

Bel UK Modern Slavery and Human Trafficking Policy

Statement for Financial year ending 31st December, 2022

Context

Bel UK is a subsidiary of the Bel Group. We have been present on the UK market since 1929.

Bel is a family business, built on a long term vision, with the respects of ethics and sustainability as a prerequisite of all its activities.

The Group has become what it is today thanks to a very strong relationship with people, both its employees and its consumers.

Our employees are our first asset. We foster an environment of care and development to allow this fantastic diversity and force to support the growth of our business.

Our brands are our flagship to connect with our consumers and create an environment of trust and confidence, underpinned by food safety and sustainability.

We condemn modern slavery and human trafficking and enforce a dedicated approach within our business and our business partners.

Bel UK Imports and markets Bel branded cheeses in the UK and Ireland, in particular Mini Babybel, The Laughing Cow, Boursin, Port Salut and the fruit pouches GoGo Squeeze. With an annual turnover in 2022 of £119 million, Bel UK sources its products only from Bel group factories in France, Poland and Slovakia. To support our activity on the UK and Irish markets, we work closely with partners in particular in marketing, in warehousing and transport.

Our Values

Our business model is built around 3 core values:



These values are embedded at every level of our business and support our policies. Modern Slavery and human trafficking are no exception.

Commit

We are committed to play our part to eradicate modern slavery and human trafficking

As a signatory of the United Nation Global Compact since 2003 Bel, supports and promotes its Ten Principles on Human rights, labour, environment and anti-corruption.

As clearly stated in our Code of Conduct, we fully endorse and support the principles enshrined in the Universal Declaration of Human Rights as well as in the Fundamental Conventions of International Labour Organization's (ILO).

Our policies

- Code of conduct
- Sustainable Purchasing Charter

As part of the Bel Group, Bel UK is fully aligned with the Group policies ([see Chapter 3 of Annual report available on www.groupe-bel.com](#)).

- Our employees are being trained to our Code of good business Practices
- They apply our purchasing policy so that our business partners are clear on our requirements with our responsible purchasing charter.
- We share with our suppliers our code of good business practice and policies
- We require our business partners to demonstrate their ethical and sustainability engagement namely by working with EcoVadis (a worldwide suppliers sustainability evaluation and management platform) or equivalent, to continuously improve performance in this field.
- We also contribute to cross-industry efforts on tackling Modern Slavery through our participation to AIM Progress since 2016.

Care

We care about our people and society in general. Bel is taking care of the opportunity of each individual to flourish and contribute to the business to the best of its abilities. We have clear HR policies aligned with UK laws and regulations. In addition to these, and in order to reaffirm our approach to the eradication of modern slavery and human trafficking,

- A group dedicated risk mapping has been done. In fact, Bel UK (and all Bel Group's subsidiaries ran in 2017 a project aimed at detecting and measuring the risk of human rights violations, focusing on the risks of modern slavery, forced labor, child labor, and violations of individual health and safety, and freedom of association. Dedicated action plans were drawn up after analyzing the risk mapping. In 2019, the Group updated its mapping of human rights violation risks, which showed an improvement in the management of those risks, thanks to the addition of new control points focused on compliance with the Group's policies in this area.
- We have reinforced our requirements towards Group suppliers (introduction of a Human rights assessment through EcoVadis Platform and through a dedicated process for the group investments)
- From the start of the tendering process, all suppliers receive copy of the Group's Sustainable Purchasing Charter. To ensure suppliers comply with the Charter and with the Code of Good Business Practices, a "CSR and ethics"

clause is inserted in call for tenders, contracts signed with suppliers and the Group's general terms and conditions of purchase. This clause was revised in 2019 to strengthen suppliers' compliance with ethical rules and the performance of due diligence vis-à-vis their supply chain and to define the consequences in the event of negligence on their part

- We monitor the continuous improvements of our suppliers via the assessments they will publish on the EcoVadis platform.
- Where Bel UK partners are not members of EcoVadis, Bel UK will encourage them to join this environment and in the meantime, we will monitor their progress via self-evaluations.
- We have raised awareness amongst our staff to recognise signs of potential modern slavery or human trafficking
- We foster an environment where should suspected practices of modern slavery or human trafficking be identified, individuals can share their concerns easily, and in confidence through the Group alert system.
- We pledge to investigate any allegations of Modern Slavery or human trafficking thanks to a digital tool that allows us to continuously monitor any allegations or sanctions of any risky suppliers. In 2021, the Group implemented a digital tool allowing a global analysis of its portfolio to identify suppliers requiring deeper diligences based on a theoretical risk. This tool gives access to detailed reports based on this theoretical risk analysis and gives support to decision to maintain or not a business relationship with the concerned supplier. The suppliers risk mapping will be updated in 2022 based on this global portfolio analysis with whom Bel would have had a business flow the previous year. In addition, a dedicated development of the digital tool has been launched in 2021 to encompass "compliance profile" of the supplier when listing is considered before integrating it to the supplier portfolio. (
- We regularly reassess the effectiveness of these policies by reviewing our risk assessment and any changes, which could create gaps of opportunities to these malpractices.

Dare

The successful eradication of modern slavery can only be achieved by cooperation between business partners throughout the supply chain. The Bel Group is committed to challenge its business partners with direct consequences on its engagement with them.

We will challenge any business partner who we believe foster environment where modern slavery and human trafficking can thrive thanks to KYC (Know your Customer) tools implemented at Group Level. Should we identify malpractice, we will develop a coordinated action plan to redress the situation within a maximum of 12 months. Should our partner fail to implement this program successfully within this time frame, we will stop our relationship with this business.

Benoit Dadolle

Bel UK Chief Executive

