



2024



# Modern Slavery Statement



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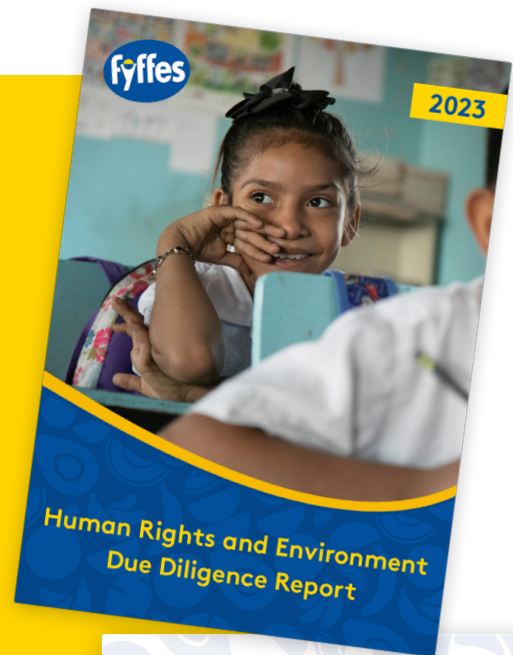
References



# Our Reporting suite

Our Modern Slavery Statement is part of our broader reporting suite and Global policies also related to this topic.

You can find these documents and others on [our website](#).



# About this statement

This is Fyffes seventh Modern Slavery Statement outlining how we manage slavery and human trafficking risks in our own operations and supply chain. This Statement was prepared in accordance with the UK Modern Slavery Act of 2015<sup>1</sup>, the California Transparency in Supply Chains Act of 2010<sup>2</sup> and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act of 2023<sup>3</sup>.

It covers the structure, operations and supply chain of Fyffes for the period ending on December 31, 2024.

Fyffes in the UK ("Fyffes Group Limited") is a wholly owned subsidiary of Fyffes International S.A (FISA).

Globally, Fyffes has policies and processes in place relating to modern slavery and human rights in our operations and supply chains that cover Fyffes Group Limited.

These policies are promulgated by, and on behalf of, FISA, which is the principal governing entity of the Fyffes group of companies, of which Fyffes Group Limited is part, and the entities within the group operate on a consultative basis.

This document provides a consolidated description of Fyffes actions to assess and address modern slavery risks.

References to Fyffes in this document refer to FISA. The process of preparing this statement involved the participation of a range of internal stakeholders across Fyffes. It has been approved by directors of the relevant reporting entities.





# Introduction

Fyffes is committed to maintaining the highest ethical business standards across its operations and does not tolerate any form of modern slavery or human trafficking. We understand that the risks associated with modern slavery and human trafficking are not static and we continue to adapt our approach to mitigating this risk on an annual basis, as described in our Statement.

In 2024, we released a new [Supply Chain Due Diligence Policy](#) and our [Supplier Code of Conduct](#), which we introduced to our key fruit suppliers at our first-ever Supplier Summit, held in October 2024.

We also made structural and functional changes to create a Responsible Supply Chain Department, independent from commercial considerations.

In line with our **Human Rights and Environmental Mitigation Plan**, we are actively working to improve our own operations and suppliers' Human Rights and Environmental Due Diligence (HREDD). These plans help us comply with, and stay ahead of, emerging human rights legislation globally and have a positive impact on people locally. Additionally, we are developing a self-assessment tool to assess the maturity of our suppliers' Human Rights and Environmental Due Diligence (HREDD), enabling us to collaborate with them in remedying any identified issues. We **hold our farms and suppliers accountable** for delivering against that plan.

We have conducted **in-depth independent HRIAs** in many of our owned farms as well as with our suppliers. We have also undertaken **independent community needs assessments at all the communities** near our own farms in Latin America, interviewing 2,200 people in 50 communities in five countries. This allows us to have a dialogue with our stakeholders, focusing on individuals or groups who may be more vulnerable or marginalised, such as migrant workers, children, women and girls, sexual and gender minorities, ethnic and racial groups and indigenous peoples. With every HRIA, we learn more, and we adjust our practices.

This statement was approved by the Fyffes International S.A. Board of Directors on 25 March 2024 and Fyffes Group Ltd Board of Directors on 24 March 2024.

# Fyffes Business and Supply Chains



Most of our business centres on three core products: bananas, pineapples, and melons. We also distribute an array of various exotic fruit. We source our products from more than 15 countries in Latin America, the Caribbean, and Africa, including 20 of our owned farms in Costa Rica, Belize, Honduras, Guatemala, and Ecuador.

Our shipping and distribution routes include 19 ports of loading, 24 ports of discharge, and 19 distribution and ripening centres in the US and Europe. Our fresh products are sold to more than 500 customers in 22 countries across Europe and North America. We have partnerships with over 80 fruit suppliers.



With over 8,700 permanent employees and 6,000 seasonal, we aim to build a world-leading company that cares deeply about how our produce is grown, harvested, and transported from farm to table, ensuring a positive commercial, social, and sustainable future. In general, Fyffes directly hires employees and contractors. The UK and Irish ripening centres require labour providers for a significant portion of our workforce whilst our distribution centres in the United States, use of labour agency workers is minimal.

Fyffes has spent over 100 years developing our farms while also building strong relationships with partner growers. This enables our growers to benefit from longer term agreements and pre-agreed prices and it enables Fyffes to invest in quality and support. It's about confidence and sustainable supply. We work with our partners to internationally recognised codes of practice that focus on worker welfare and environmental sustainability.





# Our Approach to Human Rights and Risks of Modern Slavery and Human Trafficking

Our approach to human rights is grounded in international standards, including the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles) and the Organisation for Economic Cooperation and Development's Guidelines for Multinational Enterprises (the OECD Guidelines), and enshrined in our Principles of Responsible Business Conduct (the Fyffes Principles). We welcome the Corporate Sustainability Due Diligence Directive, which we hope will create a level playing field and reward companies genuinely committed to improving human rights and environmental management in their supply chains.

The Fyffes Principles is a foundational document that provides a clear set of guiding behaviours we expect of our people and our leaders. These Principles and our new Supplier Code of Conduct include the requirement to be vigilant regarding forced or coercive labour, human trafficking, and child labour and to immediately report any suspicious activity.

Fyffes **Global Human Rights Policy** sets out our approach to protecting the human rights of all stakeholders, including our employees. In July 2021, we announced our target of 100% of Fyffes workers and supply chain workers to be trained on human rights by 2030; 100% of managers and employees by 2025. To date, 96% Fyffes employees and 16% fruit suppliers have completed the training. The training includes information for employees to understand better the importance of human rights and how they relate to the workplace. The training includes information relating to migrant workers, child labour, forced labour, slavery, and human trafficking, amongst others.

Fyffes has a **Global Child Labour Policy and Remediation Protocol** applicable to all Fyffes own and supplier operations. The policy clearly defines child labour, the minimum working age for Fyffes employees, and the definition of hazardous work for young people. In addition, it provides a clear protocol for remediating cases of child labour, including a list of reputable NGOs focusing on child labour by country/region.

# Due Diligence Processes in Relation to Slavery and Human Trafficking, Risk Assessment, and Management

## Human Rights Due Diligence

Fyffes seeks ways to prevent or mitigate adverse human rights impacts that are directly linked to our operations, business relationships, products, or services, including risks related to slavery and human trafficking. We provide for, or cooperate through, legitimate processes in the remediation of adverse impacts on human rights when we identify that we may cause or contribute to these impacts. Action plans are established to prevent or mitigate the risks identified through the Fyffes Human Rights Risks Prevention and Mitigation Plan.

We continually assess the actual and potential impact of our actions on human rights and the environment along our supply chain, on both a scheduled and ad-hoc basis. Our Due Diligence Policy outlines this process in more detail. We developed our approach to human rights due diligence in line with the UN Guiding Principles and the OECD Guidelines, with stakeholder engagement at its core (see Figure 1).

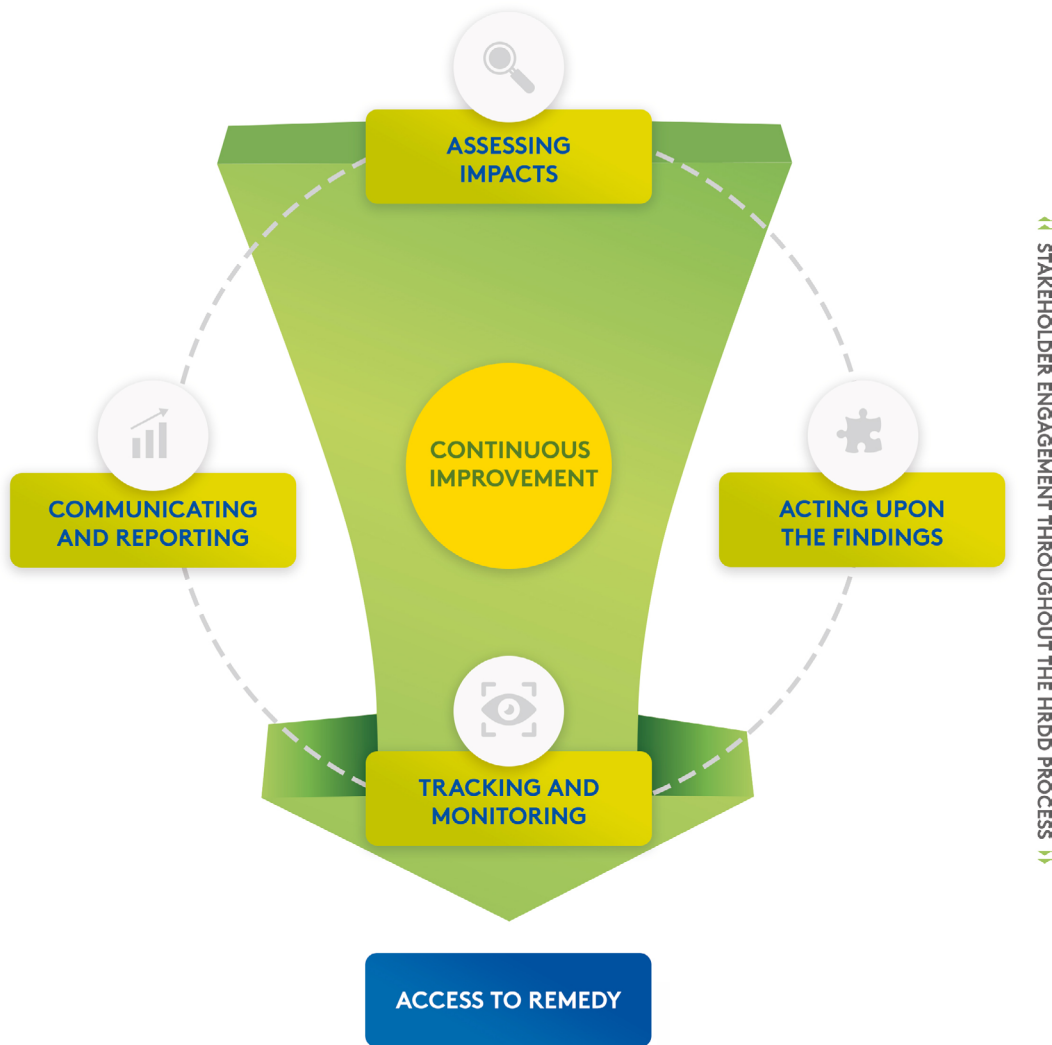


Figure 1



Every three years, we conduct an independent corporate-wide impact assessment with an experienced external business and human rights specialist. The assessment includes interviews with internal and external stakeholders, a review of external reports and media articles, and a detailed review of our policies and management systems and serve as a basis to update our salient human rights risks. A detailed description of each of our salient human rights risks can be found in our [2022 Human Rights Report](#).

Figure 2



We take a risk-based approach, including regular and ad-hoc site-level assessments when needed. Over 2024, we conducted a site-level external HRIA at our own banana farms in Belize as well as two suppliers located in Costa Rica.

The results of the company-wide impact assessments are integrated into our Corporate Mitigation and Prevention plan monitored by our Human Rights and Environmental Due Diligence Committee, which meets quarterly.

Corrective, preventive, and mitigation plans are developed with our sites and suppliers following audits or impact assessments.



For more details on our Human Rights and Environmental due diligence approach as well as progress on our Corporate Mitigation and Prevention plan, please refer to our [Supply Chain Due Diligence Policy](#) and our [Human Rights and Environmental Due Diligence Report for 2023](#).

## Responsible Supply Chain and Certifications

Our Responsible Supply Chain team conducts and participates in internal and third-party ethical and social audits, including Sedex Members Ethical Trade Audits (SMETA<sup>4</sup>), throughout a large proportion of our supply chain.

Fyffes is also the largest supplier of certified Fairtrade bananas in Europe, and we have a significant number of Fairtrade melons distributed in the United States. Fairtrade-certified farms are audited under the Fairtrade standards which incorporate a blend of social, economic, and environmental criteria. The standards contain both core requirements and development requirements aimed at improvements that benefit producers and their communities.

Similarly, Fyffes also produces or buys from many Rainforest Alliance certified farms. Currently, 100% of Fyffes pineapples and bananas produced on our owned farms, and one in two bananas overall, are certified by Rainforest Alliance.

In 2024, there were no forced labour or child labour non-compliances detected by audits on our owned or supplier farms.

## Fruit Supplier Onboarding and Risk Management

Our Fruit Supplier Onboarding and Risk Management Procedure is an internal document that evaluates suppliers against a weighted assessment of financial, legal, food safety and quality, geopolitical, certification non-compliance, security, environmental and reputational risks. These risks are additionally assessed against the commercial relationship between Fyffes and the supplier to create a score which informs our due diligence approach.

Fyffes has developed a risk-based approach to supplier due diligence, requiring enhanced due diligence for higher risk suppliers, standard due diligence for medium risk suppliers and minimum due diligence for low-risk suppliers.

All suppliers are required to sign the Supplier Code of Conduct or have an equivalent and must agree to the Due Diligence Policy and this commitment is reflected in the legal contracts with them.

This new evaluation process was agreed in 2024 and communicated to large fruit suppliers and will be implemented across all suppliers by 2027.

## Child Labour

Millions of children around the world are trapped in child labour<sup>5</sup>, depriving them of their childhood and education, risking their health and safety and condemning them to a life of poverty. Many children are stuck in unacceptable work for children — a serious violation of their rights.

Fyffes is committed to keeping our business free of modern slavery, including child labour, debt bondage, and human trafficking. Fyffes minimum age of employment is 16 years of age or over the age for completion of compulsory education or the country's legal working age, whichever is higher. In addition, employees under 18 are not employed in hazardous work conditions, as defined by the ILO. Fyffes ensures this policy is applied by communicating the policy to all employees and suppliers.

Our [Global Child Labour Policy and Remediation Protocol](#) ensures we can act swiftly and sensitively in the 'best interest of the child' in any potential case. The remediation protocol defines a set of operational principles and procedures on how to respond if child labour is ever encountered and applies to all children in all work situations in our operations and in potential cases that we are linked to by our business relationships and along our supply chain. This includes permanent, temporary, or casual labour, whether directly or indirectly (i.e. via agencies) employed by the management of the workplace, as well as children who have been trafficked or sold into work.

Although we have yet to identify any incidence of child labour in our operations, there is a higher risk with suppliers, particularly smallholder farms.

Our HRIAs concluded that child labour is a salient risk in our business of medium priority where opportunities to strengthen our current management of this risk have been identified.



Risks identified via the risk assessment methods are included in our Human Rights and Environmental Prevention and Mitigation Plan. This plan is overseen by Fyffes Human Rights and Environmental Due Diligence Committee, which meets quarterly, and the progress of this plan is reported to our Executive Leadership Team and FISA Board of Directors. In addition to identifying risks via our HRIAs, we used UNICEF's Children's Rights and Business Principles to assess risks to child rights within our supply chain.



**For a detailed list of our mitigation actions to address child labour risk as well as the results of the UNICEF's Children's Rights and Business Principles assessment we conducted, please refer to our [Child Labour Due Diligence in the Supply Chain Report](#).**

## Responsible Recruitment & Forced Labour

Recognising the scale of our value chain and the inherent complexities involved in global agricultural supply chains, we have identified several worker groups that have a higher risk of experiencing modern slavery or forced labour. These groups include migrant workers, women, young workers, and temporary and contract workers in Latin America.

Modern slavery, forced, or bonded labour is any work or service that is exacted from any person under threat of any penalty and for which that person has not offered themselves voluntarily. Forms of modern slavery can be subtle and may include mandatory overtime, limitations to movement, and deceitful forms of recruiting and contracting. Any suspicious activity in relation to forced or coercive labour, human trafficking or child labour should be reported immediately.

We also audit the labour providers we work with. Fyffes has developed a Labour Provider Standard, which includes the minimum requirements for labour providers to comply with when supplying labour to Fyffes. It includes business practices, recruitment, terms and conditions of employment, prevention of modern-day slavery, training, selection of staff to work at Fyffes, supply of staff to Fyffes and health and safety.

In 2021, we signed an agreement with Fairtrade International, the Latin American and Caribbean Network of Fairtrade Small Producers and Workers (CLAC), and other partners to develop the Migrant Roadmap towards equal rights, benefits, and decent working conditions. The roadmap's progress has been slow due to the political and social crisis in Haiti and its impact on the documentation requested for regularisation. [The Migrant Roadmap](#) conducted two studies — The Socio-economic and Impact Study of the Banana Industry on the Dominican and Haitian Economy and the analysis of the Survey on the Working and Living Conditions of Banana Workers in the Dominican Republic. The findings are to support banana producers and the migrant roundtable in discussions with governments and enable investments in better working and living conditions for workers, particularly migrants and women. In 2025, training will be provided to workers on labour and immigration laws, social dialogue and negotiation skills and the inclusion and integration of migrant workers.

In 2024, we reviewed our employees' application process and associated costs in our own farms. As a result, we now reimburse costs associated with photocopies, background or medical checks required as part of the application process to reduce the financial burden associated with recruitment of seasonal workers in our melons farms.

We are also in the process of reviewing our labour providers risk analysis, onboarding and due diligence requirements to ensure responsible recruitment and respect of the workers employed via labour agencies.

## Training

Fyffes has been actively training its employees on human rights. All new employees are furnished with a copy of the Fyffes Principles, which they must read and sign. During 2024, all employees took part in training on the Fyffes Principles, which is also available on [YouTube](#). We have also trained 96% of our employees on human rights and made available the same training to our suppliers.

In March 2025, Fyffes will provide training to its fruit suppliers on its Supplier Code of Conduct.



# Action Taken to Address Modern Slavery

## Grievance Mechanisms

Fyffes provides legitimate, accessible, predictable, equitable and transparent operational-level grievance mechanisms aligned with the UN Guiding Principles as outlined in the Fyffes Principles Grievance Procedures. This enables us to understand and address challenges in our operations and potential stakeholder dissatisfaction.

Employees or stakeholders who believe misconduct, in contradiction of the Fyffes Principles, has taken place can report their concerns through existing grievance mechanisms, including contacting the local manager, in the case of employees their immediate supervisor or line manager, their human resources representative or workers' representative, or anonymous suggestion boxes where they exist.

If this is not an option, for any reason, stakeholders and employees can contact the Fyffes Ethics Committee at [ethicscommittee@fyffes.com](mailto:ethicscommittee@fyffes.com). In addition, stakeholders can use the [Fyffes Ethics Hotline](#), an independently run, confidential business reporting hotline available to internal and external stakeholders where we have operations in their language. The hotline is provided by One Trust / Convercent and in theory complies with the UN Guiding Principles. We continually evaluate the hotline through local testing, and we have occasionally encountered issues with the lack of availability of Spanish speaking operators.

The Fyffes Ethics Hotline is confidential. Complainants using the hotline who choose to remain anonymous are provided with a unique identifying code so that the complaint can be assessed and investigated. If a complainant chooses to remain anonymous, this can reduce the speed and effectiveness of investigations.

All grievances are assessed by the Ethics Committee, which comprises senior management from the human resources, legal and compliance, and corporate affairs departments.



We do not tolerate any form of retaliatory action against anyone for reporting a concern or cooperating with an investigation. We will take all steps necessary to protect employees expressing an honest concern.

It is a violation of the Fyffes Principles to make on purpose a false accusation, lie to investigators, deny, or refuse to cooperate with an investigation related to these Principles. Doing so could lead to disciplinary measures. The Ethics Committee assesses, investigates, and agrees on an action plan, and resolves and reports on complaints to the Board of Directors and our parent company Sumitomo, as outlined in our grievance procedures.

The time necessary to handle and resolve complaints may differ depending on the complaint's scale, complexity and geographical origin, and complaints will be resolved in the shortest possible time frame.

The Ethics Committee will either investigate the nature of the complaint or appoint a team to do so.

When the investigation is complete, the Ethics Committee agrees on an action plan to address the grievance or, if the matter has been resolved, a final summary of the case will be communicated to the complainant. The Ethics Committee also evaluates thematic issues and introduces policy or procedure changes to eliminate and prevent future human rights, environmental or legal risks from occurring.

**The Fyffes Ethics Committee has never received a grievance relating to modern slavery.**

## Access to Remedy

In line with the UN Guiding Principles, we are committed to providing, or cooperating to provide, remediation measures in cases of identified adverse human rights impacts we might have caused or contributed to. The goal of the remediation is to restore to rightsholders their rights as they existed before the company negatively impacted them, to the extent that it is possible. We will not impede access to state-based judicial or non-judicial mechanisms, and we cooperate with them in good faith.

The following paragraph has been drafted to ensure confidentiality and avoid retaliation against complainants while providing transparency to stakeholders on the types and locations of grievances in our business. To avoid compromising the outcome of live investigations, only grievances raised during 2024 are shared.

During 2024, the Fyffes Ethics Committee investigated 31 grievances raised by stakeholders, via various channels, including senior managers, directly to the Ethics Committee email and the Fyffes Ethics Hotline. A more detailed outline of the grievances received, please refer to the most recent [Fyffes Human Rights Report](#). The Ethics Committee investigates grievances and meets monthly to review and assess the progress of investigations, as well as any additional training, policies or other programmes to continue to enhance our culture in line with our stated purpose of Shaping Wellbeing for the World.

## Audit Non-conformance Remediation Process

Non-conformance reports from audits are issued to the farm or ripening centres and followed up for closure within 28 days. We work with our own farms and ripening centres or suppliers to resolve the non-conformances, but if any serious non-conformance persists, this is escalated and procurement from that farm can be (and in instances has been) suspended. Such drastic measures seldom happen; non-conformances are usually resolved and the farm in question is back into line within a few days. Fyffes will always first seek a viable remediation strategy with suppliers. In 2024, Fyffes did not suspend any supplier based related to Modern Slavery issues.

## Zero Tolerance

Slavery and human trafficking are a serious infringement of human rights and Fyffes will not tolerate any instances in its supply chain and will take immediate remedial action to mitigate, address and resolve within the shortest possible timeframe. If not promptly and satisfactorily remediated, with assurance of non-recurrence, Fyffes reserves the right to take any further action, including, but not limited to, termination of employment, contractual relationship and/or notification to law enforcement agencies.

## Partnerships and Industry Collaboration

In the UK, Fyffes ripening centres are Stronger Together Business Partners and have implemented its guidelines. Staff from the UK Head Office and ripening centres have attended workshops to ensure they are aware of best practice in modern-day slavery prevention.

In Costa Rica, Fyffes is a member of the Red de Empresas Contra el Trabajo Infantil de Costa Rica (Network of Companies Against Child Labour of Costa Rica). The Network's members pledge to defend and promote the rights of the underage working population; especially, the right to education, health, and development.

Fyffes is also a member of the Food Network for Ethical Trade (FNET). Members of FNET provides resources to develop a human rights due diligence approach, in line with the UN Guiding Principles on Business and Human Rights and the requirements of the UK's Modern Slavery Act. Resources include the FNET ethical trade risk assessment tool which identifies the human rights risks of ingredients and raw materials and supports companies to prioritise where to focus their resources along their supply chains.





## Looking Ahead

Fyffes remains vigilant to the risks of Modern Slavery in its own operations and supply chain. As stated above, we will ensure all fruit suppliers have a completed evaluation in place against our Supplier Onboarding and Risk Management framework. We will replicate this also with non-fruit suppliers.

Our focus for 2025 is to ensure that all departments across Fyffes that can impact supplier due diligence are equipped with the knowledge and training needed to provide robust assurance on this important topic.



# References:

## 1

The UK Modern Slavery Act of 2015 requires organisations with a footprint in the UK to be transparent about their efforts in identifying and eradicating modern slavery and human trafficking in their own operations and supply chains.

## 2

The California Transparency in Supply Chains Act of 2010 requires large retailers and manufacturers doing business in California to disclose on their websites their efforts to eradicate slavery and human trafficking from their direct supply chain for tangible goods offered for sale.

## 3

The purpose of this Act is to implement Canada's international commitment to contribute to the fight against forced labour and child labour through the imposition of reporting obligations on:

- Government institutions producing, purchasing or distributing goods in Canada or elsewhere; and
- Entities producing goods in Canada or elsewhere or in importing goods produced outside Canada

## 4

SMETA is an audit methodology, providing a compilation of best practice ethical audit techniques. It is designed to help auditors conduct high quality audits that encompass all aspects of responsible business practice, covering Sedex's four pillars of Labour, Health and Safety, Environment and Business Ethics.

## 5

Child labour is defined as work for which the child is too young – i.e., work done below the required minimum age. The International Labor Organization defines child labour as “work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.