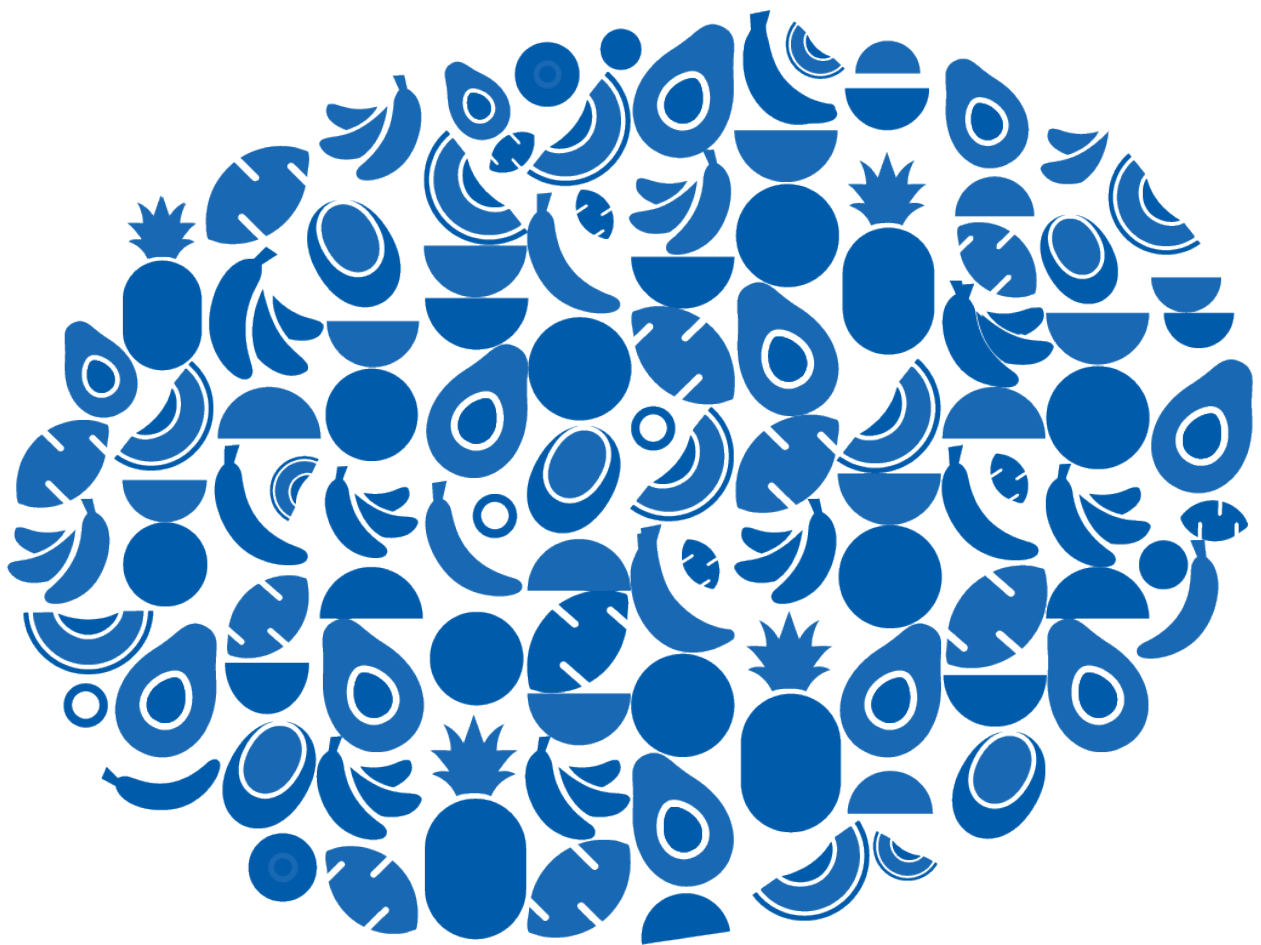




Global Human Rights Policy



INTRODUCTION

The Fyffes Principles, our Code of Conduct, outlines our commitment to respect all international human rights. Fyffes is committed to respecting people's rights and will actively address any adverse human rights impacts we cause or contribute to.

This Policy enacts the Fyffes Principles concerning human rights. Fyffes is dedicated to upholding human rights and ensuring fair and ethical treatment of employees and communities impacted by our operations throughout the Company's supply chain. For this, we are guided by the following:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- ETI Base Code
- United Nations Guiding Principles on Business and Human Rights
- International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and other applicable ILO conventions

Fyffes operations encompass numerous countries, cultures and ways of doing business. While we respect those differences, the scope of this Policy covers our entire value chain, including joint ventures where Fyffes has operational control. We recognise that achieving these standards presents unique challenges in different parts of the world.

This Global Human Rights Policy reinforces our commitment to conducting business responsibly wherever we operate.

Fyffes Global Human Rights Policy is aligned with the Human Rights Policy¹ of our parent company, Sumitomo Corporation.

Please take the time to read and understand this Policy and take advantage of the training provided



Helge H. Sparsoe
Fyffes Chief Executive Officer

1. <https://www.sumitomocorp.com/en/jp/sustainability/csr#02>

POLICY

1. In countries where Fyffes operates and where local regulations may be less stringent than international human rights standards, Fyffes will apply international standards.
2. Fyffes commits to respecting and supporting internationally recognised human rights standards in its operations and how it conducts business and engages with stakeholders.
3. Within our activities, Fyffes is committed to positively impacting human rights. We are dedicated to avoiding any actions that could cause or contribute to adverse human rights impacts, and we will address such impacts if they occur. Fyffes will take appropriate measures to identify, prevent, and mitigate risks or address adverse human rights impacts in our operations.
4. Fyffes commits to paying special attention to the rights of vulnerable groups, including, but not limited to, children, women, people with disabilities, indigenous peoples, and migrant workers.

SCOPE

5. This Policy applies to all Fyffes officers, directors, employees (permanent, fixed-term or temporary), subsidiaries and affiliates (collectively, employees). Employees must understand and uphold this Policy regardless of their position, geographical location, or level of responsibility.
6. This Policy applies to all employees where Fyffes has operational control of the entity to which the employees are contracted.
7. This Policy applies to suppliers, consultancies, agencies, and contractors on a Fyffes operational site, such as a farm, pack house, ripening centre or corporate office.

MISCONDUCT

8. For this Policy, a lack of respect for basic human rights such as the fair and ethical treatment of employees and the communities where Fyffes operates is referred to as *misconduct*, and it may invoke disciplinary proceedings up to and including dismissal.
9. Misconduct regarding the right to diversity, inclusion and non-discrimination can be found in [Fyffes Global Diversity and Inclusion Policy](#).
10. Misconduct regarding the right to health and safety can be found in [Fyffes Global Health and Safety Policy](#).
11. Misconduct regarding violence, harassment, intimidation and other unsafe or disruptive conditions can be found in [Fyffes Global Anti-Violence and Harassment Policy](#).

12. Employees are free to form, join, or not join a labour union. Fyffes does not interfere with employees' right to form, join, or not join a labour union, without fear of reprisal, intimidation, or harassment.

13. Fyffes prohibits any form of child labour and forced labour - including prison labour, indentured labour, bonded labour, military labour, and slave labour - and any form of human trafficking or exploitation in line with the ILO Convention and Universal Declaration of Human Rights, the Convention on the Rights of the Child and the Palermo Protocol².

Fyffes is committed to the *Employer Pays Principle*, meaning that workers must not pay for their employment in the form of recruitment fees and related costs (as defined by the ILO), and all costs related to employment and recruitment must be borne by the employer. Fyffes will work with its owned operations and suppliers to ensure any recruitment cost currently paid by the worker is covered by the employer.

COMMUNICATING AND IMPLEMENTING THIS POLICY

14. This Policy is communicated to all employees via email and training.

GOVERNANCE

15. Fyffes Board of Directors is responsible for reviewing and approving this Policy. The Board of Directors is supported by the Chief Corporate Affairs Officer, who is responsible for human rights risk management and implementing this Policy throughout Fyffes operations.

RESPONSIBILITIES OF FYFFES EMPLOYEES

16. Everyone within Fyffes operations has a responsibility to respect human rights in general as stated in this Policy and to respect and follow other related company policies and procedures, including the Global Diversity and Inclusion Policy, Global Health and Safety Policy, Global Anti-violence and Harassment Policy, as well as freedom of association and anti-slavery measures.

17. Employees must familiarise themselves with the policies that concern human rights and attend training sessions provided.

RESPONSIBILITIES OF MANAGERS AND SUPERVISORS

18. Managers and supervisors have special obligations to prevent and deter misconduct and must:

2. ILO Convention 29 on Forced Labour; Article 4 of the Universal Declaration of Human Rights and Art. 8 of the International Covenant on Civil and Political Rights; Article 2 (4) and Articles 4 to 8 of the International Labour Organization Minimum Age Convention, 1973 (No. 138); Article 3 of the of the International Labour Organization Worst Forms of Child Labour Convention, 1999 (No. 182); Convention of the Rights of the Child; Article 3 of the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Org.; Article 2 (2) of the International Labour Organization Forced Labour Convention, 1930 (No. 29) or with Article 8 (3) (b) and (c) of the International Covenant on Civil and Political Rights

- a. Create a safe and harmonious working environment, free from human rights abuses and misconduct. To achieve such an environment, managers and supervisors must act as role models by upholding only the highest standards of conduct
- b. Communicate this Policy to all Fyffes employees, ensure that they undertake relevant mandatory training courses, and act as a resource for Fyffes employees and external employees, such as contractors or consultants
- c. Address, report and escalate alleged incidents of misconduct consistent with the local or Fyffes Principles Grievance Procedures. Consult your local HR representative for support, as required
- d. Address reported incidents of misconduct through appropriate channels. In such cases, managers and supervisors must demonstrate fairness and impartiality, and be free from intimidation or favouritism
- e. Handle all discussions, communications and actions with discretion, sensitivity, and confidentiality
- f. Take appropriate action to protect Fyffes employees from retaliation

RESPONSIBILITIES OF FYFFES

19. Fyffes treats its employees with dignity, honesty and fairness and prohibits unequal treatment in employment.
20. Fyffes is committed to a working environment that promotes diversity and equal opportunity, where there is mutual trust and respect for human rights, as described in [Fyffes Global Diversity and Inclusion Policy](#).
21. Fyffes respects the right of all workers to freedom of association and collective bargaining.
22. Fyffes is committed to keeping its business free of child labour and modern slavery, including debt bondage and human trafficking. If child labour or any form of modern slavery is detected, Fyffes will work with necessary partners and authorities to take immediate remedial action³.
23. Fyffes does not tolerate discrimination in the workplace nor any form of bullying or harassment, whether psychological, verbal, physical or sexual, as described in [Fyffes Global Anti-Violence and Harassment Policy](#).
24. Fyffes respects the right to freedom of thought, conscience and religion
25. Fyffes is committed to providing healthy and safe working conditions. Fyffes adopts appropriate practices to prevent threats to human life, health, and welfare in its operations and supply chain including fatigue (physical and/or mental) which has been identified as a risk and can be prevented with reasonable working

hours and rest breaks. Health and safety are everyone's responsibility, and everyone needs to look out for one another's physical and mental wellbeing in the workplace. Fyffes commitment is outlined in [Fyffes Global Health and Safety Policy](#).

26. Fyffes conducts all necessary due diligence before hiring security forces to protect the Company's premises. It also ensures that security guards operating at suppliers' premises act following universally recognised human rights standards, including guidelines on the use of force, and do not violate the rights of workers and communities.

26. Fyffes is committed to providing just and favourable work conditions including a fair wage (living wage or living income), and reasonable limitation of working hours in line with Article 7 of the International Covenant on Economic, Social and Cultural Rights. Fyffes measures and compares the wages of its employees and one of its suppliers' workers against the living wage annually.

27. Fyffes prohibits unlawful eviction or taking of land and recognises Indigenous peoples' rights.

28. Fyffes upholds the ETI Base Code as its primary code of practice for labour rights. All Fyffes workers on farms, corporate offices, ripening centres or any other Fyffes premises are provided with training and are required to align to the Code. Fyffes expects growers, suppliers, and business partners to abide by the ETI Base Code.

29. Fyffes shall make available appropriate training to all Fyffes employees to ensure awareness of key provisions of this Policy and expected standards of conduct.

DUE DILIGENCE

30. Fyffes carries out its human rights due diligence through Human Rights Impact Assessments, including modern slavery risks, annually to identify hotspots and steps in the value chain that might represent risks related to the infringement of human rights. Action plans are established to prevent or mitigate the risks identified through the Human Rights Impact Assessment.

31. An independent human rights expert consultancy conducted a baseline Human Rights Impact Assessment. Subsequent annual assessments are conducted by Fyffes using the same framework and methodology. Fyffes will employ an independent expert consultancy to evaluate its human rights risks, mitigation, and management every three years.

32. Fyffes will conduct human rights due diligence before establishing new business relationships.

33. Fyffes undertakes more detailed assessments of prioritised risks identified in risk analysis when more information is needed to mitigate or remediate.

3. Please refer to Fyffes Statement on Modern Slavery: <https://www.fyffes.com/modern-day-slavery-statement/>

Fyffes Global Human Rights Policy

34. Fyffes seeks ways to prevent or mitigate adverse human rights impacts directly linked to its operations, products, or services. Fyffes provides for or cooperates through, legitimate processes in the remediation of adverse impacts on human rights when Fyffes identifies it may cause or contribute to these impacts.

35. [Fyffes Due Diligence Policy](#) outlines in detail the Company's approach to due diligence and is available on our website.

REMEDIATION

36. Fyffes provides for legitimate, accessible, predictable, equitable, and transparent operational-level grievance mechanisms as outlined in the Fyffes Principles Grievance Procedures. This enables Fyffes to understand and address challenges in its operations and potential dissatisfaction among its stakeholders.

37. Any human rights breach identified through the Human Rights Impact Assessments or reported through Fyffes various grievance mechanisms, including the [Fyffes Ethics Hotline](#), will be remediated in a timely manner.

38. Fyffes monitors remediation progress regularly and measures the effectiveness of its preventive and mitigation actions.

STAKEHOLDER ENGAGEMENT

39. To seek and address stakeholders' perspectives, build trust and develop partnerships, Fyffes is committed to:

- a. Developing strong relationships through an established engagement plan and facilitating engagement processes favouring participative engagement
- b. Consulting stakeholders and acknowledging their concerns and interests in managing the risks and impacts that Fyffes operations can have on them. For more details, please refer to [Fyffes Global Stakeholder Engagement Policy](#)

REPORTING

40. Fyffes will publicly report the results of its operations' Human Rights Impact Risks Assessment, prevention and mitigation plans, and engage with its stakeholders to improve such plans.