



## About Dole UK

Dole is a global leader in fresh fruits and vegetables, with a portfolio of over 300 products that are grown and sourced, both locally and globally, from over 30 countries in various regions worldwide. Dedicated and passionate in exceeding our customers' requirements in over 75 countries, our goal is to make the world a healthier and more sustainable place. Dole UK is a key subsidiary with multiple subdivisions that grow, pack and source fresh produce, providing due diligence services for retail customers.

As a global leader in the fresh produce industry, we are dedicated to upholding the highest standards of ethical conduct and social responsibility. At Dole UK we prioritise transparency, integrity and respect for human rights across our operations and supply chains, guided by the UN Guiding Principles for Business and the ETI Base code.

We understand the fundamental importance of ensuring fair labour practices and protecting the rights of workers as mandated by the UK Modern Slavery Act. We adhere to international labour standards including the elimination of forced labour, child labour and discrimination.

Our commitment extends to providing safe working conditions, ensuring workers' wages are legal and paid in full, as well as fostering a culture of respect and dignity for all employees and workers in our supply chain.

Dole UK strives to source responsibly and ethically throughout our supply chains. We work with suppliers who share our commitment to sustainability, human rights, and ethical business practices.

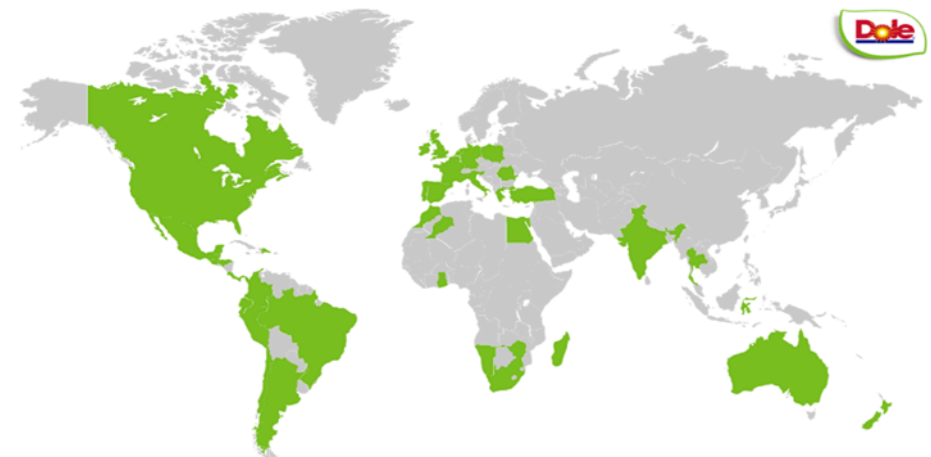
This Modern Slavery Statement covers all eligible UK legal entities and outlines our ongoing work to identify, prevent and mitigate any instances of modern slavery within our business and supply chains, as we strive to enhance a sustainable and equitable future for all.

## Our Supply Chain

Dole UK operates 23 facilities across the UK, covering Wholesale, Foodservice and Retail customers. We are supported by a wide network of the most accomplished local and global growers. Our industry-leading vertically integrated supply chain extends across the globe. Growing, sourcing, importing, packaging, marketing and distributing over 300 lines of fresh produce.

Our sector is complex, fragmented and intrinsically international, while from farm to fork, the global fresh produce supply chain is one populated by a particularly complicated set of stakeholders. We recognise there is, therefore, high vulnerability and potential across the local and international fresh product supply chain for the exploitation of workers to occur leading to modern slavery including human trafficking, debt bondage and servitude.

We are continually building and improving our due diligence systems to map, risk assess and mitigate the risk of modern slavery in our supply chains to ensure that our operations and supply chains are free from any form of exploitation or coercion.



# Modern Slavery Statement 2023



## Policies & Governance

How we manage our business is important to us. We understand the UN Guiding Principles for Business and Human Rights and are continuously reviewing our Policies and Procedures to work towards a fully integrated Protect, Respect and Remedy framework.

Dole plc has an established [Code of Business Conduct and Ethics](#) which covers our extended Dole organisation. We believe in being a responsible business: responsible to our colleagues, our shareholders, our growers, suppliers, the communities in which we work, our consumers and the workers within our supply chains. We champion human rights and worker welfare across the fresh produce supply chain and implement human rights practices, policies and protocols.

We maintain a zero-tolerance policy towards corruption, bribery and unethical behaviour. We conduct our business with honesty, integrity and accountability, promoting a culture of ethical conduct among our employees, suppliers and business partners.

Dole UK aims to protect the fundamental rights of workers in our supply chains. These include all international labour rights such as protection from forced labour, modern slavery and harsh or inhumane treatment.

These fundamentals are rooted in the principles of the Universal Declaration of Human Rights, core International Labour Organisation ILO standards, the Ethical Trade Initiative ETI Base Code and the UN Guiding Principles on Business and Human Rights and we use these documents as guidance in addressing our responsibilities as a business to protect and respect rights across our operations.

## Policy

We require those who supply us to adhere to the best horticultural practices, applying exacting ethical standards of conduct while putting in place robust

protocols and practices to ensure conformance. Dole will not knowingly tolerate the use of forced, debt-bonded, indentured labour, involuntary prison labour, slavery or human trafficking in its supply chain.

Dole plc takes a blanket prohibition against doing business with any individual or company that is engaged in child labour, slavery or human trafficking. Any violation by a supplier of these restrictions could result in the termination of that relationship. All of our suppliers are required to sign a [Terms of Trade](#) agreement which includes:-

- ≈ Compliance with anti-slavery and human trafficking laws
- ≈ Compliance with Ethical Trade Initiative ([ETI Base Code](#))
- ≈ The need for suppliers to include mandatory compliance with the Anti-slavery and human trafficking laws within contracts with direct and subcontractors and sub-suppliers
- ≈ Requirement to inform Dole UK of any suspected slavery or human trafficking in their business or in their supply chain
- ≈ Adherence to Anti-Bribery and Anti-Corruption laws
- ≈ Compliance with Sanction Laws
- ≈ Encouragement to be members of the Supplier Ethical Data Exchange (SEDEX) or SIZA (Sustainability Initiative South Africa) to enable the supply chain to be mapped

We are further committed to maintaining and improving systems and procedures to avoid inadvertent complicity in human rights violations related to our own operations, our supply chain or produce / products.



# Modern Slavery Statement 2023



## Governance

Our UK Managing Director takes overall responsibility for overseeing our Modern Slavery Statement commitments.

We employ a full-time senior technical manager to oversee our ethical trade due diligence who reports directly to a director in the UK Senior Leadership Team.

Their responsibility is to keep the business informed on the ethical KPI performance of suppliers, liaising with stakeholders in a non-competitive space and Human Rights or labour abuse horizon scanning. We also ensure that our suppliers and growers are aware of any collaborative initiatives that may help them to mitigate the risk of labour abuses, giving us and them a vehicle to collaborative action.

## Assessing Risk

We use a combined method of risk assessment based on trusted open data sources made up of 19 data points: 8 data points are specific to Human Rights, 4 are related to political, financial, progress against Sustainable Development Goals and crime risk, and the other 7 factors are related to the environment, 4 of which are inherently linked to potential worker vulnerability thereby joining the dots on how climate change impacts workers.

As we map our supply chain on Sedex to tier 3 wherever possible, we use the [Sedex RADAR](#) risk assessment tool which we overlay with other risk factors which we glean from discussions with our suppliers and growers, such as potential labour shortages and our sphere of influence/importance of business.

We recommend that growers in high-risk supply chains have a [SMETA audit](#) or [SIZA audit](#). This allows us to ensure that the site has taken the necessary steps to mitigate the risk of human rights and labour abuses in their operations.

Where identified by risk assessment we monitor the performance of suppliers/growers using Key Performance Indicators (KPI), the results of which are reported monthly to our UK Senior Leadership team.

## Managing Risk

Through our risk mapping we have identified the following areas of focus in the fresh produce supply chain to reduce risk:

- ≈ UK – Recruitment fees in the agricultural industry
- ≈ UK & Spain – Seasonal worker availability
- ≈ Egypt & Morocco – Agricultural worker recruitment
- ≈ Egypt – Worker voice & exposure to exploitation

**UK Recruitment Fees – [Just Good Work App](#).** We have encouraged our growers in the UK to promote this App that provides workers access to pre-departure information and allows them to query issues on a secure and confidential platform.

**UK Recruitment Fees – [Seasonal Workers Taskforce](#).** In 2023 we joined working [group 3](#). The aim of which is to support growers to reduce risks and enhance the recruitment and on-farm experience of seasonal workers.

**Egypt & Morocco – [Labour Supply Chain Mapping](#).** In the last year, we have mapped our labour supply chain not only in the UK and Spain but Morocco and Egypt to better understand the recruitment routes of workers employed in these territories.



# Modern Slavery Statement 2023



## ***Egypt – Seasonal Worker Exploitation.***

Because Egyptian workers were identified as being open to exploitation due to a lack of literacy, we are jointly funding a collaborative initiative with one of our key strategic growers and the Egyptian Department of Education to make available a literacy program that workers are paid to attend.



***&Wider Worker Voice*** – Continuing our work from previous years we have extended our worker voice program with &Wider to Egypt to try to understand the challenges that workers experience on an Egyptian farm.

## ***Zimbabwe Wages Partner Africa Financial & Prison Labour Due Diligence*** –

Historically, Zimbabwe has experienced and continues to experience financial instability. To ensure workers are being treated fairly, in addition to the current SMETA audits, there is also an end-of-season check to ensure that workers have been paid in full and on time.

***Whistleblowing*** – Dole provides several ways through which a suspected Code violation can be reported:

- Dole Internet Hotline
- Dole Telephone Hotline (translators are available)
- Direct Reporting by phone, email or in writing to a supervisor, a Human Resources representative or another employee relations representative, or a member of Dole’s Legal/Internal Audit Departments

Regardless of the method, a person’s decision to report a suspected Code violation is protected by Dole’s zero-tolerance policy toward any type of retaliation, and a reporter’s decision to report anonymously is strictly protected.

We continue to develop our mitigation program from a worker-focused approach.

## Training

All employees are required to undertake the Dole plc Code of Conduct training which is available in various formats and each divisional director is given regular KPI scores that show the participation and completion of the relevant training.

During 2023 as part of our Diversity and Inclusion programme focussing on raising awareness and educating our employees, we promoted campaigns covering:

- Neurodiversity,
- Men’s Health,
- Religion, Faith or
- Belief and Sexual Orientation

In addition, we held our second Employee Engagement Survey, Have your Say, which provides all employees with a further opportunity to have a voice. The UK Senior Leadership Team actively promotes Have Your Say and is targeted to take meaningful action on the results to find ways to enhance our working environment for all.

We are supporters of the [Stronger2gether training programs](#) and we encourage our suppliers/growers to attend regular training for modern slavery awareness.

Our source team recently underwent [Investigative Interviewing in the Workplace](#) skills course which helped us uncover exploitation by developing the skills and confidence required to obtain detailed and accurate information through planning and conducting an interview with an investigation focus

In Dole UK Retail all new inductees are required to complete a mandatory modern slavery module which contains the [Stronger2gether video](#) and a short test. Over the next 18 months, we are aiming to roll this out in other divisions.



# Modern Slavery Statement 2023



## Collaboration

Dole EMEA networking and collaboration provides intelligence sharing. For example, our German colleagues have been keen to understand how we approach risk assessments in the UK. We are watching developments in both [German supply chain regulation](#) and [EU Sustainability reporting](#). We believe as a group we can gain greater leverage with our shared suppliers and improve our risk assessments using shared horizon scanning and intelligence networks.

We continue to support the activity of the Fresh Produce Consortium (FPC) on the Sustainability Working group which covers ethical topics. We supported the review process for the recently updated [FPC Guidance on Temporary Accommodation for workers in the UK](#), which includes elements of access to grievance mechanisms. The new guidance was published in February 2024.

As a long-term, active member of the [Food Network for Ethical Trade](#), we network with like-minded businesses to explore opportunities for non-competitive collaborative action. The FNET membership allows us to openly discuss salient risks within our supply chain without judgment, provide practical solutions to shared challenges and exchange our collective intelligence with external stakeholders such as NGO's, industry bodies and Government.

We continue to participate in and support the [Spanish Ethical Forum](#), encouraging our growers to be members and attend events wherever possible to build their knowledge and capacity in terms of salient risks associated with modern slavery, human trafficking, worker rights and welfare. By participating in this forum, we are able to work collaboratively with NGO's, industry bodies and the Spanish Government.

## In Summary

Dole UK believes that a balanced supply chain can deliver equitable dividends to all stakeholders, especially those working across production.

This Modern Slavery Statement serves to document our commitment to combatting modern slavery and human trafficking, to invite all Dole UK colleagues to embrace the challenge of continuous improvement and to remind all our suppliers of their role in contributing to this task.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes a slavery and human trafficking statement for the financial year 1<sup>st</sup> January to 31 December 2023.

This Modern Slavery Statement was approved by the UK Dole board in their capacity as principal governing body on 15 May 2024.

A handwritten signature in black ink, appearing to read "M Owen", with a horizontal line extending to the right.

**Mark Owen**  
Managing Director

For and on behalf of Dole UK Limited  
Date: 16 May 2024

