



BARRY CALLEBAUT



BEING

BC

STARTS  
WITH

*me*

**Your new code of conduct.**

Here's everything you need  
to know – and how you can  
bring it to life.



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# Why do we have a Code of Conduct?



**Dear colleagues,**

We are the heart and engine of the cocoa and chocolate industry. Everything we do is rooted in our five core values: Customer Focus – Passion – Entrepreneurship – Team Spirit - Integrity.

Our Code of Conduct is the foundation of how we work together. It defines how we act as individuals, work as teams, and represent our company towards our customers, partners, and all other stakeholders. It guides our decisions and our interactions – and ensures we always act with integrity, especially when facing difficult choices. Our Code of Conduct is complemented by our global and local policies and regulations.

Strong performance and strong values go hand in hand. Doing the right thing, the right way, is essential to our long-term success. I encourage you to read the Code carefully, keep it for reference, and reach out to your manager, local HR, or Group Legal & Compliance if you have questions or concerns. Upholding our culture and reputation is a shared responsibility.

Thank you for your commitment and for living our values every day.

**Hein Schumacher**

Chief Executive Officer

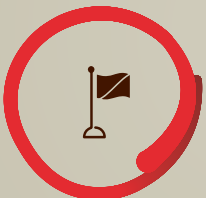
# Our values



**Customer focus**



**Passion**



**Entrepreneurship**



**Team spirit**



**Integrity**

# Our passion

Our passion for cocoa and chocolate goes hand in hand with employee safety, product safety and product quality. Our Code of Conduct provides the guiding principles to do the right thing. It outlines the regulations and company policies that apply in all work situations, without exception.

In accordance with our company values, the Code of Conduct empowers us to serve as an ambassador of integrity within our roles and responsibilities. We encourage everyone to help prevent, detect, and respond to any violations of the Code of Conduct which sets the framework for sustainable growth and our passion for cocoa and chocolate.

## **Employee safety**

The safety of our people comes first.

We are committed to a safe workplace and recognize that we all have a responsibility to protect our safety and wellbeing, and that of our colleagues. We comply with all internal safety measures and will speak up, correct, or report to a manager, when we notice situations when safety is at risk.

## **Product safety and quality**

We all have a fundamental responsibility to ensure that customers and consumers can trust the safety and quality of our products.

We comply with relevant food safety laws and standards, and we follow the hygiene and safety regulations at our plants and workplaces.

We take action and immediately correct, or report to a manager, any threat to product safety or quality.



# Our employees

## **Workplace conduct**

We conduct ourselves in a manner that is professional and appropriate at all times. We strictly adhere to our workplace policies and we are committed to keeping our work environment safe as well as smoke-, drug- and alcohol-free. We immediately correct, or report to a manager, any workplace incident and threats to employees' health or safety.

We treat people fairly, with integrity and respect at all times. No employee should be subjected to physical, verbal, sexual or psychological harassment. Workplace harassment is not tolerated.

We behave in a thoughtful way that does not offend, intimidate, degrade, insult or humiliate others. This includes jokes, banter, ridicule or taunts. We understand and act upon the fact that what may be acceptable to one person may not be to another.

We always assume our counterpart acts on their best of intentions, especially when we communicate via electronic channels or phone, where there's a bigger risk for misunderstandings.

## **Equal opportunities**

We provide equal employment and promotion opportunities. We do not discriminate on the basis of gender, gender identity, religion, race, national or ethnic origin, cultural background, social group, disability or illness, sexual orientation, marital status, age or political opinion. We show respect for different cultures and religions in all our business practices and dealings.

We treat all colleagues equally, regardless of title or seniority level, and reach out to everyone in a respectful manner. We foster a culture of openness and encourage everyone to speak up.

## **Developing employees**

We strive to provide employees with the chance to realize their full potential by offering development and training opportunities. Colleagues enjoy unique career opportunities supported by investments in learning and development.

For diversity to thrive, we are nurturing an inclusive environment where people can truly be themselves, grow to their full potential and feel like they belong.

**Data privacy**

The privacy of our employees and customers is very important to Barry Callebaut. We protect the integrity of everyone who entrusts us with their personal data and collect, retain, use or transmit personal data in compliance with applicable law. Wherever possible, we strive to apply the highest standards for data protection within our organization based on the European General Data Protection Regulation (Regulation (EU) 2016/679, hereafter “GDPR”).

**Confidentiality**

We take great care to safeguard confidential information entrusted to us by Barry Callebaut or our customers and suppliers. Confidential information includes business secrets and other information such as data or knowledge about business figures, new products, recipes, R&D or projects, commercial or marketing strategies, investments, manufacturing processes, and internal policies and procedures. Employees are expected to practice discretion so as to avoid disclosing confidential information outside the office, in particular while traveling, in public areas or while using mobile phones or social media channels.

**Insider trading**

We do not trade in shares and other securities of Barry Callebaut on the basis of confidential, non-public information (inside information), and we must not disclose any such confidential, non-public information that may have an impact on the price of Barry Callebaut securities. Such inside information may include, but is not limited to, a change in the capital structure, a planned merger or acquisition/sale, financial results, and new product developments.



# Our customers, suppliers and business partners

We demonstrate ethical business behavior in all our dealings with customers, suppliers and business partners. We strive to ensure that the expectations of our internal and external customers are always met.

## **Conflicts of interest**

We avoid any situations where our private interests may conflict with the interests of Barry Callebaut.

We do not enter into relationships with customers, suppliers or competitors that might impair our judgment in our work on behalf of Barry Callebaut.

We do not hire relatives of employees to work in the same team or department, nor do we contract with relatives for consulting or other services.

While employed at Barry Callebaut an employee may not work for, or provide services directly or indirectly to a competing business, customer or supplier of Barry Callebaut.

## **Corruption and bribery**

We strictly forbid engaging in corrupt practices with any party to advance Barry Callebaut's business interests. Corrupt practices include, but are not limited to, the authorization of direct or indirect payments of money, goods or services of value to local government officials, political parties or political candidates, or their friends or relatives, for the purpose of influencing the acts or decisions of government officials.

Corrupt practices also include the offering or receiving of any advantage to or from suppliers, customers, media or other private parties as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of business.

## **Gifts, hospitality and entertainment**

We do not solicit, encourage, extend or accept gifts, kickbacks, trips, hospitality, entertainment or other favors to or from existing or potential customers, suppliers or business partners, unless such favors are of insignificant value and do not influence our sound business judgment.

## **Fair competition**

In all our relationships with customers, suppliers and competitors we avoid arrangements or actions which restrict fair competition. Employees shall not engage in any price fixing, bid rigging, allocation of markets or customers, or any other illegal anticompetitive practices.

# Our responsibility

## **Approach to environmental, social and governance (ESG) concerns**

At Barry Callebaut our values represent a mindset and way of doing business that is with the aim of generating sustainable growth over time and creating long-term value for all our stakeholders. We are dedicated to running all our operations with transparency and integrity, including reporting on our environmental, social and governance (ESG) management and risks. We always seek to understand issues of concern and respond accordingly.

## **Environmental responsibility**

We strive to perform business in an environmentally responsible manner and are committed to comply with all applicable environmental laws and regulations.

We have a responsibility to protect the environment and biodiversity, and to reduce our carbon footprint.

As part of our commitment to protecting the environment we also have a responsibility to eliminate deforestation from our supply chain, promote forest regeneration and protection, implement agroforestry and biodiversity strategies in the areas we source from, and support farmers to develop cocoa farms that are more resilient to drought and disease, and that produce higher yields.

## **Human rights, forced labor and child labor**

Our business has an influence on the livelihoods of many people around the world. We have a responsibility to all our stakeholders – farmers, employees,

shareholders, customers, consumers, suppliers, and the communities where we operate.

Barry Callebaut observes the principles set forth in the OECD Guidelines for Multinational Enterprises, Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and 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 the International Labor Organization (ILO Convention 138) or, if higher, the age specified by local legislation.

With respect to international and national child safeguarding policies and procedures we have a commitment to treating all children with respect through our actions and conduct.

We strongly condemn forced labor, slavery and all practices that exploit both adults and children or expose them to harmful or hazardous conditions.

## **Governance**

Barry Callebaut is committed to a high standard of corporate governance. The principles and rules of corporate governance practiced by Barry Callebaut are laid down in the Articles of Incorporation, the Organizational Regulations of the Board of Directors and the Charters of the Board Committees. These are reviewed regularly by the Board of Directors and adapted as needed.

# Reporting non-compliance

The best working environment is one built on mutual respect and trust. We want to continue to foster this kind of environment at Barry Callebaut. To do so, we must strive to be open and straightforward with all our colleagues – managers, team members and peers – in discussions about our values and matters that may impair the reputation and performance of our company. Upholding the principles of the Code of Conduct is the responsibility of each Barry Callebaut employee or contingent workers at Barry Callebaut.

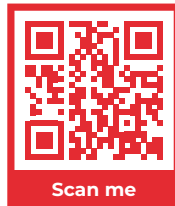
We expect all employees and contingent workers to raise their concerns if they become aware of or suspect wrongful acts in violation of the Barry Callebaut Code of Conduct. In all cases, employees should speak directly to the individual involved, their direct manager, local HR, legal, or the Group Compliance Officer.

In cases employees feel insecure about making a report directly or via [compliance@barry-callebaut.com](mailto:compliance@barry-callebaut.com), they should use Barry Callebaut's whistleblowing platform [www.bcintegrity.com](http://www.bcintegrity.com) or use Barry Callebaut's "Integrity Line" telephone (for local toll-free telephone numbers please see [www.bcintegrity.com](http://www.bcintegrity.com))

In the event there is an allegation of child abuse which is committed by a third party not associated with Barry Callebaut, or by our implementing partners, associates, or visitors, we will immediately refer the matter to the local authorities and law enforcement.

Employees who report potential misconduct, or who provide information or otherwise assist in an inquiry or investigation of potential misconduct, will be protected against retaliatory action. We will also respect any request for confidentiality to the utmost extent possible.

**Do the right thing!**



# Signature form

With your signature you acknowledge that you have read and understand the Code of Conduct. By signing, you also acknowledge your commitment to your colleagues and our company.

The Code of Conduct shall be used as a guide, and must not be understood as an exhaustive document that covers all situations that may arise during the course of operations.

If you have questions about the Code of Conduct, you should contact your direct manager or local HR. To report comments or concerns about business practices that cannot be addressed by your direct manager or local HR department, you may use Barry Callebaut's whistleblowing platform [www.bcintegrity.com](http://www.bcintegrity.com).

**Name**

**Signature**

**Date**

**City**

**State**

**Country**

**Barry Callebaut AG**

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8005 Zurich  
Switzerland

April 2023