different options to raise a concern so that it is done the way that feels most comfortable to the reporter.

The Speak Up platform is available [here](#) for Employees and external parties for reporting concerns, [with FAQs accessible for guidance](#).

5. Contact

Questions and feedback regarding this Policy can be submitted to the Business Ethics team.

6. Policy management

Version	Date of issue	Effective date	Purpose of change
1	19 March 2024	19 March 2024	New Policy release



7. Appendices

None.

8. References

For the purpose of the present Policy, please find below the following definitions:

- Corruption: is the abuse of entrusted power for private gain.
- Bribery: refers to any offer, promise, gift or acceptance of 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.
- Public official: broad concept with different meanings in different regions. It largely includes:
 - An employee, officer, official of, or consultant to 1) a government at national , state, regional, provincial or local level; a government agency, public authority or other public body; a state owned or state controlled entity (may include universities or hospitals); an international public organization (for example the United Nations and their agencies or related bodies); or
 - A politician at any level of government, whether they hold political office or not, political candidates, political parties and anyone working for them; or
 - Members of royal or other ruling families.
- Donation: contribution in cash, goods or services for philanthropic reasons without any benefits expected in return.
- Sponsorship: contribution in cash, goods, or services to support an event or activity in return for advertising possibilities or other benefits.