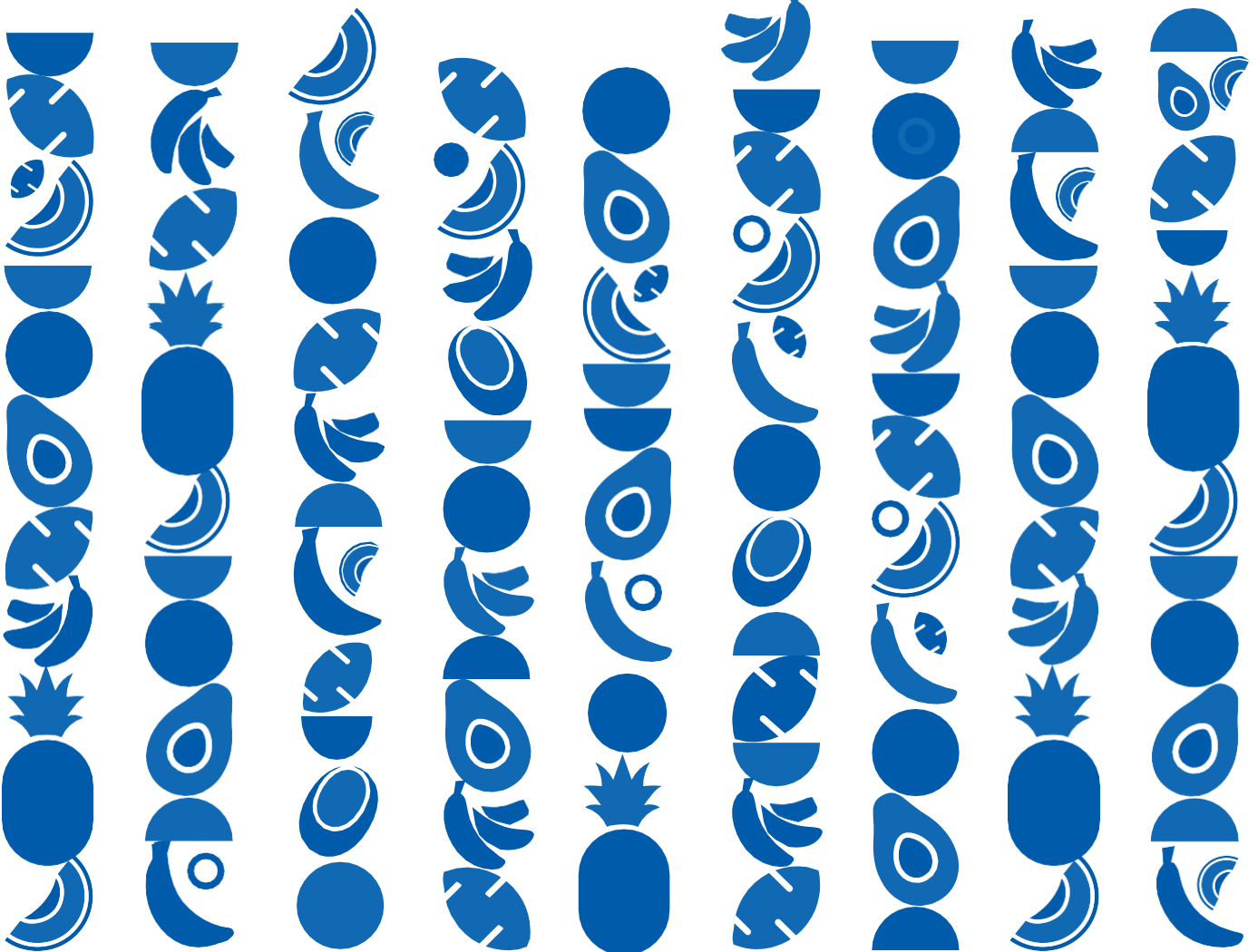




Modern Day Slavery



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

Fyffes is committed to maintain the highest ethical business standards across its operations, and as such, does not tolerate any form of modern slavery or human trafficking.

Modern Day Slavery in the Supply Chain and California Transparency in the Supply Chain Act: Statement of Actions 2020

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.

In addition, 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.

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.

Our policies and grievance mechanisms

Fyffes Principles of Responsible Business Conduct ('Fyffes Principles') govern the minimum acceptable behaviours required by our employees, contractors and leaders. This includes the requirement to be vigilant regarding coercive labour, human trafficking and child labour and to immediately report any suspicions of such activity.

Compliance with the Fyffes Principles is an essential element of our business success and encompasses relevant aspects of Modern Day Slavery prevention, detection and eradication. In 2020, we extended the scope of the Fyffes Principles to our key consultants (working with Fyffes more than six months) and large (with contracts over US\$500,000) suppliers. Any supplier or consultant wishing to work with Fyffes must acknowledge their willingness to abide by our code of conduct by signing it; in doing so declaring that at all times they will abide by the Fyffes Principles in how they conduct themselves and in the delivery of their work for Fyffes.

Fyffes also has a grievance mechanism, ('the Fyffes

Ethics Hotline'), an independent, confidential online and telephone hotline for reporting unethical behaviour by a Fyffes employee which is available to both internal and external stakeholders. Training on the Fyffes Principles started in early 2020 and over 500 employees have been trained on the Fyffes Principles and the Ethics Hotline. Additional training will be conducted across Fyffes operations by the middle of 2021. All new employees are furnished with a copy of the Fyffes Principles, which they must sign.

Human Rights Due Diligence and Risk identification

Fyffes Global Human Rights Policy and Statement sets out our commitment to protecting the human rights of all our stakeholders, including our employees, and is brought to life through training and internal protocols. As part of Fyffes sustainability targets we have committed to ensuring 100% of Fyffes workers and supply chain workers are trained on human rights by 2030 (100% of managers and employees by 2025).

This policy also requires Fyffes to undertake regular Human Rights due diligence and at the beginning of 2020, Fyffes published the results of its first corporate-wide Human Rights Impact Assessment, which was conducted by the global non-profit BSR (Business for Social Responsibility) in line with the UN Guiding Principles on Business and Human Rights. Fyffes also applies a site-level human rights evaluation checklist and prioritization tool. 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.

A human rights impact assessment involves identifying, understanding and assessing potential as well as actual human rights impacts and risks. Business should remedy adverse impacts they have 'caused or contributed to', and grievance mechanisms should be established for those at risk of being adversely impacted, including workers, communities, consumers and other rights-holders.

¹ The original goal was to complete operational training by end 2020 but COVID-19 travel restrictions delayed in-person training at operations.

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.

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BSR conducted desktop reviews of Fyffes policies and procedures, and they interviewed internal and external stakeholders. Fyffes chose five countries to do an in-depth analysis – Belize, Colombia, Costa Rica, the Dominican Republic and Honduras.

The Assessment highlighted 13 of the most relevant risks for Fyffes, which reflect the challenges and realities of where Fyffes does business, but also how Fyffes is managing or mitigating its response to those challenges. Two risk areas relevant to Modern Slavery were identified; ‘child labour’ and ‘migrant workers labour violations and forced labour’ and a third indirectly related area; ‘access to a grievance mechanism’.

As mentioned in Fyffes 2019 Modern Slavery Statement, we have implemented a global, independent grievance mechanism, available in the language of our employees via telephone or online. The hotline is advertised in our operations on noticeboards.

A HRIA involves identifying, understanding and assessing potential as well as actual human rights impacts and risks. Business should remedy adverse impacts they have ‘caused or contributed to’, and grievance mechanisms should be established for those at risk of being adversely impacted, including workers, communities, consumers and other rights-holders.

For child labour, we have strict rules in place and we do not encounter child labour on our own operations. However, we can always do more to ensure smallholders do not have child labour, for example in the circumstance that a parent brings their child to work. This is not permitted and puts the child at risk. In response, we developed a Child Labour Remediation Protocol during 2020 and we ensure this is understood and adopted by key personnel (human resources, compliance and auditors) so that we can take swift action in the event of the discovery of a child in the workplace. In 2021, we will also roll-out this protocol to our fruit suppliers.

In 2020, we also joined 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.

With ‘migrant workers labour violations and forced labour’, Fyffes has experience in putting good practices in place already, such as assisting migrant workers with legal work permit applications. However, in certain countries, such as the Dominican Republic for example, the Assessment underscored the risk to a certain portion of the workforce; Haitian migrants, who are more vulnerable. We are in conversation with local stakeholders to develop a mechanism to ensure that these workers understand their rights, including basic benefits, in their own language.

As part of Fyffes sustainability targets in 2020 we committed to building capacity and empowering 100% of our suppliers to conduct their own effective human rights due diligence by 2030. Fyffes developed a tool to evaluate human rights risks at site level and interactive training was provided to support farm management. Additional support was provided by the Sustainability and the Compliance teams who were extensively trained on human rights and the new due diligence tool in 2020. A total of 171 employees at some of our farms, suppliers and ripening centres, as well as from human resources, management, and compliance staff have already been trained.

Finally, in 2021, we will update the corporate-wide human rights impact assessment by: 1) reviewing Sedex Members Ethical Trade Audits (SMETA) non-compliance; 2) analysing the results of the site-level human rights impact assessments, and 3) reviewing any complaints received through our Ethics Hotline. This information will allow us to review our Human Rights Prevention and Mitigation Plan.

Audits and remediation

Fyffes products are grown and packaged on Fyffes owned farms as well as being purchased from various grower partners. Fyffes bananas are also packaged and are ripened in ripening facilities across Europe, Asia and the Middle East. Our compliance team continues to conduct and participate in internal and third-party ethical and social audits, including SMETA audits throughout a large proportion of our supply chain. Fyffes entire compliance team has been trained in SMETA and applies its methodology in their regular internal audits.

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In general, Fyffes directly hires employees and contractors. The UK ripening centres are the only sites where Fyffes requires labour providers for a significant portion of its workforce. In normal circumstances we audit the labour providers every year but during 2020 due to the pandemic, we did not. The following subsidiaries have relevant activities in the UK – Fyffes Group Limited, Bristol Fruit Sales (Bananas) Limited, Fyffes Bananas (Swords) Limited and Fyffes BV.

Fyffes uses our Standard to verify how the labour provider recruits and treats the workers. We look for 'Right to Work' compliance and inspect how the provider checks for signs of Modern Day Slavery, e.g. duplicate bank accounts, retention of passports etc. During 2020 Fyffes kept in regular contact with our labour providers and we did not onboard any new labour providers. In the UK, Fyffes ripening centres are also Business Partners of Stronger Together and have implemented its guidelines. Staff from the UK Head Office and ripening centres have attended workshops to stay informed of developments in the Modern Day Slavery sphere.

In addition, 100% of Fyffes ripening facilities were subject to SMETA audits during the year.

Non-compliance is taken very seriously by Fyffes. If such non-compliances occur, we take remedial action to contain, address and resolve the situation quickly. Fyffes will always first seek a viable remediation strategy with suppliers, however, such corrective action can lead to the termination of a commercial agreement with Fyffes. In 2020, Fyffes suspended one supplier with poor results to encourage them to improve their compliance. Once the supplier had reached a satisfactory level of compliance, we recommenced buying from this supplier.

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 holistic 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 a large number of Rainforest Alliance certified farms. Currently, 100% of Fyffes pineapples and bananas produced on own farms, and one in five bananas overall are certified by Rainforest Alliance. Although this certification's roots were in tackling deforestation, today it has evolved into a holistic environmental and social responsibility standard and certification.

In 2020, there were no major forced labour non-compliances detected by audits. Five minor non-compliances were raised during external SMETA audits which related to the absence of a child labour protocol or policy. This has since been remediated.

We had one incidence of child labour discovered by one of our quality assurance employees, who encountered a child at a supplier's farm in Belize. The child was not in danger and had been brought by his father to the farm. As soon as the child was found, they were taken off the farm premises. The farm had a clear policy against child labour and the employee that brought the child onto the farm was aware of the farm policy. A root cause analysis was conducted and as this was not the first instance of misconduct by the father, the worker was dismissed.

Fyffes understands that the risk associated with modern slavery and human trafficking is not static and we will continue to adapt our approach to mitigating this risk on an annual basis.

This statement was approved by the Fyffes Limited Board of Directors on 30 March 2021.

The following subsidiaries have relevant activities in the UK – Fyffes Group Ltd and Fyffes Tropical (Ireland) Limited.