



**Combining great taste
& sensational fragrance**



CODE OF CONDUCT

Bell Flavors & Fragrances GmbH

September 2023



Code of Conduct

Code of Conduct for
Bell Flavors & Fragrances GmbH

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0. Introduction

Our company values and social responsibility are firmly integrated into our daily work. They are expressed in this Code of Conduct, which serves as a guideline for all employees of Bell Flavors & Fragrances GmbH, regardless of their position within the company. It defines obligatory minimum standards for the main social, ecological and economic responsibility requirements within the company and our working relationships as well as in our role as a business partner within the supply chain.

Our code of conduct is based on the international guidelines and principles set out in the **Base Code of the Ethical Trading Initiative (ETI)** and the **key labour standards of the International Labour Organisation (ILO)**. Furthermore, it is based on local, national and other applicable laws, as well as our relevant industry standards and international norms. Bell has signed the **IFRA/IOFI Sustainability Charter**, thus making a commitment to the charter's principles of responsible sourcing, reducing our environmental footprint, employee well-being, product safety, and transparency as the foundations of sustainable business.

Our Code of Conduct is communicated to all employees within the company as well as to our external business partners. Management and all employees at Bell Flavors & Fragrances GmbH are obliged to comply with the values and ethical principles described in this document as an absolute minimum, irrespective of their department and role within the company. We see each of our business partners as a vital link in our supply chain and expect them to share and comply with the values and ethical principles laid out in our Code of Conduct.

Bell Flavors & Fragrances GmbH is committed to the continuous development and effective improvement of all operations and processes involved in fulfilling our social, ecological and economic obligations.

0.1 Legal compliance

For everyone at Bell Flavors & Fragrances GmbH, compliance with local and national laws and regulations is a vital element of our responsible and ethical business practices. We respect the general human rights, personal rights and dignity of our employees, our business partners and third parties.

Any violation or disregard of these rights can have serious consequences such as criminal penalties and damages as well as tarnishing Bell's reputation as a company. For this reason, we expect legal compliance from all employees from top management down to each individual member of staff in order to ensure no harm of any kind is caused to our company, business partners or third parties.

0.2 Implementation in the Integrated Management System

The Integrated Management System (IMS) covers all departments and processes at Bell Flavors & Fragrances GmbH. It is based on DIN EN ISO 9001, FSSC 22000, FAMI-QS and the EU Organic Regulations. An additional basis is provided by the central values set out in our mission statement. These are valid at all levels, in all departments and for all tasks.

The same applies to this Code of Conduct. It contains guidance and obligatory minimum standards with information and requirements that are implemented across the entire company to make the code an integral part of daily working life for all employees.

1. Social responsibility

We treat our colleagues as equals because tolerance, equality and impartiality are the prerequisites for respectful and fair working relationships. As a matter of course, we encourage and support our employees by making continued efforts to improve the working environment and implementing duty of care at the managerial level.

1.1 Freedom of choice and mutual respect

Bell Flavors & Fragrances GmbH respects, protects and promotes the applicable regulations for the protection of human and children's rights as fundamental and universally applicable standards. Our working environment is characterised by high levels of mutual respect and a proactive feedback culture across all operational and organisational units. Furthermore, we oppose any use of child labour as well as forced or compulsory labour.

All employees have the right to freely leave their workplace on the company premises and end their employment at any time in accordance with the contracted or legally binding termination period. Any disciplinary measures may only be carried out with respect for basic human rights and dignity and must apply equally to all employees.

1.2 Promotion of diversity

Here at Bell Flavors & Fragrances GmbH, we proudly place importance on a heterogeneous workforce and we value diversity. Any kind of discriminatory behaviour will not be tolerated. This concerns everything from ethnic origin, nationality, age, gender, sexual orientation and family status to religion, ideology, membership of trade unions and political views as well as to disabilities and any other grounds covered by non-discrimination rules.

These principles apply to hiring as well as to remuneration, promotion and professional development opportunities, contract termination, retirement and any other such circumstances that arise at work. At Bell Flavors & Fragrances GmbH, it is forbidden to behave in any way that can be constituted as threatening, offensive, exploitative, sexually abusive or otherwise intimidating. All cases will be treated the same, irrespective of whether the perpetrator was personally involved or merely supported or tolerated the action.

1.3 Freedom of association and bargaining rights

The right to co-determination is highly valued in our company. It is essential in creating a respectful cooperation between us as the employer and our employees as well as promoting strong identification with the company. Company co-determination at Bell Flavors & Fragrances GmbH is legally based and gives all employees the unrestricted right to form, organise and join unions or works councils in order to have collective representation in negotiations with senior management.

Currently, the most important representative employee body at Bell Flavors & Fragrances GmbH is the works council, with which company executives have a trusting relationship and hold regular talks. These talks focus especially on issues such as economic decisions affecting the development and future of the company and the jobs it provides. In accordance with legal provisions, any information on major changes within the company must be comprehensively and promptly communicated. For employees who play an active role in the works council, no negative effects or consequences will be tolerated or accepted.

2. Occupational health and safety

Safe workstations and health promotion take high priority at Bell Flavors & Fragrances GmbH. Safe, fair and appropriate working conditions are continuously developed based on relevant laws, regulations and industry standards. This includes working hours and remuneration.

It goes without saying that employees have access to clean sanitary facilities, drinking water and suitable break rooms. Each employee has the possibility to use a personal locker or their office workspace to adequately store private items as well as food and drinks.

Bell ensures the working environment is safe and hygienic to a level beyond the relevant industry and legal standards. To promote employee health, Bell Flavors & Fragrances GmbH organises regular events such as health days.

2.1 Risk analysis and responsibilities

Procedures as well as work areas and materials are regularly analysed to identify any potential health and safety risks. Suitable measures to reduce risks are then agreed and their implementation is monitored.

Responsible for the safety of work processes, activities and work equipment as well as hazard analyses are the general management and leading employees, who are supported by the external safety specialist as well as the HSE engineers and safety officers. Together with selected employees from the various departments and the company medical officer, they form an occupational health and safety committee (ASA) that meets regularly to discuss issues such as accident prevention and safety in the workplace.

In areas where risks cannot be completely eliminated, we supply our employees with suitable personal protective equipment at no additional cost. Furthermore, an extensive evacuation and emergency programme is in place that includes escape and rescue routes for the entire company. Within this framework, every employee has the right to leave his workspace if in serious danger without the prior approval of a supervisor. All employees are regularly instructed on the content of this programme as well as any further occupational health and safety topics.

2.2 Working hours and annual leave

The regulations on working hours, breaks and public holidays are based on current national legal and industry standards. These are documented using an electronic time recording system. A standard working week may not be longer than 48 hours.

Every employee has the right to at least one day off after working six days in a row. Additional hours can be worked on a voluntary basis. Only in exceptional cases, such as the need to cover a short-term increase in demand, may the company order employees to work longer hours in accordance with the relevant individual and collective agreements. The supervisor must apply to the works council in advance for approval. Overtime is paid in accordance with national law at a minimum rate of 125% or can be taken as time off in lieu.

2.3 Remuneration and professional development

Bell Flavors & Fragrances GmbH pays at least the statutory or industry minimum wage as well as all legally required social benefits. Remuneration is paid regularly, in full and on time as contractually regulated using legally valid means of payment. Every employee receives an overview of their wage or salary as a written statement.

Our employees are our most significant resource at Bell Flavors & Fragrances GmbH. For this reason, we not only value their health but also consider our support in the form of further education and training to be essential in providing new opportunities for our employees and thus increasing their level of job satisfaction.

2.4 Legal basis

All relevant provisions are regulated in contracts. A contract is only legally binding if signed by both the company and the employee. Any later amendments to a contract must be made in writing and signed off by both parties. It is not permitted to bypass labour and social obligations and payments by means of service contracts, subcontracts, overuse of fixed contracts, false apprenticeships or any similar practices.

3. Ecological responsibility

As a manufacturer, Bell Flavors & Fragrances GmbH is also aware of its ecological responsibilities. We aim to find as many ways as possible to contribute to increased sustainability within our company and ensure our environment remains a healthy place to live. By signing the IFRA/IOFI Sustainability Charter, Bell has committed its entire company to systematically working on sustainable sourcing, examining the options available to reduce our carbon footprint and prioritising the safety of its products.

3.1 Sustainable sourcing

The procurement department at Bell Flavors & Fragrances GmbH is focused on developing fair and long-term partnerships that can be used to sustainably repair our ecosystem and support its protection. This can be seen in the continuous development of our supply chain management, where ecological factors are considered as part of the selection process. On top of this, Bell uses recycled packaging materials whenever possible and reuses canisters as well as IBCs. What is more, Bell's focus on botanical extracts plays a significant role here alongside the use and development of white (and green) chemistry in combination with additional low-resource technologies.

3.2 Responsible production

Bell Flavors & Fragrances GmbH aims to continually reduce the carbon footprint of its entire portfolio by using resources efficiently and applying green technologies in order to produce an exemplary environmental balance. Consequently, we design all stages of our production process to be as sustainable and environmentally friendly as possible. We are constantly searching for new ways to save energy and water as well as reduce emissions and waste that ideally can be reintegrated into a circular economy. All laws and regulations governing the environment and energy are implemented and controlled effectively with the use of a legal register.

The company uses the DIN EN ISO 14001 environmental management system as a powerful tool and is also certified in accordance with the DIN 16247-1 energy management system.

4. Economic responsibility

4.1 Integrity and fair trade

Bell Flavors & Fragrances GmbH is committed to fair competition in all business relationships. The company is not prepared to participate in blackmail or corruption of any kind in order to gain an economic advantage over competitors. All employees are responsible for making sure the company is not involved in any fraudulent business practices.

For this reason, any situations involving the inappropriate giving or receiving of presents as well as hospitality offers or invitations that may lead to a mutual dependency that goes beyond usual business customs or the legally defined framework must be avoided. Anti-competitive agreements with third parties are not allowed. All suspected cases of unfair competition must be reported to the company immediately.

Within the sphere of influence of the company, all necessary measures are taken to prevent any money laundering. All financial business data must be recorded in full, correctly and punctually in order to ensure financial integrity at all times.

4.2 Conflicts of interest

Family, private or other relationships may not influence decisions to the detriment of the company. Such conflicts of interest can often arise from second jobs. It is essential to always avoid anything that could be deemed a conflict of interest. For this reason, all employees of Bell Flavors & Fragrances GmbH are required to disclose any (apparent) conflict of interest to the company in order to find a generally practicable solution together.

5. Transparency

Transparency leads to trust and authenticity. We have signed the IFRA/IOFI Sustainability Charter and therefore attach great importance to open and honest reporting and communication, both internally and externally. This is why Bell Flavors & Fragrances GmbH is committed to full and correct documentation in all areas of the company in order to ensure the best possible management and control of our procedures and operations as well as enabling the verification of our results. Here, our aim is to ensure Bell Flavors & Fragrances GmbH and its customers can increasingly feel the overall benefit of transparency and cooperative dialogue.

6. Code of Conduct violations

6.1 Procedures for reports and complaints

Any violations of the Code of Conduct, company regulations or even laws can have serious consequences, not only for the employee concerned, but also for the company as a whole. Therefore, it is fundamentally obligatory to comply with the aforementioned regulations at all levels and in all areas of the company. This is not open to discussion.

To ensure that everybody is able and willing to report (suspected) violations and misconduct as well as all related issues concerning this Code of Conduct, Bell Flavors & Fragrances GmbH offers various options.

All reports can be filed either by name or completely anonymously using the following methods:

- contacting your supervisor, a member of the works council, the compliance officer or the HR department either personally, by phone or by mail at compliance@bell-europe.com;
- Compliance Reporting Portal: <https://whistleblowersoftware.com/secure/Bell-Compliance>

All information and reports are important. This is the only way that breaches of the code can be counteracted to protect the company and, in particular, the person or group of people involved.

6.2 Protection of employees raising concerns

All information and reports will be treated with the strictest confidence and received by an officer with the duty to remain silent. Independently of the type of report, the person supplying the information can be certain that they have no need to fear any disadvantages or discrimination as a result of the report or complaint.

Any disregard of the duty to remain silent as well as any disadvantaging or discrimination will not be tolerated. Such actions themselves are regarded as a serious breach of the Code of Conduct.

6.3 Dealing with violations

The Code of Conduct is binding for all employees of Bell Flavors & Fragrances GmbH. Violations will not be tolerated at any level or in any area of the company. Each violation and each report of a violation will be examined in detail to establish the cause and immediately implement corrective and precautionary measures. Depending on the type and severity of the violation, legal (employment) action may be taken.

7. Additional items

7.1 Data protection and information security

Data protection is a matter of the highest priority in our company. Therefore, it is only permissible to collect, capture, process, use and store data, particularly personal data, in accordance with legal provisions and regulations. All data protection rules must be fully and consistently applied.

All employees must respect and apply the security systems for IT and electronic data processing at Bell Flavors & Fragrances.

7. 2 Protection of material and intellectual property

Bell Flavors & Fragrances GmbH provides its employees with machines, facilities, IT, office and communication equipment and much more so that they can carry out their tasks. All resources supplied by the company must be treated with respect and care. They must be protected from damage, loss, theft and misuse and must be used exclusively for company purposes unless otherwise agreed. This principle also applies to the company's intellectual property. All information and documents must be handled confidentially and protected from unauthorised transmission to third parties.

8. Additional obligations

In addition to the obligations defined in this Code of Conduct, further items and requirements of Bell Flavors & Fragrances GmbH that must be complied with by everyone involved are set out in our mission statement, our quality management handbook and the Bell guidelines and company agreements as well as in our procurement and ordering regulations.

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