
	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 1 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

# **Dole plc Anti-Bribery & Corruption Policy (the “ABC Policy”)**


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**Dole plc**  
Dublin, Ireland

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 2 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

## Contents

<b>1. PURPOSE .....</b>	<b>3</b>
<b>2. SCOPE.....</b>	<b>3</b>
<b>3. ANTI-BRIBERY &amp; CORRUPTION POLICY .....</b>	<b>4</b>
<b>3.1. Definitions .....</b>	<b>4</b>
<b>3.2. Bribery &amp; Corruption .....</b>	<b>6</b>
<b>3.3. Facilitation Payments .....</b>	<b>6</b>
<b>3.4. Gifts, Hospitality &amp; Entertainment .....</b>	<b>7</b>
<b>3.5. Government or Public Officials.....</b>	<b>8</b>
<b>3.6. Political Contributions and Lobbying &amp; Advocacy Activities .....</b>	<b>9</b>
<b>3.7. Charitable Donations .....</b>	<b>11</b>
<b>3.8. Accounting, Books and Records &amp; Internal Controls.....</b>	<b>11</b>
<b>3.9. Conflicts of Interest .....</b>	<b>12</b>
<b>3.10. Monitoring and compliance .....</b>	<b>12</b>
<b>3.11. Bribery &amp; Corruption Investigations .....</b>	<b>12</b>
<b>3.12. If you have a Bribery or Corruption issue.....</b>	<b>13</b>
<b>4. ROLES AND ACCOUNTABILITIES.....</b>	<b>15</b>
<b>5. REFERENCE .....</b>	<b>16</b>
<b>6. REVISION HISTORY.....</b>	<b>16</b>
<b>7. APPENDICES .....</b>	<b>16</b>

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 3 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

## 1. PURPOSE

Dole plc (“Dole”) believes 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 are committed to growing the company whilst maintaining high standards of business ethics in all our activities.

Bribery and Corruption has a detrimental impact on countries, markets, societies, and businesses wherever it occurs. It can undermine sustainable development, impact fair competition and create inequality.

Supported by its Board of Directors (the “Board”), Dole is committed to full compliance with the letter and spirit of all laws that apply to our business, and we believe that Dole will prosper in a marketplace free of bribery and corruptive practices.

**“Dole is committed to enriching the communities in which we operate and contributing to a better society. We continually focus on our commitment to responsible business practice in every aspect of our stakeholder relationships. We prohibit all forms of bribery and corrupt practices, and our Board fully supports the principles set out in our Antibribery & Corruption Policy.”**

*Carl McCann, Executive Chairman of Dole plc*

This Group Anti-Bribery & Corruption Policy (the “ABC Policy”) is designed to assist you in complying with applicable anti-bribery laws, as required by Dole’s Code of Business Conduct and Ethics (the “Code”). It will help in recognizing:

- Conduct that must be avoided; and
- Activities with potential Bribery and Corruption risks that must be discussed with our Legal Department.


Please study this ABC Policy and consult it regularly during the course of your work.

Violation of this ABC Policy because of willful or negligent behaviour may result in disciplinary action, up to and including termination of employment or business relationships.

## 2. SCOPE

This ABC Policy applies to all Dole people – directors and employees in every country and every Group<sup>1</sup> entity (“Our People”). We expect third parties such as long-term consultants, agents, suppliers, and business partners to comply with the ABC Policy when acting on Dole’s behalf.

<sup>1</sup> The Dole Group is defined as all companies where Dole plc exercises control over operating and financial policies. Control may occur for example, when Dole plc has (i) more than 50% of the voting rights or (ii) control of the Board of the company through majority representation; or (iii) power to direct activities that impact the entities economic performance. If you are unsure if a company is a Group company, please consult your local Head of Finance.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 4 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

**Joint Ventures & Associates** – Where Dole does not have control, then the Group should actively encourage the adoption and implementation of similar practices and standards in the operation of the joint venture or associate company.

**Acquisitions** – As a Group with a strong focus on growth, acquired Group businesses are required to adopt this ABC Policy and communicate the Dole values as soon as practical. It is important that in the pre-acquisition due diligence process, an evaluation of the business conduct and ethical framework (including a risk-based Bribery & Corruption due diligence assessment) is carried out, and that any potential issues are documented and addressed as soon as practical following completion of the transaction.

### 3. ANTI-BRIBERY & CORRUPTION POLICY

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#### 3.1. Definitions

For the purposes of this Policy, the following definitions apply:

**“Anything of Value”** means any form of benefit including, but not limited to cash or cash equivalents (e.g. gift cards), gifts, services, employment offers, loans, travel expenses, entertainment or hospitality, political contributions, charitable donations, excessive discounts, daily allowances, sponsorships - even if nominal in value.

**“Bribe”** is Anything of Value that is offered, promised, given, solicited or received with the intent of inducing or influencing the actions or behaviour of the recipient so as to give an improper advantage to the giver.


**“Bribery”** is the act of offering, promising, giving, accepting or soliciting Anything of Value with the intent of inducing or influencing the actions or behaviour of the recipient so as to give an improper advantage to the giver.

**“Cash Equivalents”** are assets that can easily be converted into cash or are used as substitute for cash, for example, vouchers, gift cards, cryptocurrency, shares, stock, or other forms of marketable instruments or interests.

**“Corruption”** is the abuse of entrusted power for private gain. Bribery is a means of causing Corruption.

**“Director(s)”** comprise both the Executive and Non-Executive Directors of the Board of Dole plc.

**“Executive Management”** comprises Dole plc’s Executive Chair, Dole plc’s Chief Executive Officer, Dole plc’s Chief Operating Officer, Dole plc’s Chief Financial Officer, Dole plc’s Chief Legal Officer, and Dole plc’s Company Secretary.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 5 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

**“Facilitation Payments”** are payments made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.


**“Government or Public Officials”** includes officials and employees at any level of government or government agencies (e.g. tax and customs inspectors); officials of, and candidates for, political parties; employees of public international organizations (like the United Nations or the Red Cross); employees of entities that are owned or controlled by the government; and family members of any of the above.

**“Kickbacks”** are illicit payments made to someone in return for facilitating a transaction or appointment. They are a form of Bribe.

**“Lobbying or Advocacy Activities”** is any activity carried out to influence a government or institution’s policies and decisions in favor of a specific cause or outcome. This can include the making of payments or Payments in Kind. Lobbying can also be an indirect activity when made through an intermediary organization such as a lobbyist or charity, or support given to an organization such as a think tank or trade association linked to or supporting particular political parties or causes.

**“Payments in Kind”** is using goods or services as payments instead of cash. It can also include Cash Equivalents or personal loans.

**“Political Contribution”** means financial or in-kind support provided directly to political parties, their elected representatives or persons seeking political office. Financial contributions can include donations, loans, sponsorships, retainers, or the purchase of tickets for fundraising events and other similar actions. In-kind contributions can include advertising, use of facilities, design and printing, donation of equipment, provision of board membership, employment or consultancy work for elected politicians or candidates for office.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 6 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

### 3.2. Bribery & Corruption

Dole **prohibits** any form of Bribery or Corruption, and it is our policy that we **comply in full** with the anti-bribery and corruption laws of the countries or regions (e.g., the EU) in which we do business.


This includes but is not limited to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), France’s Sapin II, the Criminal Justice (Corruption Offences) Act (2018) in Ireland, the Canadian Corruption of Foreign Public Officials Act, and the Brazilian Clean Company Act (CCA), amongst others.

- All forms of Bribery or Corruption, including both active (offering, promising, giving) and passive (accepting, requesting), are prohibited.
- Our People, and all those acting on Dole’s behalf (including consultants, suppliers or any third party acting or purporting to act on our behalf) are strictly prohibited from giving, promising, offering, or authorizing payment or transfer of Anything of Value in order to obtain or keep business or secure improper advantage for Dole.
- Do not solicit or accept any form of Bribery or Kickbacks of any kind.
- Remember, anti-corruption laws are complex, and the consequences for violating these laws are severe (for both you personally and Dole). If you have any doubts about whether the action you are contemplating is legal, consult with Dole’s Legal Department before proceeding.
- If you become aware of an incident or suspected incident of Bribery or Corruption, Dole expects you to report it through the proper channels as outlined in Section 3.12 of this ABC Policy.

### 3.3. Facilitation Payments

Facilitation Payments are payments which are made (typically to Government or Public Officials) to secure or speed up the performance of routine or standard business services or transactions to which the payer is already legally entitled to without making the Facilitation Payment. In some countries these are considered customary or “part of doing business.”

An example of a Facilitation Payment is the provision of a ticket to a sports event to a customs officer to speed up the release of goods at a port.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 7 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

- Facilitation Payments, irrespective of the size or value, are prohibited and Our People, and all those acting on Dole's behalf (including consultants, suppliers or any third party acting or purporting to act on our behalf) are prohibited from giving, promising, offering, or authorizing Facilitation Payments, either directly or indirectly.
- If you are unsure if a requested payment may be a Facilitation Payment, consult with the Legal Department before taking any further action.

### 3.4. Gifts, Hospitality & Entertainment


Dole recognizes that the giving and receiving of modest gifts, hospitality or entertainment is a routine business practice that can help in building good relationships with our business partners, therefore our ABC Policy does not prevent Our People from undertaking these activities on occasion. However, it is important that such acts are undertaken carefully and in compliance with all laws and regulations. Therefore, the criteria set out in this ABC Policy must be met before engaging in such activities.

Actions taken on behalf of Dole should be free from any suggestions that favorable treatment was sought by, received from or given to individuals or organizations that do business or seek to do business with Dole and our business decisions are to be based upon merit and Dole's goals.

No business decision should be based on personal financial or other benefits to be gained (in the past, present or future) by Our People or third parties acting on our behalf. Therefore, you must be very careful when accepting or receiving gifts, hospitality or entertainment. An especially strict standard must be applied to gifts, services or considerations of any kind from suppliers. Dealings with Government or Public Officials including Political Contributions & Lobbying are dealt with separately in Section 3.5 and 3.6.

***Remember, no gift, favor or entertainment given or received may be of such character and circumstance that its public disclosure would embarrass Dole or persons within Dole.***

***Gifts, entertainment or hospitality should always be of a sufficiently limited value and in a form that they will not be construed as a Bribe or a Corrupt Payment.***

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 8 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

### 1. Gifts:


- Gifts of Cash or Cash Equivalents, to or from any party, and of any amount, are **prohibited** in all circumstances.
- In some circumstances non-Cash or Cash Equivalent gifts of a token value (generally not exceeding USD250, per source / recipient, per year) may be appropriate, therefore Our People may receive or give such gifts as long as they are not frequent or excessive in number.
- The receipt and giving of any gifts exceeding USD250 per source / recipient, per year need to be formally approved in advance and documented by Group Legal & Compliance in the Group's Gift & Hospitality register. See Section 3.12 for contact details.
- These gifts are only appropriate where they do not contravene applicable laws or regulations, the policies of the giver or receiver, and generally accepted ethical standards. They must be consistent with accepted business practices.
- No gift should ever be received or given with the expectation it creates an obligation on either party.
- Dole employees and directors are also not permitted to give gifts above a token value using their own funds. No personal loans should ever be exchanged by Our People with our business partners.
- The value and nature of any gift should be proportionate to both market value and the occasion.
- Any payments should be correctly recorded in the books of the paying entity.

### 2. Entertainment & Hospitality:

- Our People may accept and extend common courtesies (such as occasional meals and entertainment at sports, musical and theatrical events), but only to the extent they conform with accepted business practices, any applicable laws and regulations and the policies of both parties.
- They should not be frequent or excessive in value. If you are unsure if any form of potential entertainment or hospitality is acceptable, please consult with Group Legal & Compliance in advance for advice on how to proceed. See Section 3.12 for contact details.

## 3.5. Government or Public Officials

Certain anti-bribery and corruption laws have particularly strict criteria around interactions with Government & Public Officials, therefore Our People and those acting on Dole's behalf must be especially careful when interacting with these categories of individuals.


	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 9 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

Giving gifts or providing entertainment to Government and Public Officials and employees is highly regulated and often prohibited. Punishments for violations of these regulations are severe, both for companies and individuals.

- Irrespective of your location, for any Dole employee, director, consultant, supplier or any third party acting or purporting to act on behalf of Dole, it is prohibited to directly or indirectly give, offer or promise any form of Bribe, gratuity or Kickback to any Government or Public Official.
- No cash payments or Payments in Kind (including Cash Equivalents) should ever be given to (either directly or indirectly) to any Government or Public Official or any political party or candidate (except for Political Contributions made in accordance with Section 3.6 below).
- Dole employees and directors must not engage in any exchange of gifts (giving or receiving), or entertainment or hospitality, with Government & Public Officials unless notified and pre-approved by two members of Executive Management.
- Any exchange of gifts, entertainment or hospitality needs to be appropriately recorded and receipted, and records must be maintained and reported in accordance with all applicable laws and regulations.

### 3.6. Political Contributions and Lobbying & Advocacy Activities

Political contributions are strictly regulated and should not be made other than in circumstances where they provide general support for a genuine democratic process, with full transparency and full explanation or are required by law.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> <b>10 of 16</b>
<b>Subject:</b> Anti-bribery & Corruption Compliance				


- Political Contributions should not be linked in any way to a direct business benefit and should solely be made without any expectation of return.
- Irrespective of the amount or nature of the contribution, **all** Political Contributions must be notified to and **pre-approved** by two members of Executive Management.
- Political Contributions include non-monetary contributions (for example, allowing a candidate to use Dole’s facilities or resources) as well as monetary contributions.
- Any Political Contribution needs to be appropriately recorded and receipted, and records of all political contributions must be maintained and reported in accordance with all applicable laws and regulations.
- Individuals are free to participate in the political process (including making personal Political Contributions) but shouldn’t do so in a way that would interfere with their responsibilities to Dole, creates the impression they are speaking or acting for Dole or implies Dole has endorsed their activities.

Lobbying or Advocacy Activities are any activities carried out to influence a government or institution’s policies and decisions in favour of a specific cause or outcome. These can be made directly or indirectly through trade or advocacy associations such as trade associations, trade unions, “think tanks” or special interest groups (“Lobbying” or “Advocacy Activities”).

When undertaken with integrity and transparency, Lobbying or participation in advocacy groups are legitimate avenues for businesses to be involved in the process of law making. Lobbying and advocacy groups represent valid interests and bring to policy makers’ attention much needed insights and data on all policy issues. Such an inclusive policy-making process provides opportunities for more informed and ultimately better policies. However, when it is not transparent or regulated, it can cause problems.

When Dole engages in Lobbying or Advocacy Activities, it does so with the interests of all its stakeholders in mind, including (but not limited to) the communities we operate in, the consumers we serve and the suppliers we are sourcing from. Dole is committed to its core principles of integrity and transparency when engaging in Lobbying or Advocacy Activities.

- Irrespective of the amount or nature of the contribution, **all** Lobbying or Advocacy Activities must be notified to and **pre-approved** by two members of Executive Management.
- Any Lobbying or Advocacy Activities must be appropriately disclosed, recorded and documented in accordance with all applicable laws and regulations.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> <b>11 of 16</b>
<b>Subject:</b> Anti-bribery & Corruption Compliance				

### 3.7.Charitable Donations

Dole is committed to supporting the communities we operate in, and we undertake a range of social investments in our operations and in local community development activities.

However, we must only make charitable or community donations that are legal and ethical under applicable laws and practices and that comply with our Code and ABC Policy.

Charitable donations include non-monetary contributions (for example, allowing charities or social initiatives to use Dole’s facilities or resources) as well as monetary contributions.

No charitable donation should be linked in any way to a direct business benefit and should solely be made without any expectation of return.

Charitable donations need to be appropriately recorded and receipted and records of all charitable donations must be maintained and reported in accordance with all applicable laws and regulations.

### 3.8.Accounting, Books and Records & Internal Controls


Dole places a great deal of importance on an honest and forthright presentation of the facts. Employees and Directors are expected to maintain books and records in appropriate detail to reflect Dole’s transactions accurately, fairly and completely. Dole’s policy of accurate, fair and complete recordkeeping applies to all records and this forms part of our internal control procedures for anti-bribery and corruption compliance.

This requirement extends to all transactions and any flow of benefits or funds related to gifts, hospitality, travel, entertainment, charitable and political donations, lobbying and advocacy activities must be properly recorded, classified and documented.

False, misleading or incomplete entries in such records or in other documents are prohibited as a matter of Dole policy and may violate law.

No undisclosed or unrecorded fund or account, or “off book” transactions may be established for any purpose.

Dole maintains a system of internal accounting controls that provides reasonable assurances that (i) transactions are executed in accordance with management authorization; (ii) transactions are recorded so as to permit preparation of accurate financial statements and to maintain accountability for assets; (iii) access to assets is permitted only in accordance with management authorization; and (iv) appropriate auditing functions are conducted.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 12 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

### 3.9. Conflicts of Interest

Conflicts of interest may arise where Our People are confronted with situations which require them to choose between the duties and responsibilities of their position in Dole and their own private interests.

Where Dole people have conflicts of interest, sometimes these may make these individuals more vulnerable to the risk of Bribery. Therefore, it is important that all Our People comply with the disclosure requirements as set out in the Dole plc Code of Business Conduct & Ethics with respect to any potential conflicts of interest. For more information, please see the Code<sup>2</sup>.

### 3.10. Monitoring and compliance

Dole monitors the implementation and effectiveness of our compliance program and conducts regular training and monitoring to ensure that our people are following it.

Dole will conduct Group-wide and, when appropriate, targeted risk assessments. Group-wide risk assessments will be conducted annually. Targeted risk assessments may be conducted upon the occurrence of a triggering event, such a merger or acquisition, or an identified breakdown in internal controls, or when directed by the Audit Committee or the Chief Legal Officer.

Training is provided on a periodic basis to all relevant employees as appropriate to their activities and the associated risks.

### 3.11. Bribery & Corruption Investigations


From time to time, government or enforcement agencies may inquire of Dole employees concerning antibribery and corruption matters. Such inquiries may be strictly routine or relate entirely to the investigation of a possible violation by another company. On the other hand, such inquiries might be the beginning of an investigation to determine whether Dole or any of Our People have violated laws or regulations.

It is Dole's policy to cooperate fully with all enforcement agencies in the performance of their proper investigative duties. External investigators and enforcement agencies have different rights in different jurisdictions, and it is of the utmost importance that you follow the Dole procedures and policies in place in your jurisdiction. These will be provided to you by your local management.

**Irrespective of your jurisdiction, it is important that Dole's Legal Department is notified immediately of any requests from external investigators and agencies. Any internal Dole investigation must be conducted in conjunction with the Legal Department.**

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<sup>2</sup> <https://www.doleplc.com/investor-relations/governance/governance-documents/default.aspx#cod>

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 13 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				

### 3.12. If you have a Bribery or Corruption issue

We expect all Dole people to report, through the proper channels as outlined below, any instance of non-compliance with the ABC Policy or applicable laws, and to inquire about any activity that might not comply with applicable laws or the ABC Policy.

#### **Routine queries**

All routine queries regarding the operation of this ABC Policy can be directed to the:

- The Senior Director, Compliance, Dole plc – Louise O’Sullivan ([losullivan@totalproduce.com](mailto:losullivan@totalproduce.com); + 353 83 104 1958); or
- Any member of the Legal Department.

#### **Suspected violations**

To fulfill Dole’s commitment to comply with antibribery and corruption laws, all of us have an obligation to report any suspected violations of the law or this ABC Policy.

If an issue arises, the preferred method of reporting is for you to **telephone** a member of the Legal Department. This will give us the best opportunity to assess the situation in a prompt manner and if necessary, we can immediately consult with the Group’s external legal advisor.

*A report may also be made to any of the following:*


1. An employee's supervisor unless the employee suspects that the supervisor has participated in or condoned the violation.
2. A Human Resources representative.
3. A member of Dole’s Legal Department, Compliance Department or Internal Audit Department.
4. The Dole plc Hotline ([www.doleintegrity.com](http://www.doleintegrity.com)) or the Group’s other Local Hotlines<sup>3</sup> as set out in our Group’s Speak-Up Manual.

**Irrespective of how the initial report is received, all reports should be notified to the Group’s Chief Legal Officer.** Accordingly, if a report is made through options 1 to 3 above, these reports should then be notified to the Chief Legal Officer.

#### **Reporting to the Dole plc Hotline or the Local Hotlines (the “Dole Hotlines”)**

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<sup>3</sup> Our Speak-up Manual is available at [www.doleplc.com](http://www.doleplc.com) or from your local Human Resources representative. Certain Dole EU based group companies that meet thresholds set by local law have their own dedicated Hotlines (“Local Hotline(s)”). The details of these Local Hotlines are set-out in Appendix 1 of the Speak-up Manual.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> <b>14 of 16</b>
<b>Subject:</b> Anti-bribery & Corruption Compliance				

The Dole plc Hotline site and the Local Hotlines are externally hosted by an independent third party on secure servers, and are available 24/7, 365 days a year. The Dole plc website is available in multiple languages and translators are also available. Reports can be made online or using the telephone numbers available on this site. Local Hotline sites are typically available in local language and English. Subject to applicable law and regulation, reports are made confidentially and can be made anonymously.

**Dole does not permit any retaliation of any kind for any report made in good faith of an actual or potential instance of illegal or unethical misconduct.**

It is important to note, if an unfounded allegation is determined to have been made with malicious intent (for example for the sole purpose of slandering, defaming, or harming the reported person(s)), then the reporting persons will not be afforded the protections outlined in our Speak-up Manual and may be subject to disciplinary action.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> 15 of 16
<b>Subject:</b> Anti-bribery & Corruption Compliance				


## 4. ROLES AND ACCOUNTABILITIES

The table below describes the participation by certain identified stakeholders in overseeing the implementation of the ABC Policy and ensuring compliance.

The Group's Internal Audit function will also consider Antibribery and Corruption related risks in the development of its Internal Audit Plan. As needed, the SDC, the Chief Legal Officer or the Audit Committee may retain an independent third party to perform a review of Dole plc's Antibribery and Corruption compliance program.

<b>TASK DESCRIPTION AND/OR DELIVERABLE</b>	<b>ROLE</b> R = Responsible; A = Accountable; C = Consulted; I = Informed						
	<b>Dole plc CLO &amp; Corporate Secretary</b>	<b>SDC</b>	<b>Dole plc ERC &amp; ORC</b>	<b>Division Compliance / Legal Department</b>	<b>Internal Audit</b>	<b>Division Presidents</b>	<b>Dole Corporate Function Heads</b>
Creates original ABC Policy and modifies the ABC Policy when required.	A / R	R	C	C	I	C	C
Reviews ABC Policy annually and approves amendments.	A / R	R	I	C	I	C	I
Fields inquiries about the ABC Policy.	A / R	R	I	R	I	I	I
Ensures compliance.	A / R	R	I	R / C	I	R / C	R / C
Monitors effectiveness and continuous improvement.	A / R	R	I/C	R / C	I	C	C
Ensures procedures are put in place by management.	A / R	R	I/C	R / C	I	C	C

<b>ROLES AND ACCOUNTABILITIES CHART LEGEND</b>
<b>Responsible</b>
Those who do the work to achieve the task.
<b>Accountable</b>
The one ultimately answerable for the correct and thorough completion of the deliverable or task, and the one who delegates the work to those <i>responsible</i> . In other words, an <i>accountable</i> must sign off (approve) work that <i>responsible</i> provides. There <b>must</b> be only one <i>accountable</i> specified for each task or deliverable.
<b>Consulted</b>
Those whose opinions are sought, typically subject matter experts; and with whom there is two-way communication.
<b>Informed</b>
Those who are kept up to date on progress, often only on completion of the task or deliverable; and with whom there is one-way communication.

	<b>Policy No:</b> WW.Compliance.P06.v01	<b>Effective date:</b> 1 January 2025	<b>Revision Date:</b> n/a	<b>Page #:</b> <b>16 of 16</b>
<b>Subject:</b> Anti-bribery & Corruption Compliance				

## 5. REFERENCE

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Document Type	Ref. No.	Title
Code of Conduct	WW.Compliance.P04.v02	Dole plc. Code of Business Conduct and Ethics (the "Code")
Speak-up Manual	WW.Compliance.P05.v.01	Dole plc Speak-Up Manual

## 6. REVISION HISTORY

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Date	Revision No.	Revised by	Description of Change	Approved by	Approval Date
1 January 2025	n/a	Louise O'Sullivan	Initial Creation	Jared Gale	10 October 2024

## 7. APPENDICES

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None.