

# Supplier Code of Conduct

At Dole, we are a health and wellness company in a journey of transformation and sustainable growth that is being fuelled by an inspiring purpose to champion an equitable world. A world where everyone – irrespective of age, income, location, race, or gender – has access to healthy nutrition, but where this access does not come at the cost of the planet. Inspired by the Japanese philosophy of 'Sampo Yoshi', we launched 'The Dole Promise' with 6 areas of impact, across people, planet, and prosperity.

Integral to this mission, Dole is committed to work towards achievement of the United Nations (UN) Sustainable Development Goals (SDGs). In addition to being a signatory of the UN Global Compact, Dole is committed to respecting all Human Rights as set out in the Universal Declaration of Human Rights (UDHR), as well as the International Covenant on Civil and Political Rights (ICCPR), the International Convention on Economic, Social and Cultural Rights (ICESCR), and the core conventions of the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. Dole is committed to respecting Human Rights in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) as the global standard to manage risk and proactively avoid negative human rights impacts that might derive from its business activities and operations.

Dole strives to ensure the highest ethical conduct in the treatment of its employees and in its business dealings with consumers, vendors, and customers. Our Code of Conduct serves to guide the actions of our employees, offices, and directors in ways that are consistent with our shared values. This Supplier Code of Conduct specifies and supports the continued implementation by establishing certain non-negotiable minimum standards that we ask our suppliers, their employees, agents, and subcontractors (collectively, "Suppliers"), to respect and to adhere to when conducting business with Dole. Suppliers include anyone that provides products or services to Dole.

Thus, Dole expects its Suppliers to practice similar standards of behaviour that we ask of our own employees. Suppliers are responsible for compliance with this Code of Conduct throughout their activity and it is their responsibility to educate their employees, agents, and subcontractors accordingly. This Supplier Code of Conduct applies globally. We appreciate all of our Suppliers' efforts to help us in our goal to source our goods and services in a responsible manner and create sustainable value throughout our supply chain, through commitment and continuous improvement.

At Dole, as we believe that this is just the beginning of a journey, we will refresh this Code of Conduct from time to time in our endeavour to progress from doing no harm to start doing good in times to come.

## 1. Our Commitment to Suppliers

Our goal is to partner with Suppliers to deliver cost effective products and services for Dole and our customers, and to demonstrate responsible supply chain management. To deliver long lasting positive impact through good practices and continuous improvement, Dole will seek to engage in long-term relationships with Suppliers that are committed to sustainable development.

## 1.1 Standards of business conduct

When carrying out sourcing, Dole employees are expected to share with Suppliers the company's commitments to high legal, ethical, and moral standards. Our internal guidance sets norms of behaviour in procurement activities in the areas of courtesies, conflict of interest, corruption, competition law and confidential information, among others. Dole employees are encouraged to continually consider and discuss issues of ethical behaviour.

## 1.2 Grievance Mechanisms

Supplier representatives shall not be subject to discrimination or termination of contract in retaliation for good faith exercise of rights, submitting grievances, participating in union activities, or reporting suspected legal violations. Dole offers an independent channel for Suppliers to raise questions and concerns about our business practices at: sustainable.sourcing@doleintl.com.

## 2. Our Expectation of Suppliers

Dole is committed to meeting high social, environmental, and health and safety standards and we expect our Suppliers to do likewise, based on the United Nations Global Compact principles, UN Guiding Principles on Business and Human Rights and International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

## 2.1 Human Rights

## Occupational Health & Safety

Suppliers shall provide a healthy and safe workplace to prevent accidents and injury arising out of, relating to, or occurring in the course of work or as

a result of the Supplier's operations or failure to provide the required safety equipment and procedures.

### **Working Conditions & Security**

Suppliers shall ensure fair and decent working conditions and must further ensure that all necessary security arrangements are in place to protect their employees, contractors performing work at their sites, as well as their assets, especially in areas of conflict.

## Forced Labor and Modern Slavery

Suppliers shall not use work that is performed involuntarily under threat of penalty, including forced overtime, human trafficking, debt bondage, forced prison labor, slavery, or servitude. Forced labor may include deception, restriction of movement, isolation, physical or sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage (including the payment of recruitment fees, abusive working or living conditions), or excessive overtime. Suppliers that employ migrant workers must ensure that migrants will not be hired through fraudulent recruitment practices or pay recruitment fees.

### **Child Labor and Young Workers**

Under no circumstances will a supplier employ children under the age of 15 or under the minimum age of employment or the age for completing compulsory education in the relevant country, whichever is higher. Suppliers must conduct age verification at recruitment. When young workers are employed, they must not be engaged in hazardous work that is, mentally, physically, socially, or morally dangerous or harmful or deprives them of their education.

## Non-discrimination, harassment, or abusive behaviour

All workers must be treated with respect and dignity. No worker should be subject to any physical, sexual, psychological, or verbal harassment, abuse or other form of intimidation. There should be no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination based on race, ethnicity, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, pregnancy, dependants, disability, social class, union membership or political views should be prevented. Special attention



# Supplier Code of Conduct

should be paid to vulnerable groups, including women, younger workers, migrants, and indigenous peoples.

### Wages, Benefits, Terms of Employment

Workers shall be paid at least the local industry rate or minimum wage stipulated by national law, whichever is higher, and benefit from social security schemes according to national legal standards. Should there be no legal minimum wage in the country of operation, fair and decent considerations imply Suppliers shall pay their workers considering the general level of wages in the country, the cost of living, social security benefits and the relative living standards.

#### **Working Hours**

Suppliers must ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours, overtime and days worked. In the event of conflict between a statute and a mandatory industry standard, the Supplier must comply with the one taking precedence by the law of the country where the workers are employed.

#### Freedom of Association and Collective Bargaining

Suppliers shall respect the rights of workers to choose whether to join, or refrain from joining, associate, organize or participate in collective bargaining in a lawful and peaceful manner, without penalty, harassment, discrimination, or interference.

## **Land Rights**

The rights and title to property and land of the individual, indigenous people and local communities should be respected. All negotiations with regard to property or land, including the use of and transfers of it, must adhere to local laws and the principles of free, prior and informed consent, contract transparency and disclosure.

### **Local Communities**

The rights of local communities shall be respected. Suppliers should engage communities meaningfully and on an ongoing basis. Suppliers shall ensure healthy and safe living conditions while supporting community empowerment and creation of employment opportunities.

## 2.2 Environmental Responsibility

# **Environmental Regulatory Compliance**

Suppliers shall respect and comply with environmental regulatory requirements on all levels (local, national and international). In all their activities, they shall obtain all required environmental permits and licenses, and support a precautionary approach to environmental challenges.

## **Management of Environmental Impact**

Suppliers shall put in place a system, appropriate to business's size and circumstance, to manage the environmental aspects of their operations, including measures to assess, control and minimize environmental impacts. Suppliers will implement appropriate policies to embed environmental practices across their operations and activities and assign designated roles

within the organization to have responsibility for environmental topics. Suppliers will take prompt action to prevent or remediate incidents and continually improve their environmental performance.

#### 2.3 Business Integrity

#### **Compliance with Laws**

All laws and regulations must be complied with in the countries in which the Supplier operates. All other applicable international laws and regulations must be complied with including those relating to international trade (such as those relating to sanctions, export controls and reporting obligations), data protection and antitrust/competition laws. Where national laws fall short of international laws and standards, the higher standard shall apply.

### **Bribery and Corruption**

Suppliers shall not pay bribes or make any other inducement (including kickbacks, facilitation payments, excessive gifts and hospitality, grants or donations) in relation to their business dealings with customers and public officials. Suppliers are expected to perform all business dealings transparently and these dealings shall be accurately reflected on their business books and records. Suppliers shall not hire third parties to do something they are not allowed to do themselves, such as paying bribes.

#### **Conflicts of Interest**

Any and all conflicts of interest in any business dealings with Dole, of which the Supplier is aware, will be declared to Dole to allow Dole the opportunity to take appropriate action. Any ownership or beneficial interest in a Supplier's business by a government official, representative of a political party or a Dole worker are to be declared to Dole prior to any business relationship being entered into.

### Gifts and Hospitality

Any business entertainment or hospitality that is sponsored by Suppliers to the benefit of Dole employees or representatives must be reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way Dole's decisions about how Dole awards future business. Gift giving should occur sparingly and always be legitimate and aligned with company policies.

# Competition Law and Confidential Information

Suppliers shall comply with all applicable antitrust and competition laws in their relationship with Dole and, to this effect, have a zero-tolerance policy towards any form of violation of such rules. Suppliers shall not attempt to introduce in their contractual agreements with Dole any conditions that would be in breach of competition laws. Suppliers are also expected to take all necessary precautions to avoid the disclosure of any commercially sensitive information about their supply relationship with Dole to third parties and vice versa unless expressly permitted by Dole.

## **Product Regulatory Compliance**

Suppliers shall ensure all products and services fully comply with applicable regulatory laws and regulations, and the specifications and contractual obligations it has committed to.

## **Implementation**

Dole reserves the right to verify the Supplier's compliance with the Supplier Code of Conduct.

Nevertheless, we do expect good faith commitments from Suppliers in implementing the principles of this Code of Conduct, reporting measurable progress and continuous improvement efforts. In individual cases, we will work with Suppliers to address challenges identified. However, if there is no clear commitment to prevent, mitigate and account for negative impacts, or if there is a persistent lack of action and improvement, we will consider contract termination. We reserve the right to terminate contracts immediately in case of material violation of this Supplier Code of Conduct. The sustainability performance of Suppliers will be significant in our decision to engage in or, to continue, a business relationship.