

# Modern Slavery Statement 2025



## About Dole

Dole plc is the world's leading fresh produce provider. Operating out of 30 countries, while serving many more, our vertically integrated supply chain extends across the globe incorporating over 250 facilities. Growing, sourcing, packing, shipping, marketing and distributing over 300 lines of fresh produce, our range extends from the more familiar to the truly exotic. Our mission, always, to make the world a healthier, 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 the world's leading fresh produce provider, 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 which at its core respects the ILO Declaration on Fundamental Principles and Rights at Work (1998).

We understand the fundamental importance of ensuring fair labour practices and protecting rights of our 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 our 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.

We prioritise 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 chains

Dole UK operates out of more than 20 locations 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 a potential across the local and international fresh product supply chain for 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.

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## Policies & Governance

How we manage our business is important to us, we are aware of 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 and Dole have an established [Group Antibribery & Corruption policy](#) and associated governance framework. 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 following principles:


-  Universal Declaration of Human Rights
-  Core international Labour Organisation ILO standards
-  Ethical Trade Initiative ETI Base Code
-  UN Guiding Principles on Business and Human Rights

As guidance these principles are used in addressing our responsibilities as a business

## Policy

We require from those who supply us to adhere to best agricultural and 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.

Via our [Code of Business Conduct and Ethics](#) Dole plc takes a blanket prohibition against doing business with any individual or company who is engaged in child labour, slavery or human trafficking. Any violation by a supplier of these restrictions could result in termination of that relationship. All our strategic 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](#)) and by association the ILO Declaration on Fundamental Principles and Rights at Work (1998).
-  The need for suppliers to communicate the Anti-slavery and human trafficking laws and these are contained 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

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## Governance

Our UK Managing Director takes overall responsibility for overseeing our Modern Slavery commitments. We employ a full-time senior technical manager to oversee our ethical trade due diligence who reports directly into a director in the UK Executive Leadership Team.

Their responsibility is to keep the business informed on 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 in high risk supply chains, we use the FNET Risk Assessment tool to verify our risk ratings from our own 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 strategic suppliers / growers performance with Key Performance Indicators (KPI) the results of which are reported monthly to our UK Executive Leadership team.

## Managing Risk

Through our risk mapping which involves over 100 supplying countries, we have identified the following areas of priority in our fresh produce supply chain to reduce risk:

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

**SWS Taskforce: [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 Health and Safety Collaboration** – we have been delighted to support one of our grower led initiatives created by the Hall Hunter Partnership to build a network of fresh produce Health and Safety experts to collectively address and share on farm best practice and not only addressing the physical harm to workers but also their mental health and wellbeing.




**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. We have taken the decision to sponsor the SWS Taskforce for the 2025 season, showing our commitment to ensuring that farms have the necessary tools to be able to address the specific risks that the scheme poses to UK Agriculture

**Recruitment, worker voice, exploitation & transportation** - In April of 2025 we visited Moroccan farms and in December 2025 we visited Egyptian farms, where we spoke with workers regarding their experience of the current season, their recruitment experience, how they were valued and how they could raise concerns to their management, we also enquired about their experience with transportation to and from the farm to understand best practices.

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

-  Dole Integrity 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.

## Employee Engagement and Growth











Dole UK continues to promote diversity and inclusion across its businesses and actively collaborates with industry leaders in the fresh produce sector in this area. Our ongoing focus is on encouraging broader representation across all levels of the Company and ensuring that opportunities for development and progression are accessible to all employees.

Dole plc believes in creating a workplace where every individual can thrive, grow, and lead. In 2025 Dole plc developed The Dole Women Leaders Network (DWLN) which is dedicated to supporting women within the group by offering mentorship, career guidance and broad support for career growth.

Dole UK is passionate about increasing its female leadership and fully supports this Network. We actively took part in the DWLN pilot mentoring programme, providing female mentors and creating opportunities for several females to be mentees.

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

Our commercial teams have undergone Business Ethics and Human Rights training, this covered:

-  Ethical Trade Priorities – including mitigation of Modern Slavery
-  Legal context of Business Ethics using the UN Guiding Principles in Human Rights
-  Requirements of the UK Modern Slavery Act including updates on legal landscape
-  Overview Modern Slavery facts and figures
-  Intelligence sharing and leverage
-  Supply chain mapping tools
-  Supplier Self Audits & Findings analysis
-  Ethical compliance monitoring and managing risk
-  Site visit ‘watch outs’ in accommodation, field and packhouse
-  Site visit ‘access to remedy’ ensuring workers know their rights and can gain access to help where needed.

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.

Dole PLC instigated blanket [Global Anti Bribery and Corruption](#) Training which helps us to identify when there may be indicators of corruption in our business and in the businesses that we work with. These indicators may be useful in identifying if workers are being coerced.

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## Stakeholder Engagement

We understand that although we have a far reach in terms of supply chain, we cannot work alone to address salient risks associated with Modern Slavery and the indicators related to modern Slavery. Therefore, stakeholder engagement is an important engagement tool in our arsenal. Working together we have strength in numbers and by utilising strategic partnerships we align our values and approaches to give a consistent message to our supply chain.

Engagement	Role	2025 Key Activity & Outcomes
<b>EcoVadis</b> UK	The EcoVadis Global Sustainability Platform is a globally recognised evaluation tool that assesses a company’s performance in environmental, social and governance (ESG) Criteria. It evaluates how well a company manages sustainability topics which include working conditions, business ethics and supplier relationships. The assessment is structured around four key themes, Environment, Labour and Human Rights, Ethics and Sustainable Procurement. Over 1300 multinational organisations have evaluated their supply chains using this tool.	We are currently compiling our third scorecard. Our last submission in March 2025 saw the following scores increase: <ul style="list-style-type: none"> <li>• Labour &amp; Human Rights increased by 3 points</li> <li>• Ethics increased by 5 points</li> </ul>
<b>Egyptian Suppliers Ethical Trade Forum (ESET)</b> Egypt	ESET Forum members are committed to improving working conditions in Egyptian agriculture. We actively promote our growers to attend ESET events to build capacity in their business related to worker welfare, worker voice and addressing indicators of modern slavery	We actively encourage all our Egyptian growers to participate in events <ul style="list-style-type: none"> <li>• In December 2025 we attended the international event and delivered a presentation on the international challenges with addressing the salient risks of recruitment fees and the risks associated with informal actions in the exploitation of workers</li> </ul>
<b>Food Network for Ethical Trade (FNET) UK &amp; Global</b>	FNET is a member-led initiative which is committed to improving the lives and livelihoods of workers in food supply chains. FNET uses the collective leverage of suppliers and retailers to bring about positive change in working conditions. Through its collaborative work, FNET aims to improve labour conditions in agriculture and food processing, both in the UK and internationally, by setting industry-wide expectations and ensuring they are communicated and supported throughout supply chains.	<ul style="list-style-type: none"> <li>• We attended fortnightly FNET calls, where members shared insights on emerging human rights and ethical trade risks, and engaging with sector experts. We also attended training webinars on salient risks across key commodities and GNFR sectors</li> <li>• We joined 18+ working group meetings to develop practical tools on recruitment fees, worker representation, employee engagement, remediation, heat stress and integrating lived experience into risk identification</li> <li>• Participated in stakeholder calls on SMETA requirements and continued involvement in the retailer alignment group to reduce duplication and strengthen human rights due diligence</li> <li>• For full details of the FNET strategy for 2026-2027 see <a href="#">here</a></li> </ul>

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<p><b>Morocco Scoping Visit</b> Morocco</p>	<p>Collaborative initiative with one retail customer and three of their suppliers of which we were one. Scoping visit to understand specific salient issues faced by workers in Morocco.</p>	<ul style="list-style-type: none"> <li>• Supplier visits to establish worker needs</li> <li>• Engaged with local NGO's to discuss specific salient risks related to female workers</li> <li>• Agreement to participate in a joint full scale engagement piece to bring workers, managers, owners and buyers together in roundtable events in April 2026 supported by Partner Africa with an aim to establish best practice in country and share with the wider Egyptian agricultural community</li> </ul>
<p><b>Sedex</b> UK &amp; Global</p>	<p>We use the Sedex platform (now ISO 27001, ISO 27701 and Sustainable Supply Chain Initiative certified) to map our supply chain. Sedex is a data-led platform with assessment tools and professional services to support businesses to drive sustainable practices in global supply chains.</p>	<ul style="list-style-type: none"> <li>• Mapped our Tier 1 supply chains for our Import business and wholesale division overall</li> <li>• Mapped our Tier 1 – Tier 3 supply chains for our retail divisions</li> <li>• Set and monitored KPI metrics including the management of audit non-conformances</li> </ul>
<p><b>Seasonal Worker Scheme Taskforce (SWS) UK</b></p>	<p>Established in 2023, the SWS Taskforce brings together retailers, growers, recruiters, industry bodies, non-profits and governments in its mission of 'working collaboratively to develop and implement tangible actions to help safeguard and ensure access to workers' rights in the UK SWS and wider UK horticulture'. Stronger Together co-ordinates the taskforce as Secretariat.</p>	<p>Through our sponsorship of the SWS program, we have supported the following activities:</p> <ul style="list-style-type: none"> <li>• Provision of advice and guidance to workers navigating the scheme through the Just Good Work app, reaching 45,000 potential workers and SWS visa holders. 19,000 of these users were new to the app</li> <li>• With specialist organisations, developed and delivered a range of pre-season regional roadshows and in-season webinars and free resources for UK agriculture stakeholders</li> <li>• Independent in-season worker survey providing live, grower-level and scheme-wide insights and trends to inform work prioritisation, reaching 4,438 workers during the season</li> <li>• Co-funding with Defra a feasibility study on the EPP and holding multi-stakeholder roundtables to discuss next steps to mitigate financial risks to seasonal workers</li> <li>• Responsible Recruitment Progress Assessments (RRPA) delivered to 4 scheme operators to identify performance levels and improvement areas</li> <li>• Developing a multilingual seasonal worker support line, to be launched in 2026</li> <li>• For full details of 2025 activities and 2026 priorities see <a href="#">here</a></li> </ul>

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<p><b>Spanish Ethical Trade Forum (ETF)</b> Spain</p>	<p>Established in 2015 the Forums bring together retailers, growers, industry bodies, non-profits and governments, working collaboratively to bring together industry experts into working groups that shape capacity building for the Spanish produce industry.</p>	<ul style="list-style-type: none"> <li>• 5 member meetings, including an international meeting in Murcia in June celebrating the Forum's 10-year anniversary which Co-op co-sponsored (see here)</li> <li>• Working group activity ongoing, including 6 online seminars on human rights and environmental topics and sector workshops on social dialogue, accommodation and working conditions, health and safety, environmental sustainability and human rights due diligence</li> <li>• Presentations at external events including the World Forum for Local Economic Development in Seville and a side event organised by GIZ GmbH, International Organization for Migration (IOM), and AIM Progress during the UN Forum on Business and Human Rights in Geneva. Fruit Attraction trade stand to promote the Forum and support members</li> <li>• Sponsoring the roll-out of App Foros, a free mobile app providing agriculture workers with information on labour law, rights and local working conditions. There were 433 users in 2025</li> <li>• First edition of the ETF Awards, recognising 3 local producers with best practices</li> </ul>
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## Examples of Allegation management Raised in our supply chain in 2025

We not only rely on our standard due diligence to identify indicators of modern slavery. We use other sources such as news and monitoring of NGO social media posts as well as having a close working relationship with our key suppliers. We have our own escalation policy and procedure that requires us to take reasonable steps to investigate and gain further insight into reports and act to take remedy where harm has been identified.

The cases below were found not to be serious incidents or modern slavery indicators, however we approached them as if they could potentially be. These cases show the steps that we took to investigate, share intelligence and agree a remediation plan where required.

Country	Notification Channel	ETI Base Code	Summary	Status
United Kingdom	Grower		<p><b>Report:</b> Unannounced Gangmasters and Labour Abuse Authority (GLAA) document review took place on a fruit farm due to anonymous complaints raised in 2024 and 2025. Allegations included a case of unacceptable supervisor behaviour and underpayment.</p> <p><b>What we did:</b> We arranged on site worker welfare chats with a trained member of our team (<a href="#">S2G Interviewing Skills</a>) in the same week we were informed of the GLAA visit. The results of the worker chats were anonymised and shared with our primary retailer who through the FNET Retailer alignment program shared with those who also used the site.</p> <p><b>Outcome:</b> Overall, allegations were unsubstantiated and workers felt valued and able to raise concerns to management. Workers reported that their mobile phone settings affected access to site notifications, which the grower resolved.</p>	Allegation unsubstantiated No remedy required based on the investigation’s findings
Peru	Civil Society & NGO		<p><b>Report:</b> Worker fatality on a fruit farm which catalysed strike action by 100 workers citing human rights abuses.</p> <p><b>What we did:</b> Facilitated a meeting between the grower Human Resources director and our retail customer to discuss root cause and establish remediation for the bereaved.</p> <p><b>Outcome:</b> Cause of the fatality remains under independent investigation with health and safety recommendations pending. A Crisis committee was established to provide ongoing support to the bereaved family. Safety precautions have been reinforced with verification checks. Disciplinary measures were adopted where appropriate. Strike action was resolved through agreement between site management and union representatives.</p>	Remedy partially implemented

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## In Summary

Dole UK believes that a balanced supply chain can deliver equitable dividends to all stakeholders, especially those working across production. This 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 fiscal year 1<sup>st</sup> January to 31 December 2025.

This Modern slavery Statement was approved by the UK Dole board in their capacity as principle governing body on:- 16 June 2026

A handwritten signature in black ink, appearing to read "David Macklin", with a small horizontal line at the end.

David Macklin  
UK Managing Director  
For and behalf of Dole  
Limited

Date: 16 June 2026