



Shaping

WELLBEING

FOR THE WORLD



FYFFES

RESPONSIBLE MARKETING POLICY

CPO

UPSTREAM - EXTERNAL

Effective Date: May 26 Approval Date: May 26
Approved By: Chief Marketing Officer
Policy Owner: Marketing
Next Review Date: May 2028



1. PURPOSE

Fyffes specialises in the production, distribution, and marketing of healthy fresh produce, which has been scientifically proven to play an essential role in promoting human health and wellbeing. However, we recognise that globally, many people do not meet the World Health Organisation's recommendation of consuming at least 400 grams of fruits and vegetables daily. Additionally, our products are associated with a lower carbon footprint compared to other food products.

This policy establishes clear principles to ensure that Fyffes marketing activities align with our core values as well as our purpose of Shaping Wellbeing for the World. It ensures that all marketing activities are conducted ethically, transparently, and in compliance with applicable laws and regulations.

2. SCOPE

This policy applies to:

- All Fyffes employees, contractors, and personnel directly involved in the development, execution, or oversight of marketing materials, communications, and campaigns.
- All consumer-facing marketing materials and communications, including but not limited to television, radio, outdoor advertising, digital platforms (websites, social media, apps, online games), sponsorships, direct marketing, and point-of-sale materials.

3. PRINCIPLES AND COMMITMENTS

Fyffes marketing activities shall be guided by the following principles:

a) Ethical Communication

- Marketing communications must be clear, honest, and based on scientifically proven information or reputable third parties' endorsements (e.g., certifications or standards).
- Sustainability or environmental claims will be accurate and verifiable.

b) Transparency

- Stakeholders must receive clear, factual and transparent information to enable informed decision-making.
- Marketing activities will respect cultural sensitivities and avoid misleading claims

c) Compliance with Legal and Industry Standards

- All marketing activities will comply with relevant laws, industry regulations, and third-party standards.

d) Diversity and Inclusion

- Marketing material shall reflect diversity and equal representation, in line with our **Global Diversity and Inclusion Policy**.

e) Protection of Vulnerable Groups

- Marketing communications will be designed to avoid negative impacts on vulnerable groups, including but not limited to cultural or religious minorities, LGBTQI+ communities, and children.
- We will promote healthy lifestyles in accordance with World Health Assembly standards related to marketing health products.

f) Privacy and Data Protection

- Personal data must be collected, used, and stored in compliance with the applicable legislation as well as our **Global Data Privacy Policy**.
- Direct marketing communications (e.g., emails) will only target individuals who have explicitly opted in.

g) Responsible Use of Images

- Images of employees or community members will only be used with their previous explicit consent.

h) Consumer Feedback

- A clear mechanism for complaints and feedback will be provided to protect consumer rights.

4. IMPLEMENTATION AND MONITORING

To reassure that this Policy is uphold, Fyffes will implement the following measures:

- **Employee Training:** Provide regular training on Policy and its updates, best practices and regulatory changes.
- **Regular Reviews:** Marketing procedures and materials will be evaluated on a frequent basis to ensure ongoing compliance with this Policy.
- **Monitor Consumer Feedback:** Analyse feedback and adapt strategies based on emerging trends and concerns.
- **Communication:** This policy will be communicated to all concerned employees via email and displayed on Fyffes website.

5. ROLES AND RESPONSIBILITIES

All Employees Covered by This Policy: must familiarise themselves with this policy, adhere to its principles, and report any concerns through internal channels.

Managers and Supervisors: Responsible for communicating policy expectations, ensuring compliance, and addressing any reported concerns promptly and impartially. Failure to address misconduct may lead to disciplinary action.

Activity	Responsible	Accountable	Consulted	Informed
Develop and approve marketing materials and campaigns	Marketing Team	Chief Marketing Officer	Legal & Compliance, Sustainability Team	All Employees
Verify ethical, scientific, and sustainability claims	Marketing Team	Chief Marketing Officer	Legal & Compliance, Sustainability Team	Senior Management
Ensure compliance with legal and industry standards	Marketing Team	Chief Marketing Officer	Legal & Compliance	All Employees
Ensure diversity, inclusion, and protection of vulnerable groups in marketing content	Marketing Team	Chief Marketing Officer	HR, Legal & Compliance	All Employees
Manage personal data used in marketing activities	Marketing Team	Chief Marketing Officer	Legal & Compliance, IT	Relevant Employees

Activity	Responsible	Accountable	Consulted	Informed
Obtain consent for use of employee and community images	Marketing Team	Chief Marketing Officer	HR, Data Privacy Officer	Concerned Individuals
Monitor consumer feedback and complaints	Marketing Team	Chief Marketing Officer	Customer Service, Legal & Compliance	Senior Management
Conduct policy training and awareness activities	HR	Chief Marketing Officer	Marketing Team, Legal & Compliance	All Employees
Review marketing procedures and materials for compliance	Marketing Team	Chief Marketing Officer	Legal & Compliance, Sustainability Team	Senior Management
Communicate and publish the Marketing Policy	Marketing Team	Chief Marketing Officer	HR, Communications Team	All Employees and External Stakeholders
Report concerns regarding non-compliance	All Stakeholders	Chief Marketing Officer	HR, Legal & Compliance	Head of Marketing
Address reported concerns and corrective actions	Marketing	Chief Marketing Officer	Legal & Compliance	Reporting Stakeholder
Submit annual reporting under the EU Code of Conduct	Corporate Affairs	Chief Corporate Affairs Officer	N/A	N/A

6. INSTITUTIONAL COMMITMENTS

As a founding signatory of the EU Code of Conduct on Responsible Food Business and Marketing Practices, Fyffes is committed to submitting annual compliance reports and providing continuous learning resources to support ethical marketing practices.

7. ACCESS TO GRIEVANCE

Fyffes provides for legitimate, accessible, predictable, equitable, and transparent operational level grievance mechanisms.



Consumers and all stakeholders who observe any practices not aligned with this policy may contact Fyffes to complain or raise a grievance via the contact <https://www.fyffes.com/contact-us-3/> page on our website, including using the Fyffes Ethics Hotline.

8. DEFINITIONS

Consumer	Consumer means the individual that buys and consumes Fyffes produce
Customer	Customer means a distributor of Fyffes produce, e.g. Retailer, Wholesaler, or Business Partner, which resells.
Marketing materials	A mean of communicating Fyffes brands to consumers, any type of advertising (leaflet, advertising campaign, etc.)
Stakeholder	A stakeholder is any person or group that has an interest or concern in something

9. VERSION CONTROL

Version	Date	Comments
Version 1		New document