

Global HR Labor Policy

Issuer	Human Resources
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Issue date	May 18 2020
Revision history	First issued September 03, 2018 Revised in March 2020 Amended in May 15, 2020
Publication via	BCNet

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, our people, culture and values are the heart and the engine of our company and we will only be successful if we keep developing our people and teams. Our people are the foundation for our success and the strength of our organization comes from the contribution of each and every individual.

We strive to create a constructive environment with respect for the individual, where ongoing development, passion, integrity, entrepreneurship and customer focus are encouraged and stimulated. This policy complements our Code of Conduct and specifies our main principles on how we treat our people. It defines minimum benchmarks in respect of practices, measures and controls to be respected by and within our entities worldwide. The implementation of this policy is mandatory for all our entities and applies to all Barry Callebaut employees and managers worldwide.

With the implementation of this policy, we put in place a foundation for adherence to the Universal Declaration of Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, 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 take ownership and accountability for embedding all elements of this policy in the area they are responsible for.

2 Human Rights

Within Barry Callebaut, we respect human rights within our own workplace areas as well as in the broader community in which we operate. Protection of and respect for every individual's rights are fundamental and need to be provided and safeguarded at all times.

3 Freely Chosen Employment (ILO convention 105)

The Barry Callebaut Group prides itself on a free, fair and diverse workplace and we acknowledge that forced labor is one of the critical human rights issues of our time, often very well hidden and difficult to identify.

Within our organization, we prohibit all forms of forced, bonded or involuntary labor and human trafficking. Our employees are not supposed to pay any contribution to the recruiting costs, are not required to make any financial deposits or relinquish their identity papers and they are free to leave our company at reasonable notice, in accordance with local laws and practices.

Please find more information in our statement on Human Rights
<https://www.barry-callebaut.com/en/group/forever-chocolate/ethical-sourcing-and-business/safeguarding-human-rights-our-supply-chain>

4 Responsible Recruitment

We endorse the Employer Pays Principle as no recruitment fees and related costs should be charged to workers at any stage of the recruitment process. All costs related to the recruiting of people for Barry Callebaut will be paid by Barry Callebaut.

We only work with reliable recruiting agents which also commit to the Employer Pays Principle. If it is discovered that workers have paid recruitment fees, the business partner responsible for the violation will have to reimburse the workers. In particular, our organization recognizes the vulnerable position of migrant workers and pays particular attention to respect the above principle.

Regardless of internal or external 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.

Internally, we advertise vacant positions to encourage career advancement and the development of our employees. Exceptions may include 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. When we recruit externally, our recruiters may engage a recruitment agency if previously agreed with the hiring manager. The agency will search for candidates on our behalf, and the recruiter will verify that the agency adheres to our existing recruitment policies. Recruiters usually work with a preferred list of supplier agencies. Workers' contracts shall reflect the payment and terms agreed in the recruitment process. We ensure workers have a proper understanding of wages and employment terms.

5 Child Labor (ILO convention 138, 182)

Barry Callebaut observes the principles set forth in the Universal Declaration of Human Rights. We strictly adhere to local laws regarding minimum age and other terms of employment in our factories and offices around the world. The minimum age for employment at Barry Callebaut is in accordance with ILO Conventions or, if higher, the age specified by local legislation. The minimum age for employment shall not be less than the age of completion of compulsory schooling and, in any case shall not be less than 15 years (or 14 years where established by national laws in accordance with the ILO developing-country exception). Under no circumstances will Barry Callebaut or its affiliates employ people under this minimum age of employment. We strongly condemn forced labor, slavery and all practices that exploit both adults and children or expose them to harmful or hazardous conditions. Child labor as defined by the International Labor Organization (ILO) refers to unacceptable forms of child labor, which is work that is mentally, physically, socially or morally dangerous and harmful to children¹.

Under our sustainability strategy "Forever Chocolate", which was announced in November 2016, we strive to eradicate child labor from our supply chain by 2025. More information can be found in our Human Rights statement

<https://www.barry-callebaut.com/en/group/forever-chocolate/ethical-sourcing-and-business/safeguarding-human-rights-our-supply-chain>

¹ According to the International Labour Organization, not all work done by children should be classified as child labor that is to be targeted for elimination. The term 'child labor' is often defined as work that deprives children of their childhood, their potential and their dignity, interferes with their schooling and is harmful to their physical and mental development. Activities such as carrying heavy loads or using chemicals are considered as 'unacceptable forms of child labor' because they are physically dangerous for children.

6 Young Workers

In the event of employment of young workers at the age between the minimum age of employment and 18 years, employment is only possible provided there are adequate precautions to protect them. If date of birth documents are not available we shall use other appropriate and reliable methods to establish the age of the employee. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Also in case of apprenticeship programs, we take special precautions to protect the well-being and the development of the young workers; they cannot work at night or work overtime or be exposed to any hazardous conditions and we will conduct regular health checks and provide appropriate training for these individuals.

In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks

7 Freedom of Association and the Right to Collective Bargaining (ILO convention 87, 98, 135)

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

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

8 Health & Safety (ILO convention 155)

We provide a safe and hygienic working environment for all our workers. We take adequate steps to prevent any accidents or injuries by minimizing, as 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 and safe food storage. We assign clear responsibility for health and safety at all our premises.

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

Please consult our Health and Safety Policy for more detailed information.

9 Working Hours (ILO convention 1, 14, 47, 171)

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 also be applicable to the Barry Callebaut organization. The regular working hours are specified in the employment contracts of our employees.

10 Wages and Benefits (ILO convention 95, 131)

We pay wages and benefits for a standard work week that meet, at a minimum, the national legal standards and that take into account the industry benchmark standards. These wages need to be sufficient to meet basic needs and provide some discretionary income. The wages and benefits are specified in every worker's employment contract. We compensate overtime 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 deductions from wages as a disciplinary measure.

11 Non-Discrimination (ILO convention 100, 111)

Our company fosters an inclusive and diverse culture. We do not discriminate on the 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 when hiring or with respect to compensation, access to training and development, promotions, terminations or retirement.

12 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.

13 Regular Employment (ILO convention 95, 158, 175)

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

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

14 Entitlement to Work

Barry Callebaut only employs workers who are legally entitled to work. During recruitment, the legal right to work of all potential workers must be validated by reviewing original documents. When recruiting is done by an agent, we conduct the validation ourselves based on original documents only, prior to employment.

15 Grievance and Discipline (ILO convention 105, 158)

All our employees deserve fair and consistent treatment in accordance with applicable human rights and their rights at work. We expect all our employees to comply with the principles set out in this policy, our company standards and our Code of Conduct, which is mandatory for all our employees. We have grievance procedures that capture issues and risks associated with unfair, arbitrary or inhumane treatment of our employees by providing our workers the opportunity to voice their concerns, problems or complaints.

Our grievance processes include a confidential reporting channel (whistleblowing hotline) called “BC Integrity Line,” which is independently maintained by Group Compliance and is accessible for all employees. All concerns will be reviewed by the Compliance Committee (Head of HR, Head of Internal Audit, Head of Legal and Head of Compliance) and appropriate action will be taken. This grievance channel also allows grievances to be reported to someone outside one’s own “chain of command” and employees who report concerns or grievances in good faith are protected from dismissal or retaliation of any kind.

Our grievance procedure must be accessible to all our employees and employees receive proper briefing, communication and/or training so they all are aware of the grievance channel, know how to report a grievance and under which circumstances. At the same time, all our workers need to have a proper understanding of our disciplinary process.

Our disciplinary procedures 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 may engage in verbal, physical abuse and/or other inhumane disciplinary practices. No punitive fines and deductions from wages as disciplinary measures are allowed.

Please consult our Compliance Committee and Whistleblowing Policy for further information.

16 Subcontracting

Work conducted on behalf of Barry Callebaut beyond the premises of the company, such as subcontracting or other forms of external processing, will be performed with respect for Human Rights, the ETI Base Code, and applicable laws and 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.

In the event we discover or are made aware of instances of non-compliance, a similar procedure as with internal grievances shall apply and Group Compliance will investigate such cases to ensure that corrective action are taken.

17 Data Protection and Privacy

We are committed to protecting the personal data of our employees, customers and suppliers and abiding by the rules of the European General Data Protection Regulation (GDPR) and other applicable data privacy regulations. We train and guide our employees in how to deal with personal data in accordance with GDPR. Please refer to our Global Data Protection Policy for further information on data privacy.

18 Living Accommodation (ILO convention 115, 161)

When we provide living accommodation or dormitories to our workers, they must be safe, clean, with appropriate sanitation, heating, ventilation, clean toilet facilities, access to potable water, a reasonable amount of personal space, a separate bed for each worker and meeting the living standard of the region.

Workers have the freedom to choose the accommodation of their preference, they have the freedom of movement in their housing, they can come and go at their own convenience and they can receive friends and visitors.

When workers need to pay a contribution for the accommodation, such contribution will be at or below the local market price. This contribution will not be deducted from their wage.

19 Leadership Commitment

As CEO and CHRO, we are committed to the Barry Callebaut Global HR Labor policy. This policy, its standards and directives are embedded in our regional and local business, as well as in our Human Resources procedures, practices and controls.

Antoine de Saint-Affrique
Chief Executive Officer

Isabelle Esser
Chief Human Resources Officer