

# Global HR Labor Policy

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## **Limitations and Disclaimer**

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.

# Global HR Labor Policy

## **1 Introduction**

Barry Callebaut is the place where our people can be at their best. We offer an exciting career, a competitive package, a safe environment and continued development opportunities within a team that together grows the business. We strive to create a positive and inclusive environment with respect for the individual.

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**

We expect Barry Callebaut employees, representatives, and business partners (suppliers, vendors, consultants, volunteers, etc.) to respect local laws and regulations related to human rights and to adhere to our codes and policies

On an annual basis, Barry Callebaut publishes its efforts towards safeguarding human rights, ensuring that slavery and human trafficking are not taking place in any part of our business and our supply chain. This disclosure is made under the [California Transparency in Supply Chains Act of 2010](#) and the [UK Modern Slavery Act 2015](#) and the [Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act](#)

## **3 Freely Chosen Employment (ILO convention 105)**

Barry Callebaut prides itself on having a free, fair and diverse workplace. 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 required 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](#).

## **4 Responsible Recruitment**

We endorse the Employer Pays Principle as no recruitment fees and related costs must 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 who also commit to the Employer Pays Principle. If it is discovered that workers have paid recruitment fees, the recruitment agent 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 is given to factors such as age, gender, marital status, race, religion, physical impairment or political opinions.

At the heart of our recruitment procedures is our unwavering commitment to Diversity and Inclusion. Our vision is to unite as one team, where diversity is intricately woven into the very fabric of our culture. This unity is driven by our shared Values and Leadership Behaviors, a deep passion for cocoa & chocolate, and a relentless pursuit of growth and sustainability.

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 recruitment 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, the United Nations (UN) Convention on the Rights of the Child (CRC), the African Charter on the Rights and Welfare of the Child, the United Nations Guiding Principles (UNGP) on Business and Human Rights framework, and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. 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. Accordingly, we strongly condemn all forms of child abuse, including forced labor, slavery, child labor and all practices that exploit children and adults or expose them to harmful or hazardous conditions. Child labor, which according to the International Labor Organization is widespread in African agriculture, occurs largely on family farms and is defined as children doing work when too young or work that endangers them.

For more information, please see our global position on [human rights](#).

## **6 Child Safeguarding**

Barry Callebaut recognizes that our businesses, programs and activities have an influence on the livelihoods of many people around the world, especially children.

Barry Callebaut recognizes its duty of care to protect and safeguard children from intentional or inadvertent harm caused by our activities, businesses, and programs, across all our own operations as well as within the local communities we engage in. Barry Callebaut is therefore committed to ensuring a child protection and safeguarding approach across its operations and supply chains. We expect our employees, suppliers, implementing partners, and contractors to ensure they behave and act in accordance with international and national child safeguarding standards.

## **7 Minor 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 is 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 the case of apprenticeship programs, we take special precautions to protect the well-being and the development of the young employees; 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.

## **8 Freedom of Association and the right for Collective Negotiating** (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 open-minded, transparent and respectful 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.

## **9 Health & Safety** (ILO convention 155)

We provide a healthy, safe and hygienic working environment for all our employees. 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 trainings 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 our work locations are 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.

## **10 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.

## **11 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 consider the industry benchmark standards. These living 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.

## **12 Non-Discrimination** (ILO convention 100, 111)

Our company fosters an inclusive and diverse culture. We do not discriminate on the basis of gender, gender identity, 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.

## **13 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.

## **14 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.

## **15 Entitlement to Work**

Barry Callebaut only employs people who are legally entitled to work. During recruitment, the legal right to work of all potential employees 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.

## **16 Whistle-Blowing and the Reporting of Grievances** (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.

In the case whereby a Barry Callebaut employee witnesses behavior suspected to not be in accordance with the Group's Code of Conduct or against the law, they are asked to raise concerns by speaking first to the individual involved or to contact their individual manager or local HR department directly.

If this is not possible or they feel uncomfortable contacting their line manager, Barry Callebaut has established a dedicated whistleblowing platform: Integrity Line. The [Integrity Line](#) platform is part of Barry Callebaut's Compliance program. It was launched to facilitate reporting of non-compliance and suspicious transactions in cases where employees do not feel comfortable addressing such issues directly. The platform also allows anonymous reporting. Employees also have the opportunity to call the Integrity Line hotline (24/7).

In addition, Barry Callebaut has extended its Integrity Line explicitly for complaints from external parties (ie Grievance). A Grievance in this context, can be considered as an allegation, question, or issue in Barry Callebaut`s supply chain formally raised by an affected individual (or group) regarding their treatment or experience. A complaint can be raised by parties who are themselves affected, such as workers or local communities, by an organization representing the affected parties, such as a trade union, or by an independent organization, such as an NGO.

## **17 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 is taken.

## **18 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.

## **19 Living Accommodation (ILO convention 115, 161)**

When we provide living accommodation or dormitories for 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 living accommodation, such contribution will be at or below the local market price. This contribution will not be deducted from their wage.

## **20 Leadership commitment**

As CEO and CPDO, 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.

Peter Feld  
Chief Executive Officer

Jutta Suchanek  
Chief People & Diversity Officer