



## GLOBAL VENDOR CODE OF BUSINESS ETHICS AND CONDUCT

### 1.0 MANAGEMENT COMMITMENT

As a company engaged in global trade, Fresh Del Monte<sup>1</sup> is keenly aware of the importance of working alongside our constituents, and value their interests as their own. Fundamental respect for all people, and our planet, guides our corporate conscience. The Company is committed to diversity and inclusion, dignity for all workers along our entire supply chain, sensitivity towards the environment, and a spectrum of civic and charitable priorities that promote our shared future in the communities we serve.

We also believe that vendors, suppliers, customers, contractors, consultants, agents, representatives, brokers, distributors, research partners, software providers, licensors, intermediaries and other third parties who provide us with goods and services, along with their parent entities, subsidiaries, subcontractors and supply chains (collectively "Third Parties" and each a "Third Party") approved to do business with the Company should observe the same philosophy in their actions and relationships affecting the Company. While the Company recognizes that there are different legal and cultural environments in which Third Parties operate throughout the world, the Company has established this Code of Business Ethics and Conduct for Third Parties (this "Code") to set forth the basic requirements Third Parties MUST meet with respect to performance as a Third Party to the Company.

All Third Parties must comply with this Code and must ensure that their subcontractors that produce products or materials for or provide services to the Company comply with this Code. Compliance with this Code is in addition to, not in lieu of, any Third-Party obligations set forth in any agreements between a Third Party and Company. Additionally, compliance with this Code is each Third Party's individual responsibility and we recommend that each Third Party regularly communicate this Code and its requirements to its officers and employees.

### 2.0 COMPLIANCE WITH LAWS AND REGULATIONS

Third Parties approved to do business with the Del Monte Fresh Group, including all their subcontractors, must operate in full compliance with the laws of their respective countries and with all applicable rules, regulations, customs and published industry standards applicable to them, including those relating to labor, worker health and safety, freedom of association and the environment.

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<sup>1</sup> The terms "Fresh Del Monte," "Company," "we," "our," or "us," refers to Fresh Del Monte Produce Inc. and its subsidiaries, in general, when no useful purpose is served by identifying any particular Fresh Del Monte entity.



### **3.0 PRODUCT SAFETY AND QUALITY**

One of the most significant Company values is our commitment to providing our customers with trusted, quality food products. We expect our suppliers to value product safety and quality and to comply with government and Company food safety requirements and specifications.

### **4.0 HUMAN RIGHTS AND LABOR**

We are committed to observing human rights and fair labor practices and to treating our employees, whom we call team members, with dignity and respect. Our programs and policies, such as our Human Rights Policy support the principles contained within the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the UK Modern Slavery Act, and the International Labour Organization's Labour Standards.

We expect our vendors to make the same commitments in their labor practices by having training and controls in place that: (1) Verify the employment eligibility of their employees; (2) Prohibit inappropriate recruiting practices and fees; (3) Ensure no forced labor or child labor is being used or human trafficking is occurring; (4) Respect the right of employees to freely associate, organize, and bargain collectively; (5) Ensure compliance with applicable wage and hour laws; (6) Prohibit discrimination, harassment and workplace violence; and (7) Provide options for employees to report concerns without fear of retaliation.

#### *Diversity, Discrimination and Harassment*

The Company values, honors and respects differences and diversity in its employees, customers, vendors. The Company expects Third Parties to provide a work environment that offers equal opportunity to its employees and that is free from unlawful discrimination or harassment; one in which each employee is treated with dignity and respect.

#### *Forced Labor and Coercion*

Third Parties must not use involuntary labor of any kind, including debt bondage, indentured servitude or forced labor by governments. The Company has zero tolerance for involuntary labor of any kind and will terminate its business relationship with any Third Party who uses involuntary labor or purchases from any subcontractor who uses involuntary labor of any kind. If a Third Party recruits foreign contract workers, the Third Party must pay agency recruitment commissions and must not require any worker to remain in employment for any period of time against his or her will. Likewise, the use of physical acts to punish or coerce workers, or psychological coercion, or any other form of non-physical abuse, including threats of violence, sexual harassment or verbal abuse is prohibited.



### *Child Labor*

Every worker employed by a Third Party must meet the local minimum legal age. Each Third Party must comply with all local child labor laws, including those related to hiring, wages, hours worked, overtime and working conditions.

### *Wages & Hours*

Third Parties must ensure that workers are paid at least the minimum legal wages or the local industry standard, whichever is greater. Third Parties shall carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions.

### *Working Conditions*

Third Parties must treat all workers with respect and dignity and provide them with a safe and healthy working environment and, where provided, a living environment. Third Parties must comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection, and electrical, mechanical, and structural safety. At a minimum, Third Parties must provide potable drinking water, clean and accessible restrooms, adequate lighting and ventilation, fire and emergency exits, essential life safety equipment, emergency aid kits and access to emergency medical care.

## **5.0 ANTI-CORRUPTION AND BRIBERY**

“Anti-Corruption Laws” include the US Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act (“UKBA”), and other applicable anti-corruption laws and regulations (collectively, the “Anti-Corruption Laws”). All Third Parties are expected to comply with the letter and spirit of the Anti-Corruption Laws as a condition to doing business with and receiving payment from Company. We expect our Third Parties to conduct their businesses and interactions on behalf of Company in accordance with relevant Anti-Corruption Laws. We also expect our Third Parties to have codes or other policies that prohibit bribes and other unlawful payments to third parties and government officials. The Company prohibits facilitation payments, except for a very limited set of circumstances for which prior written approval must be obtained from the Company’s General Counsel. Please refer to the Company’s Global Anti-Bribery and Anti-Corruption Policy.

Third Parties are also expected to have controls in place to prevent corruption and to train their employees accordingly. Third Parties are expected to permit Company to request and review all relevant records to ensure their compliance with the terms of this provision. The Company also expects our Third Parties’ sub-tier vendors and suppliers to comply with the Anti-Corruption laws and this provision. Third Parties may consult Company Global Anti-Corruption Policy for additional information on Company’s anti-corruption expectations. Company reserves the right to decline future business opportunities or to end existing business relationships with suppliers who do not comply with these expectations and relevant Anti-Corruption Laws.



## 6.0 TRADE SANCTIONS

Except as authorized by the U.S. Department of the Treasury, Office of Foreign Assets Control (“OFAC”), the European Union (“EU”), the Financial Action Task Force (“FATF”), the United Nations (“UN”) or the Swiss State Secretary for Economic Affairs (“SECO”), Third Parties are prohibited from acquiring any equipment or services if any proclamation, rule, regulation, executive order, and/or statute administered by OFAC, the EU, FATF, UN or SECO, or if OFAC, EU, FATF, UN or SECO’s implementing regulations, would prohibit such transaction.

Neither Third Parties, nor any of their subsidiaries, affiliates or parent company, shall be a party identified on the U.S. Commerce Department’s Denied Persons List or Entity List; the U.S. Treasury Department’s list of Specially Designated Nationals and Blocked Persons; The U.S. State Department’s Debarred List or any other similar list of prohibited or denied parties in relation to suspected acts of terrorism, human rights violations, weapon or nuclear proliferation activities and/or weapons of mass destruction, maintained by any other country or international organization, including the EU, the UN and Switzerland.

Third Parties shall not and will not engage in any transaction, commercial or otherwise, with any specified or designated persons, entities, or other bodies subject to or identified under any sanctions, prohibitions, and/or restrictions under UN Resolutions or trade or economic sanctions, laws or regulations of the EU, the United States or Switzerland.

## 7.0 USE OF TRADEMARKS AND DOMAIN NAMES

Any use of trademarks or domain names owned and/or used under license by any company within the Company by Third Parties must be submitted to the Company’s Corporate Legal Department for approval prior to use.

## 8.0 GIFTS & ENTERTAINMENT

It is never permissible for the Company, Company Representatives, or a Third Party to provide gifts, meals, travel, or entertainment to anyone (Government Official or a commercial partner) in exchange for any improper favor or benefit or to improperly influence or reward an official act or decision. Gifts also include, but are not limited to, airline upgrades for personal use, passes, services, and use of a donor’s time, materials, facilities, and equipment. Subject to the restriction for Government Officials below, this restriction does not apply to unsolicited promotional materials having a nominal value. In addition, gifts, meals, travel, or entertainment expenditures made to persons doing business with the Company are permitted if reasonable and proportionate, in accordance with customary courtesies, for *bona fide* purposes and lawful under applicable laws. Reasonable, proportionate, and *bona fide* expenses do not include expenses that are lavish or unrelated to a legitimate business purpose.

No offer of provision of or promise to provide gifts, meals, travel, and entertainment to any Government Official may be made by or on behalf of the Company unless such offer, payment or promise has been approved in advance by the Company’s General Counsel. Such gift or meal



should be reasonable under the circumstances and should not be provided to the same person or group such that the aggregate total of the benefits provided could suggest an improper purpose. It is important that Third Parties refer to any agreements between them and Company, which may contain details and restrictions regarding entertainment and gifts. In addition, refer to the Company's Gift Policy in the Code of Business Ethics and Conduct.

## **9.0 OCCUPATIONAL HEALTH & SAFETY**

Third Parties shall be committed to protecting the occupational health and safety of all employees. Safe working practices and high standards of hygiene are required in all operations. At a minimum, Third Parties must comply with the laws of their respective countries and with all applicable rules, regulations, and local health and safety laws, regulations, and standards. Third Parties must also operate in a manner that complies with training and communicating regularly with their employees about safety and making continuous efforts to achieve a workplace that is free from work-related injuries and illnesses.

## **10.0 ENVIRONMENT**

Third Parties shall be committed to protecting the environment and communities where operations are located. Safe working practices and high standards of hygiene are required in all operations. At a minimum, Third Parties must comply with all applicable local environmental laws and regulations. Additionally, and where relevant, Third Parties' factories, warehouses and other buildings used in their business with the Company must have environmental management systems or plans. The factories must also have procedures for notifying local community authorities in case of accidental discharge or release of hazardous materials or any other environmental emergency.

Contracted growers are encouraged and expected to implement various environmentally sound, economically viable, and socially acceptable management practices aimed to preserve, protect, and efficiently use our natural and human resources. Obtaining certain third-party certifications, of the Company's choosing, in these various areas may be considered a requirement for doing business.

## **11.0 CONFIDENTIALITY**

Third Parties may not publicize the existence of a business relationship with Company or use the name, trademark, logo, or other marks of Company in any sales, marketing or publicity activities or materials, unless expressly given our written consent. Third Parties with access to confidential information from Company may not disclose the existence of such information without our advance written consent. Confidential information includes but is not limited to: (1) Product formulas and pricing; (2) Production technologies and processes; (3) Engineering and technical designs; (4) Production and supply costs; (5) Operating policies, practices, and systems, and (6) Customer identification and information.



## **12.0 PRIVACY AND DATA PROTECTION**

When Third Parties handle personal and confidential Company team member information, such as home addresses, social security numbers, birth dates, or medical information, information technology security measures must be in place to ensure the personal and confidential information is protected against unauthorized disclosure and theft. Third Parties must have robust cyber security policies or privacy procedures.

If a Third Party becomes aware of an actual or possible unauthorized disclosure of Company or team member personal information, it must be reported immediately to [Privacyofficer@freshdelmonte.com](mailto:Privacyofficer@freshdelmonte.com).

## **13.0 BUSINESS PRACTICES**

We expect each Third Party to conduct its business in accordance with the highest ethical standards and in accordance with standard accounting practices such as Generally Accepted Accounting Principles (GAAP) or International Reporting Standards (IFRS). In addition, we expect Third Parties to have controls in place to prevent and detect misconduct, such as the misuse of company assets, conflict of interest, fraud, embezzlement, corruption, bribery, and extortion. All Third-Party business dealings should be fair, legal, and honest.

## **14.0 MONITORING AND ENFORCEMENT**

As a condition of doing business with the Del Monte Fresh Group, each and every approved Third Party must comply with this Code. The Company shall have the right (but not the obligation) to monitor compliance with this Code, including the right to conduct, or have its designee conduct, unannounced inspections of Third Parties' facilities and records in connection to the business with the Company. If the Company determines that any Third Party has violated this Code, the Company may terminate its business relationship with the Third Party or require the Vendor to implement a corrective action plan.

## **15.0 NO THIRD-PARTY BENEFICIARY RIGHTS**

The provisions of this Code are intended only to confirm the basic requirements that must be met by Third Parties to the Company. This Code shall in no way be construed as conferring, or in any way granting rights of any kind to any third party.



## 16.0 ACKNOWLEDGMENT

The Third Party agrees that providing goods and/or services to the Company constitutes an acknowledgment by Third Party that it understands the requirements set forth in this Code, is in compliance with all requirements of this Code, and will continue to comply with such requirements for as long as its relationship with the Company lasts. Third Party certifies that neither it nor any of its funding sources is or has ever been a terrorist or suspected terrorist, or a person or entity described in any relevant anti-terrorism legislations. Third Party understands that the Company will not enter into a business relationship with Third Party if Third Party has ever been a suspected terrorist or associated in any way with terrorist activities.

## 17.0 CONTACT INFORMATION, REPORTING PROCESS, QUESTIONS AND CONCERNs

If you wish to make a good faith report of a possible violation of our Code of Conduct and Business Ethics, our policies or applicable laws or wish to ask a question about this Policy, you may use any of the following communication channels below. Fresh Del Monte has a non-retaliation policy and will not accept retaliation against those who report in good faith.

- The Ethics and Compliance Team ([ethicsandcompliance@freshdelmonte.com](mailto:ethicsandcompliance@freshdelmonte.com));
- The Office of the General Counsel ([officeofthegeneralcounsel@freshdelmonte.com](mailto:officeofthegeneralcounsel@freshdelmonte.com)); or
- The Fresh Del Monte Speak-Up Line ([SpeakUpLine.freshdelmonte.com](http://SpeakUpLine.freshdelmonte.com)), staffed by an independent third party, which is available:
  - 24/7 in 300+ languages,
  - using any computer; or
  - your telephone, using a local toll-free telephone number; or
  - the QR Code or the Speak-up Line poster posted at your location,
  - with or without your name (to the extent permitted by local law).

Please visit [SpeakUpLine.freshdelmonte.com](http://SpeakUpLine.freshdelmonte.com) for more information, including the toll-free telephone number for your location.

When honoring a request for anonymity or a request to keep certain information confidential would, in Company's judgment, put the health or safety of others at risk, jeopardize product quality, or compromise protection of the environment, Company will disclose all information it feels is necessary to mitigate or eliminate imminent harm. Confidentiality for persons who choose not to remain anonymous will be maintained to the fullest extent possible. Employees of Third Parties are encouraged to work directly with their employers to resolve internal ethical concerns.

## 18.0 VIOLATIONS OF THIS POLICY

Third Parties who violate this Policy may be subject to termination of contract.



## RELATED RESOURCES

Required Trade Compliance Screening Process: Iran-Related Transactions  
Required Trade Compliance Screening Process: Russia, Belarus, Crimea and the so called DNR  
Code of Conduct and Business Ethics Policy  
Integrity First: Global Ethics and Compliance Program Charter  
Global Ethics and Compliance Committee Charter  
Human Rights Policy  
Investigations Council Charter  
Non-Retaliation Policy  
Global Trade Compliance Policy  
Global Anti-Bribery and Anti-Corruption Policy  
Records Retention Policy

## REVIEW SCHEDULE

Effective Date	4 April 2022
Policy Owner	Global Ethics and Compliance Committee
Date Last Reviewed	27 March 2025
Date Last Modified	27 March 2025