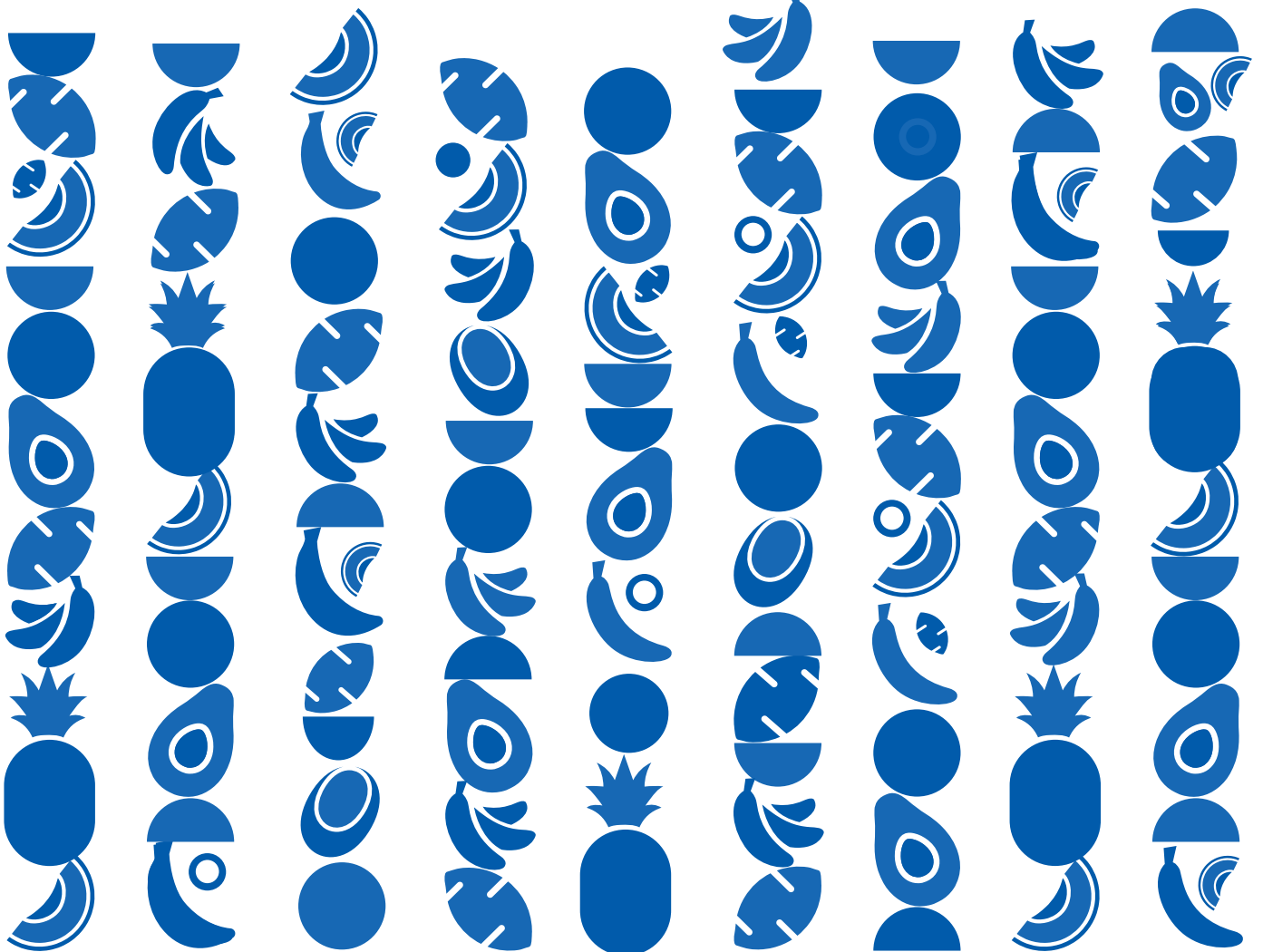




# Modern Day Slavery



**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 SUPPLY CHAIN ACT: STATEMENT OF ACTIONS 2019

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. 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.

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 global sustainability strategy encompasses relevant aspects of Modern Day Slavery prevention, detection and eradication. The development of the strategy included several internal and external stakeholder consultations and has resulted in four priority areas; stewardship for the planet, healthy food for healthy lives, enriching people's lives and principles of responsible business conduct. Fyffes commitment to modern slavery prevention is closely linked with the last two pillars.

In 2019, as a first step in implementing the strategy, Fyffes rolled-out its Fyffes Responsible Business Conduct Principles ('*Fyffes Principles*') which 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 to our business success. In addition, Fyffes made available to both internal and external stakeholders, a grievance mechanism, ('the *Fyffes Ethics Hotline*'), an independent, confidential online and telephone hotline for reporting unethical behaviour by a Fyffes employee. Training on the *Fyffes Principles* started in early 2020 and will be conducted across Fyffes operations by the middle of 2021<sup>1</sup>. All new employees are furnished with a copy of the *Fyffes Principles*.

1 Originally the goal was to complete operational training by end 2020 but COVID-19 travel restrictions is likely to delay in-person training at operations.

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 Sedex Members Ethical Trade Audit (SMETA)<sup>2</sup> audits throughout a large proportion of our supply chain. All of Fyffes compliance team have been trained in SMETA and apply its methodology in their regular internal audits. In addition, the majority of our suppliers (246 sites) are members of SEDEX, one of the world's leading ethical trade service providers, working to improve working conditions in global supply chains.

In the UK, Fyffes Group Ltd continues to audit its labour providers using a standard developed in 2016. This standard looks at 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.

In addition, 100% of Fyffes ripening facilities were subject to unannounced 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.

2 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.

---

## Fyffes Modern Day Slavery

Similarly, Fyffes also produces or buys from a large number of Rainforest Alliance certified farms. Currently, all the pineapples sold by Fyffes are certified by Rainforest Alliance, while for bananas, in 2019 this represented approximately 25%. Although this certification began with focus on deforestation, today it has evolved into a holistic environmental and social responsibility standard and certification.

In addition to our regular compliance audits, in 2019 we conducted our first corporate-wide human rights impact assessment (HRIA) which included a review of modern slavery risks across our supply chain. We also developed and rolled-out a Global Human Rights Policy and Statement, which sets out our commitment to protecting the human rights of all our stakeholders, including our employees. This policy is brought to life through training and internal protocols.

The HRIA was conducted in line with the UN Guiding Principles on Business and Human Rights, through the global non-profit organisation BSR (Business for Social Responsibility).

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.

BSR leveraged their extensive experience in this area to conduct desktop reviews of Fyffes policies and procedures, and they interviewed internal and external stakeholders. Fyffes chose five countries we operate in 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 next step is to run a broader campaign internally to make sure all employees are fully aware of that mechanism, including training.

For child labour, we have strict rules in place, 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 have developed a Child Labour Remediation Protocol during 2020 and we ensure this adopted by key personnel so that we can take swift action in the event of the discovery of a child in the workplace.

With 'migrant workers labour violations and forced labour', Fyffes has experience in putting good practices in place already, but in certain countries, such as the Dominican Republic for example, the Assessment underscores the risk to a certain portion of the workforce; Haitian migrants, who are more vulnerable. We need to ensure that these workers understand their rights, including basic benefits, in their own language.

Fyffes will implement the aforementioned action plan and report on its progress. We understand 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 24 June 2020.

The following subsidiaries have relevant activities in the UK – Fyffes Group Limited, Bristol Fruit Sales (Bananas) Limited, Fyffes Bananas (Swords) Limited and Fyffes BV.