



2022 Human Rights Report



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FOREWORD

On June 1, 2023, the European Parliament agreed its position on the Corporate Sustainability Due Diligence Directive (CSDDD). The directive brought companies with European business one step closer to a legal obligation to conduct human rights and environmental due diligence throughout their value chains — and mitigate any impacts.

At Fyffes, our company vision — Shaping Wellbeing for the World — commits us to advancing respect for human rights across our supply chain. We began human rights due diligence back in 2019 with our first independently conducted Human Rights Impact Assessment (HRIA) and we have conducted annual due diligence and enhanced our process since then. We welcome the CSDDD, which we hope will create a level playing field and reward companies that are genuinely committed to improving human rights and environmental management in their supply chains. The directive came at an important time when climate change is at a dangerous tipping point, amplifying inequalities that exist today.

Fyffes Board of Directors delegates responsibility to me as Chief Corporate Affairs Officer to further the company’s human rights agenda and ensure we not only comply with regulatory expectations but that we anticipate best practice for human rights.

This report outlines the results of our third HRIA, including a review of our salient human rights impacts and a revised mitigation plan. In addition, to ensure we are prepared for CSDDD, we asked an independent consultancy to undertake a gap analysis of our current policies, processes and reporting against the requirements of CSDDD, the Corporate Sustainability Reporting Directive, and German and Swiss due diligence legislation.

I would like to thank all our people across the globe and most especially the members of my team who play their part every day to champion human rights and build a company that is shaping wellbeing for the world.



Caoimhe Buckley
Fyffes Chief Corporate Affairs Officer

APPROACH TO HUMAN RIGHTS

At Fyffes, we believe people should be treated with dignity, honesty, and fairness throughout our value chain. We rely on people at every stage of our production, and so human rights are core to what we do. Human rights are rights inherent to all of us, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education and many more. Everyone is entitled to these rights, without discrimination¹.

Our approach to human rights is grounded in international standards, including the United Nations Guiding Principles on Business and Human Rights (the UN Guiding Principles) and the Organisation for Economic Co-operation and Development’s Guidelines for Multinational Enterprises (the OECD Guidelines), and enshrined in our Principles of Responsible Business Conduct (the *Fyffes Principles*).

The UN Guiding Principles were established in 2011 to recognise the important role that businesses can play in ensuring that people’s human rights are upheld without compromise. In a similar way to the UN Sustainable Development Goals, the UN Guiding Principles recognise that business needs to take its place alongside government and civil society in working to make the world a fairer place to live. When the UN Guiding Principles were established, human rights were not protected in many places. We are now witnessing an acceleration in human rights legislation to close this gap.

At Fyffes, we began our formal human rights journey in 2018 and since then we have seen the business and human rights landscape evolve. Our consumers, customers, employees, shareholders, local communities, and other stakeholders are increasingly concerned with the potential and actual negative impacts that companies can have on human rights and the environment. We believe the CSDDD will also provide clarity and harmony to the various regulations, guidelines and policies that are emerging as stakeholders seek to hold businesses to account.

Respect for human rights is woven into our overall approach to [sustainability](#). Our sustainability strategy has both medium- and long-term timelines to 2025 and 2030 in line with the UN Sustainable Development Goals — including the objective to advance the human rights of all our workers and provide decent, meaningful employment opportunities in our operations and through the supply chain.

Our approach to human rights is based on three pillars that mirror the UN Guiding Principles:

1. A human rights policy framework supported by awareness-raising and training to embed our commitment to human rights throughout our operations and business relationships;
2. Ongoing due diligence to assess our salient human rights risks and adverse impacts; and
3. Access to remedy, including grievance mechanisms so that communities and individuals can raise concerns, and processes and measures to ensure remedy for people who are affected.

¹ <https://www.un.org/en/global-issues/human-rights>

Fyffes Approach to Human Rights

COMMITMENT TO HUMAN RIGHTS

- Global Human Rights Policy
- Human rights target: 100% of Fyffes workers and supply chain workers to be trained on human rights by 2030; 100% of managers and employees by 2025
- Grievance procedures (available internally) outlining our approach to managing grievances
- All global policies available on Fyffes website



HUMAN RIGHTS DUE DILIGENCE

- Three years of human rights due diligence
- Independent human rights impact assessment every three years
- Published salient human rights risks in 2021 and 2023
- Human rights risks prevention and mitigation plan
- Human Rights Core Team (now Human Rights and Environment Due Diligence Committee)
- Development of human rights self-assessment tool



ACCESS TO REMEDY

- Responsibility of the Fyffes Ethics Committee
- Fyffes Ethics Hotline: independent, confidential, anonymous grievance mechanism for all stakeholders
- Grievance Procedures that outline remedy, investigation and resolution of human rights issues



COMMITMENT TO HUMAN RIGHTS

Respect for human rights within our operations and supply chain is at the core of how we do business. People should be treated with dignity, honesty, and fairness, which is why social performance within the supply chain forms an integral part of our brand, culture, and strategy.

We want a working environment that promotes diversity, inclusion, and equal opportunity and where there is mutual trust and respect for human rights. We believe no employee should ever be afraid or embarrassed to come to work. We do not tolerate discrimination in the workplace or any form of bullying or harassment — whether psychological, verbal, physical or sexual.

We respect the right of all workers to freedom of association and collective bargaining. We are committed to keeping our business free of modern slavery, including child labour, debt bondage and human trafficking. Our fifth [Modern Slavery Statement](#) describes how we manage slavery and human trafficking risks in our operations and supply chain.

Our commitment to human rights is described in our [Global Human Rights Policy](#). This policy sets out our approach to protecting the human rights of all stakeholders, including our employees (all our people, whether contractors, seasonal or permanent workers). The policy ensures that wherever local regulations may be less stringent than international human rights standards we will apply international standards in the way we conduct business and engage with our people and other stakeholders. Our Global Human Rights Policy is supplemented by other important [policies](#) which provide more detail on our approach to human rights and other risks:

- Principles of Responsible Business Conduct
- Global Anti-Violence and Harassment Policy
- Global Donation Policy
- Global Health and Safety Policy
- Global Environmental Policy
- Global Stakeholder Engagement Policy
- Global Diversity and Inclusion Policy
- Global Child Labour and Remediation Protocol
- Global Anti-Corruption Policy

STRENGTHENING OUR HUMAN RIGHTS GOVERNANCE

Our Board of Directors oversees all decision-making on economic, environmental, and social topics at Fyffes, including human rights. The Board has delegated the oversight of these matters to the Chief Corporate Affairs Officer, who reports to our CEO, Helge Sparsoe, and sits on our Executive Leadership Team.

As part of our commitment to continuously strengthening our human rights approach, we will continue to integrate human rights at all levels of our governance structure and across our organisation, setting out clear roles and responsibilities to ensure respect for human rights runs through our business. This work will include a training programme to ensure Board directors are up to date with best practice in environmental, social and governance issues, including human rights.

Our 2022/2023 human rights due diligence and an independently conducted regulatory gap analysis indicate that we need to update aspects of our governance structure to bring it in line with the higher standards required by emerging legislation — including the expected role of the Board in relation to human rights and environmental due diligence. The Board will carry out and implement the findings of this review during 2023 and 2024.

Another essential change we are implementing is the evolution of the Human Rights Core Team (comprising relevant executives across the company) into the Human Rights and Environmental Due Diligence Committee. This change will ensure we consider the interlinked imperatives of human rights and the environment together while aligning with EU regulations.

HUMAN RIGHTS TRAINING

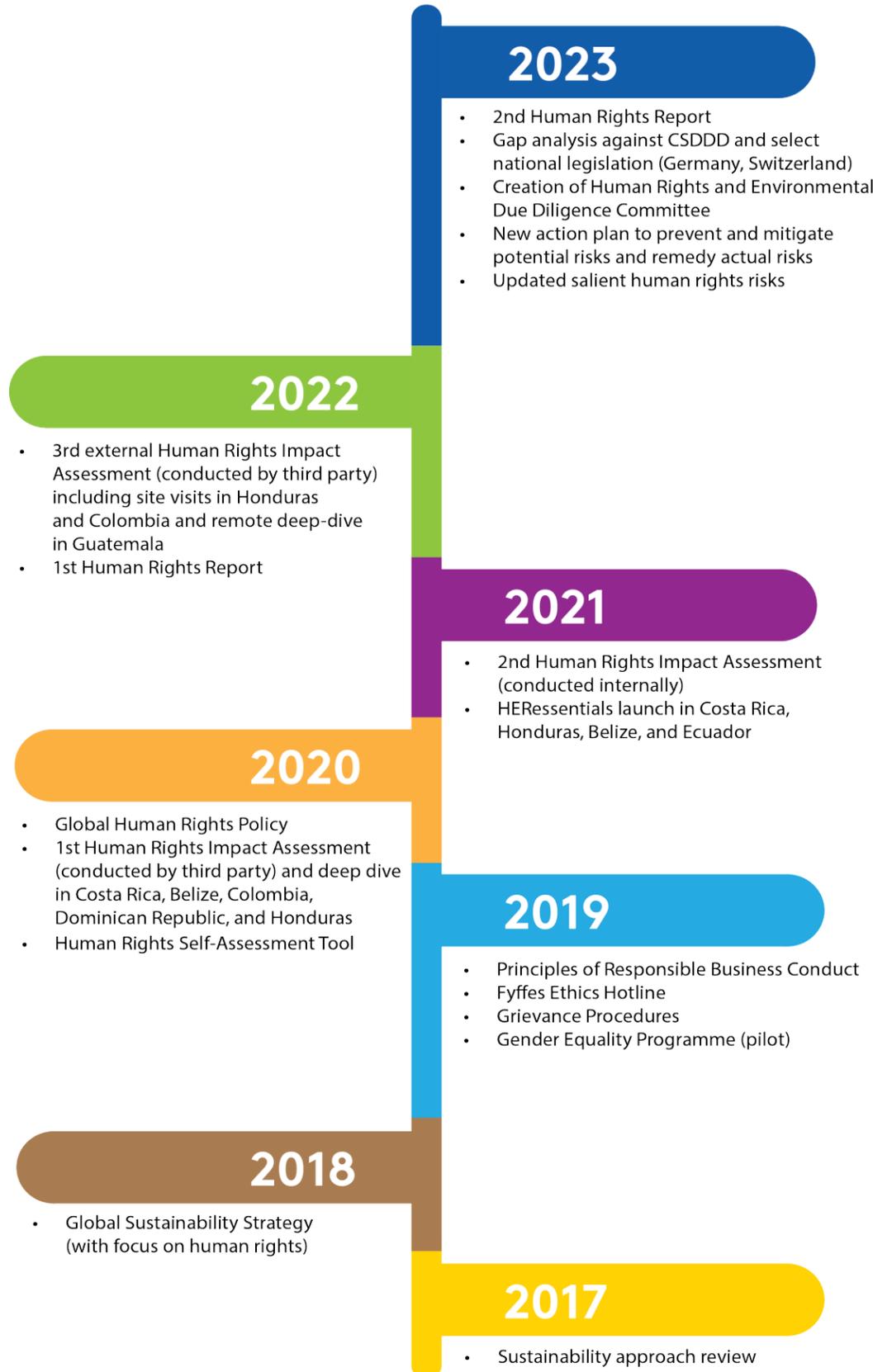
During 2022 we developed human rights training based on our Global Human Rights Policy so that all our employees and contractors would understand their rights under the UN Guiding Principles, the International Labor Organization Conventions (ILO Conventions) and the OECD Guidelines. The training was developed by an expert consultancy and is available in English and Spanish, the two main languages spoken by our people. The training is on our human resources system and is provided by human resources, compliance, and sustainability teams in locations where people do not yet have access to the human resources system.

EVOLUTION OF OUR HUMAN RIGHTS FRAMEWORK

We started our human rights journey in 2018 when we agreed on our first materiality matrix to focus on important issues related to human rights. In 2019, we conducted our first HRIA, identifying our salient human rights risks and implementing the Human Rights Risk Mitigation and Prevention Action Plan. This year marks our third HRIA and we have expanded its scope to include our largest suppliers in Colombia and look more closely at our own operations in Honduras and Guatemala. For details on our journey, see the timeline on the next page.



Fyffes Human Rights Journey



HUMAN RIGHTS DUE DILIGENCE

OUR HUMAN RIGHTS DUE DILIGENCE APPROACH

We have 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.

Our human rights due diligence is a continuous process that aims to identify and manage the human rights risks and adverse impacts associated with our operations and business relationships along our value chain. Our value chain comprises production and processing, shipping, transport, logistics and distribution and downstream activities including impacts on customers and consumers:



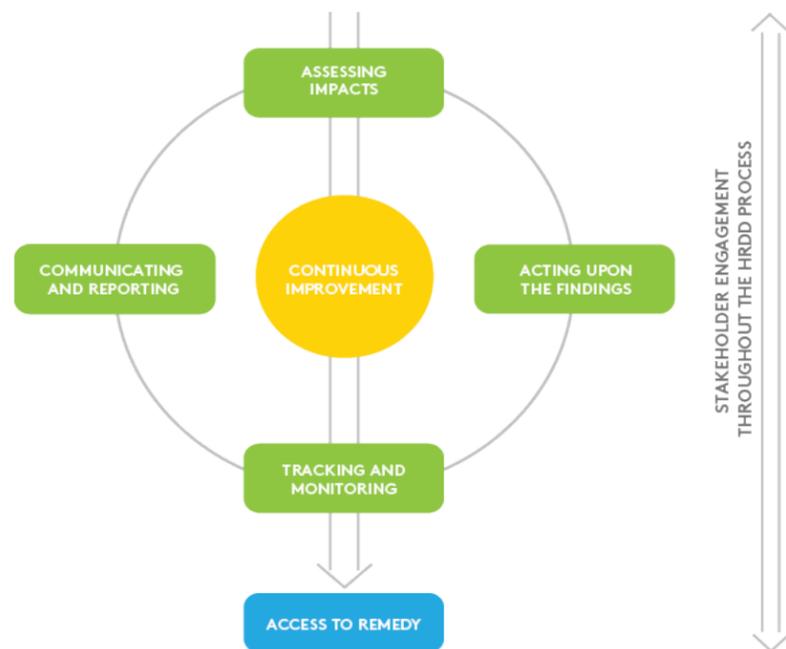
In line with the UN Guiding Principles, the human rights due diligence process covers four steps businesses should follow:

1. Assessing actual and potential human rights impacts
2. Integrating and acting on the findings
3. Tracking the effectiveness of responses to adverse identified human rights impacts
4. Communicating about how impacts are addressed to affected stakeholders and more broadly through public reporting

We look for ways to prevent or mitigate adverse human rights impacts that are directly linked to our operations, business relationships, products, or services. When we identify potential adverse impacts on human rights, we take part in legitimate processes to remediate these impacts, and we establish action plans to prevent or mitigate the risks identified based on their level of salience.

We pay special attention to the rights of vulnerable groups, including, but not limited to, children, women, LGBTIQ+, people with disabilities, elders, migrant workers, black and indigenous communities, and people of colour.

Fyffes Human Rights Due Diligence Process



IDENTIFYING SALIENT HUMAN RIGHTS RISKS

The UN Guiding Principles state that companies should avoid infringing the human rights of people and should address adverse impacts they are involved with.

External Assessment

Business for Social Responsibility (BSR) conducted our most recent human rights independent assessment by carrying out interviews with internal and external stakeholders. BSR also reviewed external reports and articles as well as our policies and procedures to inform the analysis and recommendations. BSR held more than 50 interviews in Colombia, Guatemala and Honduras while conducting site visits. These interviews included employees, union members, representatives of local communities and focus groups.

The assessment process helped us to:

- Evaluate our progress since our first HRIA in 2019
- Re-examine our salient human rights risks and the potential impacts our business activities might have on rightsholders
- Assess the potential severity and likelihood of those impacts across our value chain in line with the criteria outlined in the UN Guiding Principles criteria
- Prioritise risks in terms of urgency
- Assess our management of potential risks and impacts

External Assessment Process



Internal Assessment

In the time when we have conducted our own human rights due diligence, we have taken the following approach:

1. Human Rights-Related SMETA Non-compliances in Progress

All our farms undergo regular SMETA (Sedex Members Ethical Trade Audit) audits, and instances of non-compliance can provide a useful indication of thematic issues. SMETA is an ethical audit, encompassing all aspects of responsible business practice. SMETA audits use the Ethical Trading Initiative Base Code, which is founded on the ILO Conventions.

Non-compliance indicates that controls to manage risk are missing, weak or need strengthening. We reviewed all SMETA non-compliances to gain another perspective on issues related to human rights at our sites that may not have been identified in the initial HRIA. We examined each non-compliance by category, country, and site, and discovered some important trends that inform our approach.

The review found that employees at our melon operations in Guatemala and Honduras were working too many hours and revealed instances where workers were not taking one day off in every seven worked, as mandated. Local management has made a commitment to put things right, including better oversight of overtime and improved records of working hours. An external follow-up audit will be conducted during the next season.

2. Human Rights Related to Fyffes Ethics Hotline Complaints

The [Fyffes Ethics Hotline](#) is an independent, confidential hotline which can also be anonymous if preferred. Any rightsholder who feels they are being adversely affected by us or our employees (including contractors, seasonal workers, directors, or suppliers) can raise concerns by escalating the issue directly to the Fyffes Ethics Committee via the hotline.

In 2022, we received three complaints related to human rights via the hotline. No complaints were reported directly to our Chief Corporate Affairs Officer. All three complaints were anonymous, and none were accepted as legitimate. The three cases were vague allegations relating to the work environment, alleging in two cases that local human resources teams were too demanding and patronising. The third case was against a junior assistant,

which we believe was a complaint made in malice. We investigated each case individually (see page 34, *Access to Remedy*), and when we contacted the complainants (via the hotline system) to ask for specific details, there was no response. In each case, the approach to managing the complaints was agreed unanimously by the Fyffes Ethics Committee.

We do not view the small number of complaints as a reason to be positive. Instead, we believe take-up reflects low awareness of the hotline among our stakeholders and inadequate service offered by the hotline provider. We are switching to a new provider with better access for Latin American mobile phone networks. Given the nature of the complaints received, we also believe our employees do not understand what the Fyffes Ethics Hotline is for and how grievances are resolved. We have awareness posters on all our sites, but we need to improve the training we provide. Our new human rights training and Fyffes Principles training will help clarify how the hotline works.

3. Site-level Human Rights Impact Assessment Tool

Our Corporate Affairs team developed a self-assessment tool for site-level human rights due diligence in 2020. The assessment evaluates systems in place locally to manage human rights. In 2022 it was expanded to incorporate Rainforest Alliance requirements. The tool assesses the potential scope, scale, remediability and/or irreversibility and the likelihood of the risk and how well the risk is being managed.

We review the site-level results, validate the answers provided and work with the site on a mitigation plan. These action plans factor in independently conducted HRIAs and feed into our Human Rights and Environmental Due Diligence Committee. In 2023, we will review and improve our site-level assessment process to make sure we are in line with new regulations.

Our 2023 assessment showed that we need to invest in developing a broader network of human rights practitioners at Fyffes and capacity-building within our operations. Capacity-building develops and strengthens the skills, instincts, abilities, processes, and resources that organisations and communities need to survive, adapt, and thrive in a fast-changing world. We want to make sure we have accountable points of contact who are trained in own-farm operations, procurement, shipping, transportation, and distribution. We will provide capacity-building training to our local teams in 2023–2024 accordingly.

INFLATION AND COST OF LIVING IMPACT ON HUMAN RIGHTS

The soaring cost of food and energy is affecting people around the globe. The economic impacts of the Russian invasion of Ukraine are rippling out in a cost-of-living crisis that could push an additional 71 million people into poverty, according to the United Nations Development Programme.

The cost-of-living crisis is exacerbating human rights issues and putting some families under unprecedented levels of stress in their efforts to meet their basic needs. We understand the impact of current economic conditions on the livelihoods of our employees and communities and we took these pressures into account in our HRIA and action plans.

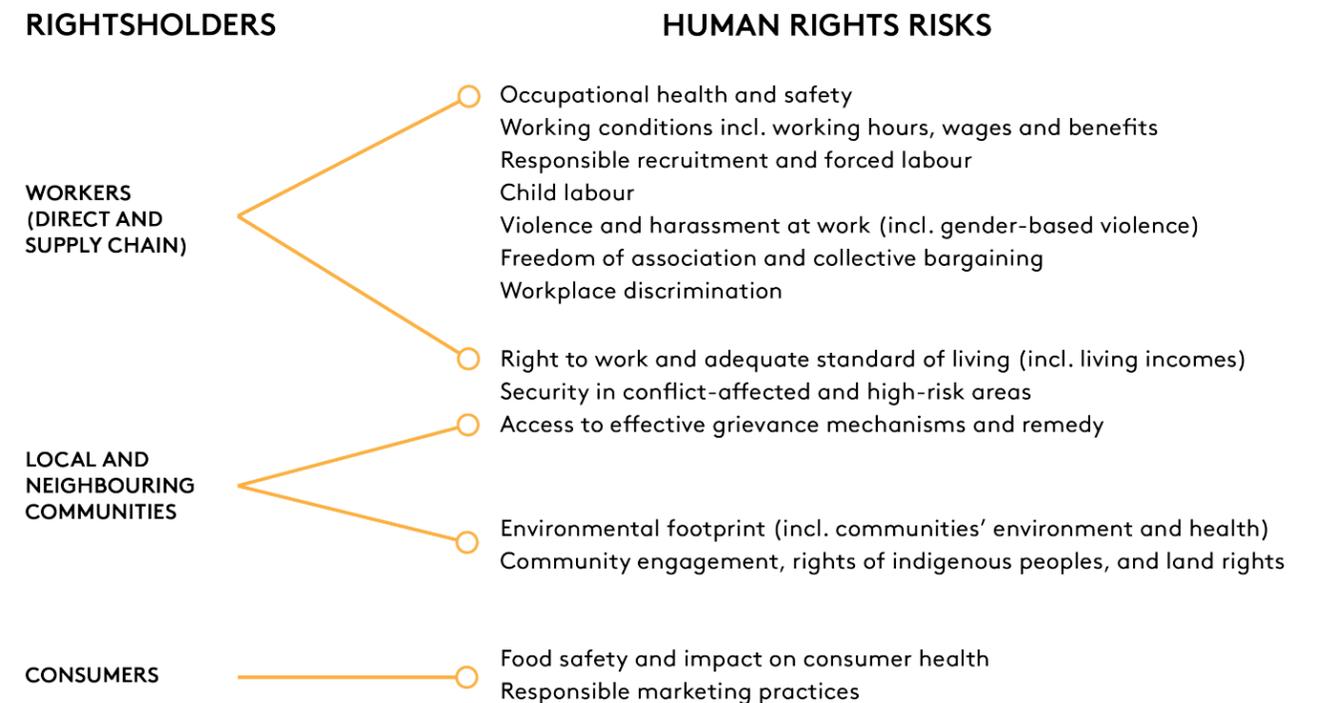
REFRAMING OUR SALIENT HUMAN RIGHTS ISSUES

Our HRIA reconfirmed the human rights issues that were salient in 2019 and highlighted the need to reframe our list of salient human rights issues and focus on actions. Talking to potentially affected groups helps us to identify our adverse impacts. We recently conducted an extensive stakeholder mapping exercise to ensure proactive engagement with stakeholders and inform our saliency mapping.

In addition to our HRIA, we conducted community needs assessments (CNAs) in all the neighbouring communities that are close to our operations. In all, we interviewed 2,200 people from more than 50 communities in the five countries where we own farms.

At Fyffes, we identify and assess actual or potential adverse human rights impacts with which we may be involved — either through our activities or because of our business relationships — by taking a rightsholder-centred approach. In the graph below you can find our updated list of salient human rights risks per rightsholder based on severity and likelihood of impacts.

Fyffes Human Rights Risks and Related Rightsholders



We then prioritise actions to address actual and potential adverse human rights impacts that are most severe or where a delayed response would make them irreparable in line with UN Guiding Principle 24. In some cases, current management may be strong, yet the issue can be a primary focus for action because of the severity and likelihood of impacts on rightsholders and our strong connection with the risk. Potential adverse impacts must be addressed with prevention or mitigation measures, while actual adverse impacts — those that have already occurred — require remedy (see page 35, *Access to Remedy*).



OCCUPATIONAL HEALTH AND SAFETY

Why is this a salient issue for Fyffes?

Occupational health and safety is a salient human rights risk in our supply chain because our people can face physically demanding working conditions, especially at farms. Employees and workers throughout our supply chain can potentially experience adverse impacts to their physical health related to injuries sustained during working hours, exposure to extreme heat and accidental chemical exposure. Mental health risks due to economic stress and seasonal work are also potential salient human rights risks.

Providing a healthy and safe work environment is our top priority. If our employees and workers in our supply chain are healthy and safe, so is our business. We aim to be a pioneer in behaviour change related to occupational health and safety in the agricultural sector, where our employees take a preventive approach to safety, unsafe acts are minimised, and everyone works together to achieve zero accidents.

In Honduras and Guatemala, we have assigned workers as labour inspectors who previously performed the role of 'caporal', ensuring compliance with health and safety as well as job tasks.

What we have done so far

- **Global Health & Safety Committee:** established a Global Health and Safety Committee in 2019 to provide support to the various health and safety officers working in our operations
- **Local Health & Safety Committees:** our farms and ripening centres are represented through formal health and safety committees made up of multidisciplinary staff who ensure that employees can share their health and safety concerns and allow management to resolve them
- **Health & Safety Risk Assessments:** our operations conduct health and safety risk assessments to identify risks and apply measures to reduce or eliminate them
- **Personal Protective Equipment:** provide and ensure the use of adequate personal protective equipment for all tasks that have been identified and evaluated as dangerous, according to the occupational risk profile
- **Health & Safety Management System:** implemented the ISO 45001 standard for Occupational Health and Safety Management System in Costa Rica (pilot)
- **Road Safety Campaign:** launched in Costa Rica in 2019 and implemented in other priority operations since then (Guatemala, Honduras)
- **ProSafety:** implemented the accident and incident traceability system ProSafety in our operations in Latin America in 2022
- **Health & Safety Training:** developed an innovative and accessible interactive health and safety training programme for regional rollout in early 2023
- **Behaviour Change Programme:** we are working on the Behaviour Change Programme at our banana operations in Costa Rica (pilot)
- **Wellness Programme:** developed the Wellness Programme in the administrative offices in Costa Rica and Ecuador, which will be strengthened in 2023 and will be replicated in other administrative areas of the company

- **Fyffes Health and Safety Programme:** our third-party fruit suppliers are subject to external social compliance verification of one sort or another, against occupational health and safety regulations and international standard certifications. The certifications include requirements on health and safety communication, training, risk assessments, and health and safety accident investigation and prevention, among other.

NEXT STEPS

1. Implement global management of health and safety and ISO 45001 standard at all sites
2. Instil a zero-harm culture through a multi-faceted H&S behavioural change campaign
3. Continue road safety campaign across our own operations and supply chain in Latin America
4. Support suppliers with health and safety training
5. Develop mental health support measures as part of our health and wellness philosophy



SECURITY AND SAFETY IN CONFLICT-AFFECTED AREAS AND HIGH-RISK AREAS

Why is this a salient issue for Fyffes?

Some of our operations and those of our suppliers are in conflict-affected and high-risk areas (CAHRAs) where people in local communities may be exposed to risks such as gangs, drug trafficking, death threats, extortion, riots, and kidnapping.

It is a company’s responsibility to limit the exposure of workers to these threats and, if that is not possible, to use its influence to collaborate with local authorities to reduce risk. The risks posed by third-party contracted armed security forces have been well documented and ensuring these contractors are trained in adequate use of force is a minimum requirement.

What we have done so far

We have partnered with an expert consultancy to conduct security assessments to enhance visibility and understanding of security threats in Latin America. Threat tables are frequently updated and provide an overview of the main security threats at the country level (for example, crime, terrorism, civil unrest, and kidnapping). We have a rapid incident reporting framework for the escalation of all security, safety, and reputational risks.

In 2022, we changed the company providing contracted armed security guards in Honduras and Guatemala to ensure the security guards were properly trained in firearm use. In both Guatemala and Honduras, we will ensure third-party security guards conduct security and human rights training in line with international standards for private security forces.

Some of our suppliers are also located in CAHRAs and in zones with a high narcotics presence. We reviewed the quality of these suppliers’ management of security issues during our assessment.

NEXT STEPS

1. Ensure security guards are trained in line with the Voluntary Principles on Security and Human Rights
2. Enhance our due diligence assessments in CAHRAs
3. Ensure at-risk workers have access to safe transportation
4. Propose a ‘safety buddy system’ for workers travelling at times of heightened safety risks

WORKING CONDITIONS INCLUDING WORKING HOURS, LIVING WAGES AND BENEFITS

Why is this a salient issue for Fyffes?

The fresh produce industry is vulnerable to unpredictable weather such as droughts, tropical storms, and weather events such as La Niña/El Niño systems. These conditions can impact work security because the total number of workers needed by a farm varies considerably depending on consumption habits and production impacts. This can increase the risk that excessive overtime occurs. Seasonal workers and women are more at risk because their wages are inadequate and do not allow for a sustainable livelihood. Overtime work is one of the ways that some workers achieve a living wage. However, overtime is not guaranteed and depends on demand and seasonal issues.

Low wages remain a significant reason for poverty worldwide. We believe that wages are a key component of an employee's right to a decent standard of living. At all the sites we own, our employees earn at least the legal minimum wage, and we strive to pay a living wage to workers in our supply chains, provided we can sell the produce at a living-wage price. A living wage is defined by the Global Living Wage Coalition as "the remuneration received for a standard workweek by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family. Elements of a decent standard of living include food, water, housing, education, healthcare, transportation, clothing, and other essential needs including provision for unexpected events."

What we have done so far

We are addressing these issues by engaging in living wage projects. In 2021, we joined [Call To Action](#), an initiative overseen by the Sustainable Trade Initiative (IDH) that aims to close the living wage gap and build a living wage economy with the participation of companies and businesses.

We are also a member of the IDH Steering Committee, whose goal is to take action on living wages through the [Roadmap on Living Wages](#), as well as developing and scaling up measures to enable workers in global supply chains to earn a living wage. We use the [IDH Salary Matrix](#) on our farms and suppliers' farms to identify and understand the gap in living wages in several countries and work with our customers to find ways to close the living wage gap.

We also conduct compliance audits at our farms and suppliers to gain clarity on working conditions at the farm level, including overtime. However, we do not have visibility on workers' wages and hours in the shipping of our products.

NEXT STEPS

1. Engage and train supervisors on owned farms to prevent excessive working hours and overtime beyond limits in line with international standards (60 hours)
2. Enhance audit and assessment processes to ensure they effectively capture living wage and employment conditions risks throughout our supply chain
3. Work with customers to roll out a road map to living wage solutions for workers in our supply chain
4. Work with suppliers to better understand working conditions at ports, terminals, and shipping operations



ENVIRONMENTAL FOOTPRINT (INCLUDING COMMUNITIES ENVIRONMENT AND HEALTH)

Why is this a salient issue for Fyffes?

At Fyffes, we acknowledge that the enjoyment of human rights depends strongly on the environment. Local communities surrounding our operations have the right to an environment free of water and air pollution and protection from adverse impacts on local habitats and biodiversity.

It is important for us to understand how we may be contributing to environmental degradation or negative effects on ecosystems and biodiversity — and to find ways to mitigate these impacts.

What we have done so far

Our operations and all our suppliers are certified by one or more certifications, such as GLOBALG.A.P. or Rainforest Alliance, which include the need to implement strong measures to mitigate our operations' impact on the environment. These measures include water management and conservation, wastewater management, protection of biodiversity, agrochemicals management, soil fertility and conservation, and integrated pest management. Our farms have identified all activities and processes of our operations that may generate an environmental impact.

We included questions on the environment in the CNAs conducted in the neighbouring communities surrounding our farms during 2021 and 2022. One of our four focus areas for community investment is climate change resilience and we have a target to ensure that 100% of our neighbouring communities are engaged in resilient socio-economic projects.

In 2022, we conducted our first high-level Climate Change Risk Assessment to understand the impact of 2°C (Paris Agreement aligned scenario) and 4°C (business as usual scenario) climate scenarios on our operations, employees, and communities by 2100, including the assessment of three climate risks: droughts/water stress, floods, and heat stress. We are already experiencing challenges such as extreme weather — becoming more intense and frequent due to rising global temperatures — which impairs production and the lives of local communities.

NEXT STEPS

1. Encourage and support suppliers to conduct CNAs in their neighbouring communities
2. Achieve our target of 100% of communities engaged in resilient socio-economic programmes
3. Encourage and support suppliers to conduct site-level HRIAs
4. Conduct localised third-party environmental impact assessments to enhance Fyffes understanding of its environmental impacts on surrounding communities

RESPONSIBLE RECRUITMENT AND FORCED LABOUR

Why is this a salient issue for Fyffes?

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.

What we have done so far

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 foundational work of the Migrant Roadmap includes two key internal studies — *The Socioeconomic 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 will 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.

NEXT STEPS

1. Review workers' application process and associated costs in our own farms and develop an adequate mitigation plan
2. Enhance monitoring of suppliers and contractors and engage with recruitment agencies to improve visibility over migrant workers' working conditions in our supply chain
3. Continue engaging in multi-stakeholder engagement initiatives to address unethical recruitment practices and forced labour and raise awareness in high-risk supply chains

WORKPLACE DISCRIMINATION

Why is this a salient issue for Fyffes?

Discrimination occurs in our operations and supply chain when employment policies, protocols, and practices are inadequate or unenforced. We consider the risk to be particularly high on sexual orientation, medical status, race, nationality, age, and gender. These risks have implications for several other areas including workers' equal pay and opportunities, and worker harassment.

What we have done so far

Our initial focus for workplace discrimination is gender equality because we perceive the risk to be greatest in this area. Diversity and inclusion are part of our strategic priorities and over the coming years, we will extend our focus to other groups. Our 2020 Sustainability Report set a target for 100% of owned sites in Latin America to benefit from gender equality programmes by 2025 and 50% of fruit suppliers by 2030. All our owned sites started the programme and 5,060 employees have been trained in Costa Rica, Belize, Ecuador, Guatemala, and Honduras. Among our suppliers, 37% started the programme in Colombia, Nicaragua, and Costa Rica.

The programme was developed with [BSR HERproject](#), a collaborative initiative that strives to empower low-income women working in global supply chains. Its aim is to engage, empower, and encourage our employees (men and women alike) to build more harmonious relationships at home and in the workplace and give them the tools to discuss and address challenges they face around subjects like family planning, finances, health, and communication. We are also working with BananaLink to implement women's empowerment and leadership training in the banana industry in the Dominican Republic. In addition, we have published a [Global Diversity and Inclusion Policy](#), and we have a gender committee on all our owned farms in Latin America.

Before 2020 our executive team was 100% white and male. Today, our Executive Leadership Team is 30% female and 40% Latin American. The team is highly diverse from a nationality perspective, including people from Danish, American, Swiss, Venezuelan, Dutch, Irish, Colombian, Argentinian, and Brazilian backgrounds. Every member of the team speaks at least two languages.

Finally, in Honduras and Guatemala, we eliminated the practice of hiring seasonal workers via worker-recruiters known as 'caporales'. Now all seasonal hiring is carried out via human resources and recruitment fairs. We also have a clear hiring policy, which is communicated to workers during the recruitment process.

NEXT STEPS

1. Perform gender pay gap analysis in all our owned operations and achieve our gender pay equality target
2. Continue to track our recruitment of workers belonging to minority unions
3. Survey all employees on their diversity characteristics
4. Ensure our recruitment process is clearly understood by seasonal and permanent workers for our farms
5. Extend diversity and inclusion beyond gender



VIOLENCE AND HARASSMENT AT WORK (INCLUDING GENDER-BASED VIOLENCE)

Why is this a salient issue for Fyffes?

Harassment and violence can take place throughout the whole supply chain, especially in countries where gender norms and power imbalances influence the perception of certain groups and where laws against harassment and gender-based violence are still inadequate. Women and LGBTQ+ workers are at higher risk of violence and harassment of all kinds including non-verbal, verbal (including sexual comments), physical and sexual harassment.

The ILO Convention No. 190, which was adopted in June 2019, is the first international treaty to recognise the right of everyone to a world of work that is free from violence and harassment, including gender-based violence and harassment.

What we have done so far

In 2020, we established our [Global Anti-Violence and Harassment Policy](#). Every person working for us has the right to be treated with dignity and respect, and to work in a safe environment free from violence — including gender-based violence — and harassment, sexual harassment, abuse, or discrimination. We do not, and will not, tolerate violence, including gender-based violence and harassment, sexual harassment, discrimination, and abuse of authority in any form. This conduct is contrary to the Fyffes Principles and may be subject to disciplinary measures up to and including dismissal. In 2022, we made anti-harassment and bullying training available online and we are rolling this training out globally.

NEXT STEPS

1. Establish a dedicated investigation process for gender-based violence and harassment
2. Extend training on anti-harassment and bullying to farm and ripening centre-based employees and ensure 100% completion of the online anti-harassment and bullying training
3. Extend gender equality training to offices and ripening centres

CHILD LABOUR

Why is this a salient issue for Fyffes?

Millions of children around the world are trapped in child labour², 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.

Worldwide it is estimated 60% of all child labourers aged 5–17 work in agriculture, including farming, fishing, aquaculture, forestry, and livestock³.

We are an international company with a footprint in many countries where the prevalence of child labour and modern slavery varies from very little risk to high risk. Our HRIA confirms there is only a potential risk that children are working in production and processing in our own operations. Child labour remains a concern among smallholders, particularly in non-Fairtrade smallholders.

The potential risks we have identified include children working as unpaid family helpers on supplier farms (for example, in Colombia and Belize) and consequential exposure to hazardous conditions linked to the use of agrochemicals and heavy machinery. Also, migrant workers may be more vulnerable to coercive work practices and child migrants may be engaged in child labour (such as in the Dominican Republic).

What we have done so far

In 2020 we developed a specific Child Labour Remediation Protocol which was shared and communicated to all our owned farms and fruit suppliers. We also monitor child labour risk in each of our markets using three main resources: the US Department of State's Country Reports on Human Rights Practices⁴, the Bureau of International Labor Affairs' (ILAB) Sweat and Toil app, and the Global Slavery Index⁵.

NEXT STEPS

1. Enhance the scope of our audit and assessment processes to ensure they effectively capture child labour risks throughout our supply chain
2. Engage and support suppliers to raise awareness about the risk of child labour in the countries of operations and supply chains that are most exposed, especially those relying on smallholdings
3. Apply UNICEF's Children's Rights and Business Principles to assess risks to child rights within our supply chain

² 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.”

³ <https://www.ilo.org/ipec/areas/Agriculture/lang--en/index.htm>

⁴ <https://www.ilo.org/ipec/facts/lang--en/index.htm>

⁵ https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/GSI-2018_FNL_190828_CO_DIGITAL_P-1594100208.pdf

COMMUNITY ENGAGEMENT, INDIGENOUS PEOPLES AND LAND RIGHTS

Why is this a salient issue for Fyffes?

We operate in rural locations where access to various basic needs and services can be limited. Some of our operations and suppliers' activities may affect local communities, indigenous and tribal peoples, and Afro-descendant peoples in particular regions. We act in a socially responsible manner within the communities where we operate, and we aim to contribute to their sustainable development. We promote open, constructive, and mutually beneficial relations with the communities where our fresh produce is grown and consumed, with the goal of enriching the lives of people in those communities.

In developing these projects, we need to ensure that communities are informed, consulted, and meaningfully engaged — and empowered through adequate and long-term community engagement, planning and strategy. This also includes the right to free, prior, and informed consent for indigenous and tribal peoples.

What we have done so far

In 2021, we began conducting community needs assessments to identify economic, environmental, and social challenges in the communities around our farms in Latin America and understand our impact. We employed third parties to survey over 2,200 people in more than 50 communities throughout Costa Rica, Belize, Honduras, Guatemala, and Ecuador.

We paired these results with the findings from our HRIA and information from other sources of engagement with our workers to develop impactful, resilient socio-economic community projects. We found that due to the nature of the locations, many communities' main priorities are infrastructure improvements to important community buildings like schools and community centres, as well as access to nutrition, water, education, and healthcare.

Since 2019 we have invested more than US\$2 million in community engagement initiatives. You can read more about our community projects in our [Sustainability Report](#).

NEXT STEPS

1. Deepen our understanding of the affected communities and indigenous and tribal peoples across our value chain and update our community and stakeholder mapping
2. Extend CNAs to other Fyffes operations and support suppliers to conduct similar assessments in their surrounding communities
3. Build on and enhance our approach to community engagement and agree on our community investment strategy
4. Reach our target of engaging our priority communities in resilient socio-economic projects



RIGHT TO WORK AND ADEQUATE STANDARD OF LIVING

Why is this a salient issue for Fyffes?

In many communities where we operate, minimal government intervention and private investment combined with a poor level of education lead to a lack of stable job opportunities.

This often creates economic dependence on our operations, both for direct, seasonal employment in production and processing and indirect impacts on the local economy. Where we offer seasonal work only, community members rely on this employment to sustain their own and their family's livelihoods throughout the rest of the year.

We also source fruit from several smallholder farms and we have yet to establish if these smallholders earn a living income. Read more about our work on living wages on page 19.

What we have done so far

In 2021 we initiated a productivity improvement programme in collaboration with the Latin American and Caribbean Network of Fairtrade Small Producers and Workers (CLAC), Fairtrade and the Co-op, a large UK grocery retailer. Our aim was to enhance productivity and resilience to climate change for 400 smallholders in Colombia and the Dominican Republic by improving soil health and fertility, reducing external costs, and increasing income. Farms in the programme showed on average 36% higher productivity and income compared with farms that had not taken part in the programme.

To provide economic opportunities for Honduran seasonal workers during the summer months, we and our subsidiary SOL Group have developed a Corn Production and Food Security Project in collaboration with Bayer Food Chain Partnership. The programme provides farmer communities with access to hybrid seeds, professional seed treatment, training in good agricultural practices, agronomic advice, and crop protection products. Measures to improve plant resilience and innovative spray technologies, such as drones, resulted in the production of close to 37 hectares of corn for the benefit of over 200 families from the local community.

NEXT STEPS

1. Continue calculating the living wage gaps and mapping suppliers' gaps
2. Initiate a project to deepen our understanding of living income for smallholders
3. Continue to support programmes supportive of livelihood generation including the production and processing of alternative crops in the off-season and alternative livelihood generation
4. Partnering with our customers to find ways to close the living wage gap

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Why is this a salient issue for Fyffes?

Unions in many countries where we operate do not have the same status as unions in countries where there is a long and healthy trade union tradition. In addition, we have faced allegations of union discrimination that we did not address sufficiently in previous years.

Fyffes is committed to ensuring that all workers have the right to establish or join a union of their choosing. We respect the right of all workers to freedom of association, and we will not attempt to influence decisions that workers — temporary and permanent — make about their rights to freedom of association. The workers are also entitled to organise as part of workers' committees, and they are free not to join a union. Where our employees are represented by a legally recognised union, we have established a constructive dialogue with their freely chosen representatives, and we negotiate in good faith at the local level. In some countries, for example in Honduras, collective bargaining agreements are creating positive impacts on workers with the inclusion of additional benefits for permanent and temporary workers such as (1) access to medical services during the off-season, especially for seasonal workers, (2) a guaranteed end of season bonus, (3) collective life insurance or (4) an education bonus for permanent workers.

We also maintain dialogue with unions that do not have legal status or do not represent enough employees to have been authorised by the local government. We believe that an open and continuous dialogue with our stakeholders is critical to informing our human rights approach, and we will engage with rightsholders, including our employees and their representatives, to strengthen our approach and address concerns.

What we have done so far

We have conducted regular meetings with labour rights NGOs that have taken an interest in two unions which do not yet represent a sufficient number of workers to receive legal status in Costa Rica and Honduras. We must recognise the decision our workers have made about their chosen representatives and so we have not formed agreements with unions unless they are elected representatives of our workers. To ensure that all our managers, no matter where they are from, are fully informed about the ILO Conventions, the Ethical Trade Initiative Base Code and international best practice, we have developed mandatory training on freedom of association and collective bargaining. This programme was launched in March 2023 and as of 30 June 2023, 64% of managers on our human resources system had already completed the training. We designed the training to equip our managers with the information they need about labour rights and trade union activities and to ensure that when employees attempt to organise, they respond appropriately. The programme also ensures that the rights of our people are protected and that they understand their rights, as outlined in the Fyffes Principles.

NEXT STEPS

1. Ensure 100% completion of freedom of association and collective bargaining training
2. Continue building collaborative dialogues with union members, trade union representatives and workers' committees
3. Support our suppliers to ensure they respect their workers' right to freedom of association and collective bargaining

FOOD SAFETY AND IMPACT ON CONSUMER HEALTH

Why is this a salient issue for Fyffes?

Food safety stands as a cornerstone of our operations, reflecting our commitment to upholding human rights and prioritising consumer health and quality of life. We believe that safe and healthy food helps us achieve our vision to shape wellbeing for the world. This is why we make sure to achieve high levels of safety through rigorous controls in the field, packhouses, distribution, and ripening centres that help prevent any possible risks of contamination at each stage of production. We embrace this responsibility as an opportunity to improve people’s wellbeing.

The application of product safety standards is fundamental for the food industry, as food containing harmful bacteria, viruses, parasites, or chemical substances can cause serious health problems or even poisoning. With a steadfast dedication to managing risks, we have implemented measures to ensure the highest standards of food safety across our operations from the field to packhouses, distribution, ripening centres and delivery.

What we have done so far

At Fyffes, we embrace a proactive and constructive approach in managing food safety risks, placing consumers’ needs at the forefront. Our relentless pursuit of excellence is evident in the following initiatives:

- **Systematic process control:** We maintain meticulous compliance control procedures, conducting regular internal and external audits and tests to prevent and promptly address potential risks and ensure product safety
- **Collaborative supplier partnerships:** We actively engage with suppliers through communication, training and audits, fostering a shared commitment to food safety and upholding high standards throughout the supply chain
- **Transparency and traceability:** By prioritising traceability and employing accurate and swift response tracking systems, we ensure rapid identification of potential concerns, enabling track-back and trace-forward actions to safeguard consumer health and build trust
- **Certifications and compliance:** We actively pursue certifications across all sites from renowned international bodies across our supply chain, underscoring our dedication to meeting rigorous food safety standards including GLOBALG.A.P., BRC, Primus GFS and International Featured Standards (IFS), ensuring ongoing full conformity
- **Continuous improvement:** We embrace a culture of food safety permeating the whole company, actively staying abreast of and addressing newly developing risks, and constantly reviewing and refining food safety measures

NEXT STEPS

1. Maintain our strong food safety standard and continued efforts to improve consumer health
2. Work with suppliers to improve their food safety management systems



RESPONSIBLE MARKETING PRACTICES

Why is this a salient issue for Fyffes?

Our consumer insights work tells us that people care deeply about sustainability in their purchasing decisions regarding our fresh produce. They care about the prevention of environmental adverse impacts, and they care about the welfare and wellbeing of the people who grow fresh produce and who work all along the supply chain. Consumers are confused about the various sustainability claims that companies make. The human rights risk is that our consumers might be misled by marketing statements and external communications.

What we have done so far

At Fyffes we are committed to being transparent in our communications. We are the first company among our peers to produce a Human Rights Report where we share transparently our human rights journey and the identified human rights risks.

In all our sustainability targets, we have either provided data that helps our audiences understand our targets and how we are achieving them, or we have chosen to submit our targets to respected organisations such as the Science Based Targets initiative.

In our community needs assessments and human rights due diligence, we have used expert third parties because we understand it takes time to build trust and credibility around our practices and reporting.

We were also a founding signatory of the European Union's Code of Conduct on Responsible Food Business and Marketing Practices. We publish an annual submission that you can read on the European Commission [website](#).

NEXT STEPS

1. Develop a responsible marketing policy
2. Reinforce our ESG data collection and verification via external assurance to substantiate all our sustainability-related claims
3. Review all applicable legislations in relation to responsible marketing, labelling and communication and establish action plan to ensure we are compliant with such regulations
4. Continue to submit annual statement to the EU Code of Conduct
5. Ensure compliance with EU Directive on Green Claims

ACCESS TO EFFECTIVE GRIEVANCE MECHANISMS AND REMEDY

Why is this a salient issue for Fyffes?

Providing access to effective grievance mechanisms with sufficient guarantees for the complainant and adequate resolution procedures, to raise potential cases of impact on human rights and, where appropriate, provide remedy in our own operations and across our supply chain is a key expectation of the UN Guiding Principles and a core element of our due diligence approach.

What have we done so far?

Complaint and Grievance Mechanisms: We provide legitimate, accessible, predictable, equitable and transparent operational-level grievance mechanisms aligned with the UN Guiding Principles criteria as outlined in the Fyffes Principles Grievance Procedures. This enables us to understand and address challenges in our operations and potential dissatisfaction among our stakeholders. To assist in the effective receipt, retention, reporting, follow-up, and resolution of concerns related to possible breaches of the Fyffes Principles, we have implemented the following communication reporting structure:

- Employees who believe improper practices or questionable acts have or will be committed are encouraged to report their concerns through existing grievance mechanisms if they feel comfortable doing so. These mechanisms include contacting their immediate supervisor or line manager, their human resources representative or workers' representative, or anonymous suggestion boxes where they exist
- When an employee reasonably believes that reporting a potential breach of the Fyffes Principles cannot be appropriately resolved with any of the mechanisms above, or that s/he might suffer retaliation or require confidentiality, they can contact the Chief Corporate Affairs Officer directly or the Fyffes Ethics Committee on ethicscommittee@fyffes.com
- To raise and resolve concerns about behaviour that contradicts the Fyffes Principles, employees can also choose to use the [Fyffes Ethics Hotline](#), an independently run, confidential business reporting hotline available to internal and external stakeholders where we have operations
- The Fyffes Ethics Hotline is confidential. Complainants using the hotline who choose to remain anonymous will be provided with a unique identifying code so that the complaint can be assessed and investigated. If a complainant chooses to remain anonymous, it can reduce the speed and effectiveness of subsequent investigations
- Complaints raised with the Chief Corporate Affairs Officer or with the Fyffes Ethics Hotline are assessed by the Ethics Committee, which comprises senior management from the human resources, legal and compliance 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 scale, complexity and geographical origin of a complaint and complaints will be resolved in the quickest 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 will agree 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

We do not allow any form of retaliatory action to be taken against anyone for reporting a concern or cooperating with an investigation. We will protect all employees who honestly and in good faith express their concerns.

In 2020, the Fyffes Principles and the Fyffes Ethics Hotline were extended from all employees in 2019 to include all major suppliers and long-term contractors. We also developed new training on the Fyffes Principles and Ethics Hotline which was launched for all our employees in February 2023, and we rebranded new posters to strengthen communication of the existing grievance mechanisms. However, during the HRIA site visits, we found that the Fyffes Ethics Hotline was not sufficiently communicated or accessible to surrounding communities. In addition, the telephone network in Belize and Honduras did not support access to the numbers for free.

In June 2023, we signed a contract to replace the ethics hotline service provider to ensure we have a grievance mechanism that fully complies with the UN Guiding Principles in all locations. We are rolling this improved service out across our locations*.

Access to Remedy: In line with the UN Guiding Principles, we are committed to providing, or cooperating to provide, remediation measures in case 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. Fyffes will not impede access in any way to state-based judicial or non-judicial mechanisms and cooperates in good faith with them.

NEXT STEPS

1. Switch to a new hotline provider with better mobile access
2. Assess the effectiveness of our existing operational-level grievance mechanisms to ensure they are accessible and effective for all workers and affected communities throughout our supply chain
3. Improve communication about the Fyffes Ethics Hotline to enhance workers' and community members' understanding and use of the service
4. Review our existing processes to verify and provide, or cooperate to provide, remediation in case of adverse human rights impacts that we might have caused or contributed to

* All links to the Fyffes Ethics Hotline in this report have been updated to the new hotline provider *OneTrust*, effective October 2023.