



# Modern Slavery and Human Trafficking Policy

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## Purpose

As a global public company, we are committed to upholding the highest standards of ethical conduct and human rights. This policy outlines our approach to modern slavery, human trafficking, forced labor, and other forms of exploitation across our operations and supply chains.

## Scope

This policy applies to our employees, contractors, suppliers, subsidiaries, and business partners in countries where we operate. It aligns with international frameworks including:

- **The UN Guiding Principles on Business and Human Rights** – We integrate human rights considerations into our business decisions and relationships.
- **The International Labour Organization (ILO) Conventions** – We adhere to global labor standards that prohibit forced and child labor.
- **The UK Modern Slavery Act** – We comply with legal obligations to disclose efforts to prevent slavery in our supply chains.
- **The Australian Modern Slavery Act** – We assess and address modern slavery risks in our operations and report transparently.
- **OECD Guidelines for Multinational Enterprises** – We promote responsible business conduct across borders.

## Our Commitment

We are committed to:

### 1. Ensuring all work is freely chosen

We do not tolerate any form of forced, bonded, or involuntary labor. All individuals must enter employment voluntarily and without coercion.

### 2. Prohibiting the retention of identity documents or deposits

We ensure that no worker is required to surrender passports, government-issued IDs, or pay recruitment fees as a condition of employment.

### 3. Guaranteeing that workers can leave employment with reasonable notice



Employees have the freedom to resign from their roles without fear of retaliation, in accordance with local labor laws.

**4. Promoting fair recruitment practices and ethical labor standards**

We work with third party agencies and labor providers that uphold ethical hiring practices and comply with our standards.

**5. Respecting the rights of vulnerable groups**

We recognize that migrant workers, women, and temporary laborers may face higher risks of exploitation, and we take steps to protect their rights.

## Due Diligence and Risk Management

We conduct regular risk assessments and due diligence to identify, prevent, and mitigate risks of modern slavery in our operations and supply chains. This includes:

➤ ***Supplier audits and assessments:***

Our supplier agreements allow the company to conduct audits to determine their compliance to federal, statutory and any other relevant regulations. These audits include their labor practices and require corrective actions where risks are identified.

➤ ***Contractual obligations requiring compliance with our Code of Conduct:***

Suppliers and business partners must agree to uphold our human rights and labor standards as a condition of doing business with us.

➤ ***Third-party risk screening and review:***

We vet our third-party providers and review performance for red flags such as labor violations, sanctions, or unethical sourcing practices.

➤ ***Corrective action plans for non-compliance:***

When issues are identified, we work with suppliers to implement improvements or terminate relationships if necessary.

## Training and Awareness

We provide training to pertinent employees and key stakeholders to raise awareness of modern slavery risks and responsibilities. This includes:

### Identifying signs of forced labor and exploitation



Staff are trained to recognize indicators such as restricted movement, withheld wages, or deceptive recruitment.

#### **Reporting mechanisms and whistleblower protections**

We maintain confidential channels for reporting concerns and protect individuals from retaliation.

#### **Ongoing education on ethical sourcing and human rights**

We update our training materials to reflect evolving risks and best practices.

### **Reporting and Accountability**

We encourage our employees and stakeholders to report concerns related to modern slavery through our confidential reporting channels. Reports are investigated thoroughly, and appropriate action is taken. We are committed to transparency and accountability in addressing any violations.

**Speak-Up Line:** We have a confidential, multilingual reporting channel available 24/7 for employees, contractors, and third parties to report concerns related to modern slavery, unethical conduct, or human rights violations. Reports can be made anonymously where permitted by law.

The Speak-Up Line is managed by the Company's Internal Audit group and is overseen by the Ethics & Compliance Committee which is composed of senior leaders in our Legal, Human Resources and Internal Audit functional units. In turn, the Ethics & Compliance Committee reports to the Company's Independent Board of Directors. Employees, contractors and third parties can communicate their concerns via the Speak-Up Line. Contact information for the Speak-Up Line is as follows: VOICE (800) 461-9330 or EMAIL via internet at [speakupline.freshdelmonte.com](mailto:speakupline.freshdelmonte.com).

**Operational Grievance Mechanism:** We are establishing an accessible, transparent, and culturally appropriate grievance mechanisms, prioritizing our most vulnerable operations to ensure that individuals and communities affected by our operations can raise concerns and seek resolution without fear of retaliation.

### **Governance and Transparency**

Our governance framework ensures that the principles outlined in this policy are embedded at the highest levels of the organization. Oversight is provided by:



**The Human Rights Council:** An internal cross-functional body composed of senior leaders from the COO and Heads of Legal, Human Resources, and Sustainability. This council meets regularly to:

- Review risk assessments and due diligence findings.
- Monitor compliance with international human rights standards.
- Recommend policy updates and strategic actions.
- Provide oversight in the implementation of remediation action plans.
- Oversee training, reporting, and stakeholder engagement efforts.

**The Board of Directors:** Holds ultimate accountability for the implementation and effectiveness of our modern slavery and human rights commitments.