

An aerial photograph of a public square with people walking. The image is overlaid with large blue geometric shapes: a square in the top right, a semi-circle on the left, and a triangle in the bottom center. The text 'iff' is in the top right blue square, and 'CODE OF CONDUCT' is in the bottom dark blue bar.

**iff**

# CODE OF CONDUCT

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\*Note to Employees: This Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time. References to "IFF" in this Code mean International Flavors & Fragrances Inc. and its subsidiaries and affiliates and any company that is directly or indirectly wholly or majority-owned or otherwise controlled by it. There are references throughout this Code to IFF policies, procedures, standards and guidelines (collectively "IFF policies"). In most instances, only the main points or a summary of the policies appear in this Code. For a complete copy of any policy, you should go to IFFConnect or contact Legal or Human Resources.



## A MESSAGE FROM OUR CEO

When we unveiled applying science and creativity for a better world, we knew championing this purpose could only be attainable with ethical, dedicated employees. Being at the intersection of science and creativity has a responsibility, one that transcends simply understanding what's right or wrong. It calls for honesty and integrity – two qualities that set us apart, and which also make us exceptional.

Our goal has always been to lead the industry. As we look ahead, “leading the industry” will take us to new horizons as we embrace new opportunities. But whether historic or uncharted, leading with integrity is paramount. This means we engage our customers as true colleagues, and we honor coworkers with the utmost respect. We safeguard our Earth to the best of our ability, and we treat each community like our own.

The words on the following pages provide a practical, easy-to-follow guideline on our ethical pillars, but don't overlook the underlying expectation in those simple words. We expect each employee to do more good in all interactions, to strive to conduct our business beyond reproach, and to ask for guidance and report concerns whenever in doubt.

By using the Code as a touchstone, we will continue to uphold the very essence of what it means to be IFF.

**Erik Fyrwald**  
**Chief Executive Officer**

# LIVING THE CODE



We strive to create an environment where employees love coming to work each day – to a place that is committed, without exception, to diversity and inclusion, respect, accountability and doing what’s right.

Everything we do to drive growth must be done with the highest standards of ethics, honesty, and integrity. Each action we take as we conduct business globally must not only adhere to these high standards, but must also comply with this Code of Conduct (“Code”), IFF policies and procedures, and all applicable laws and regulations.

All IFF employees (including temporary employees and contractors), directors, and officers across the world are responsible for reviewing, understanding, and complying with this Code and IFF’s policies and procedures.

In addition to this responsibility, IFF managers and supervisors are also responsible for:

- Acting as role models and creating an environment where employees feel comfortable asking questions and raising concerns without fear of retaliation;
- Regularly training team members about the Code and applicable IFF policies;
- Making themselves available to provide guidance to employees; and
- Timely escalating and reporting to Ethics and Compliance, Legal or Human Resources any issues or concerns raised by an employee.

The expectations within this Code apply globally, regardless of whether you are working remotely or in the office, attending a business meeting or customer event, or conducting any other activity on behalf of IFF. If there is a difference between this Code, IFF policies, and local laws and regulations, you must apply the rule that sets the higher standard of ethical behavior.

# IT'S ALL ABOUT RESPECT

The responsibility of creating a positive workplace falls to every colleague, customer, and IFF business partner. To maintain a fully inclusive culture that nurtures each individual's uniqueness, we must treat all colleagues, customers, and other business partners with respect. No direct or indirect acts of discrimination or harassment, nor any disrespectful or insensitive behavior, will be tolerated.

## What Is Discrimination and Harassment?

In plain and simple terms, discrimination is the unjust or prejudicial treatment of individuals based on their race, color, creed, religion, gender, sexual orientation, gender identity or expression, intersex, national origin, marital or civil union status, pregnancy, ancestry, citizenship, age, military or veteran status, disability, genetic characteristic, HIV status, or any other characteristic protected by law.

Harassment takes many forms and includes any activity that creates an intimidating, hostile, or offensive work environment or that has the purpose or effect of unreasonably interfering with an individual's work performance. Harassment motivated by the same protected characteristics as listed above for discrimination is prohibited. Specific examples of harassment include, but are not limited to, crude or offensive language, uninvited touching, sexually suggestive pictures, indecent gestures, threats, or inappropriate jokes. Such behavior, as well as any form of conduct that violates the right of IFF employees to work in a harassment-free environment, is unacceptable.

Prohibiting discrimination and harassment applies to all aspects of IFF's employment practices, including recruiting, hiring, training, transfers, promotions, compensation, and terminations. IFF's prohibition against discrimination and harassment extends to our suppliers, customers, and other business partners. Furthermore, this applies to activities in the workplace, as well as offsite business settings.

If you are subject to – or witness – this type of behavior, you must “speak up” and report it immediately. We must all do our part to be a part of the solution – and not part of the problem.

## What Would You Do?

### ? QUESTION

Sydney, a Black woman, periodically wears her hair in different styles to work. One day, Sydney's manager, Johann, requests that she straighten her natural hair. He says that he wants them both to look their most professional for an upcoming meeting with an important stakeholder. Is Johann being discriminatory?

### 💡 ANSWER

Yes. By asking this of Sydney, Johann is saying that her natural hair, something characteristic to her race, is inherently unprofessional. This is discrimination based on Sydney's race. In this situation, Johann should not comment on Sydney's hair.

## SEEK ADVICE

While this Code captures many of the common situations that employees may encounter, it does not address every situation. There will always be circumstances that need to be addressed more specifically or in which you simply are uncertain as to the appropriate course to follow.

Sometimes, the right thing to do is obvious, but in many situations the decision is less clear-cut. This is especially true when you are facing time constraints or seemingly opposing business pressures. In these situations, asking yourself these questions can help you make the right decision:

1. Is it legal?
2. Is it consistent with IFF's Code and policies?
3. Will I maintain my integrity?
4. Will it protect IFF's reputation?
5. Would I feel comfortable if it became public?

If the answer to any of the questions above is “no” or you are not sure, you should not continue and instead consult with Ethics and Compliance, Legal, or Human Resources. It is important that you ask for guidance before acting.



## SPEAKUP

At IFF, all of us have an obligation to ensure that business is conducted with honesty and integrity and in full compliance with this Code, IFF policies, and applicable laws and regulations.

If you become aware of a suspected violation or allegation of misconduct, you must promptly report your concern.

### How Do I Report a Concern?

You have several options:

- Speak directly to your supervisor or a member of IFF's Global Ethics and Compliance ("Ethics and Compliance"), Legal or Human Resources teams;
- Report the issue online at [iff.com/speakup](http://iff.com/speakup);
- Call IFF's SpeakUp Hotline using the phone numbers located at [iff.com/speakup](http://iff.com/speakup); or
- Email [compliance@iff.com](mailto:compliance@iff.com).

Some of the options above permit anonymous reporting if allowed under local law. However, all individuals making a report are encouraged to disclose their identity as this will allow IFF to review and respond to the report in a more efficient and effective manner.

### Non-Retaliation

IFF strictly forbids retaliation against any person who in good faith raises a concern or reports possible misconduct. If you believe you have been subject to retaliation of any kind, you should report this immediately to a member of IFF's Ethics and Compliance, Legal or Human Resources teams.

## Investigations and Violations

IFF takes all reports of potential violations or misconduct seriously and is committed to reviewing and investigating all credible allegations. If requested to do so, you must cooperate fully and truthfully during an internal investigation.

In addition, nothing in this Code or any of our policies or agreements is meant to prohibit or restrict you from reporting any violation of law to any appropriate governmental or regulatory entity, or from cooperating with or providing information to any such entity in connection with a legal violation, investigation, government inspection, or inquiry.

Violations of this Code, IFF policies and all applicable laws and regulations – and attempts to conceal violations – may result in disciplinary action up to and including termination of your employment. In some circumstances, your actions may also result in legal authorities imposing fines or criminal penalties against you and/or IFF. Therefore, it is important to follow the rules and restrictions set out in this Code at all times.

For more information, please review [IFF's SpeakUp: Raising Concerns and Non-Retaliation Policy](#) and IFF's Investigations Procedure.

## What Would You Do?

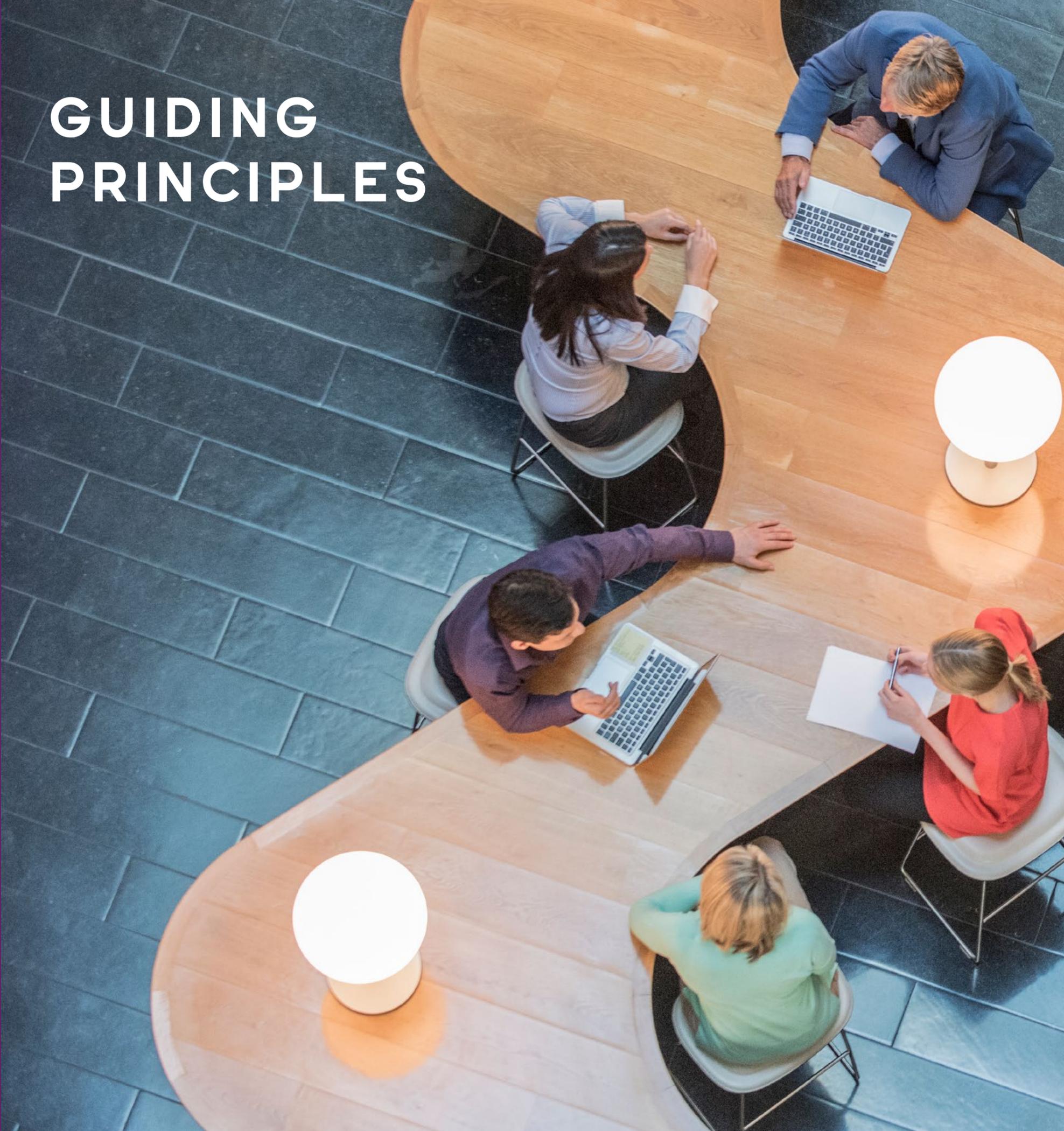
### ? QUESTION

I called IFF's SpeakUp Hotline to report that some comments by my manager made me uncomfortable. He was interviewed as part of the investigation into my complaint and after that he gave me a poor performance rating despite constantly exceeding my sales targets and high praise from other employees. Does my manager's behavior violate the Code?

### 💡 ANSWER

Maybe. IFF has a strict policy prohibiting retaliation against any employee who reports a concern in good faith. If your manager rated you poorly because you reported his behavior, he is engaging in retaliation. You should report your manager's behavior immediately.

# GUIDING PRINCIPLES



## DO MORE GOOD

We understand the support our colleagues and customers require and go out of our way to help them by focusing on what binds us together.

### Creating and Maintaining a Diverse Workplace

At IFF, we nurture an environment that not only welcomes, but also embraces the unique diversity of our colleagues, suppliers, customers, and other business partners. We celebrate and promote individual expression, innovation, and achievement, and we appreciate the power and expertise of different viewpoints. We are passionate about embracing different cultures, languages and beliefs, and about strengthening and empowering our diverse workforce and business partners.

IFF will only reach its full potential if all individuals feel enabled to unleash their uniqueness. All individuals must know they are able to “bring their whole self” to work without fear of harassment or discrimination. Such a workplace can only be achieved and maintained if we work together and treat each other with respect and dignity, and without bias or prejudice.

We are committed to providing equitable opportunities to all. We strive to ensure that the demographics of the employee population at all levels of the organization are representative of the markets that we serve.

## Being an Inclusive Colleague

We are inclusive, treat each other with respect and work in a fair, honest and ethical way.

For IFF to fulfill its commitment to creating and maintaining a diverse workplace, employees must commit to foster an inclusive, unbiased culture that unleashes every individual's unique potential. Each colleague must demonstrate this commitment by mastering the following competencies:

- Purposefully Unbiased: Develop a conscious knowledge of your personal biases, work to address them, and actively foster an equal and equitable workplace;
- Actively Inclusive: Advocate for and consistently act to support a culture that values and nurtures each colleague's uniqueness;
- Multicultural Agility: Proactively seek to understand how others experience the world and adapt your behavior to collaborate effectively in a multiculturally diverse workplace; and
- Committed to Diversity: Demonstrate active engagement to support IFF's business objective of inclusive diversity by ensuring all levels of our organization reflect the markets we serve.

## Human Rights and Fair Labor

IFF respects the fundamental human rights of all and is committed to providing fair and equitable wages to employees around the globe. As part of this commitment, IFF recognizes employees' rights to freedom of association and collective bargaining.

IFF forbids the use of child labor, forced labor, and human trafficking, and this prohibition extends to all IFF business partners.

For more information, please review [IFF's Global Human Rights Policy](#).



## What Would You Do?

### ? QUESTION

I participate in my company's mentoring program and take two or three new employees under my wing every couple of years. Recently, I realized that I tend to choose mentees that are like myself. To push myself out of my comfort zone, I would like to select individuals that display great potential but belong to identity groups to which I do not belong. Is this discrimination?

### 💡 ANSWER

Not at all. In fact, not only is this not an instance of bias or discrimination, but in pushing to mentor passionate and intelligent individuals that are different from yourself, you are taking proactive steps towards fulfilling IFF's goals of developing a diverse succession pipeline of talent.

# BE ETHICAL, HONEST AND TRANSPARENT

## Conflicts of Interest

Avoiding conflicts of interest is essential to operating as an ethical, honest, and transparent company. While working at IFF, you must ensure that your personal interests and relationships do not conflict – or even appear to conflict – with your professional obligations to IFF.

A conflict of interest can take many forms but arises when your personal activities and relationships interfere or appear to interfere with your ability to act in the best interest of IFF. Examples include:

- Having a personal or financial relationship with a competitor, supplier, vendor, or customer;
- Working or conducting business with a family member or with any business in which a family member has a personal financial interest;
- Conducting non-IFF work activities during company time or with IFF resources;
- Being in a romantic relationship with a supervisor or subordinate;
- Working as a consultant for a competitor, supplier, or customer of IFF; and
- Serving as an employee, officer, or director of another company while employed by IFF.

Potential conflicts must be disclosed immediately to your supervisor, Ethics and Compliance or Legal for resolution. The good news is that the vast majority of conflicts can be mitigated simply by disclosing them. For additional guidance on conflicts and the disclosure process, please refer to [IFF's Conflict of Interest Policy](#).

## What Would You Do?

### ? QUESTION

I would like to hire my cousin's firm to perform security services for IFF's buildings. I don't think it's a big deal as long as he gives us the best price and provides the same quality of service as other providers.

Do I have to tell my manager that I am related to the owner?

### 💡 ANSWER

Yes, because it is a potential conflict of interest if your relative owns or works for a vendor or service provider with whom we do business. In a situation like this, you must disclose the conflict and receive prior approval from your manager and Ethics and Compliance or Legal.



# ACT RESPONSIBLY AT ALL TIMES

At IFF, we protect the health and safety of our people and preserve the communities where we work.

## Sustainability

Sustainability has long been part of the essence of how we do business at IFF. This principle and our commitment to the future has been formalized in our sustainability strategy and drives the innovation that results in social and environmental improvements – from the raw materials that we responsibly source, to our eco-efficient manufacturing facilities, to carefully designed products that consider critical sustainability attributes. Our four-pillar strategy – environmental footprint, sustainable innovation, responsible sourcing and people and communities – is fully integrated and targets the most material opportunities to create products for our customers and for consumers worldwide.

For more information about our achievements, ongoing activities and future goals, refer to IFF's latest Sustainability Report.

## Charitable Giving

IFF is committed to giving back to the communities where we operate and regularly makes charitable contributions as part of this commitment.

All charitable contributions made on behalf of the company must be reviewed and approved by members of IFF's Charitable Contribution Committee. Importantly, charitable donations, whether in the form of a cash donation, corporate sponsorship, or any other in-kind benefit, must never be made to any political organization, politician, or any organization that is affiliated or linked to a politician so as to avoid the risk or appearance of bribery and corruption. IFF will also not donate to any organization that discriminates on the basis of a protected class.

For more information, please see [IFF's Charitable Contribution Approval Policy](#).

## Maintaining a Safe Work Environment

There are no shortcuts when it comes to protecting the health and safety of our employees, business partners, and visitors to our facilities. Whether it involves cleaning up spilled water on the plant floor or reminding coworkers to wear their safety glasses or masks, we all must be committed to a safe and secure working environment. Each of us is responsible for understanding and abiding by all applicable laws, regulations, and IFF policies designed to ensure safe working conditions and to prevent injuries and accidents.

By being vigilant and aware of our surroundings, and by acting when appropriate, we can all play a role in making sure we have a safe place to work. Contact your supervisor, the site leader, or a member of Environmental Health and Safety, Ethics and Compliance, Legal, or Human Resources as soon as possible if you become aware of any unsafe condition or activity, including:

- Equipment that requires maintenance or is not properly working;
- Exposure to hazardous materials to an extent that may cause illness or injury;
- A task that you or your colleagues may need additional training to complete; or
- Any other unsafe condition or behavior that could be a danger to you, others, or the environment.

Remember, even the little things matter when it comes to health, safety, and the environment.

## What Would You Do?

### ? QUESTION

There was recently a fire at our plant that resulted in significant damage to our building and one person was transported to the hospital with severe burns. When I saw the related incident report, the site manager reported that there were reports of smoke in the building, but no fire was found. He also failed to note that my colleague was injured. What should I do?

### 💡 ANSWER

Report the site manager's conduct. Each of us is required to accurately report workplace incidents, accidents, and injuries. Your plant's desire to achieve its safety goals should not preclude any employee from reporting facility damage or a workplace injury, and supervisors must never encourage employees to hide a safety incident.

## Substance Abuse

IFF maintains a work environment that fosters the health and safety of its employees and protects the integrity of its business practices. IFF will not tolerate the use, sale, possession, or distribution of illegal drugs on company property, on company time or while operating company-owned equipment or vehicles. The rules are clear: working while under the influence of illegal drugs or alcohol puts everyone at risk and is strictly prohibited.

## Workplace Violence

Any act of violence or threatening behavior by employees or by any other person on IFF property or while engaging in IFF business or activities is unacceptable and strictly prohibited. This includes physical aggression and verbal abuse, as well as the possession of any weapons. Such acts and behavior must be reported immediately. If danger is imminent, contact the local police or fire department immediately and follow any applicable site or crisis management policy.



# PREVENTING BRIBERY AND CORRUPTION

## ANTI-BRIBERY AND CORRUPTION LAWS

Anti-bribery and corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act, generally apply to all IFF employees and IFF operations around the globe.

While bribery and corruption laws vary in each country, the rules at IFF are simple:

- You must never pay or offer to pay a bribe or facilitation payment to anyone, including to a government official or a business partner;
- You must never request or receive a bribe; and
- You must never use a third party or agent on your behalf or on behalf of the company to pay or receive a bribe.

If you believe that a colleague or third party may be improperly influencing, bribing, or engaging in any corrupt behavior – or if something simply “doesn’t feel right” – contact Ethics and Compliance or Legal immediately.

## What Is a Bribe?

Bribes can take many forms and can include giving or receiving money, kickbacks, business or employment opportunities, gifts and entertainment, travel, special “favors,” or anything else of value, for the improper purpose of:

- Influencing a decision;
- Obtaining or retaining business;
- Obtaining a business permit or other license; or
- Influencing the outcome of a government audit, inspection or decision.

IFF also prohibits the making of facilitation payments, which are typically cash payments provided to government officials to speed up routine government actions such as expediting an import through customs.

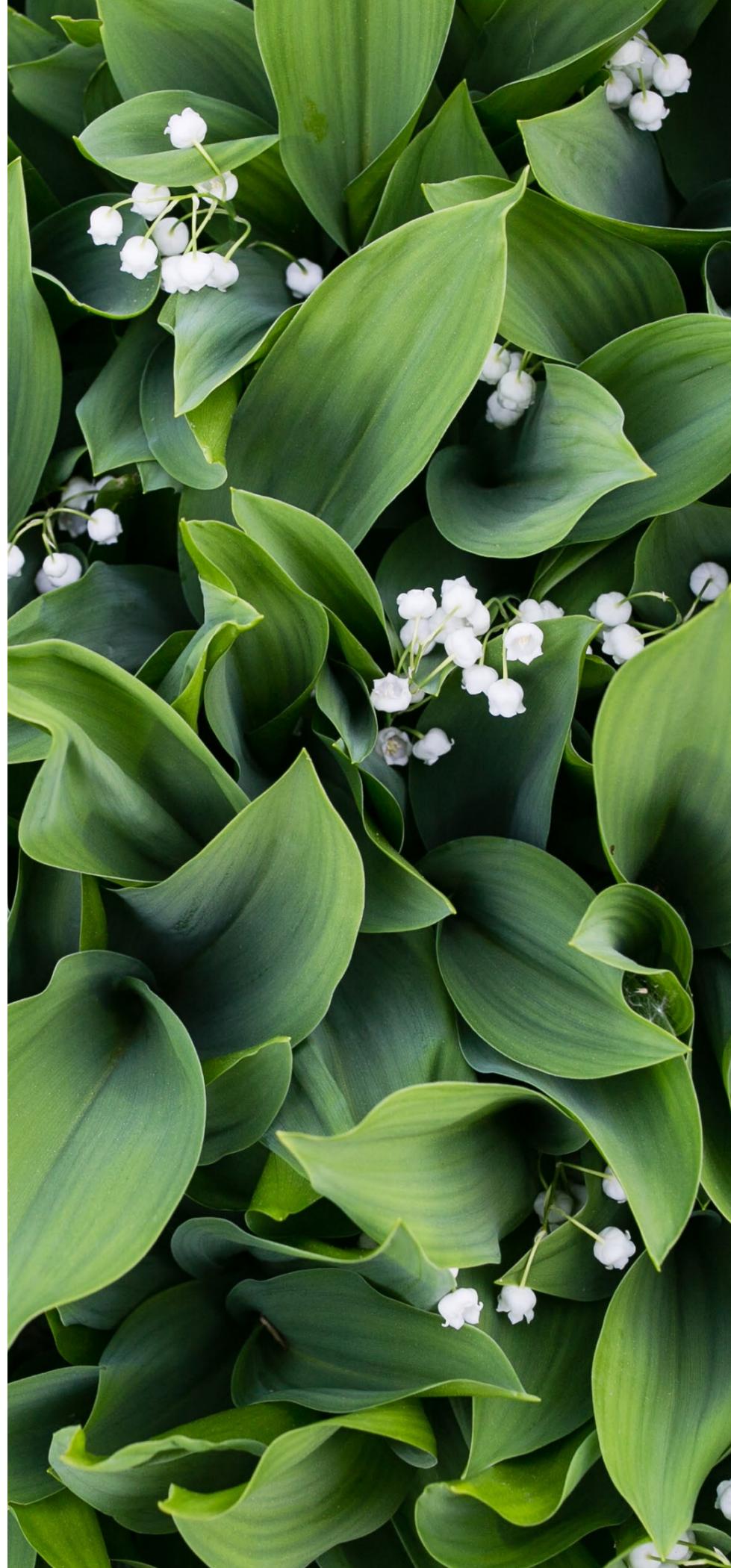
## Interactions with Government Officials

As a global company, we are often required to interact with government officials where we operate, but we must be extra cautious during these interactions because even employees with the best intentions can run afoul of anti-bribery laws when government officials are involved.

The following are examples of persons who may be considered government officials:

- Any officer or employee of a foreign government, regardless of rank;
- Employees of government-owned or government-controlled businesses, such as a hospital;
- Foreign politicians, political parties or candidates for office; and
- A family member or agent of the above.

If you expect to interact with individuals who match any of the above criteria, you must abide by the prohibitions set out above and familiarize yourself with [IFF’s Anti-Bribery Policy](#).



## What Would You Do?

### ? QUESTION

A flavor product manufactured in China has arrived at the port in Buenos Aires, Argentina without the proper labeling. The Argentine customs official told me that he would release the shipment if we pay him 4,000 pesos. We need this product urgently to satisfy a customer order. Can I make the payment?

### 💡 ANSWER

Absolutely not. By making the payment, IFF Argentina (and you personally) would be violating the Argentinean labeling laws and potentially anti-bribery laws as well. Note that similar laws exist in almost all other countries around the world so, irrespective of the location, IFF employees should consult with Legal whenever confronted with this type of request.

### ? QUESTION

In the course of the annual inspection of an IFF plant in India for the renewal of its operating license, the city official conducting the inspection has found several health and safety violations. The local agent we are using to help facilitate the inspection and licensing process says that the inspector will overlook the violations and approve the renewal, but it would require giving a sizable donation to the local school. Can we make this donation or have our agent make it on IFF’s behalf?

### 💡 ANSWER

No. It is IFF’s policy not to give, directly or through a third party, anything of value to a government official or any other person in any country to influence that person’s decisions to help IFF obtain or retain business or gain an unfair advantage. IFF’s Anti-Bribery Policy also requires that appropriate background checks be conducted by Legal in advance of appointing any third-party agent to interact with government officials on IFF’s behalf. You should immediately contact Ethics and Compliance or Legal to discuss the request.

## POLITICAL ACTIVITIES

We encourage all of our employees to be involved in their communities, and to be politically and socially active citizens. However, we do not permit the use of employees' working time or other company resources or assets – including facilities, phones, computers, copiers, or office supplies – for these purposes. We also do not permit employees to post or distribute materials on IFF property or to solicit other employees while working.

The decision to commit your free time or to contribute money or other personal resources to political or community activities is entirely up to you, and if you choose to engage in such activities, the company will not take action against you for your personal political views or contributions. When engaging in the political process, you must comply with the laws and regulations governing political activity and contributions.

All political activity on behalf of IFF, including all lobbying activities and meetings and communications with government officials, must receive prior clearance from Ethics and Compliance or Legal. Note that [IFF's Political Contribution Policy](#) strictly prohibits direct or indirect contributions by the company to any political campaign or political organization, as well as the reimbursement of any such contribution made by an employee.



## GIFTS AND HOSPITALITY

At IFF, we promote successful working relationships and goodwill with our customers, suppliers and other business partners, as they are vital to our success. We recognize that business entertainment, such as dining out or attending events, can play an important role in strengthening these relationships. Further, we appreciate that there are cultural practices that include gift-giving in countries where we do business.

While we respect these practices, we must be careful not to let them override our commitment to comply with the law and our policies. As a general rule, gifts, hospitality and entertainment must never be given or received with the intent to obtain or retain business, or to influence a government official. We should also avoid circumstances that would create even the appearance of improper intent.

The offering or receipt of a gift of minimal value may be permitted, provided that it is done openly and lawfully in accordance with acceptable practices in our industry and the location in which it is taking place. Gifts can take many forms, including free products or services, special favors, discounts, entertainment and even free transportation to or from a meeting. However, the offering or receipt of extravagant gifts, cash, or cash equivalents such as gift cards is *never* acceptable.

While understanding the difference between appropriate and inappropriate entertainment and gifts is not always easy, be guided by this: if it doesn't feel right, it probably isn't. If public disclosure of it could cause embarrassment to IFF or to you personally, it is unacceptable. If you are unsure about a particular gift or entertainment activity, or if the gift or entertainment involves a government official, you should always contact Ethics and Compliance or Legal before taking any action.

For more information on gifts, entertainment and hospitality, please review [IFF's Travel and Business Expense Policy](#).

## What Would You Do?

### ? QUESTION

We selected a new IT service provider and upon signing a contract with the company, the owner presented me with a very rare, expensive bottle of champagne. May I accept it?

### 💡 ANSWER

No. Accepting modest gifts from business partners, such as pens, calendars, fruit baskets, or other similar items, is acceptable. It is unacceptable for employees or our business partners to give or receive extravagant gifts, including expensive wine or liquor, jewelry, electronics, cash, or gift cards.

### ? QUESTION

One of our vendors invited me to attend a professional soccer match. Can I accept the invitation?

### 💡 ANSWER

Maybe. If the vendor offered an all-expenses paid trip to the final match of the World Cup including accommodation, the invitation would be considered extravagant and could not be accepted. If the vendor invited you to a local club match together with the vendor's colleagues and there was no pending contracts or new business opportunities with the vendor, the invitation could likely be accepted provided that you report the gift to your manager so there is not a question later as to whether the gift was an attempt to covertly influence IFF's relationship with the vendor.



## What Would You Do?

### ? QUESTION

I was supporting a customer to develop a new product using one of our latest enzymes. As a sign of appreciation, she gave me a watch and local sweets as I was leaving her office. Can I keep these?

### 💡 ANSWER

You may keep the local sweets, but you must return the watch. We want to be appreciated for our good customer support and collaboration and not be influenced by an exchange of valuable gifts or excessive entertainment. Accepting a watch from a business partner could be seen as excess and inappropriate, but other gifts of low value like sweets or inexpensive promotional items with the customer's logo can be accepted.



# CONDUCTING BUSINESS WITH INTEGRITY

## OUR BUSINESS PARTNERS

We focus on the business landscape as a whole and empower our teams to make ethical decisions with integrity.

Conducting business with integrity and in an ethical manner means that we must consider the reputational and financial consequences of all of our interactions with our business partners. As part of this commitment, IFF will only work with reputable business partners who act in compliance with all laws and regulations and who hold the same ethical principles under which IFF operates. These principles are set out in IFF's Vendor Code of Conduct.

When working with our business partners, you must:

- Avoid any unfair or deceptive practices;
- Treat all business partners honestly, fairly, and objectively;
- Be honest and forthright regarding our products and services;
- Follow proper procurement and sourcing procedures where applicable; and
- Select business partners based on merit and never because of a conflict of interest.

In addition to the above, you must ensure that our business partners undergo appropriate background checks to protect IFF from corruption and other risks that arise from engaging with disreputable business partners. For more information, please review IFF's Background Check Procedure.

## Money Laundering and Related Activities

IFF prohibits any form of money laundering, terrorist financing, or any other financing for illegal or illegitimate purposes. "Money laundering" is when an individual or organization attempts to hide the proceeds of crimes by making those proceeds look legitimate. Typically, these proceeds are funneled through one or more shell companies and offshore bank accounts to hide the true origin and destination of the proceeds.

If you suspect a business partner is engaged in illegal or suspicious activity, contact Legal immediately.

## TRADE CONTROL LAWS

As a global company, IFF delivers its expertise, creativity, and products throughout the world and across many borders. Operating globally means that IFF is subject to trade control laws in various countries that we do business in, and IFF is committed to full compliance with these laws, including:

- Export controls, trade restrictions, trade embargoes, and economic sanctions, which limit or prohibit IFF from engaging in business activities with certain countries, individuals, or entities;
- Anti-boycott laws that prohibit companies from participating in or cooperating with an international boycott that is not approved or sanctioned by the U.S. government; and
- Other import or export laws that require IFF and its business partners to pay duties and/or to obtain specific licenses, permits, or other documentation before transferring products and technical data across borders.

If you are responsible at IFF for making decisions about where or to whom we buy or sell products, or you are otherwise involved in cross-border business transactions, you must familiarize yourself with [IFF's Foreign Trade Controls Policy](#) and [IFF's Sanctioned Sales Procedures](#).

Trade control laws and anti-boycott laws are extremely complicated. If you have any questions or concerns that you may be engaging in prohibited business, or if you receive a boycott-related request, you should contact Global Regulatory Affairs or Legal.



## What Would You Do?

### ? QUESTION

Isabel has been working with a distributor's representative who covers the Middle East for the past several years. The representative recently said that he has found a potentially lucrative deal with a customer in the region. However, the representative was very evasive when Isabel asked questions about the customer. Instead, he told Isabel "not to worry about" where the products were going and to just ship all goods to his office in Istanbul. He then wired IFF the full payment from a bank account that was in the name of a different third party. Should Isabel send the goods?

### 💡 ANSWER

No. She should not send the goods and instead should contact Legal and Global Regulatory Affairs to help her determine whether the goods should be shipped and if the funds should be returned. This type of behavior can indicate that the distributor is attempting to sell goods to a country or entity with which IFF is not permitted to do business and proper due diligence should be performed before completing the transaction.

# DEALING WITH COMPETITORS

IFF is committed to achieving success through fair and legal competition and strictly prohibits any activity that violates antitrust laws or unlawfully restrains competition.

You must *not* discuss or agree with our competitors or others to:

- Fix or control prices or other sales terms, including rebates, discounts, freight allowances, or other sales terms;
- Align the content of tender proposals;
- Boycott suppliers or limit production; or
- Divide markets, sales territories, product lines, or customers.

Even informal discussions with our competitors about these types of activities are prohibited and against the law. If you have questions about communications or interactions with competitors, you should seek advice from Legal.

For more information, please review [IFF's Antitrust Policy](#).

## Competitor Information

IFF does not allow and will not tolerate any illegal or unethical activity to obtain or disclose competitor information – no matter how useful the information may be.

Instead, competitive information should be obtained in a legal and ethical manner such as by reviewing regulatory filings, public speeches of executives, news articles, and other publicly available information.



## What Would You Do?

### ? QUESTION

My department plans to hire an employee from one of our competitors. Are there any special rules that have to be followed?

### 💡 ANSWER

Yes. You must consult Human Resources before hiring an individual from a competitor. While it may be acceptable to hire the employee, the individual may be under a legal obligation not to work with IFF or reveal confidential information or trade secrets. Human Resources will need to review the specific circumstances before any offer is made to the individual.

### ? QUESTION

At a trade association meeting last week, one of our competitors started talking to me informally about “staying away” from one of her customers. She said the conversation was “off the record.”

Was that okay?

### 💡 ANSWER

Absolutely not. While trade association meetings serve a useful and legitimate purpose for IFF and our competitors, they should be approached with great care. Discussions with our competitors, even those that may be “off the record” in areas such as pricing, terms of sale, territories, or customers, must be avoided. If a competitor tries to discuss any of these subjects, you should ask the person to stop immediately and, if necessary, you should leave the meeting and report the situation to Legal.

### ? QUESTION

During a visit to an important customer, I was handed a sample of an encapsulated fragrance technology that a competitor has developed but not yet put on the market. The customer asked if I could match the sample. Can I do this?

### 💡 ANSWER

No. If the sample is not commercially available, we cannot accept it. IFF will always respect the valid intellectual property of our customers, competitors, and any third party. If there is ever any doubt as to whether a sample may be obtained or analyzed, contact Legal for guidance.

### ? QUESTION

Is it ever acceptable for me to discuss prices of our products with our competitors?

### 💡 ANSWER

Maybe. Because we supply some of our competitors with products, you may discuss pricing in connection with these sales. However, you may not discuss pricing with our competitor if IFF and the competitor are competing for the same business with another customer, as this could subject both you (personally) and IFF to serious criminal or civil charges.

It's simple: price fixing or agreeing to fix prices is illegal.



## INSIDER TRADING

Buying or selling IFF securities (including stock, restricted stock units, stock options, or stock-settled appreciation rights) when you know material non-public information about IFF is not only unethical, it's against the law and can result in severe civil and criminal penalties for you and IFF. This rule applies to all employees and relates to all material non-public or "inside" information about IFF's business.

Trading in IFF securities or in those of any other company (including customers and suppliers) while in possession of material inside information about either entity is strictly prohibited; as is telling other people, including family members and friends, about material non-public information regarding IFF or any other company (even if you do not trade yourself). Individuals, including family members, who trade in securities while acting on a tip or possessing material inside information, may be violating the law and subjecting themselves to civil and criminal penalties.

### What Is Material Non-Public Information?

"Material non-public information" is any information that has not been made available to the public and that a reasonable person would consider important when deciding whether to buy, sell, or hold securities of a company. This includes information about IFF, as well as information about other companies such as our business partners and competitors. Examples of material inside information include:

- Unpublished earnings forecasts, estimates, or results;
- Acquisitions, divestitures, or restructurings;
- Management changes;
- Upcoming product launches or product innovations;
- Gain or loss of important customers or contracts; and
- Pending or threatened litigation or regulatory action.

For more information, please review [IFF's Insider Trading Policy](#).

## Trading Windows

Depending on your role at IFF, or your access to confidential IFF information, you may be subject to pre-clearance requirements or periods of time when you are restricted from trading in IFF securities. If you are in doubt on whether a transaction is allowed, review [IFF's Window Period Policy](#) and contact Legal.

### What Would You Do?

#### ? QUESTION

I don't work in the finance department and am a junior employee with little access to management information. Can I ignore the Insider Trading Policy?

#### 💡 ANSWER

No. Material non-public information can take many forms, and it is possible that you possess non-public knowledge – even through casual conversations with coworkers – that might be considered valuable to an investor deciding whether to buy or sell IFF securities.

#### ? QUESTION

Is it wrong to share inside information with others even if I don't use it to benefit myself?

#### 💡 ANSWER

Yes. In fact, you may be found to be even more at fault because you are the person starting the "chain" of wrongdoing. Communicating material, non-public information to any other person, even if you don't realize any benefit, may result in you personally being held liable both civilly and criminally.

# PRODUCT COMPLIANCE AND REGULATORY AFFAIRS

IFF conducts business in full compliance with all applicable laws, rules and regulations wherever we do business. This includes all food, cosmetic, drug, and chemical control laws, many of which can be complex. These laws govern:

- The labeling of IFF's products or the consumer goods incorporating our products;
- The claims we make about our products; and
- How our products are manufactured and shipped.

IFF's global reputation and success depends on each of us understanding and complying with the rules that govern our business. If you have any questions about these rules, you must seek immediate guidance from your supervisor, Global Regulatory Affairs or Legal.



## What Would You Do?

### ? QUESTION

I want to present a customer with a fragrance that contains an ingredient that has not yet been cleared internally for fragrance use. The ingredient is already cleared for flavor use. Can I present this fragrance?

### 💡 ANSWER

No. The ingredient cannot be used until the internal clearance process is complete for the "end use" of the product. Regulations that apply to fragrances do not necessarily apply to flavors, and vice versa.

Your course of action: wait.

### ? QUESTION

A supplier has advised me that its product contains trace levels of a contaminant, but the levels are extremely low and present no safety concern. He also told me that the supplier is taking steps to eliminate the contaminant. Do I need to tell my supervisor?

### 💡 ANSWER

Yes, immediately. Even the slightest hint of an environmental, safety or quality problem with one of our products or ingredients must be reported as soon as it is discovered. You should contact a member of Global Regulatory Affairs or Legal right away.

# PROTECTING IFF PROPERTY AND ASSETS

## AVOIDING FRAUD, THEFT, WASTE, OR MISUSE

We act like an owner when it comes to protecting IFF's property, assets, and know-how, as these enable us to create and deliver the best possible products and services for our customers.

IFF property and assets are intended to be used strictly for business purposes. The theft or misuse of IFF property and assets, as well as the use of company property or assets for personal, unethical, illegal purposes, or personal gain, is strictly prohibited. We are all responsible to prevent the theft, waste or misuse of IFF property and assets.

As part of this responsibility, you must:

- Adhere to [IFF's Global Procurement Policy](#) when procuring raw materials and services;
- Avoid the waste or misuse of company funds intended for business travel or entertainment in accordance with [IFF's Travel and Business Expense Policy](#);
- Ensure that all transactions are properly authorized and within the authorization limits set out in [IFF's Global Authorizations Limits Policy](#); and
- Return all IFF property and assets – whether physical or intangible – at the end of your employment with IFF.

# INTELLECTUAL PROPERTY AND TRADE SECRETS

All intellectual property invented, created, or developed by IFF or you during your employment with IFF are company property and are often confidential. Similar to all other IFF assets, IFF's intellectual property may only be used in connection with IFF business and for the benefit of IFF.

This includes any inventions, formulas, processes, products, customer lists, programs, patents, trademarks, copyrights, trade secrets, expertise, domain names, ideas, discoveries, and improvements conceived of or developed by you or any IFF employee while working with or for IFF. You must not use or share IFF's intellectual property without appropriate legal protections and documentation in place.

Please contact Legal if you have any questions related to intellectual property.



## Safeguarding Our Assets

Protecting the confidentiality and integrity of our discoveries, unique formulas, manufacturing processes, and scientific data keeps IFF at the forefront of our industry. To retain IFF's competitive advantage and ability to continuously deliver superior products and services to our customers, it is critical that we work together to safeguard these unique and confidential assets, as well as our other confidential and proprietary information, such as sales, business, and pricing information.

You are obligated to protect and to take steps to prevent the unauthorized access or use of IFF's confidential and proprietary information and that of our employees, customers, suppliers, and other business partners.

Just as we cannot compromise our competitive advantage by disclosing the confidential and proprietary information of IFF and our business partners, we cannot compromise our high standards of ethics, honesty and integrity by accepting or using the confidential and proprietary information of third parties, including our customers and competitors.

## What Is Confidential and Proprietary Information?

Any information about IFF, our employees, customers, business partners, or any other person that is not available to the public. This includes:

- Proposed changes in Senior Management
- Acquisition or merger plans
- Consumer insights data
- IFF brand assets, including logos, designs, and digital campaigns
- Employee data
- Trade secrets which include our formulas and recipes
- Product specifications
- Scientific and technical data
- Business plans and outlooks
- Customer names or the products they purchase
- Product launches
- Processes, drawings, and designs
- Financial and operating information
- Vulnerabilities in our network and systems
- Passwords
- Network IP addresses
- Information regarding research and development
- Marketing or sales programs, plans or strategies
- Manufacturing specifications, methods, techniques, and processes
- Development plans or designs
- Operations and training manuals
- Identity, grade, or source of raw materials
- Pricing strategies
- Any other information not generally available to the public



If you are unsure whether a particular piece of information is confidential, consider the following questions:

- Is the information not known to the public?
- Could disclosure of the information harm or disadvantage IFF or any employee or business partner of IFF?
- Could your work or the work of others be jeopardized if the information is shared?
- Would disclosing or using the information violate any law or regulation?

If your answer to any of the above questions is “yes,” then you should consider the information confidential and treat it accordingly. Further, some confidential and proprietary information may be held as an IFF trade secret. In general, information regarding our practices and processes may qualify as a trade secret if:

- It is known only to a limited group of people;
- It is commercially valuable because it is secret; and
- IFF takes reasonable steps to protect the information from disclosure.

To help IFF maintain its competitive advantage, you must take steps to effectively protect trade secrets and confidential information by complying with [IFF's Confidential Information and Trade Secret Policy](#). This obligation applies at all times during your employment, including outside of the workplace and working hours, and continues beyond your employment with IFF.

# MAINTAINING CONFIDENTIALITY WHEN COMMUNICATING

Always be cautious and thoughtful when sharing confidential or proprietary information, whether in writing – including emails, instant messages, and personal and professional social media accounts – or during in-person or virtual conversations. Be aware of your surroundings when talking on a mobile phone or in a public place (like an elevator, restaurant, or public transportation) or at a social gathering. Remember that your obligation to protect confidential and proprietary information applies to conversations with friends, colleagues at other companies, and even to members of your own family. The obligation also continues beyond your employment with IFF.

Disclosure of confidential information should be strictly limited to employees (or advisors) of IFF who are authorized and need to know this information to perform their duties for the company. Similarly, the sharing of confidential information outside IFF should take place only when required for business purposes and after steps have been taken, such as the execution of a confidentiality agreement, to prevent further dissemination or misuse of the information.

If you have any questions whether information is confidential or proprietary or whether it can be disclosed, please seek guidance from Legal.



## What Would You Do?

### ? QUESTION

A chemist in our R&D group has just resigned and plans to join a pharmaceutical company. She told me that she is planning on copying her files related to several unique processes and molecules she created while at IFF because she claims that it is unlikely that IFF will ever use them. Is it okay for her to take this information?

### 💡 ANSWER

No. Everything an employee creates in his or her capacity as an employee of IFF, including processes and inventions, belongs to IFF. The creations are to be used solely in connection with IFF business and may not, under any circumstances, be taken or utilized by an employee following his or her departure.

### ? QUESTION

I'm an account manager for one of IFF's largest Taste customers. The customer recently asked if I could provide the formula for a product the customer purchased. Can I provide this information?

### 💡 ANSWER

Maybe, subject to the appropriate approvals and conditions. Formula and ingredient disclosures may only be made with the prior approval of a member of Global Regulatory Affairs or Legal according to strict disclosure specifications and confidentiality procedures. You should contact a member of Global Regulatory Affairs if the customer is requesting disclosure for regulatory purposes. In all other cases, please contact Legal.

### ? QUESTION

An important vendor of IFF's has requested to use our logo and photos of their work in our office on the vendor's social media accounts and website. Is this allowed?

### 💡 ANSWER

No. IFF's logo and brand assets are considered IFF property and proprietary. Similarly, photos of our office may inadvertently reveal confidential or proprietary information to third parties. As such, you cannot allow the vendor to use IFF's logo or any photos of their work on the vendor's website without receiving written authorization from Corporate Communications.

### ? QUESTION

I'm in R&D, and we have recently created a new molecule. Only IFF employees who worked on the molecule are aware of it. I'm having dinner with a longstanding customer of ours tonight, and I know I can trust her. Can I gauge her interest in the new molecule so that I can provide the feedback to our sales team?

### 💡 ANSWER

No. You must first check with Legal to ensure that proper intellectual property protections are in place before sharing this with anyone outside IFF. In fact, you cannot even discuss this molecule with anyone within IFF unless sharing the information is necessary for the performance of your job duties or the duties of the other person.

# ACCURATE RECORDS

Complete and accurate books and records are legally required and essential to managing IFF's business and maintaining the accuracy and integrity of our financial reporting and disclosures – all of which ultimately affect IFF's credibility and reputation.

“Books and records” do not refer to just financial accounts, but to all records prepared, generated, or maintained in the course of IFF's business, including invoices, purchase orders, agreements, time sheets, payroll documents, travel and expense reports, test results, instrument readings, technology vulnerability reports, safety and environmental reports, and regulatory filings.

Given the extensive list of records, the responsibility for ensuring their accuracy and completeness rests with each of us, not just IFF's accounting and financial personnel. When you contribute to the creation of business records, for example by submitting an expense report, a time sheet or purchase order, you are responsible for the honesty and accuracy of the information you submit.

Any attempt to conceal or misstate information in IFF's books or records is a serious violation. This includes:

- Delaying recording the date of an order or payment;
- Reporting inaccurate or misleading information about a transaction; and
- Falsifying inspection reports, test data, or other company documents.

The rule is clear: all records and reporting must be complete, fair, accurate, timely, and not misleading. No exceptions.

## Document Retention

All business records must also be held and disposed of in accordance with [IFF's Records Retention Policy](#).

IFF's retention periods for business records do not apply if you have been directed to retain certain documents or records that are relevant to an actual, threatened, or reasonably foreseeable lawsuit, investigation, audit, or administrative proceeding. Your compliance with this obligation is critical as the destruction or alteration, even inadvertently, of a document that is relevant or subject to a legal hold could expose IFF and you to civil and criminal liability.

If you are unsure about a particular document or retention period, retain the document and consult the Records Retention Policy and Legal for more guidance.

## What Would You Do?

### QUESTION

I overheard someone in the finance department ask a supplier to “hold” invoices for a few weeks for supplies we already received so that our year-end numbers would look better. This just doesn't seem right to me. What should I do?

### ANSWER

Your instinct is the right one. Holding invoices to manipulate the numbers is unacceptable and a violation of IFF policy. Hiding or disguising liabilities or keeping items off our balance sheets that should be there is unethical, illegal, and will not be tolerated. If you witness any such behavior, you should immediately report it to Ethics and Compliance or Legal.

# COMMUNICATIONS AND PRIVACY

## EXTERNAL COMMUNICATIONS

As a publicly traded company, it is critical that we speak with one voice so that all external messages are truthful, accurate, and consistent. To ensure this is the case, only our CEO, CFO, and Investor Relations team can speak on behalf of IFF.

Unless expressly authorized to do so, you may not make public statements or respond to inquiries regarding IFF, IFF's business or operations, or any IFF employee. This restriction applies to:

- Traditional media across all channels;
- Speaking engagements;
- Personal and professional social media accounts;
- Books, articles, or other published data;
- Blogs and other online content platforms; and
- Any "on the record" or "off the record" requests for information, including from investors and analysts.

If you are contacted for information, direct the inquiry to a member of the Corporate Communications team. For more guidance, please review [IFF's External Communications Policy](#) and [IFF's Social Media Policy](#).

### What Would You Do?

#### QUESTION

I want to create a private social media account to share and collaborate with colleagues and customers. I'd also like to use it to engage in online discussions with other members of the industry. Is this allowed?

#### ANSWER

No. By engaging in this activity, you may run afoul of various IFF policies, such as the External Communications Policy and Social Media Policy. You may also violate policies and antitrust laws if you engage in conversations with competitors about IFF's business activities. You should never post online about IFF unless expressly authorized to do so.

# IT AND COMMUNICATIONS SYSTEMS

IFF's systems, including electronic communication and information systems, such as computers, mobile devices, servers, telephones, email and general internet access, and all information and communications sent, received, or stored through those systems, are made available to employees for business purposes. Incidental and occasional personal use of IFF systems is permitted, but such use must not disrupt IFF's business, be detrimental to IFF, or affect an employee's performance.

Each of us is expected to use these resources in an appropriate manner. Inappropriate use includes:

- Communications containing abusive, threatening, defamatory, profane, racist, pornographic, or objectionable material;
- Unauthorized copying or transmission of personal, sensitive, or confidential information, including trade secrets;
- Accessing or viewing networks, servers, drives, folders, or files to which access has not been authorized;
- Solicitation of employees for any unauthorized purpose, including political fundraising or religious activities;
- Personal business activities; and
- Any activity that is illegal, unethical, or otherwise violates this Code or any IFF policy.

You are expected to protect IFF systems from accidental or unauthorized access, to maintain the confidentiality of passwords for all IFF systems and to comply with IFF's policies relating to IFF systems and information security.

The information on these systems is IFF property, and to keep IFF business information secure, you must only use IFF systems to send, receive, or store such information. This means that non-IFF systems, including personal or third-party email accounts, third-party file sharing accounts, electronic devices, and thumb drives must not be used to conduct IFF business unless authorized by IFF in writing.

To protect IFF's assets and reputation and to protect users, IFF reserves the right to, in compliance with applicable law, monitor, access, review, delete and record information and communications, including personal emails, received, viewed, or saved on IFF systems, as well as your use of and activity (including internet browsing) on or through IFF systems. Consequently, you should have no expectation of privacy with respect to any such information, communication, or activity.

If you believe that IFF data has been inadvertently or intentionally mishandled or disclosed, please contact IFF's Information Security team.

## What Would You Do?

### ? QUESTION

I need to work on an important presentation over the weekend, but I am going out to dinner straight from the office and don't feel like carrying my laptop around town. Can I send the latest draft to my personal email account or save it on a thumb drive so I can work on it over the weekend?

### 💡 ANSWER

No. IFF equipment and systems are equipped with appropriate security to prevent a breach. Therefore, IFF data must remain on IFF systems. IFF's policies strictly prohibit employees from sending any IFF business information to or through any non-IFF system. This means that employees must not send IFF information to their personal email. However, IFF provides a number of compliant options to securely access business files remotely. Please reach out to IT or IFF's Information Security team for more information.



## PRIVACY AND PERSONAL DATA

Personal data is information that can identify an individual, including employees, contractors, business partners, customers, and anyone else with whom IFF does business. IFF needs to collect personal information to, among other reasons, administer employee benefits, manage our relationships with customers and business partners, and comply with legal requirements. IFF respects the confidentiality of personal data, whether on paper or in electronic form, and requires that such information be handled responsibly and in compliance with applicable privacy laws.

If you have access to personal data in the performance of your job, it is important that you collect, access, use, or share such data only to the extent necessary and relevant to fulfill your assigned job responsibilities and in accordance with IFF policies, local laws, and regulations. Do not disclose personal information to anyone who does not have a legitimate need to know such information, within or outside of IFF, either during or after your employment. If you are aware of or suspect that personal information has been misused, lost, stolen, or accessed inappropriately, report it immediately to Legal.

Privacy laws vary in scope and complexity, depending on where you are doing business. IFF monitors developing privacy laws around the world and may update IFF policies and practices as a result. If you have any questions regarding the privacy laws applicable to you or concerning your responsibilities, contact Legal.

## A MESSAGE FROM GLOBAL ETHICS AND COMPLIANCE

The values, expectations, and practical guidance found within this Code form the basis of how we expect IFF employees to conduct themselves. However, the words within the Code are just the beginning, and it is up to each of you to bring the Code to life.

To assist you in this regard, there are many more practical resources that can be found in the Compliance section of IFFConnect, including additional policies and procedures that you must review, understand and follow.

I know that it will not always be easy to know what to do in each and every situation that you encounter, but the IFF Global Ethics and Compliance team is ready to help when you have questions. You should also feel comfortable reaching out to your local and regional Human Resources and Legal team members for assistance and guidance.

Finally, you may always ask questions or report suspected violations of the Code via [\*\*IFF's SpeakUp Hotline\*\*](#).

The success of IFF is dependent on employees acting ethically, seeking advice, and speaking up when things go wrong. Together we will create a positive workplace that celebrates everything that is unique about IFF and its people.

**Brynn Samson**  
Chief Ethics and Compliance Officer

For general questions or to report a possible violation of our Code of Conduct, contact [compliance@iff.com](mailto:compliance@iff.com) or visit [iff.com/speakup](http://iff.com/speakup).

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