



Fyffes Supplier

Code of Conduct

Message from our CEO

Dear Suppliers,

At Fyffes, our vision is Shaping Wellbeing for the World. To achieve this vision, we are strongly committed to the highest performance in environmental and social conduct throughout our value chain and that includes our valued suppliers. The trust of our customers and stakeholders depends on fair and ethical business practices across the supply chain. Therefore, our suppliers play a key role in upholding our commitment to have a positive impact on the world.

This Supplier Code of Conduct reflects our company values: Integrity, Energy, Win Together, Thrive and Respect. It communicates our expectations of suppliers to align with global standards of responsible practices. As our trusted business partners, we require our suppliers to uphold these standards and go beyond them wherever possible, as we ourselves at Fyffes have committed to in our own Code of Conduct, the Fyffes Principles.

Together, we can build a more sustainable and valuable business.
Thank you for helping us make a difference.
Sincerely,



Helge H. Sparsoe
Fyffes Chief Executive Officer

Table of Contents

4 INTRODUCTION

6 SCOPE AND EXPECTATIONS

8 REVISING THE SUPPLIER CODE OF CONDUCT

10 SUPPLIER CODE OF CONDUCT PROVISIONS
Human and Labour Rights
Environment
Ethics and Integrity

18 IMPLEMENTATION

20 RAISING A CONCERN: FYFFES GRIEVANCE PROCESS

22 APPENDIX

References



Introduction



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

We do this by living our values of Respect, Win Together, Thrive, Energy and Integrity. One of the ways we bring our values to life is through this Supplier Code of Conduct. The Fyffes Supplier Code of Conduct serves as a foundation for sustainable and ethical business relationships with our suppliers.

The Supplier Code of Conduct encompasses the various this environmental, social, governance and food safety provisions and standards with which we expect our suppliers to comply. It constitutes a binding set of norms for all Fyffes business partners, to also be further cascaded to all indirect stakeholders.

The Supplier Code of Conduct is based on emerging and existing supply chain due diligence legislation¹, as well as internationally recognised guidelines².

- This Code exceeds industry norms and local regulations, aiming to drive a meaningful transformation in our supply chain and production processes. We understand that this shift requires time to be fully implemented. We expect transparency and a commitment to continuous improvement from our supply chain partners in meeting these requirements comprehensively. Fyffes is committed to support this effort and work with our business partners to enhance practices. In all cases, the continuous improvement mindset will prevail, guiding Fyffes in assisting suppliers to fully meet the best standards.
- Our mission has been the same for over 130 years. We aim to make a positive difference for our people, consumers, communities, customers, and the environment. We do this by delivering nutritious and high-quality products and promoting a company and culture that cares about how the fruit gets to your local store. The world is a precious asset and we take our responsibilities very seriously, not least so that we can offer our customers the very best fruit for years to come.

Our Values



Respect:

We respect each other, caring for our people, produce and planet – working safely and with integrity towards shared goals.



Energy:

We bring energy every day, it is the driving force that separate us from others.



Win Together:

We win together, delivering success for all stakeholders, through our cooperative and coordinated effort.



Thrive:

We are driven to improve, every day and in all areas of our lives.



Integrity:

We act with integrity and honesty; we do the right thing, even when it's not the easy thing.

Scope and Expectations



**All Fyffes
suppliers are
expected to
understand and
uphold the
Supplier Code
of Conduct
(the "Code").**

As our trusted partners, Fyffes also encourages its suppliers to strive for continuous improvement as we ourselves commit across all the areas it encompasses.

This Code does not intend to cover all possible situations that may arise, but to establish guidelines on the minimum requirements expected of our suppliers during their business relationship with Fyffes.

Fyffes operations and supply chain are subject to the laws of many countries and legal jurisdictions. It is expected that our suppliers comply with the Code and all applicable governmental laws, norms and regulations.

Where local laws are less stringent than this Code, we expect suppliers to apply the higher standard, provided it does not contravene local law.

Revising the Supplier Code of Conduct



As international standards evolve over time, new regulations are necessary to address emerging issues and trends.

The nature of Fyffes business also changes, requiring us to monitor different risks and issues and adjust the code accordingly.

The Responsible Supply Chain Team, within the Corporate Affairs department will undertake human rights risk assessments in accordance with its [Due Diligence Policy](#), moving ahead of international best practice, and engage with relevant stakeholders, to gauge changes to environmental, social risks and assess Fyffes readiness to meet these changes.



Supplier Code of Conduct Provisions



Human and Labour Rights

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

More information is available in our [Policy Documents](#)

Health and Safety

Suppliers must adopt appropriate practices to prevent threats to human life, health, and welfare in their operations to protect workers physical and mental wellbeing in the workplace as per [Fyffes Health & Safety policy](#).

Suppliers should also participate in Health and Safety capacity building training provided by Fyffes to its suppliers on an annual basis.

Suppliers should:

- Aim for zero severe injuries;
- Provide safe and healthy working conditions for the prevention of work-related injuries and ill health;
- Develop and implement effective Health and Safety management systems with worker participation in the safety committees;
- Ensure that health and safety management systems support identifying risks, measuring and monitoring performance, driving continual improvements to mitigate or minimise health and safety risks emanating from its operations. This includes personal protective equipment, and measures to prevent excessive physical and mental fatigue, including through excessive working hours and insufficient rest breaks;
- Ensure compliance with applicable health and safety laws and regulations;
- Provide training on health and safety management systems;
- Empower workers to report unsafe practices without fear of reprisal;
- Give free access to safe drinking water and sanitary facilities in the workplace;
- Make sure that accommodation, where provided by the employer, includes worker access to adequate water and sanitation.

Security

Suppliers must conduct all necessary due diligence before hiring security forces used for the protection of the enterprise's premises and ensure that security guards operating at suppliers' premises act in accordance with universally recognised human rights standards including guidelines on the appropriate use of force and do not violate the rights of workers and communities. This requirement applies regardless of where such security guards operate, to ensure they do not infringe upon the rights of workers and communities.

Non-discrimination and Equal Opportunity

Suppliers shall commit to a working environment that promotes diversity and equal opportunity, and refrain from discrimination in the workplace or any form of bullying and harassment, whether psychological, verbal, physical or sexual.

Any form of discrimination based on characteristics such as, but not limited to, gender, sexual orientation, race, colour, nationality, genetic features, language, ethnic or national origin, religion or belief, disability, age, marriage and civil partnership, and pregnancy and parental leave is not tolerated.

Terms of hiring, remuneration, access to training, promotion, termination, or retirement, and access to all rights and protections granted to workers, must be based on the principle of equal opportunity.

Anti-Violence and Harassment

Suppliers must commit to a workplace free of harassment and abuse, and not use, or permit the use of any form of violence, mental or physical coercion, sexual harassment or abuse, nor execute threats of such treatment in line with [Fyffes Anti-Violence and Harassment Policy](#).

Disciplinary, grievance and termination procedures should be fair to all employees.

Suppliers must implement policies and processes for preventing, investigating and remediating any forms of harassment that occur within, and in relation to, their operations.

Freedom of Association and Collective Bargaining

Suppliers must respect the right of all workers to associate freely, join or not join trade unions, associations and/or workers' councils or committees and engage in collective bargaining in accordance with national laws and international conventions.

Any discriminatory practices or retaliation against workers for exercising their right to freedom of association, including trade union membership, will not be tolerated.

Forced Labour, Modern Slavery and Human Trafficking

Suppliers shall commit to keeping its business free of modern slavery, debt bondage, and human trafficking.

Fyffes is committed to the Employer Pays Principle. This Principle requires that workers must not pay for their employment in the form of recruitment fees (as defined by the ILO). Fyffes will work with its owned operations and suppliers to ensure any recruitment cost currently paid by the worker is covered by the employer.

Suppliers should:

- Not use or benefit from any kind of forced or involuntary labour and prohibit the use of recruitment fees, deposits, including by recruitment agencies, or other practices that may prevent employees from freely ending their employment;
- Not oblige workers to work overtime hours beyond the limits imposed by applicable legislation and must give freedom of movement outside working hours and during contractually and legally mandated leave;
- Not retain workers' money (including wages owed) or possessions such as identity documents against the worker's will, with the intention of binding workers to the place of employment;
- Take extra precautions to respect the rights and wellbeing of migrant workers whose rights may be at risk or who may lack access to basic public services.

Wage and Benefits

Suppliers must adhere to relevant national laws, industry standards and international standards relating to minimum wages, overtime wages, and legally mandated benefits, such as but not limited to, paid sick leave, paid annual leave and paid parental leave, among any other provided by the local legislation.

Suppliers' employees shall receive at least the minimum wage and be paid in a timely manner, regularly, and fully in legal tender.

Suppliers shall work with its business partners, under the shared responsibility concept, to ensure they provide a fair wage for a regular worked week that is enough to cover basic needs and provide some level of discretionary income.

Suppliers shall complete the IDH Living Wage Salary Matrix on an annual basis and participate in dialogue with Fyffes to find ways to improve wages and reduce the living wage gap if it exists in their operations.

The Salary Matrix is verified by qualified third parties and suppliers agree to sharing the results with Fyffes and customers in the same value chain.

Working Hours

Suppliers must comply with appropriate working hour requirements including overtime, breaks, and rest periods as established by national law, relevant collective agreements and international standards.

Overtime Work

Overtime work should be voluntary and should meet requirements of national law, including being requested in a timely manner and paid according to local laws and regulations and any existing Collective Bargaining Agreement, whichever is higher. In addition, overtime work should not pose an increased risk to the worker's health and safety and workers should not work more than 60 hours per week or those permitted by national law, whichever is stricter.

Employment Contract

Suppliers must ensure workers understand their contracts, payslips and general employment terms through the provision of information sessions as per local regulations and aligned to the provisions of this code as a minimum.

Child Labour

Suppliers shall not employ workers below the age of 16 or over the age for completion of compulsory education or the country legal working age, whichever is higher.

In addition, employees under 18 should not be employed in any form of hazardous work conditions, as defined by the ILO. Examples of hazardous work for young workers can include, but is not limited to:

- Working at night
- Working overtime
- Working with the application of agrochemicals
- Exposure to heat-stress

Through due diligence and impact assessments, suppliers must identify any operations at a higher risk of child labour and implement appropriate measures to reduce such risk, including training and raising awareness. Identified child labour risks must be eliminated, prevented or minimised according to their likelihood of occurrence and the severity of the adverse impacts. If a child is found working on any of Fyffes Suppliers' operations, remediation measures must be taken in accordance with [Fyffes Child Labour Policy and Remediation Protocol](#).

Suppliers should also participate in training provided by Fyffes to its supplier on an annual basis on its Child Labour Policy and Remediation Protocol.

Grievance Mechanisms and non-retaliation

Suppliers must ensure that workers have access to legitimate, confidential, accessible, predictable, equitable, and transparent operational-level grievance mechanisms to all workers and must investigate all grievances in a timely fashion.

Suppliers shall not allow any form of retaliatory action to be taken against anyone for reporting a concern or cooperating with an investigation.

Suppliers shall protect all employees who honestly and in good faith express a concern.

Workers should be aware of the investigation process and receive training on how to use the grievances mechanism as well as the supplier non-retaliation policy.

Environment

Suppliers shall integrate sustainable practices in all areas of their operations in order to respond to climate change and to ensure that natural resources are efficiently managed, conserved and enhanced for future generations. Suppliers should continuously improve their environmental performance in accordance with [Fyffes Environmental Policy](#), and:

- Comply with all relevant local and national environmental laws as well as international standards, obtain and maintain all the necessary environmental permits, approvals and registrations, including but not limited to:
 - Chemicals listed in Annex II of the Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade, and specific substances that deplete the ozone,
 - Prohibition of production, use, and/or disposal of mercury and mercury-added products in any manner contrary to the Minamata Convention on Mercury,
 - Prohibition of production and/or use of substances, and non-environmentally sound management of wastes, containing Persistent Organic Pollutants (POPs) in any manner contrary to the Stockholm Convention,
 - Prohibition of import and export of hazardous waste in any manner contrary to the Basel Convention;
- Develop and implement effective environmental management systems that support identifying risks, measuring and monitoring performance, and driving continual improvements to mitigate or minimise environmental impacts emanating from its operations such as:
 - Preventing, minimising and remedying pollution and negative impacts on air, land, soil, water, forests and biodiversity, as well as reducing greenhouse gas emissions,
 - Avoiding or reducing the generation of hazardous and non-hazardous waste, and enhancing the productive use or ensuring a safe disposal of waste,
 - Ensuring the proper handling and disposal of chemicals, including adequate use of agricultural inputs such as pesticides and other dangerous materials, emissions and effluent treatment,
 - Ensuring the sustainable use of natural resources and increasing the efficiency of resource use and energy,
 - Reducing food loss and waste and promoting recycling,
 - Promoting good agricultural practices, including maintaining or improving soil fertility and avoiding soil erosion,
 - Supporting and conserving biodiversity, genetic resources and ecosystem services; Respecting protected areas, high conservation value areas and endangered species; and controlling and minimising the spread of invasive non-native species;
- Conduct climate change risk assessments to identify climate-related risk and establish adaptation and transition plans to increase the resilience of agriculture and food systems, the supporting habitats and related livelihoods to the effects of climate change through adaptation measures;
- Ensure operations' environmental impacts do not violate the rights of people, communities and ecosystems through environmental damage and pollution.

Affected Communities

Suppliers must respect legitimate tenure rights-holders and their rights over natural resources (land, water, and marine resources); including public; private; communal; collective; indigenous and customary rights; potentially affected by supplier activities.

Special attention must be given to the internationally recognised collective human rights of indigenous peoples, especially their right to self-determination and free, prior, and informed consent (FPIC), in alignment with the UN Declaration on the Rights of Indigenous Peoples and ILO Convention No. 169 on Indigenous and Tribal Peoples. Suppliers must also acknowledge the deep, unique, and often spiritual connection that indigenous peoples have with their land and natural resources; this relationship is integral to their cultural identity and traditional practices and must be respected and protected in all business activities.

Suppliers must uphold any applicable legal standards and international norms regarding the prohibition of unlawful or illegitimate eviction and/or acquisition, development or other use of land, forests, and waters (including fisheries).

In addition, suppliers are required to seek meaningful stakeholder engagement, particularly with affected communities and relevant parties, ensuring transparent, inclusive, and ongoing dialogue. This engagement should promote collaboration, and address concerns or impacts on stakeholders. Suppliers shall act in a socially responsible manner within the communities where they operate and contribute to their sustainable development by promoting open, constructive and mutually beneficial relations with neighbouring communities.

Ethics and Integrity

Obeying the Law

Suppliers are required to maintain the highest ethical standards and comply with the laws and regulations of the countries where they operate.

Anti-corruption

Fyffes does not tolerate bribery and corruption by its own employees or business partners. Suppliers must commit to:

- Complying with all applicable anti-bribery laws
- Avoiding any behaviour or act that could be deemed active or passive corruption (i.e. bribing a government official or business partner or receiving a bribe from any third party);
- Avoiding facilitation payments and work towards eliminating it;

Fair Competition

All dealings Fyffes and its suppliers must be conducted in a manner that does not breach, or appear to breach, competition laws.

Data Privacy and Security

Suppliers should comply with local data privacy legislation regarding their employees, customers and stakeholders.

Conflict of Interest

Suppliers should avoid conflicts of interest or any circumstance where individual actions or interests create even the appearance of conflict or impropriety.

Unauthorised Subcontracting

Using unauthorised subcontractors is a critical violation of this Code and is strictly prohibited.

Suppliers must also declare to Fyffes any use of labour agencies to contract workers and must undertake due diligence of these labour agencies to ensure subcontracted workers are treated in line with the provisions of this Code. Before subcontracting any labour, Fyffes must give its approval. Our suppliers must under no circumstances initiate production of Fyffes products at farms, packhouse, or facilities or subcontractors that have not been approved and authorised by Fyffes.

Suppliers must disclose all farms, packhouse, or facilities they will use for the growing and processing the products they sell to Fyffes.



Implementation



1 Assessing and Monitoring

We assess and monitor Suppliers' observance of the Code's requirements via various methods. Our suppliers are required to acknowledge and commit to the adherence of the Code. We assess our suppliers' compliance with the Code through our internal supplier onboarding and risk management procedure.

We encourage and expect our suppliers to conduct due diligence to identify, prevent, mitigate, and address any adverse human rights and environmental impacts, while ensuring these commitments are passed along their supply chain. At the same time, we acknowledge the shared responsibility between our company, our customers and our suppliers to support continuous improvement. We also recognise the principle of proportionality, taking into account factors such as the size, industry, and structure of suppliers in their responsibility to uphold human rights and environmental standards.

Suppliers are required to assist in and/or provide information relevant to Fyffes due diligence efforts towards risk analysis, monitoring, prevention and remediation of its salient risks as stipulated in Fyffes [Due Diligence Policy](#).

2 Communication and Training

Fyffes will provide annual training on this Supplier Code of Conduct to its suppliers, including any updates.

Suppliers should communicate the expectations of the Supplier Code of Conduct along their supply chain or provide training on their own code of conduct, which must be equivalent in strength to Fyffes Supplier Code.

3 Notification of Incidents and Corrective Measures

Suppliers must proactively investigate and report to Fyffes any confirmed or suspected instances of human rights or environmental abuses, including any allegations, enquiries, related to alleged non-compliances coming from affected stakeholders, media, non-governmental organisations (NGOs), governments, communities and other relevant third parties. Suppliers must take immediate and appropriate actions to investigate and remediate confirmed instances.

4 Suspension and Termination

It is our goal to build trust-based relationships with ethical suppliers and business partners who comply with this Code. We expect our suppliers to fully cooperate with our reasonable requests for data, information, certifications, and audit access to verify compliance, and to obtain assurances that their own business partners and producers uphold this Code.

When there is a concern, or we become aware of facts that indicate a supplier has breached this Code, our practice is to investigate these incidents and work with the Supplier to develop a time-bound Human Rights and/or Environmental Corrective Action Plan (CAP).

Depending on the severity of the non-compliance, Fyffes may suspend the relationship with the Supplier if they fail to develop and implement mitigation, prevention and remediation measures. Termination of the Supplier relationship is considered a last resort, but Fyffes reserves the right to end the relationship if the Supplier fails to show timely progress in line with the CAP or does not collaborate in developing a CAP. Fyffes is committed to responsible disengagement, carefully considering potential adverse impacts and mitigating hardships that termination may impose on affected stakeholders.

Raising a Concern



Raising a Concern: Fyffes Grievance Process

We ensure transparent, fair and confidential procedures for third parties to raise concerns. If you see or suspect any conduct or business practices that you think could violate this Code, please raise a concern via:



Your Fyffes Contact



ethicscommittee@fyffes.com



The Fyffes Ethics Hotline

Concerns may be raised via phone or by filing an online report.
<https://fyffesethics.speakup.report/fyffesethics>

The Fyffes Ethics Hotline is a globally available, independent, confidential and anonymous business conduct reporting service. Fyffes Ethics Hotline numbers and website url is posted on all Fyffes operations for the use of all stakeholders.

APPENDIX

Suppliers Acknowledgement

Supplier Acknowledgement Form

I/We _____ (“Supplier”) acknowledge that Fyffes has advised us of their expectations to comply with the Fyffes Supplier Code of Conduct in the execution of work for Fyffes or we have demonstrated our Code of Conduct is equivalent to Fyffes. Fyffes reserves the right to reject a Supplier’s code of conduct if they deem it to be insufficiently robust or equivalent.

According, I/We certify that:

1. We have received and read Fyffes Supplier Code of Conduct.
2. Fyffes has advised that the Supplier Code of Conduct is important to the proper conduct of business for and with Fyffes.
3. Fyffes has advised its expectation to comply with all applicable provisions of the Supplier Code of Conduct in conducting Supplier’s business with Fyffes.
4. We commit to promptly notify Fyffes if we learn of human rights or environmental concerns that are in breach of this Code.
5. We declare we are not aware of a violation of the Supplier Code of Conduct and Supplier has no knowledge of any conduct in the following areas:
 - Human rights abuses
 - Child labour, slavery, or human trafficking
 - Antitrust/anti-competitive practices
 - Embargo/anti-terrorist violations
 - Bribes or kickbacks
 - Fraudulent or corrupt conduct
 - Misrepresentation of financial records.
 - We understand Fyffes may require the Supplier to demonstrate continuous improvement in meeting the Code requirements.

.....
NAME OF SUPPLIER

.....
SIGNATURE

.....
DATE (dd/mm/yy)

References:

1

https://www.bafa.de/EN/Supply_Chain_Act/supply_chain_act_node.html

https://commission.europa.eu/business-economy-euro/doing-business-eu/sustainability-due-diligence-responsible-business/corporate-sustainability-due-diligence_en

<https://www.regjeringen.no/contentassets/c33c3faf340441faa7388331a735f9d9/transparency-act-english-translation.pdf>

2

- The OECD Guidelines for Multinational Enterprises and the OECD Due Diligence Guidance for Responsible Business Conduct,
- The OECD-FAO Guidance for Responsible Agricultural Supply Chains
- UK Modern Slavery Act (2015)
- EU Directive on non-Financial Reporting
- The UN Guiding Principles on Business and Human Rights
- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The ILO Eight Fundamental Conventions
- Other relevant ILO Conventions
- The Sustainable Development Goals (SDG).
- The Ethical Trading Initiative (ETI) Base Code
- GLOBALG.A.P.
- The BRC Global Standard, Food Safety
- Primus GFS
- SMETA Audits
- Rainforest Alliance
- Linking Environment and Farming (LEAF Marque)
- SCS Sustainably Grown

3

'Young workers' are over the minimum age of 16 but below 18. They are still considered "child labour" under ILO Conventions Nos. 138 and 182 if the work they do is hazardous.

4

<https://www.pic.int/Default.aspx?tabid=2582>

5

This may include and is not limited to: water pollution, excessive water consumption, illegal sourcing of water, air pollution, harmful noise emission, deforestation and conversion, harmful soil change, and destruction of vital ecosystems that significantly impacts the natural basis for the preservation of health, production of food, or access to safe and clean drinking water and sanitation.