

Modern Slavery Act Statement 2022



Organisation's Structure

In November 2022, Total Produce UK Limited rebranded to Dole UK.

Dole UK is part of Dole plc, which is the world's largest fresh produce consumer brand, a household name across the Americas, much of Europe and beyond and a primary grower of fresh fruits and vegetables of global renown. Operating out of 30 countries, our vertically integrated supply chain extends across the globe incorporating over 250 facilities. Growing, sourcing, packing, marketing, and distributing over 300 lines of fresh produce.

Dole plc has an established Code of Business Conduct and Ethics. We believe in being a responsible business, responsible to our colleagues, our shareholders, our growers and suppliers, our customers, the communities in which we work and our consumers. We champion Human Rights and Worker Welfare right across the fresh produce supply chain and implement human rights practices, policies and protocols

This statement covers all eligible UK legal entities.

Our Supply Chain

Dole UK is committed to ensuring transparency with its suppliers of goods and services and is mindful as to what steps can be taken, where necessary, to combat slavery and human trafficking. We recognise that modern slavery is a complex supply chain issue, and we work in conjunction with our Customers, Growers, Non-Government Organisations ('NGO's') and industry bodies, both nationally and internationally to help develop sustainable solutions to address this important issue.

We recognise that our function; the marketing of products, the health promoting properties of which have been firmly and definitively established, brings with it great privilege and immense responsibility in equal measure. We understand that the implicit trust attached to fresh produce remains ever contingent on a confidence in the supply chain through which produce is delivered and in the integrity of those from whom it is sourced.

Ours is a sector that 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. Dole UK recognises there is, therefore, potential across the local and international fresh produce supply chain for slavery, human trafficking and exploitation of workers to occur.

We continue to work with our supply chain partners both nationally and internationally to enhance our work in this area.

Due Diligence Processes and Supplier Adherence to Our Values

We require from those who supply us adherence to best horticultural practices, applying exacting ethical standards of conduct while putting in place robust protocols and practices to ensure conformance. We will not knowingly tolerate the use of forced, debt bonded, indentured labour, involuntary prison labour, slavery or human trafficking in our supply chain. 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 and our produce/products.

Dole UK operates to the highest international standards. We:

- work to the guidelines of the Ethical Trading Initiative (ETI)
- are a member of the Supplier Ethical Data Exchange (SEDEX)
- wholly support the Stronger Together Campaign and strive to ensure the principles and spirit which underpin this initiative, permeates throughout our operations and those of our suppliers' businesses across the United Kingdom and beyond
- Dole UK continue to support FNET (Food Network for Ethical Trade), Spanish Ethical Forum and FPC (Fresh Produce Consortium) to 'develop and lead' industry best practice.
- respect ILO Human Rights

2022 Developments

The Code of Business Conduct and Ethics has been updated to reflect the change in the plc organisational structure. Additional contact telephone numbers for the Integrity Hotline are available globally, 24 hours per day to allow ease of reporting. Employees can report issues in multiple languages. An employee's decision to report a suspected Code violation is protected by Dole's zero tolerance policy toward any type of retaliation. Our Code has been widely communicated to all existing employees and it is provided to all new employees on being offered a role within our business. Our code can be accessed via a direct link at www.doleintegrity.com.

Human Rights Collaboration Forums

These memberships allow us to openly discuss salient risks within our supply chain without judgement, provide practical solutions to shared challenges and allow us to exchange our collective intelligence with external stakeholders such as NGO's, industry bodies and Government.

Food Network for Ethical Trade (FNET)

In the last year we have actively participated in:-

- continued intelligence sharing on salient modern slavery risks in the UK and abroad
- providing insight of worker experience to an industry wide round table event held to discuss the Seasonal Worker Scheme in October and November 2022. The round table was a collaboration of NGO's, retailers, importers, government bodies and growers with an aim to creating advice and further resources for the 2023 season
- in working groups to share and enhance best practice guidance

Spanish Ethical Forum (Foros Comercio Etico)

In the last year we have actively participated in:

- the Governance group to support the delivery of a new Spanish Ethical Foundation with an aim to transition from Retailer / Importer lead to Supplier / Grower lead
- Sponsorship of the International Spanish Ethical Forum in person event held in Granada in June 2022 which was attended by our key strategic Spanish growers

FPC (Fresh Produce Consortium)

- As long-standing members of the FPC both in the Governance and Technical group we recently joined the Sustainability group, this group looks at ongoing sustainability issues but also the salient risks such as labour, worker welfare and human rights associated with the growing and packing of fresh produce.

In 2022 we identified two key areas of focus for our ongoing human rights program.

UK Labour Supply 2022

Due to the war in Ukraine the supply chain for workers drastically changed, meaning workers came from further afield which identified the potential of worker exploitation.

We were invited to join a project investigating the competency of the Seasonal Worker Operators. The audit reviewed policies, procedures and checks carried out by the operators. The audits were verified through worker interviews to confirm the operators were fulfilling their obligations.

Zimbabwe Supply Chain

Identified as a potential risk due to the financial instability of the currency, known historic issues with the use of prison labour and non-payment of wages.

&Wider (Worker Voice)

Continuing the program that we started in South Africa in 2021, during the months of June to September 2022 we undertook worker voice surveys in two blueberry farms in Zimbabwe.

There was a high participation rate in the farms selected and we identified some clear opportunities to improve worker management relations.

Partner Africa Financial Due Diligence and Prison Labour Assessment

Zimbabwean growers already participated in the SMETA program of audits carried out by Partner Africa. In 2022 we completed an out of season assessment which was specifically geared to looking at the payment of wages to workers and the potential use of prison labour.

The assessments gave us further insight into worker feedback and reassured us that additional audits out of season, provide greater confidence in management practices.

Our Intelligence Network

In Dole we have a Technical & Development forum which meets monthly to share knowledge on compliance and technical issues. In 2022 webinars were arranged with key industry stakeholders, including SEDEX, SIZA and Global GAP.

Dole UK continues to issue updates and newsletters on Modern Slavery risks to our supply chain partners and growers to keep them informed of any potential risks in their country.

In Summary

In Dole UK, we believe that the benefits of fresh produce marketing can be collective and 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 improving still further 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 January to 31 December 2022.

This Modern Slavery Statement was approved by the board of Dole Limited in their capacity as principal governing body on 16 June 2023.



Mark Owen
Managing Director

For and on behalf of Dole UK

Date: 19/6/23

References:

- Dole plc - [Code of Conduct | Dole plc](#)
- SEDEX — <http://www.sedexglobal.com/>
- Stronger Together — <http://stronger2gether.org>
- ETI — <http://www.ethicaltrade.org/>
- SMETA audit — <http://www.sedexglobal.com/ethical-audits/smeta/>
- FNET - [FNET – Food Network for Ethical Trade](#)
- Foros Comercio Etico - [Ethical Trade Forums - Ethical Trade Forums \(foroscomercioetico.com\)](#)
- Foros Comercio Etico Newsletters - [Newsletters and Press Releases - Ethical Trade Forums \(foroscomercioetico.com\)](#)