



INTERNATIONAL
FRAGRANCE
COMPANY

in alliance with dsm-firmenich



EFFECTIVE DATE: 21.02.2024

POLICY OWNER: SUSTAINABILITY & BUSINESS ETHICS MANAGER

HUMAN RIGHTS POLICY



1. PURPOSE

At MG International Fragrance Company, we positively contribute to creating a world where everyone has the opportunity to lead a fulfilling life, where communities thrive, and where the planet is sustained for future generations. As a signatory of the United Nations (UN) Global Compact, MG promotes decent work throughout our operations and in our global supply chains. We align our business objectives with the UN Sustainable Development Goals (SDGs) and uphold human rights standards throughout our operations and value chains. Our human rights policy outlines our commitment and approach internally, as well as our expectations from our suppliers and business partners in the value chain.

2. SCOPE

Our Code of Business Ethics makes clear that respecting human rights, protecting nature, and supporting the safety of the communities where we operate are all key priorities, throughout our operations and value chains. This policy is based on (international) human rights standards which include the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on the Fundamental Principles and Rights at Work. We follow the UN Guiding Principles for Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct as we implement our commitments. This policy applies to everyone working for and with MG and its subsidiaries worldwide (either full owned or with a majority ownership or control). In companies/joint ventures where we do not have a control position, we will encourage to apply a similar standard. The policy also applies to all our business partners to whom our Supplier Code is applicable and sets an expectation to uphold the principles herein and adopt similar policies within their own businesses.

3. POLICY STATEMENT

(Inter)national human rights

Our employees and suppliers and business partners are expected to abide by all (inter)national laws on human rights in the countries where they operate. Where national law and international human rights standards differ, we seek ways to honour the highest standards in human rights.

Responsibilities

It is the responsibility of each employee, supplier, and business partner, to adhere to our human rights policy and promote a culture where rights are understood and respected.

While working together, we believe that collaboration is essential for promoting human rights implementation and amplifying positive impact, together.

4. ORGANIZATION

The process we implement

We build awareness of human rights through mandatory training and engagement. Throughout our operations, we will continuously assess the compliance through our internal control framework, as well as internal and external audits. We cascade our approach & requirements to our supply chain to drive awareness and uphold international standards on human rights, through our Supplier Code and support systems to onboard our suppliers. This is a continuous process, and we are eager to continuously evolve our efforts to further advance our responsible business practices.

Governance and responsibilities

Our Sustainability Department is responsible for defining our strategy and framework for managing human rights. Our Sustainability Manager provides periodic updates and reports to our senior management, which has the ultimate authority of our sustainability strategy. We align our strategy and framework in our business units and operations. Our Sustainability Department closely collaborates with the Procurement Department for application in the value chain as part of due diligence processes. Human Resources Department is closely involved on topics related to core labour conditions such as living wage, working time and diversity, equity & inclusion.

5. POLICY REQUIREMENTS

Systematic risk analysis and ongoing due diligence approach

MG structurally identifies (salient) human rights risks for our own operations and our value chain by looking at severity (scale, scope, irremediability) and likelihood, following the framework set by the UNGPs. We have a responsibility to prevent, mitigate, and address adverse impacts. We adopt a due diligence approach, aligned with (inter)national legislative requirements, that includes the following steps:

- Identify impacts, including emerging risks;
- Address our findings and take actions (prevent, mitigate and remediate);
- Track the effectiveness of our actions and disclose the progress made;
- Communicate regularly to our stakeholders on how we address impacts.



The due diligence approach is embedded in our own operations and supply chain. We believe it is critical to stimulate transformation and positive change through field-based collaborations at source. MG conducts its own due diligence process and assesses its own supply chain risks. For this purpose, we use third party-data, alert systems, or suppliers' performance data through certain platforms, but also through direct data collection from supplier-led self-assessments and onsite assessment. Third party-verification may be requested on a case-by-case basis.

Stakeholder engagement

Human rights are not a topic we can address alone. We need to work with multiple internal and external stakeholders such as governments, NGOs, employees, suppliers, customers, experts, and communities. Together, we can exchange knowledge, build leverage, and address human rights that may be at risk. We believe human rights defenders play a critical role in drawing attention to issues that may otherwise remain uncovered and strive to cooperate with our stakeholders to safeguard human rights defenders' freedom to let their voices be heard.

Grievance mechanism

SpeakUp is our reporting line for all employees and all external stakeholders for raising concerns about any suspected violation of our Code of Business Ethics, including our policies, or applicable laws and regulations. Please visit our website www.gulcicek.com to learn more about our Speak Up framework.

6. CONTACT

Questions and feedback regarding this policy can be submitted to our Sustainability Manager.

7.POLICY MANAGEMENT

Version	Date of issue	Effective date	Purpose of change
1	21 February 2024	21 February 2024	New Policy release

8.REFERENCES

This policy should be read in conjunction with the following documents:

Code of Business Ethics & Supplier Code

Modern Slavery Position Statement

Conflict Minerals Position Statement

You can find our policies at www.gulcicek.com.