



2023



# Human Rights and Environment Due Diligence Report



# Foreword

I am pleased to share that during 2023 and the first half of 2024, Fyffes **maintained its sector leadership in human rights and environmental due diligence**. We began our formal independent due diligence in human rights in 2019 because our internal and external stakeholders identified human rights as our most material issue. We started our first Human Rights Impact Assessment (HRIA) in 2019 and published the results in 2020, using the UN Guiding Principles for Business and Human Rights.

Since then, we have conducted in-depth **independent HRIAs** in many of our owned farms as well as with our suppliers. We have also undertaken independent **community needs assessments at all the communities** near our owned farms in Latin America, interviewing 2,200 people in 50 communities in five countries. Since the publication of our last report, we have worked with an external human rights expert to undertake HRIAs at two of our Costa Rican suppliers and our farms in Belize. With every HRIA, we learn more, and we adjust our practices. We agree a Human Rights and Environmental Mitigation Plan, and we **hold our farms and suppliers accountable** for delivering against that plan.

On 1 January 2023, the **German Supply Chain Act** came into effect. Although we are not in scope for this legislation, many of our customers are. For that reason, we have accelerated our readiness for the European Union's **Corporate Sustainability Due Diligence Directive (CSDDD)**, which will be transposed into member state law and replace the German Act in Germany.

The experience of working with the German Act over the past year has provided **three key lessons** that we believe are central to successful human rights and environmental due diligence:



## STAKEHOLDER CENTRICITY

The importance of the worker, community member or rightsholder's voice. It is essential to understand the actual and potential impact on people and to gather their viewpoints through independent surveys with human rights experts, including offsite interviews with workers and community members



## SUPPORTING, NOT DROPPING, SUPPLIERS IN DIFFICULTY

The importance of maintaining commercial relationships with suppliers, unless in the most extreme circumstances and as a last resort, to protect the workers whose rights are further harmed by ceasing those relationships



## RIISING COSTS OF HUMAN RIGHTS AND ENVIRONMENTAL PERFORMANCE

The escalating cost of human rights and environmental mitigation actions on our farms and supplier farms is significant. We welcome the clause embedded in CSDDD on shared responsibility, and we anticipate that the continued downward trajectory of fruit prices (in real terms) is unsustainable.

At Fyffes, our vision is *Shaping Wellbeing for the World*. Our approach to human rights and environmental due diligence, mitigation and performance sets us up to achieve that vision. I hope you enjoy reading this report and find useful the transparency we provide on the challenges we face and the progress we have made since last year.

**Caoimhe Buckley**

Chief Corporate Affairs Officer

# Commitment to Human Rights and Environment

- Global Human Rights and Environment Policies
- Fyffes Principles and Supplier Code of Conduct
- Human rights target: 100% of Fyffes workers and supply chain workers to be trained on human rights by 2023; 100% of managers and employees by 2025
- Environment target: reduce our greenhouse gas emissions to achieve the Science-Based Target in line with the 1.5°C scenario by 2025, representing a 25% reduction for scope 1 and 2 in CO<sub>2</sub> eq./kg of fruit harvested, and a 10% reduction for scope 3\* in CO<sub>2</sub> eq./kg of fruit harvested and distributed by Fyffes and its suppliers, from a 2020 base year
- All global policies available on Fyffes website



# Supply Chain Due Diligence

- Due Diligence Policy outlines our Human Rights and Environment Due Diligence approach
- Independent company-wide HRIA, including an evaluation of the impact of environmental degradation on human rights, conducted every three years
- Published salient human rights and environmental risks
- Risk Prevention and Mitigation Plan
- Human Rights and Environment Due Diligence Committee
- Site-level due diligence 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 and the Environment

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 how we conduct

business and engage with our people and other stakeholders. Our Environmental Policy also addresses environmental due diligence. Our Global Human Rights and Environment Policies are 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

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 Cooperation and Development's Guidelines for Multinational Enterprises (the OECD Guidelines), and enshrined in our Principles of Responsible Business Conduct (the Fyffes Principles). We welcome the Corporate Sustainability Due Diligence Directive, which we hope will create a level playing field and reward companies genuinely committed to improving human rights and environmental management in their supply chains.



# Supply Chain Due Diligence

We continually assess the actual and potential impact of our actions on human rights and the environment along our value chain, on both a scheduled and ad-hoc basis. Our Due Diligence Policy outlines this process in more detail. We 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 (see Figure 2).

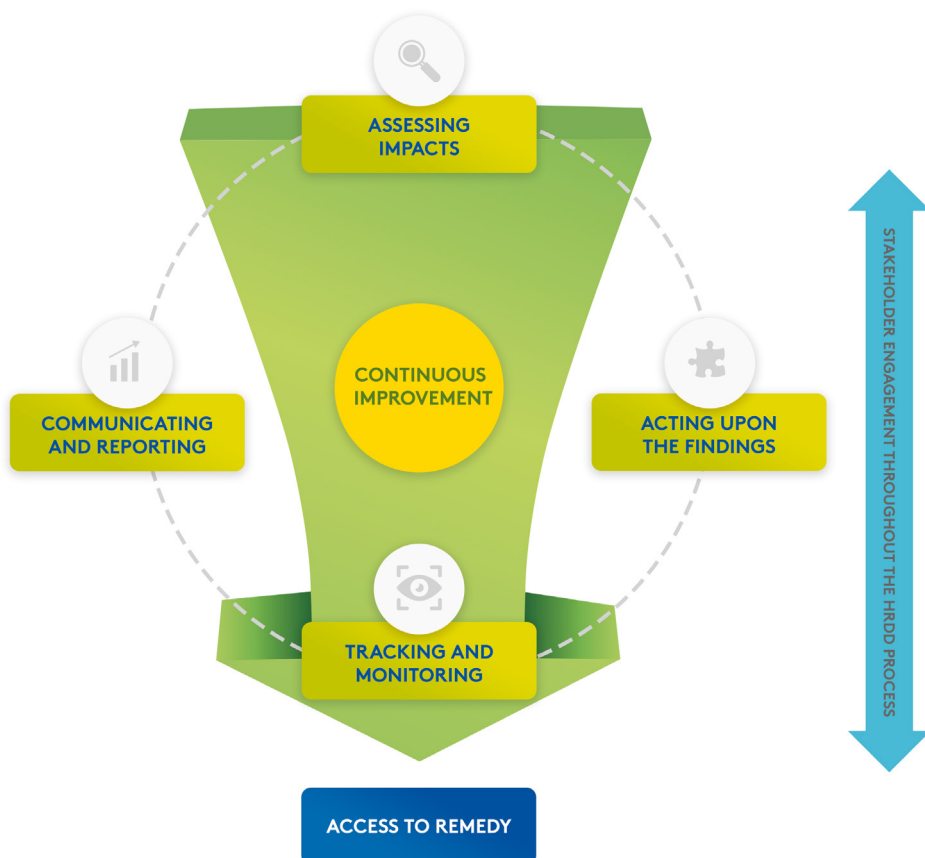


Figure 2

Every three years, we conduct an independent corporate-wide impact assessment with an experienced external business and human rights specialist. The assessment includes interviews with internal and external stakeholders as well as a review of external reports and media articles and a detailed review of our policies and management systems (Figure 3).

Figure 3



## Human Rights Impact Assessment:

- **Evaluates** our progress against mitigation and prevention actions identified in the previous company-wide impact assessment
- **Re-examines** our salient human rights risks and the potential and actual adverse impacts of our business activities on rightsholders
- **Assesses** the potential severity and likelihood of those impacts across our value chain in line with the criteria outlined in the UN Guiding Principles
- **Focuses** on affected stakeholders and vulnerable groups
- **Prioritises** risks in terms of urgency
- **Assesses** our management of potential risks and impacts
- **Includes** stakeholder consultation as an integral component



This assessment defines and updates our salient human rights and environmental risks, which are:



Figure 4

Our risk assessments also evaluate how environmental degradation and/or adverse impacts on the environment affect the human rights of people (affected stakeholders) in order to better identify and more effectively address these interconnected impacts.

We have a greenhouse gas emissions reduction target and are working on a transition plan to mitigate our impact on climate change. We have undertaken a Climate Change Risk Assessment to understand the impact of climate change on our operations and surrounding communities and develop adaptation plans.



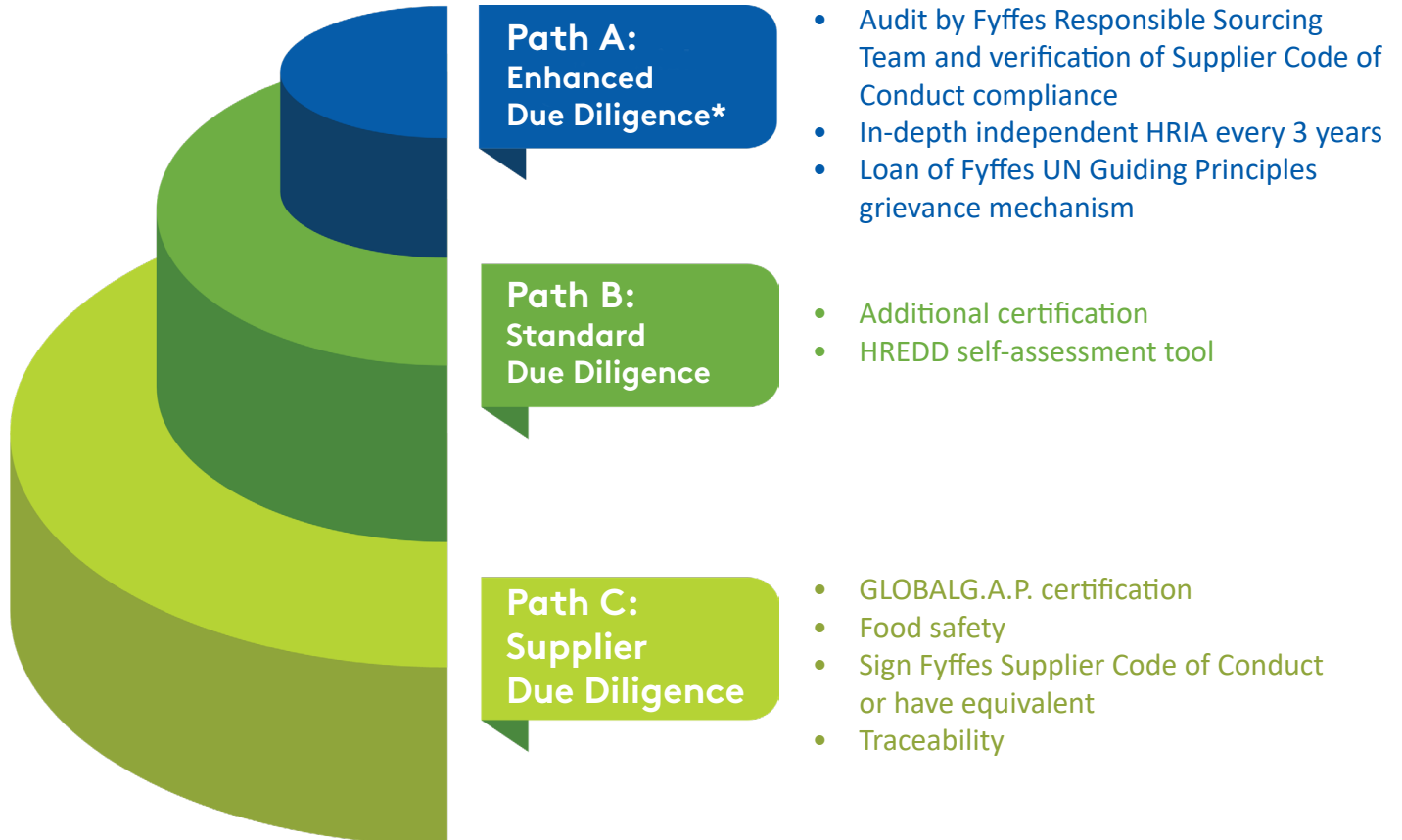
For a detailed description of each risk and why they are an issue, please refer to our [2022 Human Rights Report](#)





Our risk-based approach dictates the level of due diligence to be applied to Fyffes-owned farms and suppliers, detailed in our Due Diligence Policy and summarised in Figure 5.

Figure 5



*\*Enhanced due diligence will apply to all Fyffes-owned farms, regardless of risk*








# Prevention and Mitigation Plan Progress

In our 2022 Human Rights Report we committed to a number of actions to prevent, mitigate or remediate our salient human rights risks. The table below highlights our action plan and any progress made. The Human Rights and Environmental Due Diligence Committee meets quarterly to review the progress towards our plan.

Current management level:





## Risk:

## Occupational Health and Safety

Commitment	By When	Progress	Details
Develop and implement Fyffes H&S Management System Base on ISO 45001	<b>Latin America:</b> May 2025 <b>Other regions:</b> 2026		<ul style="list-style-type: none"> <li>Global Director Health, Safety and Security appointed in April 2024</li> <li>Gap analysis and strategic plan to achieve ISO 45001 standard to be completed in 2024</li> </ul>
Deploy behaviour based safety programme for Latin America operations	February 2025		<ul style="list-style-type: none"> <li>Global Director Health, Safety and Security appointed in April 2024</li> <li>Gap analysis and strategic plan to achieve ISO 45001 standard to be completed in 2024</li> </ul>
Continue road safety campaign across our operations and supply chain in Latin America	February 2025		<ul style="list-style-type: none"> <li>Continued road safety campaigns in Costa Rica</li> </ul>
Support suppliers with health and safety training	December 2024		<ul style="list-style-type: none"> <li>Supplier meeting to be held in 2024 on health and safety with Fyffes Global Director Health, Safety and Security</li> </ul>
Develop mental health support measures as part of our health and wellness philosophy	March 2025		<ul style="list-style-type: none"> <li>We identified mental health as a topic of concern during our 2024 Employee Engagement Survey</li> <li>Human Resources is developing a mental health programme</li> <li>In 2024, we began offering office-based employees one day off per year for volunteering. Volunteering has a positive impact on employee mental health by providing a purpose and sense of belonging<sup>1</sup></li> <li>We are piloting a Latin American employee assistance programme in Costa Rica during 2024</li> </ul>





<sup>1</sup> <https://www.forbes.com/councils/forbesnonprofitcouncil/2024/03/06/volunteering-a-proven-way-to-improve-employee-well-being/>

**Risk:****Security and Safety in Conflict-affected Areas and High-risk Areas (CAHRAs)**

Commitment	By When	Progress	Details
Ensure security guards are trained in line with the Voluntary Principles on Security and Human Rights	March 2025		<ul style="list-style-type: none"> <li>During 2023, we provided training to sustainability, legal, compliance, health and safety and security staff on security and human rights and the Voluntary Principles on Security and Human Rights</li> <li>We are developing protocols for the roles and responsibilities of security personnel at the farm level and practices on the appropriate use of force</li> <li>In 2024, all security personnel will be trained in these protocols as well as the Voluntary Principles on Security and Human Rights</li> </ul>
Enhance our due diligence assessments in CAHRAs			<ul style="list-style-type: none"> <li>We identified CAHRAs</li> <li>In accordance with Due Diligence Policy, we will conduct enhanced due diligence</li> </ul>
Ensure at-risk workers have access to safe transportation	March 2025		<ul style="list-style-type: none"> <li>Evaluating employees at risk and potential mitigation plans during 2024</li> <li>Expecting to implement mitigation actions during 2025</li> </ul>
Propose a “safety buddy” system for workers travelling at times of heightened safety risks	March 2025		<ul style="list-style-type: none"> <li>Evaluating employees at risk and potential mitigation plans during 2024</li> <li>Expecting to implement mitigation actions during 2025</li> </ul>



**Risk:****Working Conditions Including Working Hours, Living Wages and Benefits**

Commitment	By When	Progress	Details
Engage and train supervisors on owned farms to prevent excessive working hours and overtime beyond limits in line with international standards (60 hours)			<ul style="list-style-type: none"> <li>We reviewed overtime management on our farms and identified excess overtime as an ongoing concern and non-conformance against several standards and certifications</li> <li>We implemented a new system of control to ensure compliance</li> </ul>
Enhance assessment processes to ensure they effectively capture living wage and employment conditions risks throughout our supply chain			<ul style="list-style-type: none"> <li>Our banana and pineapple farms and suppliers completed the annual IDH Living Wage Salary Matrix, comparing workers' average wage and in-kind benefits against their country's living wage benchmark</li> </ul>
Work with customers to roll out a road map to living wage solutions for workers in our supply chain			<ul style="list-style-type: none"> <li>We review the IDH Living Wage Salary Matrix every year and are working with several customers to help them close the living wage gap in their supply chains via voluntary contributions, and more sustainable practices via retailer commitment deadlines. For example, our Fairtrade agreement with Sainsbury's in 2024</li> </ul>
Work with suppliers to better understand working conditions at ports, terminals and shipping operations	December 2025		

**Risk:****Environmental Footprint  
(Including Communities' Environment and Health)**

Commitment	By When	Progress	Details
Encourage and support suppliers to conduct community needs assessments in their neighbouring communities	December 2025		<ul style="list-style-type: none"> <li>We conducted an assessment of key suppliers in Nicaragua</li> <li>We plan to conduct an assessment in Guatemala in 2024</li> <li>We intend to conduct an assessment in the Dominican Republic in 2025</li> </ul>
Achieve target of 100% of neighbouring communities engaged in resilient socio-economic programmes	2030		<ul style="list-style-type: none"> <li>Conducted community needs assessments in 100% of our neighbouring communities</li> <li>2,200 people in 50 communities in five countries took part</li> <li>Nearly 40% engaged in resilient socio-economic projects</li> </ul>
Encourage and support suppliers to conduct site-level Human Rights and Environment Impact Assessments	March 2025		<ul style="list-style-type: none"> <li>Our revised site-level due diligence self-assessment tool will be launched at our Supplier Summit in October 2024</li> </ul>
Conduct localised third-party environmental impact assessments to enhance Fyffes understanding of its environmental impacts on surrounding communities	April 2026		<ul style="list-style-type: none"> <li>We are reviewing all our farms' environmental aspect lists to define potential risks and potential need for a localised environmental impact assessment. An environmental aspect list sets out elements of an organisation's activities, products or services that interact or can interact with the environment</li> </ul>








**Risk:****Responsible Recruitment and Forced Labour**

Commitment	By When	Progress	Details
Review workers' application process and associated costs in our own farms and develop an adequate mitigation plan	December 2025		<ul style="list-style-type: none"> <li>We identified where workers in our operations incur costs</li> <li>We are assessing how to minimise these costs for workers</li> <li>We introduced a Supplier Code of Conduct and updated our Human Rights Policy to include a section on the Employer Pays Principle during 2024</li> </ul>
Enhance monitoring of suppliers and contractors and engage with recruitment agencies to improve visibility over migrant workers' working conditions in our supply chain	September 2024		<ul style="list-style-type: none"> <li>We mapped recruitment agencies and the migrant workforce</li> <li>Risk analysis was developed, and mitigation actions were identified. Based on this mapping, we started a risk analysis and identified mitigation actions where needed. We mainly use labour agencies in the UK and Ireland ripening operations and audit the agencies using SMETA guidelines, including a review of records/ payslips and right to work</li> </ul>
Continue engaging in multi-stakeholder engagement initiatives to address unethical recruitment practices and forced labour and raise awareness in high-risk supply chains	Ongoing	Ongoing	<ul style="list-style-type: none"> <li>Stronger Together (<a href="https://www.stronger2gether.org/">https://www.stronger2gether.org/</a>) is implemented in our UK ripening centres</li> </ul>

## Risk:




### Workplace Discrimination

Commitment	By When	Progress	Details
Perform gender pay gap analysis in all our owned operations and achieve our gender pay equality target	2027		<ul style="list-style-type: none"> <li>Completed job architecture and grading down to supervisor level.</li> <li>On track for EU Pay Transparency Reporting in 2027</li> </ul>
Continue to track our recruitment of workers belonging to minority unions			<ul style="list-style-type: none"> <li>We are tracking the quantity of minority union representation</li> <li>During 2023, 100% of managers completed freedom of association training <a href="https://www.youtube.com/@FyffesGlobal">https://www.youtube.com/@FyffesGlobal</a></li> </ul>
Survey all employees on their diversity characteristics	2026		<ul style="list-style-type: none"> <li>Our December 2023 Employee Engagement Survey included questions on diversity characteristics, including sexual orientation, gender, race/ethnicity, disability and belonging to a minority group. The survey did not include all farm or ripening centre employees</li> </ul>
Ensure hiring policy in melon operations is understood by seasonal and permanent workers			<ul style="list-style-type: none"> <li>Published updated hiring policy for melon operations</li> <li>Recruitment fairs explain the policy to potential workers</li> <li>Elimination of “caporal” recruitment process</li> <li>Our hiring policy outlines non-discrimination, including trade union affiliation</li> </ul>
Extend diversity and inclusion beyond gender	2026		



## Risk:

### Violence and Harassment at Work (Including Gender-based Violence)




Commitment	By When	Progress	Details
Establish dedicated training for gender-based violence and harassment, and roll it out to Latin America	End of 2025		<ul style="list-style-type: none"> <li>• Training given in Belize, Costa Rica and Guatemala during 2023 and 2024</li> <li>• Our local policy on sexual harassment in Costa Rica has been published</li> <li>• Email address established for cases of sexual harassment in Costa Rica</li> <li>• A local ethics committee was established in Costa Rica, initially focusing on sexual harassment</li> <li>• From 2025 all employees will be required to disclose familial and intimate relationships within reporting lines</li> </ul>
Extend anti-harassment and bullying training to farm and ripening centre employees Ensure 100% completion of online anti-harassment and bullying training	End of 2025		<ul style="list-style-type: none"> <li>• Online anti-harassment training and bullying completed by 89% of eligible participants</li> <li>• In-person training rolled out to UK ripening centres only</li> <li>• In-person training not started in other locations</li> </ul>
Extend gender equality training to offices and ripening centres	End of 2026		

## Risk:

### Child Labour

Commitment	By When	Progress	Details
Enhance the scope of risk assessment processes to ensure they effectively capture child labour risks throughout our supply chain			<ul style="list-style-type: none"> <li>We enhanced our risk assessment to better capture child labour risk. For more details on our process, please refer to our report on Child Labour Due Diligence in the Supply Chain <a href="https://www.fyffes.com/sustainability/reports-2/">https://www.fyffes.com/sustainability/reports-2/</a></li> </ul>
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	March 2025		<ul style="list-style-type: none"> <li>We are working with a plantain supplier on an independent expert multi-faceted programme to prevent and/or mitigate child labour to be rolled out during 2025</li> <li>We signed an agreement in 2021 with Fairtrade International, the Latin American and Caribbean Network of Fairtrade Small Producers and Workers, and other partners to develop the Migrant Roadmap towards equal rights, benefits, and decent working conditions for Haitian migrant workers in the Dominican Republic. Roadmap actions address child labour root causes</li> </ul>
Apply UNICEF's Children's Rights and Business Principles to assess risks to child rights within our supply chain			<ul style="list-style-type: none"> <li>We have completed this exercise, and more details can be found in our report on Child Labour Due Diligence in the Supply Chain <a href="https://www.fyffes.com/sustainability/reports-2/">https://www.fyffes.com/sustainability/reports-2/</a></li> </ul>

**Risk:****Community Engagement, Indigenous Peoples and Land Rights**



Commitment	By When	Progress	Details
Deepen our understanding of the affected communities and indigenous and tribal peoples across our value chain and update our community and stakeholder mapping	End of 2025	 NOT STARTED 0%	
Extend community needs assessments to other Fyffes operations and support suppliers to conduct similar assessments in their surrounding communities	December 2025	 IN PROGRESS	<ul style="list-style-type: none"> <li>• We conducted an assessment of key suppliers in Nicaragua</li> <li>• We plan to conduct an assessment in Guatemala in 2024</li> <li>• We intend to conduct an assessment in the Dominican Republic in 2025</li> </ul>
Build on and enhance our approach to community engagement and agree on our community investment strategy		 COMPLETED 100%	<ul style="list-style-type: none"> <li>• Finalised three-year community engagement strategy</li> </ul>
Reach our target of engaging our priority communities in resilient socio-economic projects	2030	 IN PROGRESS	<ul style="list-style-type: none"> <li>• Nearly 40% of communities are engaged in resilient socio-economic projects</li> </ul>





**Risk:****Right to Work and Adequate Standard of Living**

Commitment	By When	Progress	Details
Continue calculating the living wage gaps and mapping suppliers' gaps			<ul style="list-style-type: none"> <li>Our banana and pineapple farms and suppliers are required to complete the IDH Living Wage Salary Matrix, which compares workers' average wage and in-kind benefits against the applicable country living wage benchmark</li> </ul>
Initiate a project to deepen our understanding of living income for smallholders	2026		
Continue to support programmes supportive of livelihood generation including the production and processing of alternative crops in the off-season and alternative livelihood generation	2027		<p>Programmes to support livelihoods and production of alternative crops:</p> <ul style="list-style-type: none"> <li>Honduran corn planting project for employees, families and communities</li> <li>School garden projects in Guatemala to improve access to fresh produce for students and their families</li> <li>Livelihood generation projects being developed with CARE (<a href="https://www.care.com/">https://www.care.com/</a>) and GOAL (<a href="https://www.goalglobal.org/">https://www.goalglobal.org/</a>) in Guatemala and Costa Rica</li> </ul>
Partnering with our customers to find ways to close the living wage gap	2027		<ul style="list-style-type: none"> <li>We review the IDH Living Wage Salary Matrix every year. We are working with several customers to help them work toward closing the Living Wage gap in their supply chains via voluntary contributions. We are also helping them develop more sustainable practices</li> </ul>


**Risk:****Freedom of Association and Collective Bargaining**

Commitment	By When	Progress	Details
Ensure 100% completion of freedom of association and collective bargaining training for managers			<ul style="list-style-type: none"> <li>100% of managers have completed freedom of association training since 2023. Freedom of Association included in Fyffes Principles training, which has been rolled out to 90% of employees</li> </ul>
Continue building collaborative dialogues with union members, trade union representatives and workers' committees	Ongoing	Ongoing	<ul style="list-style-type: none"> <li>We are a founding member of the World Banana Forum and we participate in Working Group 3 – Labour Rights</li> <li>Ad hoc engagement at corporate and farm level with Latin American unions SITRAP <a href="https://sitrap.net/">https://sitrap.net/</a>, COLSIBA <a href="https://www.colsiba.org/">https://www.colsiba.org/</a>, ANEP <a href="https://www.anep.or.cr/">https://www.anep.or.cr/</a> and IUF <a href="https://www.iuf.org/">https://www.iuf.org/</a></li> </ul>
Support our suppliers to ensure they respect their workers' right to freedom of association and collective bargaining	December 2024		<ul style="list-style-type: none"> <li>We encourage suppliers to conduct freedom of association training using our YouTube material <a href="https://www.youtube.com/@FyffesGlobal">https://www.youtube.com/@FyffesGlobal</a></li> </ul>

**Risk:****Food Safety and Impact on Consumer Health**

Commitment	By When	Progress	Details
Maintain our strong food safety standards and continued efforts to improve consumer health	March 2025		<ul style="list-style-type: none"> <li>We are developing a food safety policy</li> </ul>
Work with suppliers to improve their food safety management systems	March 2025		<ul style="list-style-type: none"> <li>Fyffes already has GFSI benchmarked standards for field, harvest, packhouse and transport (GLOBALG.A.P., BRC, IFS, Primus GFS)</li> <li>Our Food Safety Policy will be rolled out to suppliers</li> </ul>

**Risk:****Responsible Marketing Practices**

Commitment	By When	Progress	Details
Develop a responsible marketing policy	December 2024		
Reinforce our ESG data collection and verification via external assurance to substantiate all our sustainability-related claims	December 2024		<ul style="list-style-type: none"> <li>We are conducting our first external limited assurance on a number of sustainability-related metrics using an expert consultancy</li> </ul>
Review all applicable legislation in relation to responsible marketing, labelling and communication and establish an action plan to ensure we comply with regulations	2027		<ul style="list-style-type: none"> <li>We have reviewed the EU legislation on labelling and we are monitoring it</li> <li>Through our membership of Freshfel and IBEC, we are monitoring the Green Claims Directive to ensure compliance</li> </ul>
Continue to submit an annual statement to the EU Code of Conduct			<ul style="list-style-type: none"> <li>We report our statement each year to the <a href="#">EU Code of Conduct</a></li> </ul>
Ensure compliance with EU Directive on Green Claims	2027		<ul style="list-style-type: none"> <li>Through our membership of Freshfel and IBEC, we are monitoring the Green Claims Directive to make sure we comply</li> </ul>



**Risk:****Access to Effective Grievance Mechanisms and Remedy**

Commitment	By When	Progress	Details
Switch to a new hotline provider with better mobile access	2023		
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	December 2024		<ul style="list-style-type: none"> <li>We conducted an accessibility and effectiveness assessment to test our Fyffes Ethics Hotline against the UN Guiding Principles effectiveness criteria</li> </ul>
Improve communication about the Fyffes Ethics Hotline to enhance workers' and community members' understanding and use of the service	Ongoing		<ul style="list-style-type: none"> <li>We have trained more than 11,500 employees (over 90% of our employees) in the Fyffes Principles and the Ethics Hotline and have updated all posters in our offices, distribution ripening centres, farms and transportation buses with the new Ethics Hotline numbers</li> <li>We are developing a pamphlet which will include Fyffes Ethics Hotline numbers to distribute to members of communities during our various engagement sessions with them</li> </ul>
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	December 2024		<ul style="list-style-type: none"> <li>We are finalising our Due Diligence Policy</li> </ul>



# Access to Effective Grievance Mechanisms and Remedy

## Why is this a salient issue for Fyffes?

The availability of a UN Guiding Principles-compliant grievance mechanism is fundamental to the success of human rights and environmental due diligence. An independent, confidential and anonymous ethics hotline provides complainants with the ability to report misconduct by the company's employees.

## 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 as outlined in the Fyffes Principles Grievance Procedures. This enables us to understand and address challenges in our operations and potential stakeholder dissatisfaction. 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 or stakeholders who believe misconduct, in contradiction of the Fyffes Principles, has taken place can report their concerns through existing grievance mechanisms, including contacting the local manager, in the case of employees their immediate supervisor or line manager, their human resources representative or workers' representative, or anonymous suggestion boxes where they exist

- If this is not an option, for any reason, stakeholders and employees can contact the Fyffes Ethics Committee at [ethicscommittee@fyffes.com](mailto:ethicscommittee@fyffes.com)
- In addition, stakeholders can use the Fyffes Ethics Hotline <https://ethicshotline.fyffes.com/>, an independently run, confidential business reporting hotline available to internal and external stakeholders where we have operations in their language. The hotline complies with the UN Guiding Principles
- The Fyffes Ethics Hotline is confidential. Complainants using the hotline who choose to remain anonymous are provided with a unique identifying code so that the complaint can be assessed and investigated. If a complainant chooses to remain anonymous, this can reduce the speed and effectiveness of investigations
- All grievances are assessed by the Ethics Committee, which comprises senior management from the human resources, legal and compliance, and corporate affairs 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 complaint's scale, complexity and geographical origin, and complaints will be resolved in the shortest 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

During 2023, we successfully introduced a new provider for the Fyffes Ethics Hotline with much better accessibility and mobile network coverage than the previous provider. While the internet-based hotline functions well, many

employees prefer the telephone system. In 2024, we reviewed the effectiveness of the telephone hotline in all its operations with employees, testing for the operator's communication skills, connectivity and service quality.

## Access to remedy

In line with the UN Guiding Principles, we are committed to providing, or cooperating to provide, remediation measures in cases 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. We will not impede access to state-based judicial or non-judicial mechanisms, and we cooperate with them in good faith.

## Summary of cases received via the Fyffes Ethics Hotline

The following paragraph has been drafted to ensure confidentiality and avoid retaliation against complainants while providing transparency to stakeholders on the types and locations of grievances in our business. To avoid compromising the outcome of live investigations, only grievances raised during 2023 are shared.

During 2023, the Fyffes Ethics Committee investigated 13 grievances raised by stakeholders, via various channels, including senior managers, directly to the Ethics Committee email and the Fyffes Ethics Hotline. Three allegations were not substantiated after thorough investigation, and one allegation highlighted a significant cultural issue although there was insufficient evidence for the Ethics Committee to take action. However, a programme to address the cultural issue has been implemented.

Of the remaining substantiated issues, three allegations were related to Belize (sexual harassment/abuse of power, discrimination and conflict of interest), three were related to Honduras (disrespectful treatment) and one was related to Guatemala (harassment, disrespectful treatment).

In response to the allegations, we have developed and rolled out sexual harassment prevention training for employees in Costa Rica, Belize and Guatemala. We have also trained our leaders and dismissed perpetrators of misconduct.

The Ethics Committee investigates grievances as required and meets monthly to review and assess the progress of investigations, as well as any additional training, policies or other programmes to continue to enhance our culture in line with our vision of Shaping Wellbeing for the World.



The background image shows two women working in a large industrial facility, likely a banana processing plant. They are wearing yellow aprons and green gloves, and are washing green bananas in a large water tank. The woman on the left is smiling at the camera, while the woman on the right is looking down at the bananas. The water is splashing around the bananas, and there are more bananas on a conveyor belt in the background.

## Conclusion

It is more than five years since we set ourselves the goal of becoming the leading company in our sector for human rights and environmental policies and practices. We want to stay ahead of human rights and environmental due diligence legislation, ensure the best possible working conditions for our people, and support healthy and vibrant communities. We will continue to help our growers meet rising regulatory requirements and customer expectations by providing training and frameworks so they can fulfil our high expectations.

In this report, we have tried to be as transparent as possible about our progress over the past three years. We hope it provides consumers and customers with the information they need to make an informed decision about our company and the fresh produce we sell to countless people across the globe.