

CODE OF CONDUCT

Code of Conduct of Bell Flavors & Fragrances GmbH

As of: November 2026

Contents

Foreword 3
Scope of application 3
Compliance with applicable law 3
Implementation in the integrated management system 3
1 Social Responsibility 3
1.1 Voluntariness and mutual respect 4
1.2 Promoting diversity 4
1.3 Freedom of association and the right to collective bargaining 4
2 Health and safety at work 4
2.1 Hazard analyses and responsibilities 5
2.2 Working hours and vacation 5
2.3 Remuneration and further training 5
2.4 Regulations of the employment relationship 5
3 Ecological responsibility 5
3.1 Sustainable procurement 6
3.2 Responsible production 6
3.3 Certification and monitoring 6
4 Economic responsibility 6
4.1 Integrity and Fair Trade 6
4.2 Conflicts of interest 7
5 Transparency 7
6 Data protection and information security 7
6.1 Protection of personal and confidential data 7
6.2 Disclosure of Information 7
6.3 Responsible behaviour 7
6.4 Technical and organizational measures 8
6.5 Protection of tangible and intellectual property 8
7 Violations of the Code of Conduct 8
7.1 Reporting and Complaint Procedure 8
7.2 Protection of whistleblowers 8
7.3 Dealing with violations 9
8 Other commitments 9

Foreword

Our corporate values and our social responsibility are firmly integrated into our everyday lives. They are expressed in this Code of Conduct, which serves as a guideline for employees at all levels of Bell Flavors & Fragrances GmbH. It regulates binding minimum standards that define and specify the essential requirements with regard to our social, ecological and economic responsibility in the company, both in our dealings with each other and in relation to our role as business partners in the supply chain.

Our Code of Conduct is based on the international principles and principles of the Base Code of the Ethical Trading Initiative (ETI) and the core labour standards of the International Labour Organisation (ILO). Our Code of Conduct is based on local, national and all other applicable laws as well as our relevant industry standards and international norms. As a signatory to the IFRA/IOFI Sustainability Charter, Bell is committed to its principles, which proclaim responsible purchasing, reduction of the CO2 footprint, employee well-being, product safety and transparency as the basis for sustainable business.

Bell Flavors & Fragrances GmbH is committed to continuously developing and effectively improving its procedures and processes that are necessary to fulfil its social, ecological and economic responsibility.

Scope of application

The Code of Conduct is communicated to all employees within the company and to our business partners outside. The management and all employees of Bell Flavors & Fragrances GmbH undertake to comply with at least the values and ethical principles described in this document in all areas and activities.

We expect our business partners to share and comply with the values and ethical principles of our Code of Conduct. In particular, we oblige our suppliers, as a fundamental part of our supply chain, to at least comply with our Code of Conduct.

.

Compliance with applicable law

Compliance with local and national laws and guidelines is an indispensable part of responsible and ethical behavior for us at Bell Flavors & Fragrances GmbH. We respect the general human rights, personal rights and dignity of our employees, our business partners and third parties.

Any violation or violation can have serious consequences such as criminal prosecution, damages and/or damage to Bell as a company. For this reason, we expect everyone, from management to individual employees, to always act in accordance with the law and not to harm the company, our business partners or third parties in any way.

Implementation in the integrated management system

The integrated management system (IMS) refers to all departments and processes of Bell Flavors & Fragrances GmbH. ISO 9001, ISO 14001 and ISO 50001, FSSC 22000 and the Organic Regulation serve as the basis for this. The central values set out in our mission statement also establish a basis and apply at all levels, in all areas and in all activities.

1 Social Responsibility

Good products are created by people who find good conditions. Fair working conditions, long-term prospects and a stable team are the basis for us as a partner to consistently deliver what we promise.

We meet at eye level, because tolerance, equality and impartiality are the prerequisites for respectful and fair dealings with each other.

Promoting and supporting our employees is a matter of course for us and is lived through the duty

of care of our managers and the constant effort to improve the working environment.

1.1 Voluntariness and mutual respect

Bell Flavors & Fragrances GmbH respects the applicable regulations for the protection of human and children's rights as fundamental and generally applicable requirements. A high level of mutual appreciation and a lively feedback culture, both across functions and instances, characterize our cooperation. In addition, we reject any use of child, forced and compulsory labor.

All employees have the right to leave the company premises and their workplace freely and to terminate their employment relationship in accordance with the contractually agreed or statutory notice period. Disciplinary measures are only permitted in compliance with respect for fundamental rights and human dignity and apply equally to all employees.

1.2 Promoting diversity

At Bell Flavors & Fragrances GmbH, we attach great importance to a heterogeneous workforce, value diversity and are proud of it. Discriminatory behavior is therefore not tolerated in any way. This applies to all extent, whether on the basis of ethnic origin, nationality, age or gender, sexual orientation or marital status. Furthermore, this includes religion, ideology, membership in trade unions, political opinions, physical or mental limitations or other reasons covered by a prohibition of discrimination.

These principles apply to the hiring process as well as to remuneration, possible promotion or further training, termination, retirement and all other events in the business environment. Any behavior that is threatening, insulting, exploitative, sexually coercive or otherwise intimidating is prohibited at Bell Flavors & Fragrances GmbH. There is no distinction between whether a person acts accordingly, supports or tolerates such behavior.

1.3 Freedom of association and the right to collective bargaining

Co-determination is a high priority in our company. This is the only way to promote a trusting cooperation between us as an employer and our employees and to bring about a stronger identification with the company. Co-determination at Bell Flavors & Fragrances GmbH is based on legal principles and gives all employees the unrestricted right to form, organise or join trade unions and employee representatives and thus negotiate collectively with the management on a representative basis.

Employee representation as the most important body at Bell Flavors & Fragrances GmbH is currently the works council, with which the company management is in constant, trusting exchange. This applies in particular to economic decisions on the development and future of the company and jobs. Information on significant operational changes must be provided in a timely and comprehensive manner in accordance with the legal basis. With regard to involvement in the works council, it is also true that no negative effects and consequences towards these employees are tolerated and accepted.

2 Health and safety at work

Safe workplaces and the promotion of health play an important role at Bell Flavors & Fragrances GmbH. The company complies with the extensive German legislation to ensure fair and appropriate working conditions. This includes all relevant laws, regulations and industry standards, for example with regard to working hours or remuneration.

Of course, there is free access to clean sanitary facilities, drinking water and appropriate break rooms. All employees have the opportunity to store private belongings as well as food and drink appropriately via a personal locker or a workstation in an office.

Bell ensures a safe and hygienic working environment beyond the applicable standards and laws. In order to promote the health of its employees, Bell Flavors & Fragrances GmbH offers, for example, regular campaigns such as health days.

2.1 Hazard analyses and responsibilities

Work processes, areas of activity and work equipment are regularly analysed with regard to potential health and safety risks, appropriate measures are taken to reduce hazards and their implementation is tracked.

Responsibility for the safety of work processes, activities and work equipment as well as hazard analyses lies with the management and the managers, who are supported in this by the external safety specialist as well as the HSE engineers and safety officers. Together with other selected employees from different areas and the company doctor, they all form our Committee for Occupational Safety (ASA), which meets regularly to discuss topics relating to accident prevention and safety in the workplace.

Where hazards cannot be completely eliminated, our employees receive appropriate, free personal protective equipment. In addition, a comprehensive evacuation and emergency program, including rescue and escape routes, has been implemented for the entire company. In the course of this, everyone always has the right to remove themselves from serious dangerous situations without first obtaining the permission of the manager. All employees are trained annually on this program as well as other health and safety-related topics.

2.2 Working hours and vacation

Working and break time regulations as well as regulations on public holidays are based on the applicable national laws and industry standards. An electronic time recording system is used for documentation. A normal working week may not exceed 48 hours.

Every employee has the right to at least one day off after six consecutive working days. Overtime is voluntary. Only in exceptional cases, e.g. in order to be able to meet increased demand at short notice, may the company order overtime in accordance with individual and collective agreements. This must be approved by the works council after prior application by the manager. Overtime is remunerated with a surcharge in accordance with national law or with at least 125% or can be taken as compensatory time off.

2.3 Remuneration and further training

Bell Flavors & Fragrances GmbH pays at least the statutory minimum wage or the industry minimum standard as well as all statutory social benefits. Remuneration is regular, complete and timely as well as contractually regulated with a legal tender. Each employee receives a written payslip as an overview.

Employees are the most important resource for Bell Flavors & Fragrances GmbH. For this reason, we not only attach great importance to their health, but also consider the promotion in the form of further education and training to be fundamental in order to provide our employees with new opportunities and thus increase their satisfaction.

2.4 Regulations of the employment relationship

All relevant conditions are contractually regulated. A contract is only legally binding if it has been agreed to by both the company and the employee. All subsequent changes to the contract must also be recorded in text form and confirmed by a signature on both sides (digital signature if necessary). It is not permitted to circumvent obligations and services under labour and social law by means of pure contracts for work, subcontracts, the excessive use of fixed-term employment contracts, incorrect apprenticeships or the like

3 Ecological responsibility

Our environment is not a resource that we consume. It is the basis on which we operate. As a processing company, Bell Flavors & Fragrances GmbH actively assumes responsibility for environmental protection. Our aim is to consistently promote sustainable solutions and to use the available opportunities to make our processes more

environmentally friendly and to secure a future worth living.

We focus on efficient use of energy, responsible raw material sourcing and the safe handling of substances of concern. As a signatory of the IFRA/IOFI Sustainability Charter, Bell is committed as a whole company to systematically working on sustainable procurement, exploring options to reduce our carbon footprint and prioritizing the safety of its products.

3.1 Sustainable procurement

In the area of purchasing, Bell Flavors & Fragrances GmbH focuses on the development of fair and long-term partnerships in which it is committed to sustainably restoring our ecosystem and promoting its protection. This is reflected in the continuous development of supplier management, which takes ecological factors into account in the selection process. In addition, Bell uses recycled packaging materials wherever possible and recycles canisters and IBCs. Bell's focus on plant extracts as well as the use and expansion of white (or green) chemistry and other resource-saving technologies also play a role.

3.2 Responsible production

Bell Flavors & Fragrances GmbH strives to constantly reduce the ecological footprint of its entire portfolio through the efficient use of resources and the inclusion of green technologies and to demonstrate an exemplary environmental balance. Accordingly, we design all stages of our production as sustainable and environmentally friendly as possible. We are continuously looking for new ways to save energy and water, reduce emissions and waste and, if possible, return them to the circular economy. All laws and regulations relating to the environmental and energy sector are implemented and effectively monitored by means of a legal register.

3.3 Certification and monitoring

Our certification according to the environmental management standard ISO 14001 helps us to systematically record and reduce environmental impacts in our core processes. In accordance with our environmental policy, we monitor and analyse environmental impacts from product development onwards and evaluate them at regular intervals. These are the following environmental aspects: waste, water and wastewater, contaminated sites, energy consumption, emissions, contamination of soil/groundwater, operating materials/auxiliary materials, handling of hazardous and non-hazardous raw materials and products, including storage and transport, as well as packaging.

ISO 50001 has now also been integrated into our management system and successfully certified.

4 Economic responsibility

Markets are changing, supply chains are coming under pressure, and a continuous supply of raw materials cannot be taken for granted. We monitor these developments at an early stage and align our structures accordingly. This applies to cost efficiency as well as the assessment of supply risks and the stability of our supplier base. After all, resilience is the prerequisite for reliable partnerships.

4.1 Integrity and Fair Trade

Bell Flavors & Fragrances GmbH is committed to fair competition in all business relationships. The company does not engage in any form of bribery or corruption in order to gain a business advantage. It is the responsibility of all employees not to involve the company in fraudulent business practices.

For this reason, for example, situations in which inappropriate gifts or receiving gifts, hospitality or invitations create a mutual obligation that goes beyond normal business practices or the legally permissible framework should be avoided. No anti-competitive agreements are entered into with third parties. Any indication of unfair competition must be reported to the company immediately. All necessary measures are taken to prevent money laundering in the company's own sphere of influence. All business financial data must be recorded completely, correctly and in a timely manner in order to ensure financial integrity at all times.

4.2 Conflicts of interest

Family, private or other relationships must not influence decisions to the detriment of the company. Such conflicts of interest can arise in particular from secondary activities. It is always important to avoid even the appearance of 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 acceptable solution together.

4.3 Transparency

Transparent reporting makes our progress traceable. Anyone who works with us should know what they are relying on.

Transparency creates trust and credibility. As a signatory of the IFRA/IOFI Sustainability Charter, we attach great importance to open and truthful reporting and communication – both internally and externally. For this reason, Bell Flavors & Fragrances GmbH is committed to complete and correct recording in all areas of the company in order to ensure the controllability and controllability of processes and activities in the best possible way and to make results comprehensible. The aim is to increase the overall benefit for Bell Flavors & Fragrances GmbH and our customers through traceability and partnership-based dialogue.

5 Data protection and information security

The protection of data is a top priority in our company: Bell Flavors & Fragrances GmbH respects and protects personal data, business-critical and internal information. In doing so, we act with care and within the framework of clearly defined processes.

The collection, collection, processing, use and storage, in particular of personal data, is only permitted in compliance with the legal requirements and guidelines. All data protection regulations must be complied with consistently and completely.

5.1 Protection of personal and confidential data

The personal data of our employees, customers and partners is processed exclusively within the framework of the strict legal requirements - in particular the General Data Protection Regulation (GDPR) and the Federal Data Protection Act (BDSG).

The basis for this is the principles of purpose limitation, necessity and legal legitimation. We only circulate as much data as necessary. The provisions of employee data protection also apply to employee data.

Non-personal, confidential information that is required and processed in daily work is also subject to special protection. It may only be used within the scope provided for in each case and in compliance with legal, contractual or internal requirements.

Bell has therefore aligned its information security system with the requirements of ISO 27001 so that it can be continuously developed in a structured manner and always offer the best possible protection for all data worthy of protection.

5.2 Disclosure of Information

In the case of disclosure within or outside Bell, everyone is obliged to check whether the addressee is entitled to receive it. Care must always be taken to ensure that the information is transmitted securely. Depending on the type and need for protection of the information, additional measures such as encryption, access restrictions, confidentiality obligations or checks of contractual security requirements must be taken.

5.3 Responsible behaviour

All employees are obliged to protect sensitive data and information from unauthorized access, loss, modification or publication. This includes, in particular, the use of secure passwords, the locking of devices when absent, and the responsible use of mobile work equipment.

Participation in regular training courses on data protection and information security is mandatory for all employees. In addition, the company ensures that employees are continuously aware of the topic as part of information campaigns.

Every employee is obliged to report violations immediately to the data protection officer and/or IT. Violations of data protection and information security regulations can lead to significant fines and legal consequences.

5.4 Technical and organizational measures

Our IT systems are protected by technical and organizational measures (TOM) – e.g. access restrictions, data backups, logging and regularsecurity updates.

All processing operations are also documented in a register of procedures. Compliance with all data protection and security-related requirements is regularly reviewed. If you have any questions or uncertainties, the responsible persons and officers for data protection and IT security are available as contact persons. They are responsible for monitoring compliance with data protection regulations and are available to all employees if they have any questions.

The IT and IT security system of Bell Flavors & Fragrances GmbH must be observed and implemented by all employees.

5.5 Protection of tangible and intellectual property

Bell Flavors & Fragrances GmbH provides its employees with machinery and equipment, IT, office and communication facilities for the performance of their activities. All resources provided by the company are used appropriately and carefully. They are protected against damage, loss, theft or misuse and, unless expressly permitted, are used exclusively for business purposes. This principle also includes the company's intellectual property. All information and documents must be treated confidentially and protected from unauthorized disclosure to third parties.

.

6 Violations of the Code of Conduct

6.1 Reporting and Complaint Procedure

Violations of the Code of Conduct, internal guidelines or even laws can have serious consequences not only for individual employees, but especially for Bell Flavors & Fragrances GmbH as a whole. Compliance with the aforementioned requirements at all levels and in all areas of the company is therefore fundamental and out of the question.

In order to offer everyone the opportunity and at the same time encourage them to report (possible) violations and misconduct with regard to this Code of Conduct and all related topics, Bell Flavors & Fragrances GmbH has various ways.

All notifications can be submitted with your own name or completely anonymously via the following channels:

- Manager, HR department, works council members (in person, by phone, post, e-mail)
- Whistleblower portal: https://whistleblowersoftware.com/secure/Bell-Compliance

All information and reports are important. This is the only way to counteract violations at an early stage and to protect the company and, in particular, the person or group of people affected.

6.2 Protection of whistleblowers

All information and reports will be treated in the strictest confidence and will be received by persons who are bound to secrecy. Regardless of the type of report, the whistleblower is guaranteed at all times that no disadvantages or discrimination are to be feared as a result of the report or complaint.

Disregarding the confidentiality requirement or discrimination will not be tolerated in any way and itself constitutes a serious violation 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 are not tolerated at any level or in any area. Every violation or indication of a violation is conscientiously investigated, the cause is determined and corrective and preventive measures are initiated immediately. Depending on the type and severity of the violation, consequences under (employment) law may be expected.

7 Other commitments

In addition to the obligations of this Code of Conduct, we describe further aspects and requirements of Bell Flavors & Fragrances GmbH in our mission statement, our QM manual, the Bell guidelines and company agreements, our terms and conditions of purchase and business, which must be complied with by all parties involved and addressees.