

Modern Slavery Statement 2024



About Dole

Marketing the most nutritious of products with the lowest environmental impact, 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.

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 across 23 locations, covering Wholesale, Foodservice and Retail customers. We are supported by a wide network of the most accomplished local and global growers.

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 produce 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 minimise the risk of Modern Slavery in our supply chains to work towards our operations and supply chains being free from any form of exploitation or coercion.

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.

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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 plc has established a [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:

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

As guidance these principles are used in addressing our responsibilities as a business to protect and respect rights across our operations.

Policy

We require from our key suppliers to adhere to 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.

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 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 communicate the Anti-slavery and human trafficking laws and these are contained within contracts with direct, 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.

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 Senior Leadership Team.

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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, 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 suppliers / growers' performance with Key Performance Indicators (KPI) the results of which are reported monthly to our UK Senior Leadership team.

Managing Risk

Through our risk mapping which involves 109 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 – 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 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. We not only address 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 also 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

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.

Egypt – Seasonal Worker exploitation. 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.






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&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.

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

-  Dole Internet Hotline
-  Dole Integrity 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.

In Q4 2024, we also delivered an online Antibribery & Corruption training campaign.











During 2024 as part of our Diversity and Inclusion programme focussing on raising awareness and educating our employees, we promoted Age and Generation. We celebrated our multi-generational colleagues across our UK businesses and supported young adults within the communities in which we work. In recognition of the new legal requirements regarding Sexual Harassment, we updated our policy and provided training across the UK to ensure our employees understand what harassment is and how they can report any concerns.

In addition, we held our third 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](#), 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. The training will aid 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.

Our commercial teams recently underwent 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 required.

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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.

On Anti-slavery day 2024 we took the opportunity to [enhance awareness of modern slavery](#). The awareness was also extended to our [UK growers](#) by inviting [Unseen](#) a UK based charity working towards a world without slavery to give an overview of the [Modern Slavery Helpline](#), we were happy to be [named along with other businesses](#) who took the initiative to promote this charity during Anti-Slavery week.

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 are useful in identifying if workers are being coerced.

Collaboration

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

Fresh Produce Consortium (FPC), we continue to support the activity of the 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](#), this 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 likeminded businesses to explore opportunities for noncompetitive collaborative action. The FNET membership allows us to openly discuss salient risks within our supply chain without judgement, provide practical solutions to shared challenges and allows us to exchange our collective intelligence with external stakeholders such as NGO's, industry bodies and Government.

FNET have various working groups of which we are members of The Empowering Work and Responsible Recruitment groups. In The Empowering Work group we have been actively engaged in a sub group who are building a [maturity model for Employee Engagement](#).

We continue to participate and support the [Spanish Ethical Forum](#), encouraging our growers to be members and attend events wherever possible to capacity build their knowledge 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 2024 we were delighted to [represent the UK industry by participating in the opening speeches](#), showing not only our commitment to the forum but to listen and work collaboratively with the growers to address salient risks.

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
- 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

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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 1st January to 31 December 2024.

This Modern Slavery Statement was approved by the UK Dole board in their capacity as principle governing body on 16 April 2025.

Mark Owen

UK Managing Director

For and behalf of Dole Limited

Date: