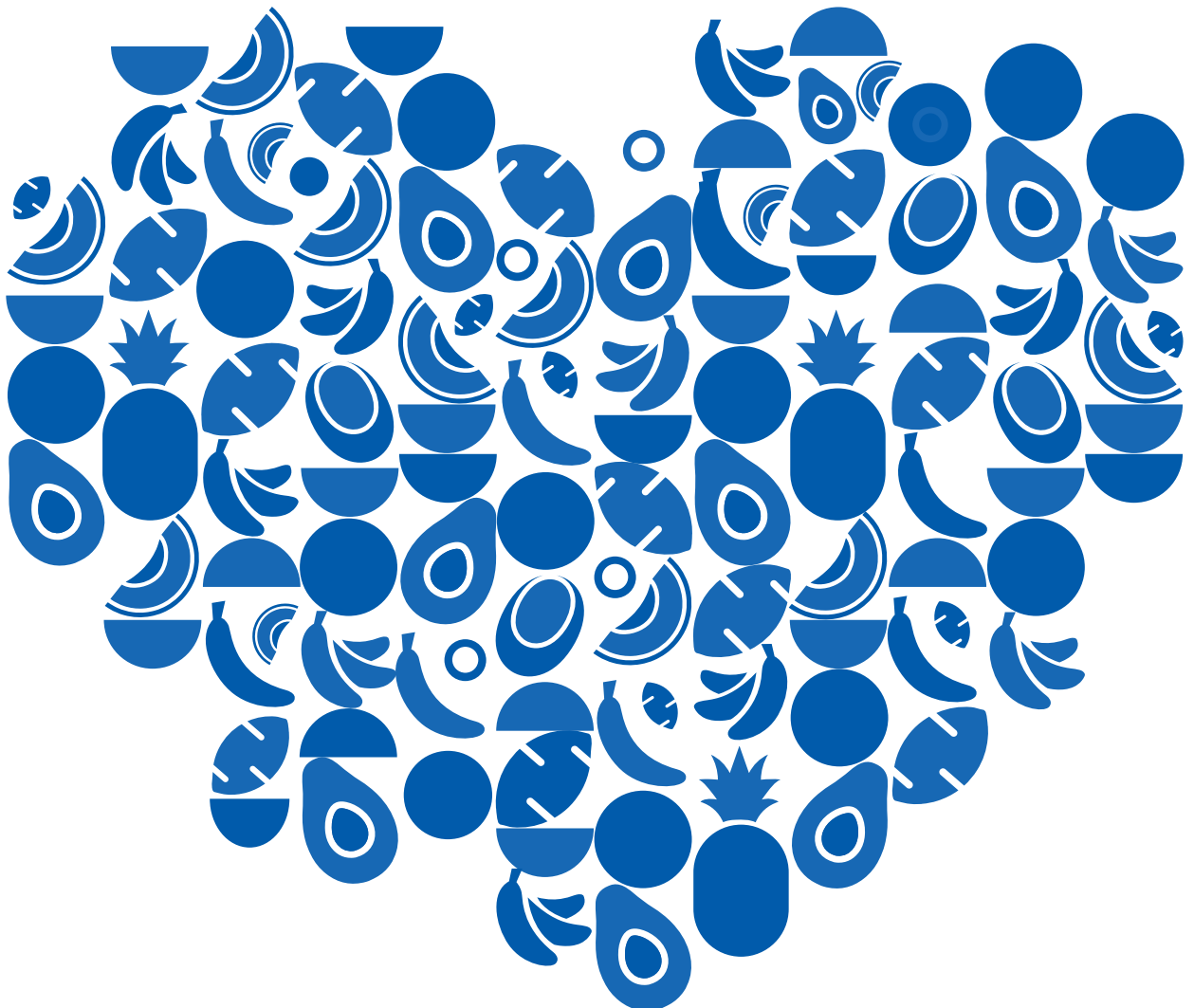




# Global Human Rights Policy

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## INTRODUCTION

Fyffes Principles of Responsible Business Conduct or ‘*Fyffes Principles*’ outline our commitment to respect all international human rights. Fyffes will not infringe on people’s rights and will address adverse human rights impacts that we contribute to or cause.

This policy implements the Fyffes Principles, in relation to human rights. Respect for human rights within our own operations and throughout our supply chain. Fyffes supports human rights and is committed to the fair and ethical treatment of employees and the communities where our operations are located throughout the Company’s supply chain. For this, we are guided by the:

- 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; and
- 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.

Fyffes Global Human Rights Policy and Statement aligns with its parent company Sumitomo’s Human Rights Policy<sup>1</sup>.

This Global Human Rights Policy will further support our commitment to conducting business in a responsible way wherever we operate.

Please take the time to read and understand this policy and avail of the training provided.



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Helge H. Sparsoe  
Chief Executive Officer, Fyffes Limited

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

## POLICY

1. In countries where the company operates and where local regulations may be less stringent than international human rights standards, Fyffes will apply international standards.
2. Fyffes commits to respect and support internationally recognised human rights standards in our operations and in the way we conduct business and engage with stakeholders.
3. Within the context of our activities, Fyffes avoids causing or contributing to adverse human rights impacts and we will address such impacts should they occur. Fyffes takes adequate measures to identify, prevent and mitigate risks or address adverse impacts to human rights relating to 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 (whether permanent, fixed-term or temporary), subsidiaries and affiliates (collectively 'employees'). Employees are required to 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 when they are on a Fyffes operational site, such as a farm, pack house, ripening centre or corporate office.

## MISCONDUCT

8. For the purposes of this policy, 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 therefore 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 our Global Health and Safety Policy.
11. Misconduct regarding violence, harassment, intimidation and other unsafe or disruptive conditions can be found in our Global Anti-Violence and Harassment Policy.
12. Fyffes does not interfere in employees' right to join, form or not to join a labour union without fear of reprisal, intimidation or harassment.
13. Fyffes prohibits the use of all forms of child labour, forced labor, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking.

## COMMUNICATING AND IMPLEMENTING THIS POLICY

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

## RESPONSIBILITIES OF FYFFES EMPLOYEES

15. Everyone within Fyffes operations has a responsibility to respect Human Rights in general as stated in this policy, and respect and follow other related company policies and procedures, including diversity and inclusion policy, health and safety policy, global anti-violence and harassment policy as well as freedom of association and anti-slavery measures.
16. Employees must familiarise themselves with the existing Human Rights policies and procedures and attend training sessions provided.

### RESPONSIBILITIES OF MANAGERS AND SUPERVISORS

17. Managers and Supervisors have special obligations to prevent and deter misconduct and must:
  - a create a safe and harmonious working environment, free from human rights abuses and any form of misconduct. To achieve such an environment, managers and supervisors must act as role models by upholding only the highest standards of conduct;
  - b communicate the 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, impartiality, and be free from intimidation or favouritism;
  - e handle all discussions, communications and actions with discretion, sensitivity and confidentiality; and
  - f take appropriate action to protect Fyffes employees from retaliation.

### RESPONSIBILITIES OF FYFFES

18. Fyffes treats its employees with dignity, honesty and fairness.
19. 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 our Diversity and Inclusion Policy.
20. Fyffes respects the right of all workers to freedom of association and collective bargaining.
21. Fyffes is committed to keeping our 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, we will work with necessary partners and authorities to take immediate remedial action<sup>2</sup>.
22. Fyffes does not tolerate discrimination in the workplace nor any form of bullying or harassment, whether psychological, verbal, physical or sexual, as described in our Global Anti-Violence and Harassment Policy.
23. Fyffes is committed to providing healthy and safe working conditions. We adopt appropriate practices to prevent threats to human life, health, and welfare in our operations, and in our supply chain. Health and safety is everyone's responsibility and we need to look out for one and other's physical and mental wellbeing in the workplace. Fyffes commitment is outlined in the Fyffes Health and Safety Policy.
24. Fyffes upholds the ETI Base Code as its primary code of practice for labour rights. All Fyffes workers on farms, in corporate offices, in ripening centres or at any Fyffes premises are provided with training and are required to align to the Code. Fyffes expects the growers, suppliers and business partners to also abide by the ETI Base Code.
25. Fyffes shall make available appropriate training to all Fyffes employees to ensure awareness of key provisions of this policy and expected standards of conduct.

<sup>2</sup> Please refer to Fyffes Corporate Statement on the UK Modern Slavery Act: <https://www.fyffes.com/pages/modern-day-slavery>

## DUE DILIGENCE

26. Fyffes carries out human rights due diligence through Human Rights Impact Assessments, including modern slavery risks, on an annual basis to identify hotspots and steps in the value chain that might represent risks related to infringement of human rights. Action plans are established to prevent or mitigate the risks identified through the Human Rights Impact Assessment.
27. The baseline Human Rights Impact Assessment was undertaken by an independent human rights expert consultancy. Subsequent annual assessments will be undertaken by Fyffes using the same framework and methodology. Every three years, Fyffes will employ an independent expert consultancy to evaluate its human rights risks, mitigation and management.
28. Fyffes will regularly conduct human rights due diligence before establishing new business relationships.
29. Fyffes seeks ways to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services. 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.

## REMEDIATION

30. Fyffes provides for legitimate, accessible, predictable, equitable, and transparent operational-level grievance mechanisms as outlined in our Fyffes Principles Grievance Procedures. This enables us to understand and address challenges in our operations and potential dissatisfaction among our stakeholders.
31. 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.
32. Fyffes monitors remediation progress on a regular basis and measures the effectiveness of our preventive and mitigation actions.

## STAKEHOLDER ENGAGEMENT

20. 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 facilitate such engagement processes favouring participative engagement;
  - b Consulting stakeholders and acknowledging their concerns and interests in managing the risks and impacts our operations can have on them.

For more detail, please refer to our Global Stakeholder Engagement policy.

## REPORTING

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