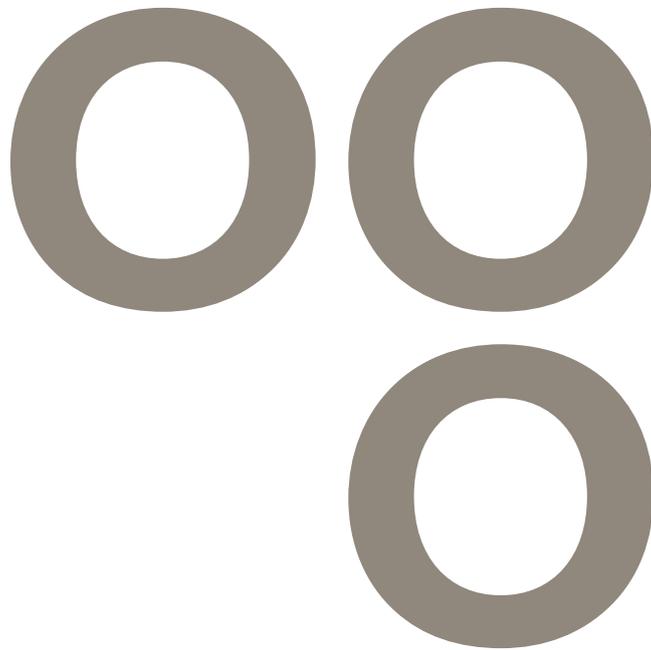

Declaration of human rights



Declaration of human rights

Companies such as the Bell Food Group are challenged by the fact that the procurement and sales markets are globally integrated. As supply chains are multisectioned and complex, our procurement activities via the different sections of the supply chain have an impact in all regions worldwide. The Bell Food Group is aware of its responsibilities with regard to human rights, the environment and animal welfare. It has always lived up to this responsibility in the past and will continue to exert its influence to ensure that violations of human rights and threats to the environment or animal welfare are prevented or recognised and ended. The Group Executive Board of Bell Food Group Ltd has made a clear commitment to the protection of human rights and the environment. This ensures that all business areas of the Group clearly understand their own responsibility as well as their duty to implement these principles.

Values and objectives

For the Bell Food Group, the protection and defence of human rights and the environment is a key concern in our entrepreneurial activities. Our expectation of ourselves as well as our suppliers and service providers (hereinafter: «suppliers») is to take a decisive stance against violations of and threats to human rights in their own enterprises and along the supply chain. In doing so, we adhere to the UN Guiding Principles on Business and Human Rights as well as the relevant conventions and guidelines of the United Nations (UN), the Organization for Economic Cooperation and Development (OECD) and the International Labour Organization (ILO). We attach particular importance to the following points:

- Right to freedom of assembly and collective bargaining
- Appropriate compensation
- Occupational safety
- Special protection for young employees
- No forced labour and disciplinary measures
- Ethical business practices
- No discrimination
- Reasonable working hours
- No child labour
- No precarious employment situation
- Protection of the environment, in particular in compliance with the Basel and the Stockholm Conventions
- Equal opportunities, in particular gender equality

Child labour, the exploitation of need, the prevention of freedom of speech or assembly, bullying, discrimination and any other form of interference with and threat to the personal rights of people as formulated in the guidelines of the International Labour Organization (ILO) must be consistently prevented or prosecuted by us and our direct or indirect business partners.

Expectations of our suppliers and supply chains

The Bell Food Group expects a personal and unconditional commitment from all its suppliers to prevent or identify, consistently prosecute and end all violations of human rights and threats of environmental harm in the context of their business activities. This is why the Bell Food Group has drawn up a Supplier Code, observance of which is compulsory for all suppliers of the Bell Food Group. Our suppliers not only have to defend and implement these expectations, but also oblige their upstream suppliers to comply with these expectations so that the values we have adopted become the basic blueprint for the business relationship.

Expectations of our employees

As far as our own employees are concerned, we not only expect them to prevent any human rights violations and threats of environmental harm, but also that they

- refrain from actively engaging in or tolerating human rights violations and threats of environmental harm by other persons,
- make an internal notification without delay and support the processing of human rights violations or threats of environmental harm,
- approach the relationship with a supplier with great sensitivity and are always willing to ask the right questions of the supplier and to follow up if there is a suspicion that such topics may be a problem with a particular supplier or their upstream suppliers.

Risk management

The Bell Food Group works at different levels to identify risks in the supply chain. Risk management within the Bell Food Group is based on centralised and decentralised functions and departments. This topic is therefore very broadly established within the Group, and the

employees – in particular those involved in procurement – approach the relationship with our suppliers with great sensitivity. In centralised terms, the employees are supported by the Internal Audit and Legal Services departments. In decentralised terms, these topics are processed by the Procurement, HR and Sustainability departments. Risk management also entails listening and giving people the option to contact us. To this end, a simple and transparent as well as anonymous platform for notifying violations and risks has been installed on our internet sites.

Risk analysis

We have implemented a multistage risk analysis process to identify the risks relating to the products manufactured and services provided by our suppliers as well as the risks present in the countries where these products are manufactured and services provided. The risk analysis assesses product-related and country-specific / regional risks in order to quantify the risk exposure. Supporting analyses are carried out regularly but at least once a year, or whenever the situation demands. The assessment as well as our expectations of these suppliers are thus regularly updated.

The risk index is higher for certain product groups (e.g. fish, seafood, oils and spices). These include environmental risks as well as human rights violations during the harvesting of these raw materials. Preventive and remedial measures are defined for each risk category. Suppliers are compelled to comply with the Supplier Code. Suppliers with a higher risk profile are also required to provide written proof of their compliance with social standards as well as a valid audit to the amfori BSCI or a comparative standard (e.g. Sedex Members Ethical Trade Audit – SMETA).

Preventive measures

In our own enterprises, we use training courses, guidelines and directives to ensure that our employees are regularly informed about and comply with human rights and the protection of the environment. The effectiveness of intracompany preventive measures, including compliance with the relevant regulations, is checked by way of regular and unannounced audits by Internal Audit, at least once per financial year or whenever the situation demands.

The Bell Food Group already monitors compliance with specific standards and acceptance of the Bell Food Group's Supplier Code to ensure that suppliers observe the protection of human rights and the environment during the selection process and before placing the first order with a supplier. Depending on the risk, we require suppliers to identify the preventive measures they wish to implement in their companies. A suitable concept for raising awareness, training, monitoring and control should always be a component of these preventive measures. Suppliers with whom we are negotiating a future business relationship are subjected to an internal audit that also takes account of the potential supplier's risk profile and the product group before any contracts are concluded and the first orders are placed. The effectiveness of the preventive measures implemented by existing suppliers is audited at least once per financial year, or whenever the situation demands. Contractual agreements with suppliers clearly formulate the compliance expectations and include sanctions for any violations.

Remedial measures

If we discover that a supplier is violating human rights or involved in environmental risks, we consistently investigate the matter and demand their elimination. If the supplier does not or cannot eliminate these violations within a suitable period of time, we terminate the business relationship.

However, termination of the business relationship is just one of the options we have when violations or risks are identified. From our point of view, termination of the business relationship would mean that we are turning our back on the risk or violation and no longer know whether the supplier is rectifying the problem or not. It is therefore a priority for us to work with the supplier to eliminate the risk or end the violation and to jointly define the measures to be implemented by the supplier. Whenever possible and required, the supplier will be supported and monitored by teams of the Bell Food Group.

If we identify risks or violations within the Group, the situation is analysed in cooperation with the relevant business unit and manager and the required measures are implemented. The shared services areas of Internal Audit and Legal Services are always on hand to provide support. If it is found that the violations or risks stem from a conscious decision by certain employees, personnel decisions and claims under employment relationships are also investigated.

While the effectiveness of remedial measures for intracompany violations is monitored via reporting channels and the supervision obligations of managerial employees with the support of Internal Audit, we can carry out or arrange for unannounced on-site audits of an affected supplier after the expiry of the deadline given to the supplier, and request further documents such as written confirmations, certifications or other proof if needed.

Complaints procedure and anonymous notification procedure

In addition to regular audits of the company and the supply chain regarding the effective protection of people and the environment against the negative effects of our activities, the Bell Food Group also makes it possible to anonymously notify violations and risks. The Internal Audit team has served as the point of contact for internal and external notifications of suspicions and irregularities for many years.

The Bell Food Group also has an anonymous, internet-based platform for notifying such suspicions and irregularities, which can then be investigated comprehensively. The whistle-blowing unit can be reached via the following link, which is available on all online sites of the Bell Food Group:

www.bellfoodgroup.com/whistle-blow

Reporting

We document the implementation and procedures for compliance with our due diligence obligations on an ongoing basis and report on our obligations and measures concerning human rights and environmental risks every year. This provides the transparency that is required by our customers, employees and stakeholders.

Group Executive Board of the Bell Food Group



Lorenz Wyss
Chief Executive
Officer (CEO)



Thomas Bodenmann
Head of business area
Hügli



Xavier Buro
Head of business area
Finance/Services (CFO)



Martin Henck
Head of business area
Hilcona



Marco Tschanz
Head of business areas
Bell International and
Eisberg