



Child Labour Due Diligence in Supply Chain

2024

Re: Art. 964j-k of the Swiss Code of Obligations and the Swiss Ordinance on Due Diligence and Transparency in Relation to Minerals and Metals from Conflict-Affected Areas and Child Labour

This report relates to the due diligence and reporting obligations covering child labour required by Art. 964j-k of the Swiss Code of Obligations and the Swiss “Ordinance on Due Diligence and Transparency in Relation to Minerals and Metals from Conflict-Affected Areas and Child Labour.” It covers the period January 1, 2024, to December 31, 2024.

FYFFES BUSINESS AND SUPPLY CHAINS

Most of our business centres on our core product categories: bananas, pineapples, melons and exotics. We source our core products from more than 14 countries in Latin America, the Caribbean, and Africa, including 20 of our owned farms in Costa Rica, Belize, Honduras, Guatemala, and Ecuador (see map below). In addition, we source our exotics products in more than 25 countries all around the world.

Our shipping and distribution routes include 19 ports of loading, 24 ports of discharge, and 23 distribution and ripening centres in the US and Europe. Our fresh products are sold to more than 1000 customers in 39 countries across Europe and North America

With more than 4,100 permanent employees and 8,000 seasonal workers across 141 countries, we continuously aim to build a world-leading company that cares deeply about how our produce is grown, harvested, and transported from farm to table, ensuring a positive commercial, social, and sustainable future. In general, Fyffes directly hires employees and contractors. The UK and Ireland ripening centres are the only sites where Fyffes requires labour providers for a significant portion of its workforce.

Fyffes has spent over 100 years developing our farms while also building strong relationships with partner growers. This enables our growers to benefit from longer term agreements and pre-agreed prices, and it enables Fyffes to invest in quality and support. It’s about confidence and sustainable supply. We work with our partners to internationally recognised codes of practice that focus on worker welfare and environmental sustainability.

COMMITMENT TO HUMAN RIGHTS

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

At Fyffes, we believe in a working environment that promotes diversity and equal opportunity, and where there is mutual trust and respect for human rights. 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 have promised to keep 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. This policy sets out our approach to protecting the human rights of all stakeholders, including all our people, whether contractors, seasonal or permanent workers. This policy ensures that if local regulations are less stringent than international human rights standards, we will apply international standards in the way we conduct business and engage with workers and other stakeholders.

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).

Our commitment to respect human rights, covers all internationally recognized human rights, including those contained in the International Bill of Human Rights and the International Labour Organization's (ILO) core labour rights conventions, including the ILO Minimum Age Convention (no.138) and the Worst Forms of Child Labour Convention (no. 182). Fyffes is also committed to respecting the rights enshrined in the United Nations Convention on the Rights of the Child (UNCRC).

POLICIES ON CHILD LABOUR

Fyffes acknowledges the risk of child labour in global agricultural value chains and takes responsibility for respecting human rights in our operations and business relationships. This means exercising due diligence to avoid infringing on the rights of others and to address any potential adverse impacts.

Fyffes is against all forms of exploitation of children, and we are firmly committed to actions to eradicate child labour from our agricultural supply chains, in line with the Fyffes Principles (our Code of Conduct), our Supplier Code of Conduct, our Global Human Rights Policy and our Modern Slavery Statement. Millions of children around the world are trapped in child labour, depriving them of their childhood and education, risking their health and safety, and condemning them to a life of poverty. The Fyffes Principles prohibit child labour, and our direct suppliers are required to sign the Fyffes Principles.

We constantly monitor human and labour rights compliance through frequent site visits and internal and external audits, and many of our certifications require vigilant monitoring of potential child labour throughout our operations and supply chain.

Fyffes also recognises children's rights as a broader concept defined in the UN Convention on the Rights of the Child (CRC), recognising the diversity of ways business affects children.

The Convention on the Rights of the Child (CRC) recognises every child's right, "to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education," or that is likely to harm the child's health or, "physical, mental, spiritual, moral or social development."

The International Labor Organization defines child labour as "work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development."

Not all work done by children should be classified as child labour. According to the ILO, it refers to work that:

- is mentally, physically, socially or morally dangerous and harmful to children; and/or
- interferes with their schooling by depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

Fyffes recognises Children's Rights as outlined in the UN Convention on the Rights of the Child, understanding the wide-ranging impact business operations can have on children.

Fyffes is firmly committed to eradicating all forms of modern slavery—including child labour, debt bondage, and human trafficking—throughout our operations and supply chain. Fyffes minimum age of employment is 16 years of age or over the age for completion of compulsory education or the country's legal working age, whichever is higher. In addition, we do not employ under 18s in hazardous work conditions, as defined by law. Fyffes ensures this policy is applied by communicating the policy to all employees and suppliers.

Our Global Child Labour Policy and Remediation Protocol ensures we can act swiftly and sensitively in the 'best interest of the child' in any potential case. The remediation protocol defines a set of operational principles and procedures on how to respond if child labour is ever encountered and applies to all children in all work situations in our operations and in potential cases that we are linked to by our business relationships and along our supply chain. This includes permanent, temporary, or casual labour, whether directly or indirectly (i.e. via agencies) employed by the

management of the workplace, as well as children who have been trafficked or sold into work. Any remedial actions should be consistent with ILO standards and the latest best practice guidance. The protocol indicates that the site HR representative or senior manager should try to identify and understand the causes of the child's presence in the workplace as well as how the management system failed to prevent child labour. If the investigation shows that the reason relates to the additional income needs of the family where the child comes from, management can explore other options, for example substituting another family member who is fit to work.

Fyffes expects suppliers and business partners to adopt similar standards for their own supply chains, including on child labour. [The Fyffes Principles](#) and the [Global Child Labour Policy](#) and Remediation Protocol is included in our contracts with our direct suppliers, giving us the contractual right to conduct an audit to monitor compliance with them as well as the right to suspend or terminate an agreement for noncompliance with them. It is important to note that termination is always a last resort decision after due assessment of the situation and operational context and the potential adverse consequences of the decision to end the relationship, as we align our processes with a continuous improvement approach when we work with our direct suppliers, looking first to find ways to remediate and improve their management systems.

RISK ANALYSIS AND IMPACT ASSESSMENTS

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. At Fyffes, we identify and assess actual or potential adverse human rights impacts with which we may be involved—either through our own activities or because of our business relationships—by taking a rightsholder-centred approach. 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.

In 2024, we used UNICEF's Children's Rights and Business Principles to assess risks to child rights within our supply chain to better understand risks related to Children's Rights. Our HRIAs concluded that child labour is a salient risk in our business of medium priority where opportunities to strengthen our current management of this risk have been identified.

HUMAN RIGHTS IMPACT ASSESSMENTS (HRIA)

Overall Owned Operations and Business Partners Risk Analysis

We manage the end-to-end process of reviewing and onboarding new partners into our supply chain. Prior to granting final approval, we coordinate on-site visits to supplier farms to conduct verification checks and quality assessments, while collecting relevant data about the production site for our internal database. Suppliers are then assigned a risk classification—Path A, B, or C—based on a matrix of criteria, which determines the level of scrutiny applied during both the approval process and ongoing monitoring. We also support suppliers in applying for membership with appropriate compliance platforms and ensure continuous oversight through periodic reviews of all approved suppliers. 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.

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

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

External on-site in-depth HRIA

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.

In 2024, Fyffes conducted in-depth on-site HRIAs in its owned operations in Belize and at two suppliers in Costa Rica subject to specific allegations unrelated to child rights.

Internal site-level HREDD self-assessment

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.

RESPONSIBLE SUPPLY CHAIN AND COMPLIANCE AUDITS

We audit our own farms and our suppliers in the following responsible supply chain areas: legislation; food safety; health and safety; social; ethical; labour; environmental; and security. We have a mature and dedicated Responsible Supply Chain department, consisting of in-house professional auditors and standards compliance experts who are either permanently based in the country (Costa Rica, Ecuador, and Belize) or visit regularly on-site as required. The department also relies on other farm-based human resources, and quality inspection staff who regularly visit suppliers. This multiplies the positive impact on levels of environmental and social compliance.

One of our basic criteria is that every source should receive at least one ethical audit per crop per year, regardless of the product's destination and the ethical requirements of the customer. We also carry out announced and

unannounced formal farm visits on a rotating spot-check basis, where we use a shortened checklist of indicators that flag potential problem areas. Non-conformance reports from these visits are issued to the farm and followed up for resolution within 28 days. We work with the farm to resolve the non-conformances, but if any serious issues persist this is escalated and procurement from that farm can be (and in some rare instances has been) suspended as a last resort. We work closely with our supplier partners to avoid this drastic measure by quickly resolving non-conformances.

RISK MANAGEMENT

Our HRIAs concluded that child labour is a salient risk in our business of medium priority where opportunities to strengthen our current management of this risk have been identified.

Although we have yet to identify any incidence of child labour in our own operations, there is a higher risk with suppliers, in particular smallholder farms. Most specifically, we have identified the highest risk in the uncertified plantains smallholder farmers we source from in the Dominican Republic, where children of undocumented migrant parents, many of Haitian descent, are vulnerable to labour exploitation due to a lack of birth certificate or residency documentation.

To address the above, we have taken the following actions:

We are engaging and supporting 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. In 2024, we stopped working with our main long-lasting plantain supplier with whom we were in the process of developing a multi-faceted program to improve the livelihood of the plantains smallholders, including capacity-building to improve productivity and yields, mitigate climate change risk, and awareness on prevention and mitigation of child labour. We are currently mapping our new plantains suppliers and will look into the feasibility of running a similar program with them in 2026.

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. The goals of this project are:

Workers employed in hired labour set-ups and smallholdings have access to social benefits or similar coverage provided by the social security system

Workers employed in hired labour set-ups and smallholders are protected from deportation

Dominican Republic and Haitian authorities are informed about the importance of the banana sector and migrant labour

We expect this initiative to formalize the employment of migrant workers, reducing the risk of child labour and enhancing livelihoods to prevent the economic necessity of child involvement in labour.

All risks identified via the aforementioned methods of risk assessment are included in our Human Rights and Environmental Prevention and Mitigation Plan. This plan is overseen by Fyffes HREDD Committee, which meets quarterly and the progress of this plan is reported to our Executive Leadership team and Board of Directors. In addition to identifying risks via our HRIAs, we used the UNICEF's Children's Rights and Business Principles to assess risks to child rights within our supply chain.

Our initial assessment identified the following gaps which we will address through our Human Rights and Environmental Prevention and Mitigation Plan:

Gap Identified against UNICEF's Children's Rights and Business Principles	Proposed Solution	Action Taken
Need to further promote youth employment, skills development and job training for young workers	Work with existing governmental programs and/or universities to implement skills development programs or advanced education opportunities.	<ul style="list-style-type: none"> - Fyffes has partnered with EARTH University in Costa Rica for a scholarship program covering tuition, transport, laptop, start-up support, and stipend. Now in its second year, two students are enrolled. - Partnered with the National Learning Institute of Costa Rica (INA) to offer theoretical and practical training to young adults on pineapple farms, targeting the rural skills gap and building middle management capacity. The idea is to also implement in our banana farms at a later stage.
Improve working experience for workers who are parents	<ul style="list-style-type: none"> - Undertake a qualitative study to understand workers' socio-economic realities. - Evaluate flexible shifts. - Collaborate with governments to provide nearby childcare. - Review breastfeeding room availability and quality. 	<ul style="list-style-type: none"> - In 2024, an independent expert conducted a qualitative study covering poverty, care responsibilities, and workforce engagement. - The study provides a baseline for long-term impact measurement and supports evaluation of flexible shifts. - Dialogues are ongoing with governments to implement childcare facilities. - A legal review on breastfeeding room requirements was conducted. In countries like Belize (where it's not legally required), surveys were done to assess demand. Full analysis and recommendations are due in 2025.
Food Safety and Marketing Policy lacked reference to protection of children's rights	Include reference to children's rights in policies.	Policies have been reviewed and updated accordingly.
Lack of assessment of our operations' impact on children's rights related to the environment	- Conduct localized environmental impact assessments to understand the potential impacts on communities, including children.	Not started
No attention to adverse impacts on children's rights in security policies and protocols (e.g. security guards)	Review existing security policies and protocols to include reference on children's rights in policies.	Not started

As part of its sustainability strategy, Fyffes also have several programs that contribute to tackle the root causes of child labour such as supporting access to education (maintenance of schools etc.), overcoming rural poverty by promoting living wage, gender equality and women empowerment, and resilience to climate change for better income generation.

SUPPLY CHAIN TRACEABILITY SYSTEM

Fyffes maintains a comprehensive list of all direct fruit and raw material suppliers, including monitoring records and audit findings. We keep records of our monitoring activities and various assessments we conduct. We will continue to monitor and enhance the tracking systems we use to trace goods from third parties beyond our direct suppliers.

GRIEVANCE MECHANISMS

Fyffes provide legitimate, accessible, predictable, equitable and transparent operational-level grievance mechanisms aligned with the UN Guiding Principles criteria as outlined in the Fyffes Principles Grievance Procedures. This enables us to understand and address challenges in our operations and suppliers and potential dissatisfaction among our stakeholders.

Any human rights breach identified through the Human Rights Impact Assessments or reported through Fyffes various grievance mechanisms, including the Fyffes Ethics Hotline [<http://ethicshotline.fyffes.com>], will be remediated in a timely manner.

Fyffes regularly reviews the implementation of remediation measures and evaluates the effectiveness of our prevention and mitigation actions.

During 2023, we did not receive a complaint about child labour in our own operations or our supply chain.

For more details on our grievances mechanisms and remediation progress, please refer to our most recent Human Rights Report section “Access to effective grievance mechanisms and remedy”.