



Bell Flavors & Fragrances

**FIGHTING AGAINST FORCED LABOUR
AND CHILD LABOUR IN SUPPLY
CHAINS**

Annual Report 2025

May 30th, 2026



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1. Introduction and Context

Bell Flavors & Fragrances (Canada) Co. (“**Bell**”) is submitting its third annual report in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”),¹ enacted in 2023. This report covers the measures, governance mechanisms, and practices implemented during the 2025 fiscal year, ended December 31, 2025, to combat “forced labour” and “child labour” in the production of goods in Canada or abroad, as well as in goods imported into Canada (the “**2025 Report**”).

The 2025 Report is an original document and not a revision of a previously submitted report for 2025. Bell is not subject to additional reporting requirements under supply chain legislation in force in other jurisdictions.

For the purposes of this report, the terms “Bell,” “we,” “our,” “us,” and the “Company” refer to Bell.

2. Overview of Measures to Prevent and Reduce the Risks of Forced Labour and Child Labour in 2025

Year after year, Bell makes efforts to preserve and foster an organizational culture based on respect for human rights and responsible labour practices, both within our operations and throughout our global supply chain. We work actively with our partners—suppliers, employees, and external stakeholders—to raise our ethical standards and strengthen transparency throughout our supply chain.

In order to eliminate, as much as possible, any risk of forced labour or child labour in our production chain in Canada and internationally, as well as in the goods we import, we seek to identify, prevent, and reduce such risks to the extent reasonably possible. To this end, we maintained a set of structured actions throughout the fiscal year ended December 31, 2025. These measures are intended to prevent human-rights infringements, strengthen our due diligence mechanisms, and increase our ability to detect and manage risks across our supply ecosystem. These measures include:

- Gathering information on all worker recruitment in Canada and implementing internal controls to ensure that all workers are recruited voluntarily. This includes, among others, conducting business exclusively with recruitment agencies that have their mandatory license from the Quebec’s Commission for Labour Standards, Pay Equity and Occupational Health and Safety (CNESST). A mandatory license issued by Quebec’s

¹ L.C. 2023, ch. 9.

CNESST provides assurance to employers that the agency operates in compliance with applicable labour laws and regulatory standards;

- Developing and implementing statements against forced labour and child labour in our employees' Code of Ethics and Business Conduct;
- Developing and implementing due diligence policies and processes, including a Human Rights Policy described in further detail in section 4 of this report, to identify, address, and prohibit the use of forced labour and/or child labour in the organization's activities and supply chains;
- Requiring suppliers to put in place policies and procedures to identify and prohibit the use of child labour and/or forced labour in their activities and supply chains. As of 2024, we require each supplier to review and formally acknowledge our Supplier Code of Conduct, which prohibit such practices. Their acknowledgement is mandatory to conduct business with Bell. By signing this Code, suppliers confirm that they adhere to the same principles and have appropriate mechanisms in place to prevent, detect, and eliminate forced labour and child labour within their own operations and across their supply chains;
- Developing and implementing forced labour and child labour clauses in all of our standard terms and conditions applicable to each and all purchase orders. These clauses are intended to clearly communicate our expectations to suppliers, reinforce our commitment to ethical sourcing, and ensure that prevention measures are contractually embedded in our procurement processes. By formalizing these requirements, we strengthen accountability across our supply chain and help mitigate the risk of forced and child labour in all transactions.

The remainder of this report provides further details about the Company, its supply chain, and the measures established and applied by Bell in 2025 to prevent and reduce the risk of forced labour or child labour within its operations and supply chain.

3. Company Structure and Supply Chain

a. Understanding Our Company's Structure and Activities

Incorporated under the *Companies Act* of Nova Scotia², Bell is a family-owned business that has built a strong reputation through the superior quality and innovative nature of its products. Guided by values of commitment and responsibility, we strive to conduct our business using sustainable

² R.S.N.S. 1989, ch. 81.

and ethical practices at all times. Our head office is located in Nova Scotia, Canada, and we also operate a manufacturing site located in Brossard, Province of Quebec, Canada.

At Bell, we operate in the chemical industry through the following five main departments:

- Flavors – Flavors in liquid, powder, spray dry, and paste forms, and our technology capabilities include flavor enhancers and modifiers, masking agents, bitterness suppressors, heating and cooling agents, salt reducers, and replacers/extenders for vanilla, cocoa, honey, and sweeteners.
- Fragrances – Fragrance creations, oil or water soluble, encapsulates, and dry blends for personal, fine, fabric, home, air, or pet care products.
- Botanical Extracts – Belltanicals® offers botanical extracts, Essential Infusions, all-natural essential oil blends, certified organic extracts, and NOP-certified organic essential oil blends for personal and home care and food grade products.
- Ingredient Specialties – Commercial quantities of raw materials for flavors and fragrances including natural chemicals, aroma specialties, aroma chemicals, and citrus concentrates.

We are proud to be among the companies that have signed the Sustainability Charter of the International Fragrance Association (IFRA), developed jointly with the International Organization of the Flavor Industry (IOFI). This charter is based on a life-cycle approach to sustainability and sets out clear areas of action, supported by 17 specific amendments. These include, among others, responsible sourcing, reducing the environmental footprint, product health and safety, employee well-being, transparency, and collaboration with key partners. Although these commitments are voluntary, Bell adopts them as a reference framework in order to contribute actively to the advancement of sustainable practices in its sector.

In addition, our company is a “Corporate B” member of Sedex, the world’s largest platform for sharing ethical data and recognized audit programs. This membership reflects Bell’s commitment to operating responsibly, promoting ethical sourcing, and supporting the continuous improvement of social standards and working conditions throughout its supply chain.

b. Mapping Our Supply Chain

Bell’s activities take place in an international context, with its supply chain serving Canada as well as several foreign markets. Its sourcing areas include, without limitation, Germany, the United States of America, Mexico, China, Brazil, and Singapore.

In addition to acquiring finished products from its subsidiary in the United States of America, which are subsequently relabeled and marketed in Canada, Bell uses various raw materials to manufacture flavour preparations intended for the food industry. Diversifying its sources of supply

enables the Company to maintain a steady and reliable supply of products that meet the required quality standards and are delivered within prescribed timelines. Purchasing decisions are based on criteria of optimal quality and economic competitiveness. To that end, Bell requires its suppliers and any intermediary involved to provide comprehensive documentation attesting to product quality and compliance with applicable regulatory requirements, including food safety standards and respect for human rights.

The Company sources approximately seventy-five percent (75%) of the raw materials required for its operations—namely aromatic compounds, essential oils, and commodities—from manufacturers and distributors located primarily in the United States of America. The balance of raw materials is acquired from companies located in Canada. Since certain raw materials are repackaged by the manufacturers and distributors with whom the Company does business, their origin may vary and include various countries around the world, including, without limitation, Argentina, France, Poland, Viet Nam, and Madagascar.

Bell continues to work to identify and report the source countries or regions of origins of each of the goods used in its supply chain through the obtention of the Certificate of Origin (COO). For continuous improvement, we encourage our suppliers to join SEDEX, while also streamlining our supplier base to partner with reliable and trusted organizations.

4. Due Diligence Policies and Procedures

Bell has embedded responsible business conduct principles at the core of its internal policies and management mechanisms, with an aim to preventing and reducing risks associated with the use of forced labour and child labour, both within its own activities and throughout its supply chain. These principles are incorporated into the following instruments:

- a) **Employees' Code of Ethics and Business Conduct:** each Bell employee is required to sign a code of conduct as part of their engagement with the Company. This document expressly provides that the use of child labour and forced labour is strictly prohibited, both within the organization and among its partners and suppliers. Implemented years ago, its content is clearly explained to employees as part of their onboarding process. This approach helps raise awareness about the importance of preventing forced and child labour both within our organization and across our supply chain and equips employees with the knowledge needed to make informed and responsible decisions;
- b) **Human Rights Policy:** this policy formalizes Bell's efforts to respect, promote, and protect human rights in all countries where the Company operates. It is made available to employees at all times electronically and provided to customers upon request. It reaffirms

the prohibition of any form of child labour or forced labour within the business and its supply chain;

- c) Terms and conditions of our purchase orders: all purchase orders issued by the Company incorporate terms and conditions containing specific clauses explicitly prohibiting the use of forced labour as well as child labour;
- d) Supplier Code of Ethics and Conduct: adherence to this code is a prerequisite for the approval of any supplier by our quality team. To this date, all active Bell suppliers have confirmed their efforts to comply with the fundamental principles set out therein, including ethical sourcing practices, the prohibition of child labour and forced labour, and the maintenance of fair, safe, and health-respecting working conditions;
- e) Child Labour Policy: this policy complements the codes and policies mentioned above. It clearly defines the remediation measures applicable in the event of non-compliance, which may include awareness activities, the development and implementation of a corrective action plan with follow-up audits to assess progress achieved, and, where applicable, the removal of a delinquent supplier from the approved supplier program when no sufficient improvement is observed.

While the Company considers that the policies, codes, and mechanisms described above provide a framework for due diligence aimed at preventing forced labour and child labour in its operations and supply chain, Bell remains prepared to assess, as needed, whether it would be appropriate to strengthen or supplement these measures by adopting additional policies or processes in order to further consolidate its commitment to ethical and responsible sourcing.

5. Identified Risks of Forced Labour and Child Labour

Bell acknowledges that the *List of Goods Produced by Child Labor or Forced Labor*, published by the U.S. Bureau of International Labor Affairs and updated in September 2024, identifies certain raw materials used by the Company, including fruit juice concentrates and vanilla. However, the Company believes that the existing control mechanisms and measures mitigate these risks and their effectiveness is subject to ongoing evaluation and improvement. Furthermore, Bell maintains a proactive and attentive posture with respect to any emerging risk, reflecting its efforts to continuously strengthen its responsible and ethical sourcing practices.

6. Risk Assessment and Management

At the beginning of December 2024, our plant underwent a three-day Sedex Members Ethical Trade Audit (SMETA) conducted by the BFSI group. The audit assessed the Company's performance in the areas of labour, health and safety, environment, and business ethics through a site inspection, a document review, and staff interviews. The three improvement recommendations raised by the auditor were implemented in 2025 and are detailed in section 7 of this report.

One of these recommendations led to the development and implementation of a policy specifying the corrective measures to be applied should a concerning situation involving a supplier arise, as mentioned in section 4e. Based on the information available to Bell, no instances of forced labour or child labour were identified within the Company or its suppliers during 2025. Consequently, the measures set out in that policy were not implemented. Bell nevertheless continues to monitor risks through its supplier oversight, audit processes, and internal review mechanisms, and remains vigilant and attentive to any situation that may arise.

7. Corrective and Remediation Measures

Consistent with its values of integrity and responsibility, Bell makes efforts to address any issue that may arise in its operations or supply chain.

As mentioned in section 6, following receipt of our SMETA audit report, the three non-conformities identified were addressed and corrected as quickly as possible. The points raised and the corrective actions implemented are detailed below:

- 1) There is no written policy specifying how child labour should be remediated, or the policy is not aligned with ILO guidance.

Although the Company had policies in place prohibiting child labour as well as robust age-verification procedures, no formal policy had been developed describing the remediation measures to be applied in the event a child was identified in its own workplace or at its suppliers.

As of January 2025, corrective actions were taken, including formalizing and bringing into force a Child Labour Policy, described in more detail in section 4 of this report.

- 2) The organization does not have a confidential reporting procedure (whistleblowing).

Although the Company applies a general open-door policy allowing workers to report any breach of the Code of Ethics and Business Conduct, the site did not have a complaint mechanism that allowed anonymity. To address this gap, the Company implemented an anonymous suggestions/complaints policy, which was communicated to all employees as of January 2025, thereby offering a new fully confidential alternative.

- 3) Communication of the Company's Human Rights Policy.

This was addressed by posting the policy on a platform accessible to all Company staff. Everyone was informed of this addition in December 2024, and an acknowledgement of receipt was requested.

These improvements, implemented promptly, demonstrate that the Company makes ongoing efforts to identify the need for corrective measures and is prepared to take appropriate action should other issues be identified in the future.

8. Impact on Vulnerable Families

At Bell, protecting families is a core value. As such, we pay particular attention to the risks that forced labour and child labour may pose to vulnerable family populations. While we did not identify, based on the information available to the Company, any risks in 2025 relating to impacts on vulnerable families within our supply chain, we remain vigilant. Should such issues be identified in the future, we commit to intervening promptly and with the necessary rigour to implement appropriate corrective measures.

9. Employee Training

Bell is fully aware of its corporate social responsibility. In 2024 and 2025, all employees involved in purchasing activities, regardless of their hierarchical level, received specific mandatory training on the prevention and consequences of child labour and forced labour in the supply chain. Bell is working on a refresher of this training to the same staff yearly. The Company also promotes a culture of integrity and social responsibility among its staff.

10. Assessment of Policy Effectiveness

Bell recognizes the importance of having policies and procedures in place to assess the effectiveness of ensuring that forced labour and child labour are not used in its activities and supply chain. While formal mechanisms specifically related to forced labour and child labour are not currently in place, the Company remains open to feedback and opportunities for continuous improvement in order to enhance its ethical sourcing practices.

Bell applies a risk-based and proportionate approach to responsible sourcing, focusing its efforts on areas of greatest potential impact. In 2025, Bell prioritized the assessment of its top ten suppliers, representing approximately 90% of its annual raw material purchases, as part of building a structured and scalable due diligence framework.

Short-term (next 12 months)

Bell is in the process of formalizing its supplier evaluation framework and related KPIs, including:

- Percentage of suppliers aligned with Bell's Supplier Code of Conduct
- Integration of ESG criteria into supplier performance evaluation and monitoring

In 2025, Bell did not officially develop detailed medium- and long-term plans to ensure year-over-year progress in identifying, preventing, and managing risks. However, the Company remains open to developing them in order to better structure its approach.

11. Conclusion and Future Outlook

In conclusion, Bell remains committed to upholding the highest standards of ethical conduct and respect for human rights throughout its operations and supply chain. We recognize that this commitment is a continuous and evolving process, and we remain open to suggestions and constructive feedback. Together, we can help build a world where businesses thrive while respecting the fundamental rights of all.



12. Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity identified above. To the best of my knowledge, and after exercising due diligence, I confirm that the information contained in the report is true, accurate, and complete in all material respects for the purposes of the application of the Act, for the reporting year referenced above.

This 2025 Report is approved pursuant to paragraph 11(4)(a) of the Act.

I attest to the foregoing in my capacity as President, CEO, and a member of the Board of Directors of Bell, for and on behalf of the Board of Directors of Bell.

I have the authority to bind Bell.

Ronald J Stark

Full name: Ronald J. Stark

Full name: Ronald J. Stark

Title: President, CEO, and Director of Bell
Flavors & Fragrances (Canada) Co.

Date: May 28, 2026

Signature: 
Ron Stark (May 28, 2026 11:28:08 CDT)

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