



# Human Rights Report 2021



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## FYFFES APPROACH TO HUMAN RIGHTS


The [Fyffes Principles](#) outline the importance of respecting human rights within our own operations and in our supply chain. We believe people should be treated with dignity, honesty, and fairness.

Fyffes approach to Human Rights Due Diligence has been developed in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises with stakeholder engagement at its core. Fyffes Limited Board of Directors oversees all decision-making on economic, environmental, and social topics at Fyffes Limited, including human rights.

Our first Human Rights Impact Assessment, which we started in 2019, has been instrumental in helping us to better understand the environment we work in.

Fyffes first Human Rights Impact Assessment identified 13 salient human rights risks with varying levels of company management and mitigation. To improve our mitigation measures, we established a human rights core team, composed of human resources and compliance personnel across the company to undertake our first Human Rights Risks Prevention and Mitigation Plan.

In 2020, Fyffes outlined its commitment to human rights in our [Global Human Rights Policy](#). This policy sets out our approach to protecting the human rights of all stakeholders, including our employees (all Fyffes workers, whether contractors, seasonal or permanent workers). It is brought to life through training, internal protocols, and leadership action.

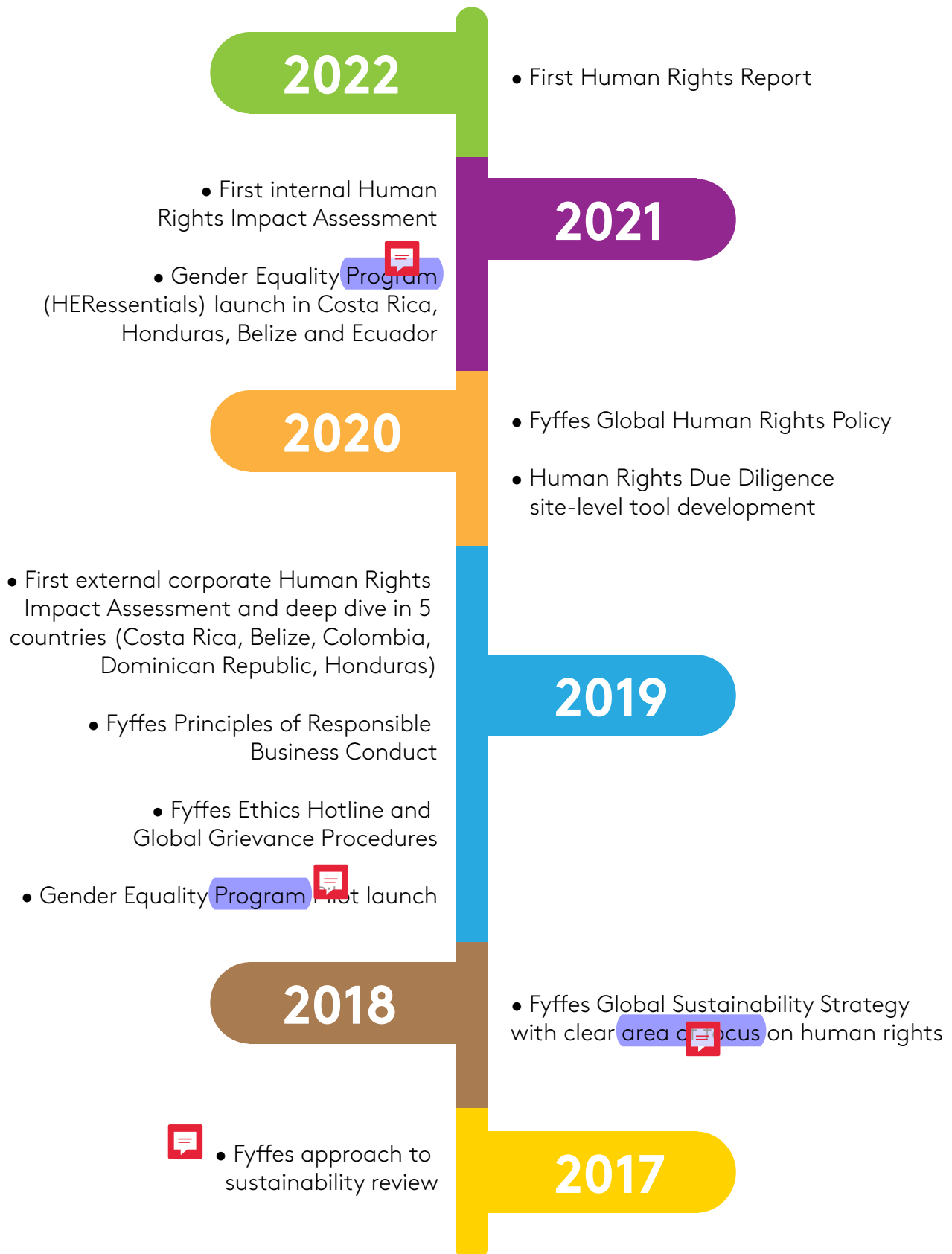
We  developed a due diligence tool to evaluate human rights risks at site-level. The sustainability department provided interactive training on the implementation of this tool to managers at all our sites to help them conduct local assessments with the assistance of our partner AED (Alianza Empresarial para el Desarrollo). Additional support was also provided by our sustainability and compliance teams, who were extensively trained during 2020 on human rights and the use of the new due diligence tool. A total of 170 employees from the human resources, compliance, and management teams at our farms, ripening centres, and supplier operations have been trained on human rights so far.

These site-level assessments, combined with SMETA (Sedex Members Ethical Trade Audit) non-compliances and Fyffes Ethics Hotline complaints, formed the basis for updating our 2021 Human Rights Impact Assessment, outlined in this report.

In July 2021, we announced our target of **100% of Fyffes workers and supply chain workers to be trained on human rights by 2030; 100% of managers and employees by 2025.**

As previously communicated, we will undertake an independently assessed Human Rights Impact Assessment in 2022, using a third-party human rights expert consultancy, that will include on-site deep-dive stakeholder consultations in two countries. This will help us continue improving our policies and control systems. We will conduct an independent Assessment every three years and an internal Assessment on an annual basis.

## Fyffes Journey to Human Rights



## FYFFES COMMITMENT TO RESPECT HUMAN RIGHTS

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

Fyffes is committed to a working environment that promotes diversity and equal opportunity, 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 nor any form of bullying or harassment, whether psychological, verbal, physical or sexual. Fyffes respects the right of all workers to freedom of association and collective bargaining. Fyffes is committed to keeping our business free of modern slavery, including child labour, debt bondage, and human trafficking.

Our commitment to human rights is outlined in our [Global Human Rights Policy](#), adopted in 2020. The policy ensures that wherever local regulations may be less stringent than international human rights standards, Fyffes will apply international standards in the way we conduct business and engage with stakeholders. Fyffes also commits to take adequate measures to identify, prevent and mitigate risks or address adverse impacts to human rights within our operations, as well as paying special attention to the rights of vulnerable groups, including, but not limited to; children, women, LGBTIQ+, people with disabilities, black, indigenous or people of colour (BIPOC) and migrant workers. We accomplish this by doing human rights due diligence through an annual Human Rights Impact Assessment with the aim to identify hotspots and processes in the value chain that might represent risks related to human rights.



## FYFFES HUMAN RIGHTS DUE DILIGENCE

### FYFFES HUMAN RIGHT DUE DILIGENCE APPROACH

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

In 2019, Fyffes conducted its first-ever Human Rights Impact Assessment. The baseline Assessment was undertaken by an independent human rights expert consultancy using the [UN Guiding Principles on Business and Human Rights framework](#), published in 2020. This Assessment included an in-depth analysis of five countries in which we operate directly or through suppliers — Belize, Colombia, Costa Rica, the Dominican Republic, and Honduras. The baseline Assessment identified 13 salient human rights risks.

This year's Assessment was undertaken by Fyffes using a similar framework and methodology. Every three years, Fyffes will employ an independent expert consultancy to assess its human rights risks and review its mitigation and management systems to ensure the company is following best practices and is not at risk of bias or complacency.

This process will be further improved by consulting stakeholders, including local communities surrounding our operations, acknowledging their concerns and interests while managing or mitigating the potential or actual risks that our operations may have on them. This will be done through community needs assessments and community engagement surveys. Fyffes will proactively seek stakeholders' perspectives by developing strong relationships through an established engagement plan in order to facilitate such engagement processes.

To ensure Fyffes is transparent with stakeholders, the company will carry out and report the results of its Human Rights Impact Assessment annually, providing updates on progress against our Risks Prevention and Mitigation Plan while engaging with stakeholders on a regular basis to continue improving.



## IDENTIFYING FYFFES SALIENT HUMAN RIGHTS RISKS

Business for Social Responsibility (BSR) conducted our baseline assessment in 2019 using the [UN Guiding Principles on Business and Human Rights framework](#). The Human Rights Impact Assessment methodology consisted of four main phases: (1) Scoping, (2) Mapping, (3) Prioritisation, and (4) Management Review and Recommendations. BSR relied on information provided by Fyffes, as well as employee and stakeholder interviews and [desktop](#) research. The identification of Fyffes salient human right risks and BSR baseline assessment can be found in our [2019-2020 Sustainability Report](#) and on our [website](#).

In 2021, Fyffes used the following sources of information to review its salient human right risks, their severity level, and the level of company management, including progress made in its original Risks Prevention and Mitigation Plan:

### 1. Human rights SMETA-related non-compliances

Fyffes used the results and insights from the SMETA (Sedex Members Ethical Trade Audit) non-compliances in process of remediation to verify if any non-compliances related to human rights were found during those audits. A non-compliance indicates that controls to manage a risk are missing, weak or need strengthening. This exercise allowed Fyffes to gain another perspective on issues related to human rights on our sites that may not have been identified initially in the baseline Assessment. The exercise reviewed each individual non-compliance by category, country, and site, and highlighted some important trends that will inform Fyffes efforts going forward and help update the Assessment. The exercise highlighted issues in Guatemala, Honduras, and Belize around inadequate systems for monitoring labour providers, excessive hours of work and overtime, and how hours are logged.

### 2. Human rights related to Fyffes Ethics Hotline complaints

In 2019, Fyffes introduced the [Fyffes Ethics Hotline](#) as a mechanism to give any rights holder who feels they are being adversely affected, the opportunity to raise their concerns and for Fyffes to investigate the Grievance above the local level by escalating the issue directly to the Chief Corporate Affairs Officer.

In 2020, three complaints were lodged via the Fyffes Ethics Hotline, and one was reported directly to our Chief Corporate Affairs Officer separately. Of the four complaints made, three related to human rights and two were accepted as legitimate. Of the complaints accepted as legitimate, one was related to sexual harassment and was addressed and rectified, while the second one was related to an alleged case of bullying, although the alleged victim (who was not the complainant) denied the allegations being made.

We believe that the small number of complaints received via the Ethics Hotline indicates a low level of awareness of the grievance mechanism. While we have awareness posters on-site, the majority of farm employees still have not received training on the Fyffes Principles or the Fyffes Ethics Hotline.





### 3. Site-level human rights due diligence

In 2020, Fyffes Sustainability team developed a tool to conduct due diligence on human rights risks at site-level. The tool includes questions to evaluate the systems in place that manage human rights. It also includes a risk prioritisation tool, where each of our 13 salient human right risks is evaluated against potential scope, scale, remediability/irreversibility, and likelihood as well as the level of current management of the risk by the site.

Interactive training was provided to the management teams at all our sites to help them complete their site-level assessments using the tool. Additional support was provided by our sustainability and compliance teams who were extensively trained on human rights and the new due diligence tool during 2020. A total of 170 employees from the human resources, compliance, and management teams at our farms, ripening centres and suppliers have been trained at the date of publication.

The Sustainability team reviewed the site-level results and validated the answers provided depending on the quality of the results received, using a detailed validation questionnaire. Adjustments to the results were made as appropriate and shared with each site. The Sustainability team graded the residual risk level for each site based on the answers provided. The residual risk consists of the initial risk compared to the level of company management of said risk.

The following table lists all sites and the results of the site-level human rights risk assessment following validation, highlighting the residual risk of each. The detailed results for each site are available upon request.

RISK	Costa Rica		Belize	Honduras	Guatemala	Ecuador	United Kingdom				Germany		Ireland
	FFdE	Anexco*	PMS	Sol Hn	Sol Guate	San Jorge	Coventry	Basingstoke	Livingstone	Normanton	Interwicht	Van Wylick	Swords
Working hours, wages and benefits	●	○	●	●	●	●	●	●	●	●	●	●	●
Freedom of association and right to CB	●	○	●	●	●	●	●	●	●	●	●	●	●
Access to grievance mechanism	●	○	●	●	●	●	●	●	●	●	●	●	●
Child labour	●	○	●	●	●	●	●	●	●	●	●	●	●
Gender discrimination and gender-based violence	●	○	●	●	●	●	●	●	●	●	●	●	●
Workplace discrimination	●	○	●	●	●	●	●	●	●	●	●	●	●
Migrant workers labour violations	●	○	●	●	●	●	●	●	●	●	●	●	●
Security threats	●	○	●	●	●	●	●	●	●	●	●	●	●
Land rights	●	○	●	●	●	●	●	●	●	●	●	●	●
Right to livelihood	●	○	●	●	●	●	●	●	●	●	●	●	●
Health and Safety	●	○	●	●	●	●	●	●	●	●	●	●	●
Communities' environment and health	●	○	●	●	●	●	●	●	●	●	●	●	●
Food safety and consumer health	●	○	●	●	●	●	●	●	●	●	●	●	●

● Low ● Medium ● High ○ N/A

\*Anexco was unable to complete the site-level assessment on time to be included in this report but will be included in the next report.



## 4 COVID-19 impact on human rights

### Protection from transmission at work

The COVID-19 pandemic not only posed a risk to our workers and communities, but it also had the unfortunate consequence of reducing the scale and effectiveness of worker training, as physical distancing was implemented to keep our people safe.

Safeguarding the health and safety of our employees, grower partners, and communities was a heightened focus in 2020 due to COVID-19. In addition to the early adoption of best-in-class biosafety measures at our farms and ripening centres, we were quick to help our grower partners and communities to prevent the risk of infection by donating masks, personal protective equipment, and COVID-19 tests, as well as setting up medical brigades to provide healthcare to individuals and families.

Despite our best efforts, community transmission was still very high in most of the countries where we operate and several of our employees caught the virus, although thankfully most of the positive cases were asymptomatic and were only detected thanks to proactive testing. Before the vaccines became available, our policy required all employees who tested positive to self-isolate for 14 days, and a negative test before returning to work was required. This way, we managed to significantly reduce the transmission of the virus in the workplace. All of these employees were paid during their quarantine period. Since the vaccines became available, Fyffes has played an important role in facilitating the transport of employees to vaccination centres while encouraging the uptake of vaccines amongst our worker population through posters and management communication. As a result, vaccine uptake has been higher than the population average in many of our Central American locations.




## Gender

As early as April 2020, the UN issued a warning on the worldwide increase of violence<sup>1</sup> against women. Since then, it has been widely acknowledged that domestic violence and related abuse has increased since the pandemic began. The precise dynamics driving the increase are unclear. However, higher levels of social and economic stresses due to the pandemic – such as increased male unemployment, the stress associated with childcare and home-schooling, and increased financial insecurity - combined with restricted mobility outside of the home and reduced access to services, have created a pressure-cooker situation for potential abuse.

We recognise that people may not have the proper coping strategies to deal with these stresses and support services were either unavailable or lacked resources during the early stages of the pandemic.

Reduced social interaction due to restrictions left parents and children confined to their homes, cut off from friends, neighbours, colleagues, and others who might have either reported signs of abuse and violence, or intervened to help potential victims escape violent situations.

The  urges governments to address the situation by increasing access to support services, awareness-raising campaigns, and reporting mechanisms to ensure victims are empowered to report the issue. While there is no single simple solution to combatting domestic and gender-based violence, it is clear that any responses to COVID-19 must include a gender lens.

Fyffes identified gender empowerment as a key focus area for its sustainability strategy, aligned to the UN Sustainable Development Goal 5. Fyffes launched its gender equality training program in Honduras and Costa Rica in 2019. Gender is also one of the four focus areas for Fyffes community investment programs, including climate change resilience, nutrition, and education.

## Food shortages

The COVID-19 shutdown created job losses and instability as well as reduced access to food and other essential goods in communities throughout the world. Since the outbreak of the pandemic, we have been at the forefront of emergency relief efforts to help communities surrounding our operations.

We partnered with additional food charities in Europe and Latin America to ramp up our contribution to ensure community access to fresh and healthy produce during these tough times. We also set up temporary food banks, such as the one in Honduras, to support individuals and families who were most affected by COVID-19.

<sup>1</sup> The concept of violence is to be taken here in the broadest sense, as defined by the World Health Organisation: “the intentional use of physical force or power, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, maldevelopment, or deprivation.”


































## 2021 HUMAN RIGHT IMPACT ASSESSMENT RESULTS AND RISKS PREVENTION AND MITIGATION ACTION PLAN

The table below outlines our updated salient human rights risks. The definition for each human rights risk can be found in the [Appendix](#). The 2021 Assessment tested the enduring relevance of the salient human rights issues mapped in 2019 and assessed improvements or deteriorations. Salient human rights risks are those that are the most severe and most likely actual or potential risks to humans across the supply chain. The UN Guiding Principles Reporting Framework makes it clear that companies should prioritise their efforts and resources to tackle salient human rights risks but also look beyond and consider emerging risks.


The Human Rights Risks Prevention and Mitigation Plan was set within a three-year timeframe and has been updated on a regular basis according to the monitoring of activities carried out, the lessons learned from the due diligence approach, and other assessment activities. The 2021 Assessment has also resulted in additional actions being added to the Risks Prevention and Mitigation Plan.

The most recent Assessment has not resulted in the addition of new salient human rights risks. However, we have changed the severity and the company management level of some of the the risks, as can be seen in the following tables:

RISK	RESIDUAL RISKS	COMPANY MANAGEMENT			
		NONE	LITTLE	GOOD	STRONG
Migrant workers labour violations					
Child labour					
Gender discrimination and gender-based violence					
Freedom of association and right to CB					
Workplace discrimination					
Health and safety					
Working hours, wages and benefits					
Security threats					
Access to grievance mechanism					
Communities' environment and health					
Land rights					
Right to livelihood					
Food safety and consumer health					

 High  Medium  Low

 2020  2021

SALIENT HUMAN RIGHTS RISK	2021 ASSESSMENT	ACTION ARISING FROM 2019 ASSESSMENT	COMMENT
<b>Child Labour</b>	Changed residual risk to <b>Low</b> and company management to <b>Good</b>	Establish and circulate Fyffes Global Child Labour Remediation Protocol	 <p>Child Labour Policy and Remediation Protocol written, published, and circulated to all Fyffes owned farms and fruit suppliers</p>
<b>Freedom of Association and Right to Collective Bargaining</b>	<b>No change</b> to risk level or company management	Continue to engage with existing trade unions and workers committees in good faith and train all managers on freedom of association	<p>Continues to be an important focus area for Fyffes and its stakeholders.</p> <p>Regular meetings held with labour rights NGOs, trade unions in Costa Rica and Honduras.</p> <p>Training for all managers on freedom of association planned for May 2022.</p>
<b>Gender Discrimination and Gender-Based Violence</b>	<b>No change</b> to risk level or company management	Implement Fyffes Gender Equality Programme, targets, and gender-related training	<p>Maintained because gender-related risks were exacerbated by the pandemic, e.g., domestic violence, and training had to be adapted to reduce social contacts via digitisation.</p> <p>Published target of 100% of owned sites in Latin America to benefit from Gender Equality Programmes by 2025 and 50% of fruit suppliers by 2030.</p> <p>Retailer and Fyffes customer Lidl UK and IDH are founding partners in the HERessentials digital programme. Fyffes adapted BSR's HERessentials—their digital training tool—for the Latin American region. The digital programme includes two packages: the 'Worker Toolkit' and the 'Manager Toolkit'. In 2021, we began the roll out in Costa Rica, Belize, Ecuador, and Honduras. As of the end of December 2021, a total of 148 employees have been trained.</p> <p>Fyffes has partnered with Bananalink, Tesco, the Cultural Research and Support Centre (CIAC) and Sindicato Único de Trabajadores y Productores de Banano de Montecristi (SIUTRAPBAM) on a six-month women's empowerment and leadership training in the banana industry in the Dominican Republic. It is an initiative designed to empower rural women in banana exporting areas and increase their participation in the leadership of workers' and producers' organisations.</p>

SALIENT HUMAN RIGHTS RISK	2021 ASSESSMENT	ACTION ARISING FROM 2019 ASSESSMENT	COMMENT
<b>Security Threats</b>	Maintained risk level as <b>High</b> but increased company management from <b>None</b> to <b>Little</b>	Provide training on security and community programmes to reduce security threats	<p>Criminals hijacked an employee outside one of our farms in Ecuador, stealing his belongings. The employee was not hurt, but this incident is sufficiently serious for us to maintain the risks as high.</p> <p>We engaged a professional security company in 2021 to undertake a global analysis of Fyffes security protocols and procedures. The recommendations from the report form the basis of an action plan at the executive level.</p> <p>The security company also undertook a security threat level analysis in Honduras.</p> <p>The Honduran Community Needs Assessment (CNA) included 900 interviews with community members in 14 communities, also included questions on security threats. There is a list of actions arising out of the CNA.</p> <p>Training of farm security personnel and guards on human rights as well as staff carrying weapons on the adequate use of force is planned for 2022.</p>
<b>Communities' Environment and Health</b>	Company management improved to <b>Good</b> but residual risk maintained with confidence we can reduce it during 2022 and 2023	Conduct community needs assessments to identify environment and health-related issues and solutions	<p>In 2021, we conducted a Community Needs Assessment (CNA) in Honduras to inform community engagement and investment in the region, and to mitigate any human rights risks.</p> <p>As a result of the CNA, in Honduras we will:</p> <ul style="list-style-type: none"> <li>-Reinforce donated focus areas: education, nutrition, and climate change relevant as well as gender</li> <li>-Explore additional programs or partnerships in the areas of decent housing and access to medical facilities</li> <li>-Communicate more about our community programs and increase the reach and number of beneficiaries</li> <li>-Undertake road safety campaigns</li> <li>-Assess road signage gaps in vicinity of farm</li> </ul> <p>For more details, please refer to <a href="https://www.fyffes.com/news/fyffes-completes-community-needs-assessment-in-honduras/">https://www.fyffes.com/news/fyffes-completes-community-needs-assessment-in-honduras/</a></p> <p>In 2022, we will conduct similar CNAs in Ecuador, Costa Rica, Belize, and Guatemala.</p> <p>In addition, Fyffes Food Safety and Compliance department conducted an internal gap analysis of the farms in Honduras and Guatemala against the Rainforest Alliance Standard and developed a detailed action plan in order to ensure the proper controls are in place to mitigate potential impacts on the environment and health of the surrounding communities.</p> <p>Finally, in 2022 we will communicate our Fyffes Ethics Hotline to our various communities.</p>

SALIENT HUMAN RIGHTS RISK	2021 ASSESSMENT	ACTION ARISING FROM 2019 ASSESSMENT	COMMENT
<b>Right to Livelihood – including Living Wage and Living Income</b>	<p>Increased company management to <b>Good</b> and maintained risk level</p> <p>Given focus on this area plus our own actions, we expect the risk level to decrease in coming years</p>	<p>Facilitate capacity-building in smallholder and own farm climate resilience</p> <p>Continue to engage with and support the Living Wage initiative</p> <p>Conduct community needs assessments to identify socio-economic community engagement projects</p>	<p><b>Climate change resilience</b></p> <p>We published our target to improve the resilience of 2,000 smallholders to climate change across key production countries in Latin America with specific capacity-building programmes by 2030.</p> <p>In 2021, we initiated a program in collaboration with CLAC, Fairtrade and the UK retailer Coop to improve productivity and resilience to climate change of 600 smallholders in Colombia and the Dominican Republic. The objective of the program is to help small scale farmers to increase production by improving soil health and fertility, reduce external costs and increase income.</p> <p>Fyffes co-funded a project for eight smallholder families in Colombia who are facing increasing droughts, to improve their irrigation system infrastructure, optimize water use and improve yields.</p> <p>In 2021, Fyffes also conducted its first climate change risk assessment, and a climate change risk mitigation plan will be established during 2022.</p> <p><b>Living wage</b></p> <p>For at least five years,, Fyffes has been advancing the concept of a Living Wage for all those working in the banana sector.</p> <p>Together with The Sustainable Trade Initiative (IDH), Rainforest Alliance and other partners, we participate in the calculation of living wages for the banana producing areas in Costa Rica and Belize. With practical tools, the IDH Salary Matrix developed supports the efforts that companies and other organisations undertake to bring transparency to supply chains regarding wages.</p> <p>Our role is to apply the salary matrix on our farms to identify and understand the living wage gap in several countries.</p> <p>Fyffes is also an active member of the IDH Steering Committee, whose goal is to take action through the Roadmap on Living Wages</p> <p>We also sit on the World Banana Forum Sub-Group on Sustainable Cost of Production which has a mandate to find a global solution to the price dispute between large distributors in developed countries which results in low prices for bananas.</p> <p>In 2021, Fyffes calculated the living wage gap in the majority of its owned farms and suppliers and plans to complete this mapping in 2022.</p> <p>Fyffes has already started discussing approaches to closing the living wage gap with some of its key partners and customers.</p>



SALIENT HUMAN RIGHTS RISK	2021 ASSESSMENT	ACTION ARISING FROM 2019 ASSESSMENT	COMMENT
			<p><b>Community needs</b></p> <p><a href="#">Fyffes Global Donation Policy</a> has four focus areas: education, nutrition, climate change resilience, and gender within the communities surrounding our operations.</p> <p>Fyffes has published three targets in this area:</p> <ul style="list-style-type: none"> <li>-Provide five million healthy meals to vulnerable communities by 2025 by working with qualified partners.</li> <li>-100% of Fyffes neighbouring communities to be engaged in resilient socio-economic community projects out of our four community investment areas by 2030.</li> <li>-Improve the resilience of 2,000 smallholders to climate change across key production countries in Latin America with specific capacity-building programmes by 2030.</li> </ul> <p>As a result of our community needs assessments, we have a lot more insight into how to improve the livelihood of employees, their families, and their communities.</p>
<b>Access to Grievance Mechanisms</b>	<b>No change</b> to risk level or company management	Extend grievance mechanism to suppliers and communities; increase worker training and awareness of the Fyffes Ethics Hotline	<p>All sites in Latin America have access to local grievance mechanisms and there are posters showcasing the Fyffes Ethics Hotline, complete with local numbers or internet-based ways to register a grievance. However, when surveyed about the Ethics Hotline, most of the employees in Latin America were not aware of it. This is due to delays in providing training to farm employees on the Fyffes Principles and the Ethics Hotline given the COVID-19 biosecurity measures, which prevent classroom-type training.</p> <p>Some farms, including the three banana farms in Finca Frutas de Escocia, Costa Rica, have communicated the Ethics Hotline to employees and have included this as part of their new employee on-boarding process. Awareness of the Ethics Hotline was evidenced in worker interviews conducted in early 2021 at those farms. Fyffes has committed to ensuring all employees receive the Fyffes Principles training (which includes a section on the Ethics Hotline) which will begin in 2022. During 2020 and 2021, all office-based employees completed Fyffes Principles training, except the ones in Honduras and Guatemala. To date, over 520 employees have been trained on the Fyffes Principles and the Ethics Hotline.</p> <p>In 2020, the Fyffes Principles and Ethics Hotline was extended from all employees in 2019 to include all major suppliers and long-term contractors.</p> <p>During 2022 we will communicate our Fyffes Ethics Hotline to our various communities.</p>

SALIENT HUMAN RIGHTS RISK	2021 ASSESSMENT	ACTION ARISING FROM 2019 ASSESSMENT	COMMENT
<b>Migrant workers labour violations</b>	<b>No change</b> to risk level or company management	Partner with non-governmental organisations to reduce Haitian migrant worker vulnerability in the Dominican Republic	<p>All of Fyffes migrant workers have legal working permits, but migrant workers are in general more vulnerable to exploitation and can fall through the cracks when it comes to social security and other issues.</p> <p>In 2021, Fyffes signed an agreement with Fairtrade, CLAC, and other partners to develop the Migrant Roadmap towards equal rights, benefits, and decent working conditions. The goals of this project are that:</p> <ul style="list-style-type: none"> <li>-Workers employed in hired-labour set-ups and smallholdings have access to social benefits or similar coverage provided by the social security system;</li> <li>-Workers employed in in hired-labour set-ups and smallholders are protected from deportation;</li> <li>-Dominican Republic and Haitian authorities are informed on the importance of the banana sector and migrant labour.</li> </ul> <p>The <a href="#">Roundtable</a> is still at the inception stage, and we are yet to see tangible results that will decrease risks for migrant workers. Fyffes will continue to monitor results from the Roadmap and report back on an annual basis.</p>
<b>Health and Safety</b>	Increased residual risk to <b>Medium</b> and reduced company management from <b>Strong</b> to <b>Good</b>	<p>Continue and increase health and safety awareness campaigns</p> <p>Improve Health and Safety Management Systems</p>	<p>The introduction of more robust health and safety management practices and greater scrutiny at the executive level has resulted in a better understanding of health and safety management across the company, resulting in both an increased risk score and a reduced score on company management.</p> <p>More details on our health and safety incidents and management can be found on pages 61 and 63 of our <a href="#">Sustainability Report</a>.</p> <p>Road accidents involving workers travelling to work on motorbikes is a particular concern for our production facilities in Latin America. In 2021, Fyffes initiated a <a href="#">motorcycle</a> safety campaign in Costa Rica, Honduras, and Guatemala to raise awareness of how to drive safely, including wearing a helmet. The high-impact digital and printed campaign focused on “WAS IT WORTH IT?” to appeal to workers, their families, and the public.</p> <p>The road safety campaign was launched in May 2021 in Costa Rica and will last one full calendar year.</p> <p>In Latin America, Fyffes introduced a safety and accident management system based on the ISO45001, which will be rolled out across the region by the end of 2022 and globally by the end of 2023.</p>
<b>Working hours, wages, and benefits</b>	Increased residual risk to <b>Medium</b> and maintained company management at <b>Good</b>	Continue to monitor progress on remediation of non-compliances	<p>We have a number of number of non-compliances in process of remediation related to this related to this human right in Belize, Guatemala, and Honduras. The majority of our sites have good practices in the management of working hours, wages, and benefits, and non-compliances mostly relate to contractors, who comprise a very small portion of our workforce.</p> <p>We will provide an update on remediation status in our 2022 report.</p>







## ACCESS TO REMEDY

Companies are required to provide remedy where they determine that they have caused or contributed to negative human rights impacts.

Fyffes provides for legitimate, accessible, predictable, equitable, and transparent operational-level grievance mechanisms aligned with UNGPs criteria as outlined in our Fyffes Principles Grievance Procedures. This enables us to understand and address challenges in our operations and potential dissatisfaction amongst our stakeholders.

To assist in the effective receipt, retention, reporting, follow-up, and resolution of concerns related to possible breaches of the Fyffes Principles, the following communication reporting structure has been implemented:

- 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, 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.
- 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 both internal and external stakeholders available where Fyffes has operations.
- The Fyffes Ethics Hotline is confidential. Complainants using the Fyffes Ethics 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.
- Fyffes does not tolerate any form of retaliatory action against anyone for reporting a concern or cooperating with an investigation. Fyffes will take all steps necessary to protect employees expressing a concern with honesty, but 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, which could lead to disciplinary measures.
- The Ethics Committee assesses, investigates, agrees an action plan, and resolves and reports on those complaints to the Board of Directors and our parent company Sumitomo, as outlined in the Grievance Procedures.



- The time necessary to handle and resolve complaints may differ depending on the scale, complexity, and geographical origin of a complaint and will be resolved in the quickest possible time frame. The Committee will either investigate the nature of the complaint or appoint a team to do so.
- When the investigation is complete, the 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.

## CONCLUSION

Fyffes was one of the first companies in its sector to conduct and publish the results of its human rights due diligence in 2020. The assessment we undertook helped inform both our sustainability targets and our human rights targets.

In this report, we are proud to share the results of our second Human Rights Impact Assessment and demonstrate transparently the progress made since our first-ever HRIA in 2019. The key to thorough human rights due diligence is stakeholder engagement and really trying to understand their everyday concerns, and then adapting the company's approach to those stakeholders and informing our business priorities.

Of equal importance to stakeholder engagement is building a strong culture where everyone is unified behind the values and principles of Fyffes while allowing our differences to thrive. Despite being one of the first, Fyffes is only at the beginning of its human rights due diligence journey, and we are continuing to learn and adapt our approach as we grow our understanding of this important area.

I would like to congratulate the Sustainability Team for their relentless focus on this area, for working with farm managers, compliance, and human resources personnel, including the innovative creation of a site-level human rights evaluation tool and training. I would finally like to thank all our people across the world 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

## APPENDIX

SALIENT HUMAN RIGHT RISK	SALIENT HUMAN RIGHT ISSUE & DEFINITION
<b>Working Hours, Wages, and Benefits</b>	Related to the efforts to ensure workers are working reasonable working hours in line with International Labour Standards on Working time and are provided with appropriate wages and benefits that respect legal requirements and ultimately allow families to meet basic needs
<b>Freedom of Association and Right to Collective Bargaining</b>	Related to the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities is respected
<b>Access to Grievance Mechanism</b>	Related to the steps to ensure that if a human rights abuse occurs in the operations and supply chain, victims have access to effective grievance mechanisms (mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on dialogue and engagement).
<b>Child Labour</b>	Related to any activities undertaken by children that can qualify as child labor under local law or international standards
<b>Gender Discrimination and Gender-based Violence</b>	Related to unequal treatment based on the gender or perceived gender of workers in the workplace, including but not limited to act of harassment and violence, ranging from verbal abuse and sexual harassment to assault, and rape.
<b>Workplace Discrimination</b>	Related to unequal treatment based on non-gender factors including in particular the temporary / seasonal status of workers, as well as race, ethnicity and national origin such as afro-descendants and indigenous peoples in particular, as well as disability, persons with HIV/AIDS, sexual orientation, language, and socioeconomic status.
<b>Migrant Workers, Labour Violations and Forced Labour</b>	Related to any labour violations including but not limited to forced labour, indecent working conditions and retaliation that migrant workers particularly face because of the migration status
<b>Security Threats</b>	Related to direct or indirect personal security risks that staff and local surrounding communities may be exposed to, including but not limited to gang violence linked to drug trafficking, and any other forms of extortion, physical violence, death threats, verbal abuses and intimidation.
<b>Land Rights</b>	Related to the impacts of Fyffes' direct and indirect activities on the land of the surrounding communities, including but not limited to land rights, land ownerships and land usages in particular in countries where land regulations are poorly developed or enforced.

<b>Right to Livelihood</b>	Related to the right of communities to preserve and develop an adequate standard of living including by engaging in social and economical activities through continued access to natural resources and land for instance, as well as the right to an effective participation in shaping decisions that may affect the future of the community.
<b>Health and Safety</b>	Related to farmers and workers' exposure to potential health and safety hazards as a result of their involvement in Fyffes's operations and supply chains
<b>Communities' Environment and Health</b>	Related to impacts from Fyffes' operations on the environment and health, affecting local communities.
<b>Food Safety and Consumer Health</b>	Related to potential consumer exposure to eating contaminated products or produce that have become unsafe through unintentional chemical, microbiological or physical contamination.

