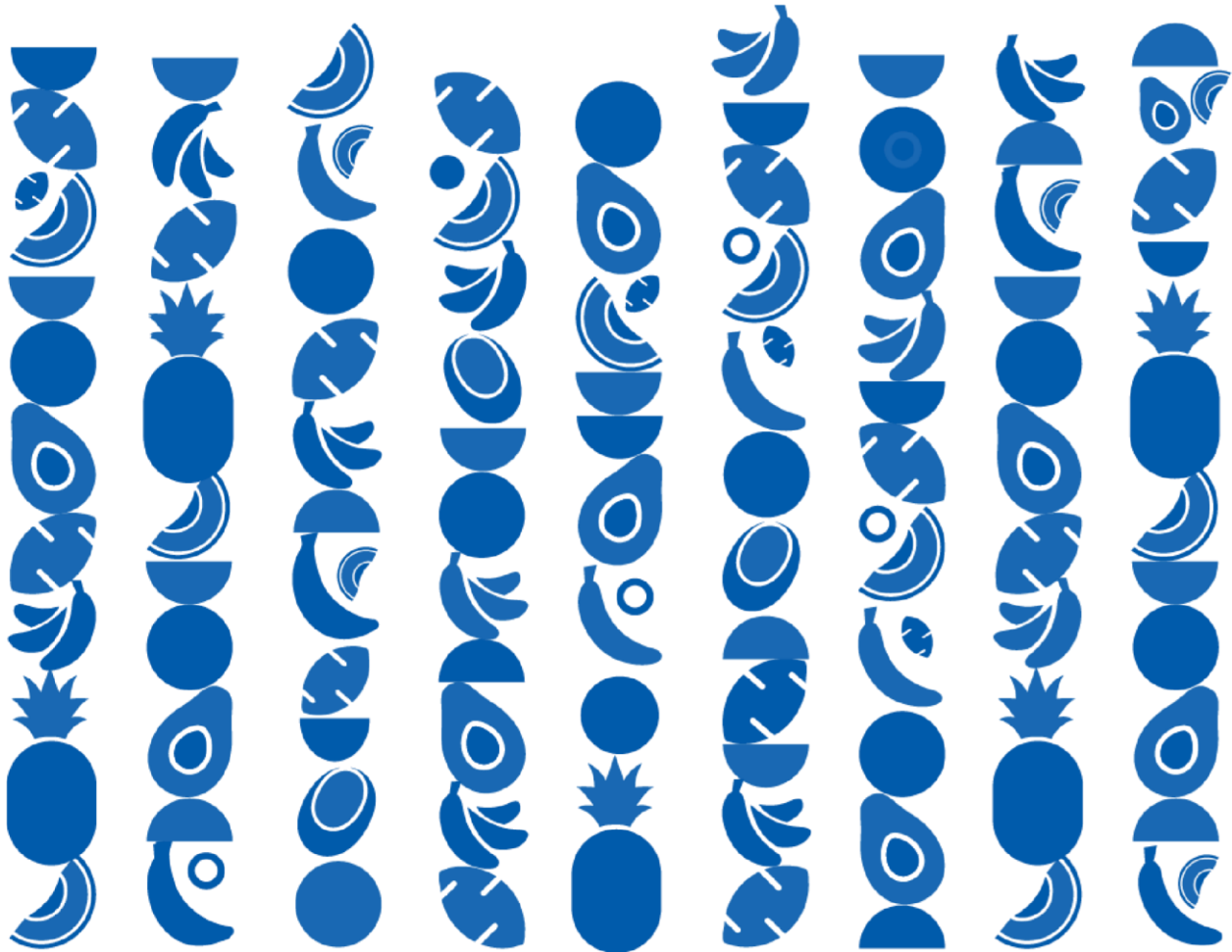




Global Anti-Violence & Harassment Policy



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INTRODUCTION

This Global Anti-Violence and Harassment Policy implements the Fyffes Principles of Responsible Business Conduct, or Fyffes Principles, to anti-violence and harassment. Fyffes is committed to providing healthy and safe working conditions, and we adopt appropriate practices to prevent threats to human life, health, and welfare in our operations and supply chain.

People should be treated with dignity, honesty, and fairness. No one should ever be afraid or embarrassed to come to work. We do not tolerate discrimination in the workplace nor any form of bullying and harassment, whether psychological, verbal, physical or sexual. All our employees should feel safe to be their whole selves at work, provided doing so does not compromise their safety and that of their co-workers.

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



Helge H. Sparsoe
Fyffes Chief Executive Officer

POLICY

Fyffes is committed to creating and maintaining a work environment free from any form or type of violence and harassment, that respects the inherent dignity of all people, allowing them to reach their fullest potential and empowering them to deliver the best possible results for the company and its stakeholders.

Every person working for Fyffes has the right to be treated with dignity and respect, and to work in a safe environment. Recognising that violence and harassment in the workplace can constitute a human rights violation or abuse and that those behaviours are a threat to fair working conditions and may prevent vulnerable groups, particularly women, from accessing equal opportunities any conduct of violence and harassment in the workplace shall not be tolerated including but not limited to physical violence, gender-based violence, psychological violence, online violence, sexual harassment, verbal harassment, bullying and mobbing or abuse of authority in any form. Such conduct is contrary to the Fyffes Principles, and exhibiting such behaviour or conduct may be subject to disciplinary measures up to and including dismissal, as appropriate.

Also, as set out in the Fyffes Principles Grievance Procedures, retaliation by any Fyffes employee against any person for having, in good faith, properly reported cases of misconduct, or for having cooperated with a duly authorised audit or investigation, is strictly prohibited. Such retaliation

violates the fundamental obligation of all Fyffes employees to uphold the Fyffes Principles, discharge their tasks, and regulate their conduct per these standards.

SCOPE

This Policy applies to all Fyffes officers, directors, and employees regardless of their contractual status (whether permanent, fixed term, or temporary), subsidiaries and affiliates (collectively, employees), who are required to understand and uphold the Fyffes Principles regardless of their position, geographical location, or level of responsibility. Likewise, this Policy applies to contractors, vendors, and visitors to Fyffes facilities where they may have business as it relates to protecting the health, safety and wellbeing of Fyffes workers.

MISCONDUCT

In this Policy, workplace violence and harassment refer to a range of unacceptable behaviours and practices in line with the International Labour Organization Convention No. 190 on the Elimination of Violence and Harassment in the Workplace (hereafter ILO Convention No. 190), including but not limited to gender-based violence and harassment, sexual harassment, bullying, threats, discrimination, and abuse of authority, as defined below in the Definitions

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section. These behaviours are referred to as *misconduct*. Misconducts can include a one-time incident and/or a series of incidents.

The legitimate application of rules and policies or the mere expression of disagreement, admonishment, criticism, or similar action regarding work performance, conduct or related issues within a supervisory relationship is not considered misconduct. This list of behaviours provides some examples of misconduct that is prohibited:

- a. Causing physical injury to another person or the threat of physical injury
- b. Making threatening remarks
- c. Displaying aggressive or hostile behaviour that creates a reasonable fear of injury to another person or subjects another individual to emotional distress
- d. Acts of bullying, mobbing, or any other form of psychological abuse
- e. Intentionally damaging Fyffes property or property of Fyffes people
- f. Bringing into the workplace a lethal or non-lethal weapon, held illegally or legally, intending to use it unlawfully or not authorised by the company's internal policies, and in particular intending to cause physical violence or threats of physical violence against another person in the workplace
- g. Violence perpetrated, in physical and/or psychological form, against another person based on his or her gender, gender identity or sexual orientation, including violence against women and LGBTQ+ persons
- h. The non-consensual dissemination of intimate images
- i. Sexual harassment (as defined in the Definitions) and sexual assault, whether attempted or actual
- j. Any type of verbal violence as defined in the Definitions

SAFE WORKPLACE

Fyffes will reserve the right to take every precaution reasonable in the circumstances for the protection of the worker from workplace violence regardless of whether it occurs amongst individuals within the organisation or if the incident of workplace violence stems from an external source. As such, engaging in any violent activity, be it physical, verbal, written, electronic, or visual act that may knowingly or ought knowingly to lead someone to believe it could cause or causes harm, be it attempted, threatened, or exercised is forbidden and subject to serious repercussions.

Each member of the Fyffes community is responsible for contributing to a safe and healthy work environment. Everyone is accountable for themselves and to each other in ensuring a safe workplace, free from violence. This Policy is intended to provide a general outline of the various parties' responsibilities on workplace violence including the obligation to report incidents of violence and how the incident reported will be addressed within the organisation.

RESPONSIBILITIES OF FYFFES PEOPLE

Fyffes employees are ultimately accountable for their actions and are expected at minimum to treat each other with respect and not engage in violent behaviour. They are expected to:

- a. Be respectful to others and maintain the highest standards of conduct
- b. Refrain from causing or participating in any form of discrimination, violence and harassment, for their safety, integrity and dignity, as well as that of others
- c. Maintain a harmonious working environment by behaving in a manner that is free of intimidation, hostility, offence and any form of misconduct
- d. Read, understand, uphold and ultimately comply with Fyffes policies, including understanding what constitutes misconduct. In addition, Fyffes employees must take mandatory courses related to misconduct, as determined by the company
- e. Be aware of the various options and internal channels available to them for reporting and/or otherwise addressing such behaviours, including the Fyffes Ethics Hotline
- f. Respect confidentiality and fully cooperate with those responsible for investigating reports of misconduct under this Policy

RESPONSIBILITIES OF MANAGERS AND SUPERVISORS

Managers and supervisors have the responsibility to work together to create a work environment based on respect and in line with Fyffes Principles of Responsible Business Conduct, support the Affected Persons who report prohibited conduct or episodes of violence and harassment, and cooperate in the relative investigations.

Managers and supervisors have special obligations to prevent and deter misconduct, and they must:

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- a. Create a safe and harmonious working environment, free of violence, intimidation, hostility, offence, and any form of misconduct. To achieve such an environment, managers and supervisors must set an example for appropriate workplace behaviour and must deal with situations of workplace violence immediately upon becoming aware of them, whether reported or not
- b. Read, understand, uphold and comply with Fyffes policies
- c. Communicate the present Policy to all Fyffes employees, ensure that they take relevant mandatory courses, and act as a resource for Fyffes employees and contractors
- d. Address, report and escalate alleged incidents of misconduct consistent with the present Policy and the Fyffes Principles Grievance Procedures
- e. Ensure that incidents of misconduct are promptly addressed through appropriate channels. In such cases, managers and supervisors must demonstrate fairness and impartiality, and be free from intimidation or favouritism; managers should not attempt to pre-investigate allegations and should support the effective undertaking of relevant investigations
- f. Report to the appropriate authorities if they witness or are made aware of someone else being subjected to workplace violence and/or harassment
- g. Ensure that all discussions, communications, and actions are handled with extreme discretion, sensitivity, and utmost confidentiality
- h. Ensure appropriate action is taken to protect Fyffes employees from retaliation

The failure of a manager or supervisor to address any known or reasonably suspected act of misconduct may result in the imposition of appropriate disciplinary measures.

When they are consensual, intimate relationships between Fyffes employees are generally not prohibited; employees, managers and supervisors should recognise that such relationships can create a conflict of interest where one person manages, reviews, or takes administrative decisions concerning the other person, is subordinate to the other person in the same line of reporting/authority, or is in a position in which some other conflict of interest may arise.

Such relationships may, among others, have negative repercussions on the morale in the office and lead to allegations of favouritism. They may also lead to complaints of sexual harassment if the relationship sours, and the subordinate person alleges that they were coerced into the relationship.

The parties to any such relationship must disclose it to their managers and file a personal relationship report with Human Resources. The parties to any such relationship may also consult their supervisor, Human Resources representatives or any member of the Fyffes Ethics Committee for advice. The Fyffes Ethics Committee consists of the Chief Legal Counsel and Compliance Officer, Chief Corporate Affairs Officer, Chief Human Resources Officer and the Global Director of Compliance.

RESPONSIBILITIES OF FYFFES

Zero Tolerance

In line with the provisions of the Fyffes Principles of Responsible Business Conduct, Fyffes 'zero tolerance policy' prohibits, without exception, the commission of acts of violence or harassment in the workplace of all forms and all types, as defined in the Definitions section against the Affected Persons.

Prevention Programmes

Fyffes shall make available appropriate learning resources to all its employees to ensure awareness of key provisions of this Policy and standards of conduct and promote a corporate culture based on respect.

Fyffes will ensure that timely and appropriate action— including action to protect the safety and wellbeing of the complainant—is taken when misconduct is reported. Disciplinary action, when warranted, will be taken against Fyffes employees found to have engaged in retaliation.

Where appropriate, Fyffes shall take precautionary measures to deal with alleged cases of discrimination, violence, and harassment, pending the results of the investigation, to fairly balance the rights and interests of the persons involved, while keeping in mind the Company's need to continue to operate its business efficiently. This includes, amongst other, appropriate support and assistance for persons involved.

For substantiated cases of discrimination, violence, and harassment, Fyffes must take prompt remedial actions and sanctions. Remedial actions include, among others, dispute resolution mechanisms such as mediation and facilitation, training and coaching, and/or providing appropriate support and assistance for persons involved.

Any substantiated act or behaviour that is unacceptable and incompatible with this Policy will trigger appropriate sanctions, including, without limitation, disciplinary measures up to and including immediate dismissal and/or contract termination, or removal from boards or committees. Criminal offences or threats shall be reported to local authorities per applicable laws. Remedial actions and sanctions must

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comply with the principle of proportionality and consider, as required, local laws and regulations.

Fyffes works with its suppliers as part of contractually agreed terms to also adopt anti-violence and harassment policies in line with Fyffes policy.

REPORTING MISCONDUCT

Complainants can use various channels to report misconduct, as outlined in the Fyffes Principles Grievance Procedures, including grievance mechanisms in local jurisdictions, businesses, and operations.

Under this Policy, there is no time limit for reporting sexual harassment, although legal limits may be in place in different jurisdictions which may impact any criminal or civil actions. Complainants are strongly encouraged to report cases as soon as possible after the incident has occurred. Early reporting improves the chances of resolution and success of any investigation.

For other types of misconduct described above, a formal complaint must be filed within one year from the date of the last incident.

Information

Employees must be informed of available reporting channels regularly and if they are subject to, or become aware of, situations involving discrimination, violence, and harassment.

Investigation Procedures

When a situation of discrimination, violence or harassment is reported, Fyffes will make the necessary verifications and/or investigations objectively and timely. Local operations must ensure that investigation procedures are implemented locally, providing appropriate training and tools to conduct the investigations following local laws and regulations and following, as needed, Fyffes practices. Where relevant, investigations must be conducted and/or monitored in line with the principles of this Policy, generally by an investigation body and/or compliance body at the local level, as defined locally.

Cooperation

When required, employees concerned must cooperate in an investigation of complaints or incidents.

Confidentiality

Investigation procedures will be kept confidential, and the employees and persons involved will be duly protected, as necessary, except if disclosure is required to carry out the investigation, resolve the incident or complaint, take corrective actions, protect employees, and/or as otherwise required or permitted by applicable law.

Speaking up

Compliance with this Policy is an essential element in Fyffes business success. Employees are encouraged to

speak up, ask questions and seek advice about concerns to prevent or minimise the damage arising from business conduct issues. Fyffes ensures transparent, fair, and confidential procedures for employees and third parties to raise concerns. If you have a concern regarding the behaviour of a Fyffes employee or affiliate, whether this behaviour directly affects you or not, we advise that you speak up.

The [Fyffes Ethics Hotline](#) is an independent third-party global business conduct advisory service provided to report any behaviour by a Fyffes employee that contradicts the Fyffes Principles. You can contact the Fyffes Ethics Hotline by telephone or online and can choose to remain anonymous. Fyffes Ethics Hotline contact details are found on Fyffes website and posted in all Fyffes operations.

No Retaliation

Fyffes does not allow retaliatory action against anyone for reporting a concern or cooperating with an investigation. Fyffes shall protect all employees who express a concern honestly and in good faith. However, it violates the Fyffes Principles to make a false accusation, lie to investigators and deny or refuse to cooperate with an investigation related to these Principles.

Grievance Mechanisms

Fyffes provides for legitimate, accessible, predictable, equitable, and transparent operational-level grievance mechanisms. This enables Fyffes to understand and address challenges in its operations and potential dissatisfaction among its stakeholders.

DEFINITIONS

Workplace includes (a) public and private spaces where they are a place of work; (b) places where the worker is paid, takes a rest break or a meal, or uses sanitary, washing and changing facilities; (c) during work-related trips, travel, training, events or social activities; (d) through work-related communications, including those enabled by information and communication technologies; (e) in employer-provided accommodation; and (f) when commuting to and from work.

Workplace violence includes actual, attempted as well as threats of physical, psychological, sexual, or economic harm and includes gender-based violence directed at a person because of their sex, gender, or sexual orientation. Workplace violence is further defined herein for this Policy to include damaging employer or employee property; furthermore, the possession of a firearm, weapon or dangerous weapon, explosives or explosive devices and any other item(s) through inappropriate misuse or abuse that could be used to inflict injury and/or intimidation

upon another individual, including replicas of any of the aforementioned on Fyffes property, other affiliated Fyffes workplace environment, while conducting Fyffes business, and/or while representing the Fyffes organisation are strictly prohibited.

Workplace harassment is any improper, vexatious comment or conduct against a worker or external party in a workplace that is known or ought reasonably to be known, unwelcome, or has caused, or that might reasonably be expected or be perceived to cause offence or humiliation. Harassment includes bullying. Harassment may be present in words, gestures, electronic communication, or other actions that intentionally annoy, alarm, abuse, demean, intimidate, belittle, or cause personal humiliation or embarrassment to another, or cause an intimidating, hostile or offensive work environment. It includes, but is not limited to, harassment based on any grounds, such as race, religion, colour, creed, ethnic origin, physical attributes, gender identity, or sexual orientation.

- 1. Bullying** is usually seen as acts or verbal comments that could mentally or psychologically hurt or isolate a person in the workplace. Bullying can also involve negative physical contact. Bullying can be defined as repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/ or in the course of employment, which could reasonably be regarded as undermining the individual's right to dignity at work.
- 2. Complainant** is a person who has been subjected to, witnessed, or became aware of, or ought to have known about, an alleged incidence of workplace violence. Complainants are obligated through this Policy to report incidents of workplace violence accordingly.
- 3. Sexual harassment** is a form of harassment and is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that has or that might reasonably be expected or be perceived to cause offence or humiliation. Sexual harassment can include instances when sexual favours are requested in exchange for employment or better employment conditions. Sexual harassment may result in an intimidating, hostile or offensive environment. Employees of any gender identity can be the injured party or the offender.
- 4. Discrimination** is any unfair treatment or arbitrary distinction based on a person's race, sex, gender identity, religion, nationality,

marital status, ethnic origin, caste, sexual orientation, disability, diseases, pregnancy, age, language, social origin or other status, migration status, membership in worker organisations including unions, political affiliation, or any other personal characteristics. Discrimination may be an isolated event affecting one person or a group of persons similarly situated or may manifest itself through harassment or abuse of authority.

- 5. Fyffes People** are all employees or persons working for or at Fyffes sites and facilities (such as interns and contractors) and/or interacting with a Fyffes employee and/or under a business relationship with Fyffes.
- 6. Affected Persons** are the person(s) against whom the violence or harassment in the workplace is directed directly or indirectly.
- 7. Abuse of authority** is the improper use of a position of influence, power, or authority by a Fyffes employee against another Fyffes employee, contractor, or external individual or group. This includes situations when the person in question uses their influence, power, or authority to arbitrarily influence the career or employment conditions (including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion) of another Fyffes or external employee. Abuse of authority may also consist of conduct that creates a hostile or offensive work environment which includes, but is not limited to, the use of intimidation, threats, blackmail, or coercion.
- 8. Threats and threatening behaviour** includes, but is not limited to: throwing objects at another person (e.g. to inflict pain, injury, or intimidation); verbal prediction of harm directed towards another individual or his/her property; making threatening or menacing gestures; obsessive behaviour (e.g. unprofessional and/ or excessive unwelcome romantic interest); any such behaviour that indicates or suggests that the individual poses a danger to themselves or others; escalation of unacceptable behaviour within the workplace (e.g. inappropriate behaviour triggered by personal circumstances such as an impending divorce, custody battle, etc.); any inappropriate electronic or cyber activity used for violence, intimidation and/or harassment.
- 9. Retaliation** is any direct or indirect detrimental action recommended, threatened, or taken against an individual because that individual engaged in a good faith report alleging misconduct. Retaliation is a separate act of

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misconduct and a violation of the Fyffes Principles.