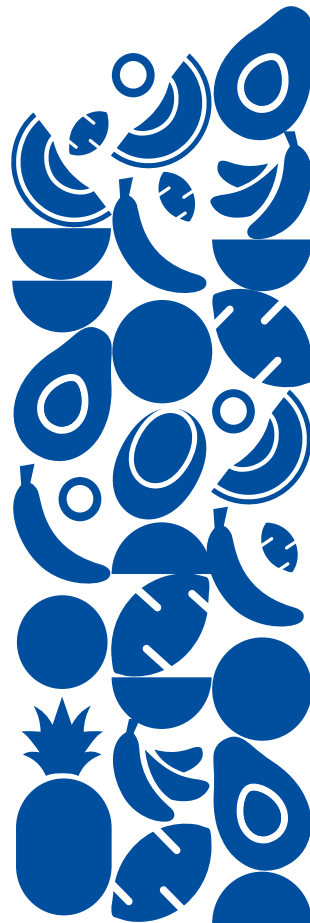




# Supply Chain Due Diligence Policy

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## 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.

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, seasonal or permanent workers). It ensures that where local regulations are less stringent than international human rights standards, we apply international standards in our business conduct and stakeholder engagement. Our [Environmental Policy](#) also addresses environmental due diligence. Our Global Human Rights Policy is supplemented by other [important policies](#) detailing our approach to human rights and other risks.

Our approach to human rights is grounded in international standards, including the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles) and the Organisation for Economic Cooperation and Development's Guidelines for Multinational Enterprises (OECD Guidelines), and enshrined in our Principles of Responsible Business Conduct (Fyffes Principles). We welcome the Corporate Sustainability Due Diligence Directive (CSDDD), 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. This Policy outlines Fyffes Human Rights and Environment Due Diligence Approach, pursuant to the CSDDD requirements.

## FYFFES PRINCIPLES OF RESPONSIBLE BUSINESS CONDUCT ('FYFFES PRINCIPLES') AND SUPPLIER CODE OF CONDUCT

At Fyffes, our vision is to Shape Wellbeing for the World.

We live our values of Respect, Win Together, Thrive, Energy, and Integrity through the Fyffes Principles of Responsible Business Conduct ('Fyffes Principles'), which are widely communicated to our employees. These Principles serve as a foundation for sustainable business performance by requiring all our employees to operate ethically and responsibly.

Fyffes also commits to and requires its business partners to comply with all applicable laws in the countries and regions in which they operate. Beyond legal compliance, our business partners must adhere to the requirements and standards our [Supplier Code of Conduct](#), which is included in contractual agreements with all business partners. Where local regulations are less stringent than international human rights standards, we apply international standards in business conduct to protect potentially affected rightsholders such as workers and communities, as well as the environment.

## RISK ANALYSIS AND IMPACT ASSESSMENTS

Fyffes conducts due diligence and risk assessments to continually evaluate the actual and potential impact of its business on human rights and the environment along its supply chain. We take a risk-based approach, including regular and ad-hoc assessments when needed.

Our human rights due diligence aligns with the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, with stakeholder engagement at its core. This continuous process aims to identify and manage human rights risks and adverse impacts associated with our operations and business relationships along our value chain.

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

We have a [GHG emission reduction target](#) and transition plan to mitigate our impact on climate change. We have also conducted a Climate Change Risk Assessment to understand the impact of climate change on our operations, sourcing areas, and surrounding communities, which will help us develop adaptation plans.

### Company-wide Impact Assessments

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, a review of external reports and media articles, and a detailed review of our policies and management systems. The Assessment includes:

- Evaluates our progress against mitigation and prevention actions identified in previous assessments.
- 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 UN Guiding Principles criteria
- 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

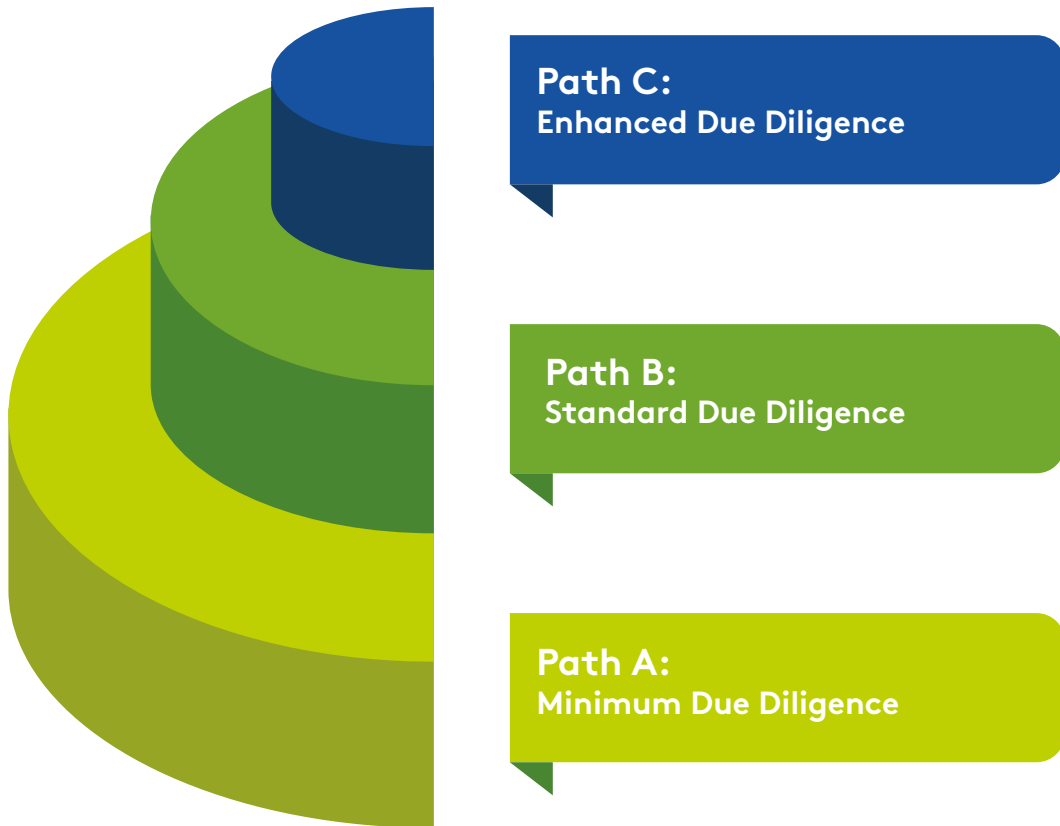
This assessment defines and updates our salient human rights risks:



**More details** on the methodology and results of this assessment can be found in our latest [Human Rights Report](#).

### Overall Owned Operations and Business Partners Risk Analysis

At least annually, Fyffes conducts a risk analysis based on factors such as country of origin, geographical risk, type of product, processes or services, and expected volumes, in line with our internal risk management and evaluation procedures. 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 below.



Fyffes conducts on-site, in-depth impact assessments at all high-risk suppliers every three years and unannounced audits against our Supplier Code of Conduct (Enhanced Due Diligence). These assessments include pre and post field visit preparation, reconciliation and validation of information, site and operations review, interviews, and focus groups with farm employees and community members, concentrating on vulnerable groups.

Such assessments are also conducted when there is a specific third-party complaint or allegation requiring further investigation.

We have developed a self-assessment tool for site-level human rights and environmental due diligence for all our medium to low-risk fruit suppliers. This tool evaluates local management of human rights and environmental risks and includes a rightsholder mapping tool.

We regularly audit our own farms and direct suppliers in compliance areas such as: legislation; food safety; health and safety; social; ethics; labour; environmental; and security. Nearly 100% of our core products supply chain complies with at least one ethical standard and many suppliers comply with multiple certifications. We maintain a list of all suppliers and track their certifications. Our Responsible Supply Chain department, consisting of in-house professional auditors and compliance experts oversee these audits, supported by farm-based compliance, human resources, and quality inspection staff who regularly visit suppliers.

### Supplier Onboarding

Fyffes conducts a risk analysis for all new potential suppliers based on factors such as country of origin, geographical risk, type of product, processes or services, and expected volumes, as per our internal risk evaluation and management procedures. The results of this analysis dictate the level of due diligence to be applied (see diagram above).

## PREVENTION AND MITIGATION – RISK MANAGEMENT

The results of the company-wide impact assessments are integrated into our Corporate Mitigation and Prevention plan monitored by our Human Rights and Environmental Due Diligence Committee, which meets quarterly.

Corrective, preventive, and mitigation plans are developed with our sites and suppliers following audits or impact assessments.

Based on our risk analysis and impact assessments, we implement measures to address risks and prevent and mitigate potential and actual adverse risks, prioritising the most salient ones in our operations and suppliers. We require Suppliers to:

- Agree to the [Fyffes Supplier Code of Conduct](#) and related policies. We also accept an equivalent Code of Conduct and policies if the supplier has them, provided they can demonstrate employees have been trained or have received communication on them.
- Commit to proactively inform Fyffes of any human rights or environmental actual risks in relation to the Supplier Code of Conduct, without waiting for certification audits.
- Respond to Human Rights and Environmental Impact Self-Assessments with a plan to address, prevent, and mitigate actual and potential adverse risks.
- Participate in audits carried out by Fyffes.

## FYFFES COMMITMENT TO SUPPLIERS

Fyffes commits to:

- Supporting suppliers who proactively notify us of human rights or environmental actual risks by working with them to prevent, mitigate or remediate those risks.
- Providing training and capacity-building to our own operations and business partners.
- Partnering with suppliers on sustainability targets and community projects, where possible.
- Annually evaluating the effectiveness of our sustainability strategy, Human Rights and Environmental Due Diligence Prevention and Mitigation Plan, and remediation actions resulting from grievances received.

## GRIEVANCE MECHANISMS

Grievance mechanisms are essential for identifying potential and actual adverse impacts and risks in our supply chain. They allow affected people to raise concerns and access remedies.

Fyffes provides legitimate, accessible, predictable, equitable and transparent operational-level grievance mechanisms aligned with the UN Guiding Principles criteria as outlined in the Fyffes Principles Grievance Procedures. This enables us to understand and address challenges in our operations as well as potential stakeholder dissatisfaction. Fyffes is committed to making its grievance mechanisms accessible to the most vulnerable rightsholders.

We advocate and support industry-wide and multi-stakeholder implementation of grievance mechanisms to facilitate and streamline access to grievance mechanisms in our industry.

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, immediate supervisor or line manager, human resources representative or workers' representative, or using anonymous suggestion boxes where they exist.

- If this is not an option, stakeholders and employees can contact the **Fyffes Ethics Committee** at [ethicscommittee@fyffes.com](mailto:ethicscommittee@fyffes.com).
- Stakeholders can also use the Fyffes **Ethics Hotline** <https://ethicshotline.fyffes.com/>, an independently run, confidential business reporting hotline available to internal and external stakeholders 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 a person who reports a concern or cooperates with an investigation, and we will take all steps necessary to protect them. It is a violation of the Fyffes Principles to intentionally make a false accusation, lie to investigators, deny, or refuse to cooperate with an investigation and doing so can lead to disciplinary measures.
- The Ethics Committee assesses, investigates, and agrees an action plan, resolves and reports on complaints to the Board of Directors and our parent company Sumitomo, as outlined in our grievance procedures.

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

## GOVERNANCE

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

Our Human Rights and Environmental Due Diligence Committee is comprised senior executives, human rights and environmental specialists. It oversees the progress towards our Prevention and Mitigation plan as well as continuous improvements to our policies and practices in line with regulations and best practice.

Fyffes Corporate Affairs and Ethical Compliance Departments jointly oversee the implementation of this policy.

We regularly evaluate how to improve and strengthen our approach and will review this policy annually at a minimum.

Fyffes Due Diligence Policy is reflected in legal contracts with suppliers.