



INTERNATIONAL  
FRAGRANCE  
COMPANY

in alliance with dsm-firmenich



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**POLICY OWNER: SUSTAINABILITY AND BUSINESS ETHICS MANAGER**

## **CODE OF BUSINESS ETHICS**



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## FOREWORD FROM OUR LEADER

Dear colleagues,

A warm welcome to our MG International Fragrance Company Code of Business Ethics! Together, we're setting out to become the innovators in fragrance. And we want to start as we mean to go on: with the right mindset, values, and behaviours. 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 MG International Fragrance Company 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 MG International Fragrance Company 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 Department, or the Ethics department. And if you ever feel a principle in the Code is being breached, please use the Speak Up framework on our company website or send an e-mail to [etik@gulcicek.com](mailto:etik@gulcicek.com). 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.



## 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 MG 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 supply the fragrances we manufacture to over 2.500 domestic firms and to 65 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 Ethics 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 the English version of our Code. 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 fragrance, our values guide how we want our employees to act. It helps us understand what doing the right thing means at MG. Our purpose and values guide our decisions and actions. Our business principles clarify what we mean by doing the right thing.

### Shape the future

We are curious and open-minded. We're cutting-edge scientists, breakthrough innovators, and passionate creators with more than sixty-year 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, we guide them.

### Be a force for good

For us, integrity is the only way forward. We are responsible and focus on impact, 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, to drive impact.

### ...Together, with our customers

We act with unity – 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 actions. Our business principles clarify 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 MG's values. We continue to raise awareness of human rights through education and engagement with our expert partners. We strive to train target masses with appropriate tools so that they can further integrate human rights into their daily roles and functions.

What does this mean in practice?

- Maintaining the highest standards of health, 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 labour, child labour, modern slavery, and excessive working hours

We prohibit any form of child labour, forced labour, 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, bullying, and harassment

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
- Religious
- Sexual orientation
- Experience
- Socio-economic status
- Abilities
- Marital status
- Other protected categories

As employees of MG, 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 behaviours.

### 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 labour 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 behaviours, 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

MG 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

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 behaviours are never allowed:

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

#### Contractual obligations

We honour 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 MG, 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 MG. 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. MG 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.

## **Cyber security**

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 MG International Fragrance Company 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 use this information to achieve business goals and should not share this information with others. The company's tangible and intangible assets and resources should be used only for business purposes and carefully. Accurate records should be kept, and applicable laws and regulations should be followed when working with them.

## **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 favour 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 MG. 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 endeavour 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, our Code of Business Ethics 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 Ethics department.

## SPEAKING UP

At MG International Fragrance Company, 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 behaviour that contradicts our values, it is vital that you raise it! We offer different options to raise concerns so that you can choose the option that suits you best. We encourage open and honest communication, and therefore, where possible, we recommend that employees first address their concerns directly with the person involved or with their local contact from HR or the Business Ethics team. We also realize that sometimes it is not easy to speak face-to-face. That’s why we have our Speak Up platform, which is run by an external provider and can be accessed 24/7. The platform offers the possibility to report anonymously and is also available for third parties. Please visit our website to learn more about our Speaking Up framework.

## ZERO TOLERANCE TO 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 behaviour 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 honoured, 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 [gulcicek.com](http://gulcicek.com).