

**Supplier Code**



**BELL  
FOOD  
GROUP**



LEADING IN FOOD

# Introduction

In its Declaration of Human Rights<sup>1</sup>, the Bell Food Group defined the material principles underpinning its strategies and objectives in the area of human rights and the environment.

The following Supplier Code builds on the Declaration of Human Rights and is addressed to our suppliers. This Supplier Code sets out the values and objectives of the Bell Food Group relating to humans, animals and the environment, and describes the minimum standards with regard to human rights, sustainability and entrepreneurship that we expect our suppliers and their direct and indirect upstream suppliers to meet. The Bell Food Group encourages suppliers to make an effort that goes beyond these minimum criteria.

These expectations are based on international standards such as the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the Declaration on Fundamental Principles and Rights at Work (ILO).

The supplier accepts the need to adhere to the principles set out in this Code in order to actively support the values and objectives contained herein. Where the requirements of national legislation deviate from the principles formulated in this Supplier Code, the stricter requirements must be observed. Suppliers have to inform their upstream suppliers and sub-contractors about the requirements of this Code and ensure adherence with the Code at all locations where end products are produced or services provided for the Bell Food Group.

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<sup>1</sup> <https://www.bellfoodgroup.com/en/downloads>



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# 1. Working conditions and human rights

## Principle

We value the people who help us and other companies to produce high-quality food products and thus ensure the supply of food to the population. This recognition also means that we pay attention to human rights and compliance with the applicable conventions of the ILO within our group of companies as well as within our supply chains, and expect the same from our suppliers and customers.

## Respect for human rights

The supplier undertakes to pay respect to human rights and maintain a suitable risk management system whenever possible.

Internationally recognised human rights must be observed, such as those inscribed in the Universal Declaration of Human Rights and the applicable ILO conventions. The supplier has to review, respect, defend and whenever possible avoid the violation of these rights in its own enterprise and along its supply chains.

## Employment relationships

The supplier only concludes employment contracts that adhere to the legal guidelines of its country and also meet at least the internationally accepted standards for the protection of employees.

Employment contracts are preferably made in writing and have to inform employees in an easy-to-understand manner about their rights, remuneration, rules for working hours and vacation entitlements.



## **Occupational health and safety**

**During the employment relationship, the supplier must adequately protect the lives and health of its employees.**

The supplier has to provide its employees with a safe and healthy working environment. This includes the provision of protective equipment, occupational medical services, suitable ventilation and temperature control, adequate sanitary facilities and, if applicable, clean and safe accommodation.

## **Remuneration and working hours**

**The supplier pays its employees at least the applicable minimum salary and does not expect them to work excessive hours.**

The supplier at the very least pays a salary that complies with the statutory minimum salary and strives to pay living wages at the relevant place of work. Overtime is paid in addition to the standard hourly wage. At the very least, overtime payment has to comply with the local laws. The maximum working hours may not exceed 60 hours per week (exceptions are permitted). A rest period of 24 hours must be granted after 6 consecutive working days.

## **Protection against violence, bullying and sexual harassment**

**Employees should be guaranteed a working environment in which they are protected from physical and psychological violence.**

The supplier has to ensure a corporate culture and implement organisational measures that are suitable for protecting its employees from physical and psychological violence. The supplier must prevent and consistently investigate bullying, corporal punishment or disciplinary measures, sexual harassment and other forms of violence, protect victims and witnesses, and sanction offenders.

## **Discrimination**

**The supplier must refrain from and prevent any form of unequal treatment of employees due to skin colour, gender, age, health, disability, ethnic origin, nationality, religion or world view, sexual identity, membership of trade unions or political views. This in particular applies to their working conditions and remuneration.**

## **Ban on child labour and forced labour**

**The supplier does not employ any children below the age of 15 or younger than the age for compulsory schooling in accordance with local legislation. It does not employ anyone whose situation of need or predicament can be exploited or anybody who lacks the ability to reason or to judge.**

When employing young people, the supplier has to ensure that the working hours and conditions do not have a negative impact on their health, safety and opportunities in life. School children may be given limited employment to carry out light tasks in accordance with the ILO's requirements.

The supplier must ensure that neither itself nor its contracting partners create a relationship of dependence, whether by threatening punishment, creating extreme financial dependence or restricting the freedom of movement, such as by confiscating or detaining travel, ID or other documents. The supplier may not engage in any form of slavery.

## **Protection of freedom of assembly and right to collective bargaining**

**The supplier recognises and does not deny that employees form stakeholder groups.**

It is a basic principle that employees' right to join collective groups designed for opinion formation or the representation of their interests has to be respected. This includes the right to freedom of assembly and collective bargaining.

The supplier may only react to such opinion formation, representation of interests and industrial action with legally acceptable means and always free of physical violence by the supplier itself or a third party.

## 2. Sustainability

### Principle

We understand that the production and distribution of food requires the exploitation of environmental resources and that our entrepreneurial activities have an impact on people, animals and nature. A core objective of our corporate strategy is to reduce or even totally avoid any negative effects. We and our suppliers must at all times endeavour to optimise routes, technologies, processes and the procurement of raw materials in a way that constantly minimises or even totally avoids any disadvantages for humans, animals and the environment.

### Animal welfare

**The supplier cares about animal welfare, adheres to the applicable statutory regulations regarding animal protection and animal welfare during all stages of the life of an animal, and ensures species-appropriate conditions for birthing, raising, stabling, hunting and fishing. It does not deliver any prohibited products included in the Bell Food Group's DON'Ts list to the Bell Food Group.**

When managing animal resources, it is essential that the animals are treated in accordance with the provisions on animal welfare as well as the ethical principals and requirements of generally accepted international animal protection standards from birth to slaughter. It must in particular be ensured that the animals are not exposed to unnecessary suffering, pain or injury during the transport, stunning and slaughter processes. The applicable laws on animal protection and animal welfare must be observed. Prohibited products are indicated on the so-called DON'Ts list of the Bell Food Group and encompass products involving endangered species or from inhumane or inappropriate husbandry.

The supplier is in particular prohibited from

- Breeding, stabling, catching or hunting animals in violation of the applicable laws, ordinances or provisions;
- Hunting or catching animals during periods when or in locations where this is forbidden in order to protect the animals;
- Processing or delivering animals or animal products stemming from animals included in the so-called Red List or subject to export or import bans;
- Using catching or hunting methods that are banned by law or under international or multinational agreements.

### Environmental protection

**The supplier makes a contribution to the efficient husbanding of resources such as water, energy, food and packaging.**

The supplier has to implement the provisions of laws, international agreements or assessments of international organisations, in particular with regard to maximum emission levels and the use of certain raw materials. The supplier is encouraged to reduce its CO<sub>2</sub> balance sheet, thus contributing to the achievement of international or national objectives. The supplier must also constantly review and improve any operational conditions that have a negative impact on the environment. The supplier in particular has to reduce negative effects on the environment caused by water consumption and wastewater, harmful substances and greenhouse gas emissions, material usage and waste, and support the preservation of soil quality and biodiversity.

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We want to **constantly optimise** routes, technologies, processes and the procurement of raw materials.

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### **Deforestation**

**The supplier undertakes not to engage in any deforestation or degradation of primary forest systems or any other areas particularly worthy of protection, in particular with regard to critical raw materials such as palm oil, soy and beef, as well as to comply with the applicable regulations, including EU Regulation 2023/1115.**

The supplier further undertakes to pursue a zero gross deforestation approach. It expresses its commitment to supply chains free of deforestation, logging, forest clearance and conversion, also known as deforestation- and conversion-free supply chains, in accordance with the basic principles of the Accountability Framework Initiative.

### **Traceability and documentation**

The supplier maintains a directory of its direct suppliers and can trace the flow of materials back to its original source. The supplier actively involves its supply chain in the process of improving transparency and traceability, and can trace raw materials to their place of origin.

To ensure traceability, the supplier must prepare or obtain the documentation that is relevant in this regard and store this documentation for the periods prescribed by law. Such documentation must be checked for current relevance and accuracy at regular intervals, but at least on an ad hoc basis. The documentation should also provide proof that the supplied products do not contribute to deforestation or forest degradation. Documentation should be submitted to the Bell Food Group upon request.

## 3. Business ethics

### Principle

Our aspirations and expectations of our contracting partners is that they comply with the legal regulations and engage in a peer-to-peer relationship based on a spirit of partnership and fairness with their business partners.

### Observance of laws

**The supplier has to respect and comply with the laws and ordinances in all the countries in which it operates. It will also keep an eye on any new developments and react to such developments in an appropriate manner.**

Respect for the legal and value system of a country also requires the supplier to refrain from engaging in any efforts or measures to evade legal provisions or to put its business partners at a disadvantage, such as by

→ Setting up or enforcing structures, including payment flows that can be regarded as an aggressive tax planning model,

→ Requesting a legal system or place of jurisdiction that is unusual for a particular transaction ("forum and applicable law shopping"),

→ Using under-capitalised and empty companies (special purpose vehicles) to deny its business partners access to a sufficient basis for liability.





## Combating of corruption

**Any form of corruption, abuse for personal profit or any other form of improper manipulation of decision makers and decisions must be decisively rejected.**

Business conduct must be such that decisions are based on an objective assessment and comply with all legal provisions. The supplier must refrain from any improper manipulation of persons who take or can influence a decision as part of their office or function ("decision makers").

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We engage with one another in a **peer-to-peer relationship based on a spirit of partnership and fairness.**

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The supplier must implement measures in its area of responsibility and influence to raise the awareness of its employees and business partners and encourage them to avoid, recognise, notify and prosecute any and all forms of corruption and abuse for personal profit. This also applies to employees of the Bell Food Group: suppliers may not offer any gifts worth more than a minimal amount to employees to influence them in a forbidden manner.

## Anti-trust law

**Each disadvantageous and unfair manipulation of the market, whether horizontally or vertically, that violates applicable laws must be avoided and decisively rejected.**

The supplier undertakes to stay abreast of and respect the anti-trust provisions in all the countries in which it operates. The supplier may not exchange information with and join forces with suppliers, customers or other market players at the same level in order to unfairly disadvantage the market and/or individual market players.

## Data privacy

**All processing of personal data must be done in compliance with the applicable provisions.**

The supplier knows and respects the data privacy regulations in the European Economic Area and Switzerland, and in particular the EU's General Data Protection Regulation.

## Whistleblowing

**The supplier has implemented the legal provisions applying to a whistleblowing system for notifying infringements of the law, violations of human rights or the existence of environmental risks.**

The supplier maintains a system that enables anonymous notifications and ensures the appropriate processing of all notifications. Guaranteeing availability and accessibility, confidentiality and impartiality is particularly important here. The relevant information must be disclosed. If the supplier identifies illegal conduct on the part of employees of the Bell Food Group, the supplier is encouraged to notify these violations on the whistleblowing platform of the Bell Food Group. This applies in particular to misconduct relating to financial irregularities, fraud, corruption, anti-competitive practices or infringements of important regulations in the fields of labour, health or the environment.



⇒ Further information is available at [www.bellfoodgroup.com/whistle-blow](http://www.bellfoodgroup.com/whistle-blow)

## Confidentiality

**The supplier respects that information and documents it receives from us or third parties may contain business secrets pertaining to us and agrees to protect these against misuse.**

A fair business relationship conducted in a spirit of partnership is always based on the fact that the business partners can trust one another. This trust also implies that information and documents may only be used for the purpose of their relationship of cooperation. Such information and documents must at all times be protected from access by third parties.

## Conflicts of interest

**The supplier must inform us in writing without delay if our cooperation or a sub-aspect thereof triggers a conflict of interest for the supplier.**

A conflict of interest arises, among other things, when persons related to the supplier who are involved in the business relationship or decision-making process feel that their family or other private interests are threatened or at risk, or they use or could use such family or other private interests to their own advantage or the advantage of third parties to influence the decision-making process.

## Intellectual property

**The supplier respects the intellectual property of third parties and refrains from using such intellectual property, unless the owner thereof gives its consent.**

The supplier recognises and respects that third-party intellectual property may only be used, developed, passed on or exploited in another manner by the supplier with the consent of the relevant third party.

## Sanctions

The supplier manages its operations and procurement of raw materials in a manner that does not violate any trade sanctions and embargoes.





## 4. Supply chains

### Principle

In a global economy with global dependencies, the conduct of direct and indirect suppliers is transparent and visible for each market player. Violations of basic rights or moral and ethical principles and the infringement of national and international agreements, regulations or legal provisions that serve to protect nature and the environment become quickly and transparently apparent to the whole world. The supplier must be aware of its responsibility to enforce the requirements of this Supplier Code among its direct and indirect upstream suppliers and to monitor their compliance with this Code.

### Risk management

**The supplier must implement an appropriate and effective risk management system to monitor compliance with the requirements of this Supplier Code in its own enterprise as well as those of direct and indirect suppliers.**

An effective risk management system makes it possible to identify and minimise risks pertaining to human rights and the environment and to prevent, terminate or minimise the scope of violations of human rights and environmental obligations.

The supplier must implement suitable procurement strategies and purchasing practices and monitor their effectiveness in avoiding the risks that have been identified by the risk management system.

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# 5. Compliance with this Code

## Principle

We trust that a supplier who has studied and accepted this Code also adopts the values and objectives formulated herein and will help us to defend these against attacks at all times. The supplier will implement these values and objectives in a binding manner along its supply chain and notify us of any violations and suspicious activities in its own enterprise or along its supply chain.

## Enforcement along the supply chain

The supplier is obliged to consider the values contained in this Code when selecting its upstream suppliers, and to oblige its upstream suppliers to comply at the very least with the values set out in this Code.

The supplier also has to oblige its upstream suppliers to enforce the values set out in this Code among their own suppliers.

## Audit rights

The supplier allows us and our customers to use suitable and appropriate measures to check compliance with this Code.

The supplier will implement effective measures to ensure that we or our customers can carry out such audits of its direct and indirect suppliers.

## Notification requirement

The supplier has to inform us in writing without delay if it finds out or suspects that the values contained in this Code have been or are in danger of being infringed in its own enterprise or along its supply chain.

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We expect the requirements of this Code to be **implemented in a binding manner**.

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## 6. Violations of this Code

### **Principle**

This Code formulates our expectations of our suppliers and their supply chains. This Code serves as an important foundation for our partnership. A partnership with a supplier who violates this Code is impossible for us, not only from a legal point of view but also from the point of view of our other business partners.

### **Termination of the cooperation**

**We reserve the right to terminate any and all legal transactions with the supplier if it should violate this Code.**

If we identify a violation, we will discuss the matter with the supplier before terminating the cooperation and try to end the violation of this Code and remedy any disadvantages that have already occurred by way of suitable measures.

### **Proceedings**

**We reserve the right to report violations of this Code to the competent authorities and institutions, to file requests for the opening of legal proceedings and to submit all available information (including oral information), documents and proof during these legal proceedings.**



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