

Barry Callebaut Group Policy regarding **Social Media**

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BC Group Policy regarding Social Media

Limitations and Disclaimers

This policy is Barry Callebaut's general guideline and management reserves the right in its sole discretion to apply different terms. This policy can be changed at any time, with or without notice by the employer. Nothing in the policy is meant to alter the individual terms of the employment relationship. Nothing in this policy shall apply to the extent it would be inconsistent with any applicable law.



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1 Purpose and basis of this policy

Barry Callebaut encourages communication among its employees, customers, partners, and other stakeholders – and new tools such as Social Media can be one way to stimulate conversation and discussion.

For us as a company Social Media create opportunities as well as challenges. To make sure that Barry Callebaut, our brands and our reputation are protected and not harmed, we need to use Social Media wisely. That's why we have established this policy. It will continually evolve as new technologies and social networking tools emerge – updates will be regularly communicated through BCnet and e-mail.

The following policy has to be considered when participating in Social Media. However, it does not regulate access rights to Social Media sites of employees using a personal computer at Barry Callebaut, since this is subject to regulation by the responsible management.

2 What do we mean by Social Media?

The term Social Media is an umbrella term used to describe a suite of tools on the web for social interaction. Some typical examples of Social Media tools are:

- social networking sites (e.g. Facebook, MySpace, Xing, LinkedIn or StudiVZ)
- video, photo and presentation sharing website (e.g. YouTube, Flickr, slideshare)
- micro-blogging sites (e.g. Twitter, yammer)
- weblogs
- collaboration sites (e.g. Wikis)
- social tagging sites (e.g. Delicious) or social news sites (e.g. Digg)
- Customer Service Networks (e.g. Yahoo Groups).

3 Addressees of this policy

This policy applies in the first instance to the Official Spokespersons (as defined below) and those other employees of Barry Callebaut who are authorized to use Social Media for work. However, the rules and principles set out in section 4 apply to all Barry Callebaut employees worldwide who use Social Media.

It is important that you follow the requirements set out in this policy. Failure to do so may result in disciplinary action, up to and including termination of your employment with Barry Callebaut.

4 Rules to be followed when using Social Media

This section describes the most relevant requirements that apply to all Barry Callebaut employees participating in Social Media, be it for work or privately.

Requirements when using Social Media:

4.1 *Understand the Medium*

Websites and external Social Media are public spaces and the content that you contribute will be available to the public for a long time. It is necessary to read and understand the rules and policies of a site before you begin adding content or engaging in the respective community.



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4.2 Don't Post Anonymously

Even if you are not an Official Spokesperson, your status as a Barry Callebaut employee may still be relevant to the subject matter. Therefore, whenever you are sharing information on Social Media about Barry Callebaut-related topics or providing feedback relevant to Barry Callebaut, identify yourself as a Barry Callebaut employee.

4.3 Don't Speak on behalf of Barry Callebaut

Only staff members authorized by Barry Callebaut's Corporate Communications department (the "**Official Spokespersons**") are allowed to speak in an official capacity on behalf of the company on Social Media sites. When using Social Media, make it clear that your opinion is your own and does not necessarily reflect the views of the corporation.

If a journalist contacts you, simply notify and involve the Corporate Communications department at media@barry-callebaut.com. They will determine the best way to handle the inquiry.

4.4 Protect Confidential Information

Do not disclose confidential information about Barry Callebaut when using Social Media. This includes non-public financial information such as future revenue, earnings, and other financial forecasts, as well as anything related to Barry Callebaut's strategy, products, policies, management, operating units, new innovations and potential acquisitions, that have not been made public.

Protecting the confidential information of our employees, customers, partners, and suppliers is also important. Do not mention them, including Barry Callebaut executives, in Social Media without their permission, and make sure you don't disclose items such as sensitive personal information of others or details related to Barry Callebaut's business with its customers.

4.5 Don't comment on M&A Activity

You must not comment publicly on Barry Callebaut's M&A activity, including potential and pending acquisitions. This applies to potential acquisitions regardless of their status – in diligence, announced but not closed, etc. Any commentary on what a transaction or potential transaction may mean to Barry Callebaut, positive, negative or neutral can be problematic.

4.6 Refrain from Objectionable or Inflammatory Posts

Treat other participants on Social Media with courtesy and consideration. Do not post anything that is false, misleading, obscene, defamatory, profane, discriminatory, libellous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity.

Make sure to respect others' privacy. Third-party web sites and blogs that you link to must meet our standards of propriety. Be aware that false or defamatory statements or the publication of an individual's private details could result in legal liability for both Barry Callebaut and yourself.

4.7 Respect Copyrights and Privacy

Respect copyrights and related applicable laws. Don't use Barry Callebaut or third-party content without their permission. While certain limited use of Barry Callebaut or third-party materials (for example, use of a short quotation that you are providing comment on) may not always require approval from the copyright owner, it is still advisable to get the owner's permission whenever you use Barry Callebaut or third-party materials. Posting an image, video, material or an idea that



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is owned by someone else violates copyright law. As a general rule, if you are referring to materials that you have seen on another site, it is best to link to the material and state the source. If you are unclear or unsure, please contact the Web & Social Media Council of Barry Callebaut for more clarification.

4.8 Use a disclaimer

Whether you publish on a blog or some other form of Social Media, make clear that what you say there represents your views and opinion, but does not necessarily reflect the views and opinion of Barry Callebaut.

If you have your own blog or any personal space on the web that it is not an official appearance of Barry Callebaut, you should – at a minimum – include the following standard disclaimer: “This [e.g. choose blog, Twitter account, etc.] is the personal [e.g. blog, Twitter account, etc.] of [your name] and only contains my personal views, thoughts and opinions.”

5 How to proceed when setting up a Social Media platform?

Whenever you intend to build a new Social Media platform for Barry Callebaut’s business purposes, in particular when you make use of our brand identity (e.g. logo) or “Barry Callebaut” or one of our other brand names as any part of the name or URL of that Social Media platform, make sure to contact Barry Callebaut’s Web & Social Media Council to avoid confusion with official Barry Callebaut communication.

Having taken into consideration this policy and respecting other relevant internal policies and guidelines, you are free to set up any Social Media space, blog or other area within the given framework of the terms provided by the host of such space (e.g. Facebook, LinkedIn, Twitter, etc.).

6 Some general tips and guidance for using Social Media

- Be aware of the fact that everything you publish is public and stays there.
- Remember that you are responsible for the content and language in your posts.
- Stick to the facts; don’t speculate or spread rumours.
- If you’re not sure whether you should post something, don’t post it.
- Write something useful, clear and concise. Your post should increase other people’s skills and knowledge and help them do their job better.
- Be careful about who you talk to.
- Don’t let Social Media get in the way of your day-to-day work.
- Use the first person (“I”) and when you post an opinion, make it clear that it’s your own opinion.
- Everyone makes mistakes. If you do, admit it, learn from it and change it if you can. If you’re editing an earlier post, tell your readers that’s what you’re doing.

7 Who to contact in case of questions or approvals for Social Media activities?

In case you have questions related to this policy or for approval of any kind of Social Media activities for our company, please contact Barry Callebaut’s Web & Social Media Council: web_socialmedia_council@barry-callebaut.com.



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The Web & Social Media Council consists of a diverse and well-balanced combination of representatives from the different product groups as well as corporate functions. The members of the Web & Social Media Council are published on BCnet: <http://bcnet.barry-callebaut.com/122441/G/4684/?rdr=Y>.

8 Monitoring and reporting

Corporate Communications is responsible for monitoring the Social Media activities related to Barry Callebaut's corporate brand. Monitoring of Social Media activities for other brands (e.g. Cacao Barry, Callebaut, Carma, etc.) is in the responsibility of the respective marketing department.

If a violation of this policy is suspected, the company is entitled to conduct a thorough investigation. Such investigations will be initiated by the Corporate Communications department and conducted together with the Legal department. Employees suspected of violating this policy will be personally notified beforehand and, if these suspicions are correct, will face consequences up to and including termination of employment with Barry Callebaut.

9 Approval and Implementation

This policy has been approved by the Executive Committee of Barry Callebaut on September 30, 2010, and technically revised on January 4, 2012. It enters into force with the publication on BCnet.

January 4, 2012

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