

Global HR Labour Policy

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Limitations and Disclaimers

This policy is the Company's general guideline and management reserves the right to apply different terms, as determined in management's sole discretion. This policy can be changed at any time, with or without notice by the employer. Nothing in this policy shall apply to the extent it would be inconsistent with any applicable law

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1 Introduction

At Barry Callebaut, we recognize that our people are the foundation of our success. The strength of our organization comes from the contribution of each and all individuals, with our passion and company values as common denominators.

We strive to the creation of a constructive environment with respect for the individual, where ongoing development, passion, integrity, entrepreneurship and customer focus is encouraged and stimulated. This policy defines the minimum of practices, measures and controls to be respected by and within our entities worldwide. The implementation of this policy is mandatory.

With the implementation of this policy, we put in place a foundation for adherence to the Ethical Trading Initiative (ETI) Base Code, local, national and international laws and standards, as well as to customers' expectations and requirements.

To ensure proper implementation of this policy, our global, regional and local Management supported by their Human Resources organization need to take ownership and accountability to embed all elements of this policy in the area they are responsible for.

2 Human Rights

Within Barry Callebaut, we respect human rights at any time, within our own workplace area as well as to the broader community in which we operate. Proper protection and respect to the individual rights will be provided and safeguarded.

3 Freely Chosen Employment

The Barry Callebaut Group prides itself on a free, fair and diverse workplace.

Within our organization, there shall be no forced, bonded or involuntary labor. Our employees are not required to lodge any deposits or their identity papers and they are free to leave within reasonable notice, in accordance with local laws and practices.

4 Health & Safety

We provide a safe and hygienic working environment for all our workers. We take adequate steps to prevent any accident and injury by minimizing, so far as reasonably practicable, the causes of hazards inherent to our working environment and activity.

We provide regular Health and Safety training and such training will be repeated for new or reassigned workers. All employees are provided access to clean facilities and to potable water and, if appropriate, to sanitary facilities for food storage. We assign clear responsibility for health and safety at all our premises.

We are committed to keeping the work environment safe, and smoke-, drug- and alcohol-free. We have a zero tolerance to alcohol and illegal drugs at the workplace. Possession of firearms or weapons of any kind is prohibited on Company property at all times.

We refer to our specific Health and Safety Policy for the more elaborate information.

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5 Child Labour and Young Workers

We adhere to local laws and to the ETI base code regarding the minimum age and other terms of employment and will in no case be under 15 years of age. As a company, we foresee in the transition of any child found while conducting labor, to enable the child to attend quality education until the age they are no longer considered a child.

In case of employment of young workers at the age between 15 and 18, they will not be exposed to night work or any hazardous condition.

6 Working Hours

Employees at Barry Callebaut will work reasonable working hours, in compliance with local laws, collective agreements and all elements of the ETI base code related to working time.

Any changes to the ETI base code will be applicable to the Barry Callebaut organization.

7 Wages and Benefits

We pay wages and benefits for a standard work week that meets, at a minimum, the national legal standards and take into account the industry benchmark standards. These wages need to be sufficient to meet basic needs and provide some discretionary income. Overtime is compensated in compliance with local laws, collective agreements and the ETI base code.

Our employees receive written and understandable information about their employment conditions with respect to wages, before they enter into employment.

We do not make any deduction from wages as a disciplinary measure.

8 Discrimination

Our company fosters an inclusive and diverse culture. We do not discriminate on basis of gender, religion, race, national or ethnic origin, caste, cultural background, social group, disability or illness, sexual orientation, marital status, age, union membership or political opinion. We do not discriminate during hiring, in compensations, access to training and development, promotion, termination or retirement.

9 Harsh or Inhuman Treatment

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment, verbal abuse or other forms of intimidation are strictly prohibited within our organization.

10 Regular Employment

Barry Callebaut provides employment on the basis of recognized employment relationships established through national law and practices.

We fulfill our obligations arising from regular employment relationships towards the employees and social security laws and regulations.

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11 Responsible Recruitment

Our recruitment and selection procedures encourage the assessment of potential candidates according to their skills, knowledge, qualifications and capabilities. No regard should be given to factors such as age, gender, marital status, race, religion, physical impairment or political opinions.

All roles have current position descriptions that specify role requirements and selection criteria, determined by the hiring manager. If no position description exists for the available position, or if it requires revising, this is the responsibility of the appropriate Manager. HR is responsible for ensuring hiring managers are familiar with the recruitment policies and procedures and that they follow them accordingly.

We advertise vacant positions internally to encourage career advancing and development of our internal staff. Exceptions may include the need of direct appointments or the recruitment of roles of specialized nature. Barry Callebaut Employees are encouraged to apply for vacant positions if they have the qualifications, experience and skills appropriate for the role.

Workers' contract reflects the payment and terms agreed in the recruitment process. We ensure workers have a proper understanding of the payment and terms.

When deemed appropriate, recruiters engage with a recruitment agency if previously agreed with the hiring manager. The agency will search for candidate on our behalf, and it remains to the recruiter to ensure the agency adheres to our existing recruitment policies. Recruiters usually work with a preferred list of supplier agencies to avoid unnecessary contractual issues and ensure a good service is provided to hiring managers.

Workers cannot pay any recruitment fees at any stage of the recruitment process.

12 Freedom of Association and the right for Collective Bargaining

We support the freedom of association and collective bargaining. Our employees are free to join or form trade unions or worker organizations and to bargain collectively in line with local laws and regulations.

We adopt an open attitude towards trade unions and their activities; we do not discriminate workers' representatives and provide them the room to carry out their representative functions in the workplace.

13 Entitlement to Work

Barry Callebaut only employs workers with the legal right to work. During recruitment, all potential workers must be validated for their legal right to work by reviewing original documents. When recruiting is done by an agent, we validate ourselves based on original documents only, prior to employment.

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14 Subcontracting

Work conducted on behalf of Barry Callebaut, done outside the premises and legal directory of the company, like subcontracting or other forms of external processing, will be done with respect for the human rights, the ETI base code, laws and other Barry Callebaut policies.

Where we use subcontracting, we verify our supplier codes are in place and respected. In addition, we are also attentive to customer requirements in the context of subcontracting and external processing.

15 Grievance and discipline

All our employees deserve a fair and consistent treatment and expect everyone to behave according to our company standards.

Our organizations run grievance procedures that capture issues and risks for unfair, arbitrary or inhumane way of dealing with our people by providing our workers the opportunity to raise concerns, problems or complaints. The grievance process has to foresee in a confidential reporting channel, preferably combined with a grievance committee composed of management and worker representatives. The grievance channel should allow to report grievances to someone outside the own "chain of command" and the reporter should not fear for penalty, dismissal or reprisal of any kind.

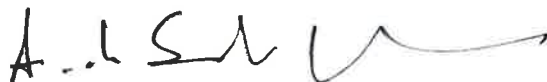
Our disciplinary procedures have to ensure that the company's standards of conduct and performance at work are followed and provide a fair and humane method of dealing with issues in this respect. No one is allowed to verbal-, physical abuse and/or other inhumane disciplinary practices. No punitive fines and deductions from wages as disciplinary measure are allowed.

All our employees receive proper briefing of and insight into the applicable grievance and disciplinary process.

16 Leadership commitment

As CEO and CHRO, we are committed to this Global HR Labour policy
This policy, its standards and directions need to be embedded in our regional and local Business as well as Human Resources procedures, practices and controls.

Antoine de Saint-Affrique
Chief Executive Officer



Carole Le Meur
Chief Human Resources Officer

