

*always  
inspiring more ...*

symrise 

# The Symrise Code of Conduct

*Communication, Decision-making and Actions*





# Why Do We Need a Code of Conduct?

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*Dear Symrise employees,*

Symrise has more than 10,000 employees around the world – people from more than 160 countries working at over 84 sites. Every day, we do business with other companies in other countries with different cultures, habits and customs. We are in daily contact with a broad spectrum of stakeholders, including customers, colleagues, suppliers and shareholders.

So much diversity requires a common basis. The Code of Conduct is an instrument that allows Symrise to create this basis on an ethical and legal foundation. The Code of Conduct is therefore one of the most important components of our Group-wide compliance program. It provides us with a proven framework in which to make business decisions.

By complying with our Code of Conduct, we have built up an outstanding reputation as a reliable company of exceptional integrity. This reputation is a vital asset to our company: It isn't just a facade – it's part of our daily business. So please continue to comply with the Code of Conduct and support your colleagues in doing the same.

*The Executive Board*

**1** PAGE 6

**What Is the Code of Conduct?**

**2** PAGE 8

**One Code of Conduct for Everyone**

**3** PAGE 10

**What Guides Our Behavior at Symrise?**

**3.1** PAGE 12

The Basis of Our Code of Conduct:  
Our Compliance Guidelines

# Overview of Topics

---

**4** PAGE 14

**The Code of Conduct: The Guidelines**

**4.1** PAGE 16

In the Workplace

*Respect and Fairness*

*Health and Safety at Work*

*Product Safety*

*Company Property*

*Data and Information Technology*

*Alcohol and Drugs*

**4.2** PAGE 26

In Business Relationships

*Market and Competition*

*Conflicts of Interest*

*Corruption and Bribery*

*Gifts and Invitations*

*Financial Contributions*

*Finances*

**4.3** PAGE 38

Handling Information

*Confidentiality and Data Protection*

*Insider Information*

*External Requests*

*Intellectual Property*

**5** PAGE 48

**Your Contacts at Symrise**

# What Is the Code of Conduct?

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Our Code of Conduct at Symrise is a set of legally binding ethical guidelines that apply to every employee, regardless of position, location or task and irrespective of any personal characteristics such as age, gender, language or culture.

The Code of Conduct provides the framework for interactions with our key stakeholders: Employees and colleagues, customers and suppliers, shareholders and investors, neighbors, society, national and local governments, as well as government agencies, opinion leaders, media and the public.

The Code of Conduct is based on our values and principles. By following it, we guarantee that every person is treated fairly and with respect, while ensuring that our behavior and business activities remain transparent, honest and consistent throughout the world.

*Our stakeholders are all those that have a legitimate interest in our company, including its activities and services, and with whom we interact on a regular basis.*

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# One Code of Conduct for Everyone

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The Code of Conduct applies to every employee at Symrise AG and its national and international Group companies. The Code of Conduct applies during working hours. It should also be followed when you are involved in external activities as an employee or representative of Symrise. A violation of our Code of Conduct or other regulations and guidelines can lead to disciplinary measures and other legal actions.

Every Group company must also comply with national laws when implementing the Code of Conduct. In certain countries, it is possible that stricter or more comprehensive laws or regulations may apply than those described in the Code of Conduct. In such cases, the stricter regulations always apply.

All employees are required to know the basic laws, regulations and internal corporate rules that apply to their areas of responsibility. Additionally, every manager needs to ensure that their staff are familiar with the Code of Conduct and that they work in compliance with its provisions. This is a mandatory requirement.

We also expect our business partners to accept and respect the principles contained in our Code of Conduct.



# What Guides Our Behavior at Symrise?

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Decisions are a part of our daily work. We all know to consider more than just business interests and success – legal and ethical aspects must also be taken into account.

One bad decision can have far-reaching consequences for the entire company. If you are unsure of how to act in a given situation, check your decision against the following criteria:

+ Does my decision align with the applicable laws, Code of Conduct and other company rules?

+ Can I make an unbiased decision in the best interests of the company, completely free from my own competing interests?

+ Would my decision be approved if a third party were to check it? Will my decision protect the company's good reputation?

*If you cannot unequivocally answer every question with "Yes", then you should seek advice from one of our contacts (see page 48).*



# The Basis of Our Code of Conduct: Our Compliance Guidelines

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*The Group Compliance department at Symrise is responsible for monitoring observance of the Code of Conduct and the applicable legal regulations as well as for developing, implementing and adhering to the Symrise compliance program.*

The Code of Conduct is a core element of Symrise's compliance program. The program also includes advising employees on questions regarding the Code of Conduct, performing audits, advising on disciplinary measures regarding Code of Conduct violations and reporting to the Executive and Supervisory Board on its implementation and effectiveness.

Group Compliance offers regular training on the Code of Conduct. Your supervisor may contact you regarding participation. In an attempt to make the training fit busy work schedules, we've also made it available online.



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*The term compliance means observing all of the applicable laws and regulations at local, national and international levels. This includes, in particular, the principles of ethical business. We at Symrise act in accordance with the laws and constantly strive to conduct ourselves correctly, based on the Symrise compliance guidelines, which form the foundation for all specific and broader statements as summarized here in the Code of Conduct:*

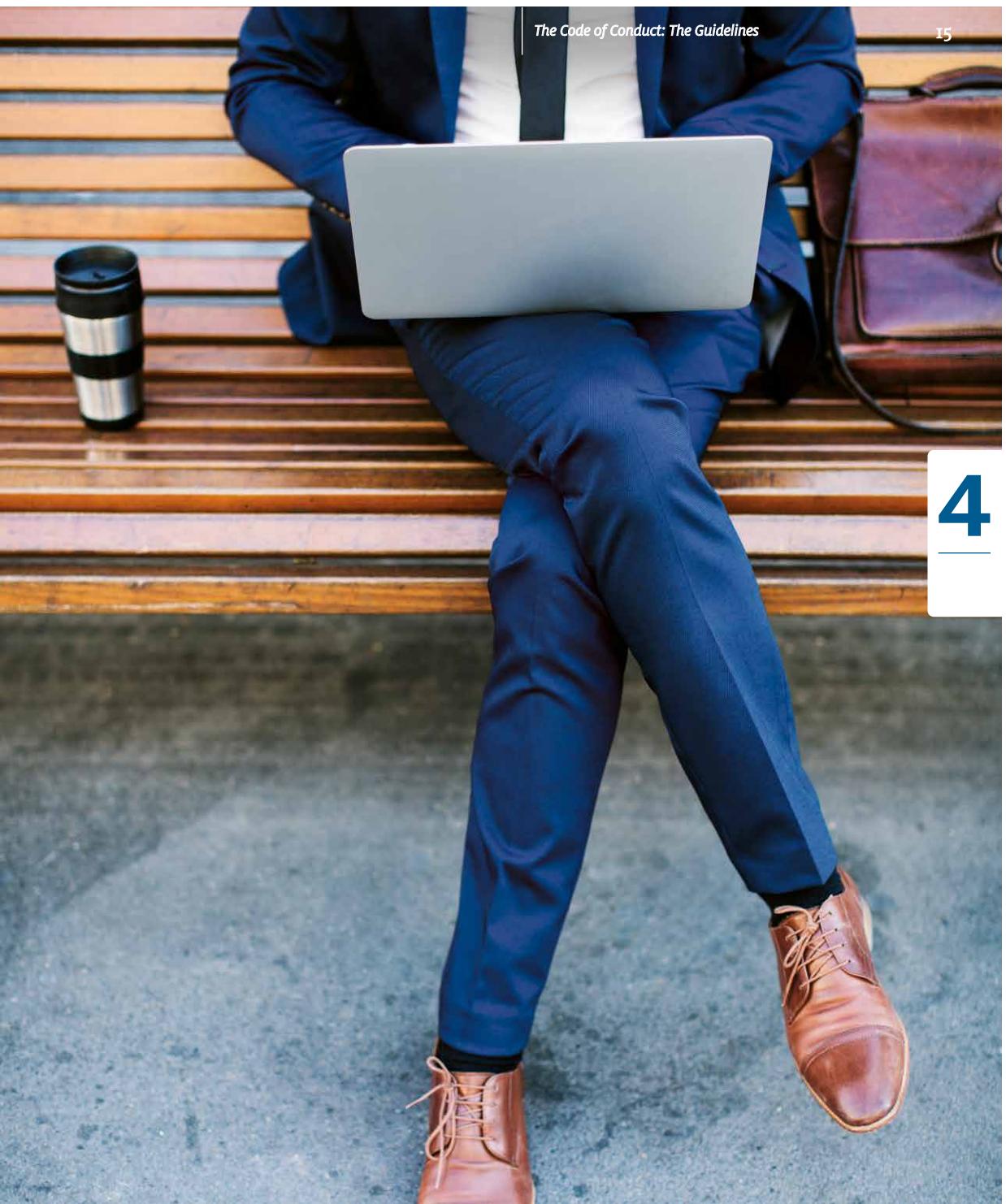
- + We comply with the applicable legal provisions and our internal standards at all times.
- + We strengthen the trust placed in us by customers and stakeholders by upholding our high ethical standards.
- + We avoid conflicts of interest. If conflicts of interest exist, we deal with them openly. We maintain transparency in order to handle conflicts of interest in an appropriate manner.
- + We condemn every form of corruption. Corruption has no place in our business practices and poses an obstacle to development and advancement.

# The Code of Conduct: The Guidelines

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*In the following chapters, you will find our company's compulsory guidelines for ethical and legal conduct. These guidelines will help you make successful decisions. They cover the following areas of application:*

- + *Conduct in the workplace*
- + *Conduct in business relationships*
- + *Handling information*



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# In the Workplace

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*In this section, you will find all guidelines regarding workplace conduct. All Symrise employees must comply with these guidelines.*

As a company, we are committed to upholding human rights, in particular the basic principles set down by the International Labor Organization (ILO), the United Nations Conventions on the Rights of the Child, and the Universal Declaration of Human Rights.

Every form of exploitation, disrespect towards people due to their age, gender, health, skin color, religion or other personal characteristics, as well as the disregard of work safety provisions or employee rights is illegal and will not be tolerated. We reject any and every form of forced or child labor.

We guarantee a compensation that, at the very least, corresponds to the legal or standard wage levels in our industry. In regard to working hours and paid vacation, Symrise complies with the local legal regulations, labor agreements and national customs where it operates.



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# Respect and Fairness

*Honesty, respect and fairness in our behavior and communication with one another are absolutely vital. Our employees are hired, trained and promoted based on these principles.*

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- + We respect the personal dignity, personal rights and privacy of our colleagues, customers, suppliers and every other stakeholder with whom we have contact.
- + We do not tolerate discrimination based on gender, ethnic identity, skin color, nationality, age, religion, sexual orientation, disability or any other personal characteristic.
- + We also do not tolerate expressions or actions that promote a hostile working climate and/or that have the exclusion of colleagues as their goal.
- + We do not accept any statements that could be understood as inappropriate or illegal, regardless as to whether the point of view expressed is technically correct or not.

# Health and Safety at Work

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*Symrise is committed to providing its employees with a safe and healthy working environment. And every employee can contribute to the overall level of health and safety at work, too. We therefore encourage our employees to do just that. The basic rules in this regard are as follows:*

- + We observe our company's safety rules and regulations.
- + We always use the ergonomic aids provided and the relevant safety equipment.
- + We immediately seek help in the case of accidents and report every incident to our supervisors without delay.
- + We report inadequate safety standards, dangerous working conditions and violations of work safety provisions. There are various contacts available throughout the company to deal with these issues (see page 48).
- + We provide suggestions for improving safety and motivate our colleagues to do the same.

# Product Safety

*Safety is also an essential aspect for our products, as our customers and consumers expect safe, high-quality products from us at all times. Therefore, the following points are always to be considered:*

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+ We ensure that our products have no deficiencies or dangerous qualities that could potentially harm the consumer or our customers' property.

+ We support the monitoring systems for substances and products that have been established by the company. Incidents that could compromise their safety are immediately reported.

+ We assume responsibility for our products over their entire life cycle. We act in awareness of this responsibility in everything we do.



# Company Property

*Many of the items that we use each day are the property of Symrise. This includes computers and furniture, but also office supplies, software and copyrights. To protect the company's property, the following guidelines are to be observed:*

- + We handle Symrise's property with care and protect it from improper use, damage and theft.
- + We do not use company property without the necessary permission to do so. Symrise property is not to be sold, borrowed, given away or removed from the company grounds.
- + We only use company property for its intended purposes. Misuse, including personal, illegal or other unauthorized use, is not permitted.

*In certain circumstances, employees are allowed to use company property for private use. The corresponding regulations can be found in the respective employment agreements and/or company guidelines. You can find more information on this topic on our intranet.*

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# Data and Information Technology

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*Information technology (IT) is indispensable in our day-to-day operations. Just as important are the measures ensuring data security. Violations of these security measures can have serious consequences: Theft of (personal) data, loss of data and copyright violations, to name a few. Our guidelines help in avoiding such incidents:*

- + We use the company's IT systems to complete our business-related tasks. We do not use them for personal purposes that are inappropriate or not permitted, nor for unethical or illegal activities.
- + We pay close attention to the content of emails and email attachments, downloaded files and saved voicemails. We do not download any inappropriate material from the internet and handle passwords with care.
- + We only install software on our computers for which we have the necessary license and approval from Corporate IT.
- + We support the measures that our company has established for the security of its IT systems and the protection of data from internal or external abuse or threats.

# Alcohol and Drugs

*The health of all employees is just as important to us as workplace safety. We are therefore committed to a work environment free of drugs and alcohol.*

- + Under no circumstances may work safety or our ability to work be jeopardized or impaired by the consumption of alcohol or drugs.
- + The possession or consumption of illegal drugs and substances of any kind in the workplace and during working hours is strictly prohibited.
- + We report every case of drug or alcohol abuse. There are various contacts available throughout the company to deal with these issues (see page 48).



*Should tasting alcoholic beverages or other drugs be among your professional tasks, then it does not represent a violation of the Code of Conduct. If special regulations apply to your area of work, they must be taken into account.*

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# In Business Relationships

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*When we as employees come into contact with our business partners, we are representatives of Symrise. Act accordingly by upholding our values, complying with applicable laws and abiding by our Code of Conduct.*



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# Market and Competition

*We advocate fair competition everywhere and at all times. The following principles belong to our understanding of fair competition:*

We do not put down our competitors and/or their products and services. We do not make any statements to customers that might misrepresent competitors and/or their products and services.

We do not manipulate project tenders and do not attempt to prevent other companies from entering the market or drive competitors from the market.

We do not take information directly from competitors, but rather depend on ethical and legal market research sources to gain information on competitors. This includes:

+ Nonconfidential facts on competitors, customers and third parties

+ Industry studies and reports from market research companies

+ Information from publicly accessible sources, such as trade fairs, websites, company brochures, press releases and advertisements

We do not discuss pricing or related information with competitors. We do not make any arrangements with them regarding pricing or production quantities.

We do not make any arrangements with competitors in an attempt to divide up the market or share customers, or to boycott customers or other market participants. We hand out this brochure to our raw material suppliers and service providers to ensure that they are also familiar with our guidelines.

*Every employee who is entrusted with information and who comes into contact with competitors must comply with our guidelines and be familiar with the competition regulations of the nation in which they are acting on behalf of Symrise.*



## ***Sanctions, Embargoes and Export Controls:***

*We are required to comply with any sanctions, embargoes and applicable export control laws in our international activities. We are responsible for ensuring that we do not violate any applicable national or international legal regulations during our business activities. If in doubt, please contact Group Legal Affairs.*

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## ***Antitrust Law:***

Some agreements with business partners may be subject to antitrust or competition laws. Before initiating or making one of the following agreements, please consult Group Legal Affairs.

+ Contracts with competitors.

+ Agreements that stipulate another company must obtain all of the products it requires to cover its needs exclusively from Symrise.

+ Agreements that require Symrise to provide one customer exclusively with certain supplies.

+ Package deals that tie the sale of one product to the sale of another product.

+ Agreements that involve market behavior coordinated with third parties.

# Conflicts of Interest

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*A decision that serves Symrise's interest may stand in conflict with your personal, professional or financial interests. Such conflicts of interest can lead to a situation where business decisions can no longer be made impartially and in the best interests of the company. The following points are therefore to be considered:*

- + We ensure that our personal activities do not conflict with our responsibilities at Symrise.
- + If we are seeking additional professional employment or activities beyond Symrise, we notify our supervisors about this and receive prior approval.
- + We ensure that our performance for Symrise is not negatively affected by jobs held outside of Symrise.
- + Whilst employed by Symrise, we are not involved directly or indirectly with Symrise's competitors, customers or suppliers. This also applies to working at a company that is or that would like to become one of Symrise's competitors, customers or suppliers.
- + We inform our supervisors immediately if we are met with a possible or definite conflict of interest and work through the situation together.



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# Corruption and Bribery

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*We do not tolerate any form of corruption at Symrise. Accepting or providing money or services of any kind in an attempt to obtain a competitive advantage is prohibited.*

+ No gifts and/or other personal favors may be expected or provided in return for business relationships. This holds true even when “cultural customs” seem to demand it.

+ We do not expect any personal favors from our business partners and refuse all offers of this kind. This applies equally to all employees at every level of our company.

+ We never provide financial contributions of any kind to government officials or public servants, even if they should request them.

+ We do not provide government officials of any kind or public servants with cash or noncash contributions, not even when these are requested.

+ We do not involve ourselves in any form of money transfer whose origin or destination could be tied to money laundering or other criminal activities.

+ We are certain of the identity of our business partners when it comes to transactions. We only accept money from and/or pay money to business partners whose identity we are certain of.



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# Gifts and Invitations

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*Both material and immaterial goods, commissions, rebates and discounts on privately procured goods and services qualify as gifts. The exchange of small gifts and mutual invitations between business partners are allowed as part of maintaining good business relationships. This means that:*

- + We ensure that the context leading to the giving or receiving of a gift or invitation is appropriate. It goes without saying that no legal provisions are to be violated through the transaction.
- + We also make sure that the value of the invitation or gift is appropriate (e.g., pens, calendars or other promotional articles) and that there is no obligation to provide a service or gift in return.
- + We inform our supervisors about the acceptance of gifts and invitations. If we are unsure or in doubt about a situation regarding gifts or invitations, we discuss it with our supervisors and Group Compliance.

*In addition, discounts and special offers, for example from transport companies, hotels, car rental agencies and restaurants, are acceptable if they occur as part of a membership or bonus program and as long as Symrise has not expressly forbidden them.*

# Financial Contributions



*Donations and sponsorships are an expression of our social commitment. We promote the areas of health, education and science, art and culture, and social projects. Having this reputation, we are approached by various organizations, institutions and associations with requests for support. The following rules apply to awarding financial contributions:*

- + We award contributions according to consistent principles, which are documented in our financial contributions guidelines. All requested donations and sponsorships are examined to see whether they meet the requirements outlined in these guidelines.
- + We value transparency in our contributions, meaning that the reason for a contribution and its use must be verifiable at any and all times.
- + We ensure that contributions are never awarded to organizations whose goals do not align with our Code of Conduct or operate for profit.

*Donation-like payments violate our requirements for transparency. They are forbidden. Donation-like payments are financial contributions that are declared as payment for a service, but the payment clearly exceeds the value of the service. This is therefore classified, at least in part, as a contribution for other purposes.*

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# Finances

*As a publicly traded company, we are required to observe numerous capital market laws and national and international accounting regulations. The following principles also apply:*

- + We are committed to fulfilling all disclosure obligations to the full and in a timely manner.
- + We prepare all tax returns and other forms for the tax offices responsible in compliance with all relevant legislation. We prepare them properly and completely and turn them in before the deadline.
- + We do not make any financial transactions that contain a risk that exceeds the value limits of normal operations in our area of responsibility. Any exceptions require the express consent of the Group's Executive Board.
- + Any financial transactions that do not directly benefit Symrise's usual business require the approval of the Group's Executive Board in advance.



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# Handling Information

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*Information is valuable and must therefore be handled carefully and responsibly. That we communicate about our company, including its products and services, in a truthful manner goes without saying. In addition to this, please observe the following guidelines.*



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# Confidentiality and Data Protection

*Symrise complies with all applicable data protection laws and regulations across the Group. We expect our employees to handle internal information and data just as carefully and responsibly:*

- + We protect confidential information about our company, our products and our customers as well as other sensitive data from abuse.
- + We ensure that confidential information, regardless of format, is only accessible for the intended recipient.
- + We do not discuss confidential information publicly and ensure that confidential information is not shared illicitly internally nor published externally.
- + We check whether a confidentiality agreement exists or needs to be signed before passing confidential information on to third parties.

+ We uphold our confidentiality obligations that we agreed to in writing when starting our employment at Symrise. This obligation also continues after termination of employment.

+ We collect and process personal data only when it is explicitly required for legal purposes.

*Some employees have access to especially confidential information, such as those working in the areas of finances, human resources, legal matters, and research and development.*



*What is considered confidential information? Confidential information at our company includes:*

- + Access data for our web-based systems
- + Customer and supplier lists
- + Procurement figures sorted by product and supplier
- + Sales figures sorted by product and customer
- + Financial data and other reports
- + Sales and earnings expectations
- + Growth and improvement plans
- + Business and product plans
- + Investment plans
- + Planned acquisitions or divestments
- + Symrise's intellectual property (patents, etc.)
- + Information on inventions as well as research and experimental data
- + Product formulations and production instructions
- + Information on personnel and personal data
- + Wage and salary plans
- + Organizational charts
- + Contracts
- + Court records

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# Insider Information

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*As with every publicly traded company, Symrise is subject to the strict rules of the capital market and to monitoring by various supervisory bodies. This requires a very sensitive handling of insider information, meaning internal information that would have a considerable impact on the company's stock value if it became public.*

+ We never pass on insider information to third parties.

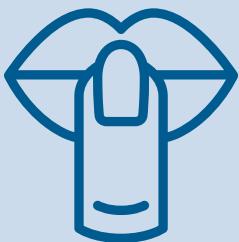
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+ We never purchase or sell stocks based on insider information. This applies to stocks in any company, including Symrise, its customers, suppliers and competitors.

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+ We never entice third parties to buy or sell stocks based on insider information. This applies to stocks in any company, including Symrise, its customers, suppliers and competitors.

*Insider information is internal corporate information that would have a considerable (direct or indirect) impact on the affected company's stock value if it became public. This includes...*



- + Information on research and development results.
- + Information on improvements to production processes, market launches for new products or product deficiencies.
- + Information on the bankruptcy of a customer, securing a tender or the discontinuation of a product.
- + Information on the outcome of court proceedings or the approval or expiration of a patent, financial data and other reports.
- + Information on the purchase or sale of companies or parts of companies, the founding of joint ventures or capital measures.

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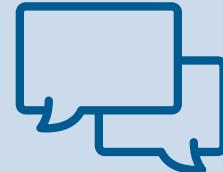
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# External Requests

*We are contacted on a daily basis by external sources such as media representatives, government authorities, service providers and other stakeholders. These inquiries belong to the normal workday of only a few employees. Therefore, please observe these guidelines when dealing with external inquiries:*

- + We do not answer any inquiries without authorization that do not belong to our area of expertise or work, but forward them to the correct contact.
- + If in doubt, we go to our supervisors for advice or get in touch with one of the contacts listed here.
- + We always protect Symrise's lawful interests when answering any inquiries.
- + We only provide financial information that has already been published in our annual or quarterly reports. All other such information is considered insider information and is confidential.
- + We deal and communicate with governments, authorities and nongovernmental organizations in an honest and transparent manner and in compliance with the applicable laws.
- + We ensure that recordings and documents in connection with an official inquiry or audit are preserved for the statutory durations and are not destroyed or deleted.
- + We always maintain this flow of information within the company.

## The Right Contact



- + For routine inquiries concerning your normal activities: **You.**
- + Inquiries from media and the public: Contact **Corporate Communications.**
- + Inquiries from official authorities, governmental bodies or on legal matters: Contact **the regional Legal department.**
- + Inquiries from municipalities or local authorities: Contact **the local subsidiary head or plant manager.**
- + Inquiries from nongovernmental organizations: Contact **Corporate Communications.**
- + Inquiries from investors: Contact **Investor Relations.**
- + Inquiries via social media: Make sure that it is clear in your communication whether you are speaking as a company representative or private person.  
Also, please observe our social media guidelines on communication using Web 2.0 applications.

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# Intellectual Property

*A major portion of our success is due to products and solutions that have been developed in our company – creative breakthroughs that we always seek to protect (e.g. through patents). We know just how important these ideas and breakthroughs are. We therefore respect and protect intellectual property of every kind, regardless of whether or not it was developed by one of our companies or by third parties, and regardless of its commercial value.*

+ We use third-party publications only with the express consent of the rights holder. Every publication, whether image or text, whether in print or digital form (for example on the internet), is protected by copyright. Group Legal Affairs can help in cases with possible exceptions.

+ We do not procure confidential information on third parties and do not use such information without a corresponding agreement approved by Group Legal Affairs.

+ We especially respect patents and trademark rights of third parties and do not use these rights without prior approval.

+ We do not use any software without a license agreement and without the prior approval of Corporate IT.

*You can find images and videos that can be used for your day-to-day work in our Symrise Media Center. Observe the rights that apply to these media, which can also be found in the Symrise Media Center.*



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# Your Contacts at Symrise

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Do you have questions regarding compliance or the Code of Conduct? Do you have the impression that certain actions are being undertaken that violate the principles of the Code of Conduct? Feel free to express your concerns openly. Symrise will support you in any and every case. You will not be in any way disadvantaged, as this would be a major violation of our guidelines. You can turn to the following contacts to report your concerns in confidence:

## ***Your supervisor***

*You should generally contact your supervisor on such issues, as they are most familiar with your area of responsibility.*

Information on how to contact the Integrity Hotline by telephone or online is available in the SymPortal. Additional details are also available there.

## ***Your Human Resources Officer***

*If you cannot express your concerns to your supervisor, perhaps because of potential involvement/conflict of interest, please contact your Human Resources Officer or the next-highest supervisor.*

## The Integrity Hotline

With the Integrity Hotline, you can report possible violations of the Code of Conduct anonymously. The Integrity Hotline can be contacted via telephone or over the internet in your native language, 24 hours a day. Symrise is obliged to investigate all reports and to support the observance of all applicable laws.

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## Your Compliance Officer

*If the position of Compliance Officer has been established at your site, then they are your contact. Your questions and concerns will always be handled confidentially. You can also contact the Compliance Officer anonymously.*

## Group Legal Affairs

*If certain practices need to be checked for legality or compliance with legal or ethical principles, Group Legal Affairs is your point of contact.*

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ClimatePartner<sup>°</sup>  
**climate neutral**

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