



Position Statement: Responsible Use of Third-Party Labor

Alico, Inc. is committed to ensuring that labor and human rights are respected throughout our workforce, including our temporary and contingent employees. Our approach to third-party labor is structured to reduce risk to Alico and to help protect those employed by third party contractors from unfair or abusive labor practices.

Principles and Commitments

Informed by labor and human rights principles and practices outlined by the International Labor Organization (ILO), the United Nations Human Rights Commission's (UNHRC) Ruggie Principles, the Athens Ethical Principles, the Luxor Protocol, and the Dhaka Principles, Alico works with properly registered farm labor contractors (FLC) who have documented policies and practices in place that ensure:

- FLC employees are of legal age to work at host locations and are in possession of documentation allowing them to work in the country of employment, including valid visas, certificates and/or work permits that are renewed as necessary.
- FLC provides its employees with the material terms and conditions of employment (nature of work, estimated weekly hours and days off, any mandatory overtime requirements, wages, benefits, duration of contract, disciplinary and other procedures that can lead to termination, as well as any procedures for filing grievances and any fees and contract penalty provisions) in their principal language at the time of recruitment, and timely provides employees with a written copy of their job offer consistent with federal and state regulations.
- FLC prohibits recruitment fees paid by prospective or current employees at any point in the recruitment process. Financial arrangements with agents and subagents do not assume, or permit, fees from jobseekers as part of the agents' or subagents' revenue for services provided. Neither Alico, Inc., its farm labor contractors nor their respective brokers, agents, or subagents require jobseekers or employees to post a bond. Authorized charges or deductions for room and board or meals, where permitted or required by law, are fully disclosed to prospective employees, are consistent with market rates in the local area, and do not to serve to recover recruitment fees at the employee's expense.
- FLC ensures that no material changes are made to working conditions as stated in the written job offers without the knowledge and consent of the employee and applicable law. For material changes allowed by applicable law, consent of the employee must be obtained voluntarily and without threat of penalty. No changes are allowed which diminish the employee's originally anticipated wages, benefits, or other conditions of work in such a way as

to place the worker in a position of physical or mental risk or peril, or other form of disadvantage or vulnerability.

- FLC promotes nondiscriminatory practices and equal pay for equal work, while prohibiting sexual harassment, unfair or discriminatory treatment, retaliation, or abuse of employees.
- FLC only uses medical screening to select candidates as permitted by applicable law.
- FLC takes affirmative steps to protect the rights of its employees who become pregnant. FLC prohibits pregnancy screening or testing at any time before or after the employee signs an employment agreement, except where required by law. In such cases, the results of pregnancy screens or tests are used only for official purposes in accordance with applicable law.
- FLC prohibits the retention of applicants' or employees' passports, bank books, ATM cards, visas, identity cards, or other personal documents unless required by law, and promptly returns such documentation immediately upon an employee's demand.
- FLC ensures third-party remittances are made only at the employees' initiative and with his or her full knowledge and consent. When FLC or Alico acts on an employee's behalf in making such voluntary remittances, receipts are provided for all funds handled. Neither the broker nor Alico engages in making personal loans to employees or jobseekers under circumstances where repayment terms could be construed as debt bondage or forced labor. Neither FLC nor Alico requires prospective employees or employees to participate in any form of forced savings.
- FLC maintains procedures for protecting the confidentiality of information and documents received from employees and jobseekers. FLC must provide opportunities for employees to confidentially report grievances without fear of reprisal and maintain a process to investigate and resolve grievances.
- FLC complies with the letter and spirit of all applicable laws and does not engage in or tolerate any type of fraud including extortion, bribery, collusion, graft, or corruption. FLC must transparently and accurately disclose the positions available to jobseekers, the jobseekers available to employers, and the services available to both.
- FLC must conduct due diligence on the content of job offers and on the companies that present those offers, to ensure they accurately represent genuine openings, on reasonable terms of employment, with responsible employers.

Oversight and Accountability

Our FLCs are regulated by Florida Department of Business and Professional Regulation and the United States Department of Labor. In addition, FLCs who furnish housing for their employees are also subject to additional oversight in the counties where such housing is operated by either the local county health department or by the Florida Department of Business and Professional Regulation, Division of Hotels and Restaurants.

During the annual contracting process, Alico uses a variety of methods to confirm that each FLC meets our standards for ethical conduct, including:

- Confirming current license and good standing by the United States Department of Labor.
- Receiving and reviewing supporting documentation directly from the broker on issues ranging from receiving and reviewing documentation exhibiting farm labor contractor's compliance with its employer responsibilities, including proper compensation of its employees and compliance with the terms of its written job offers.
- Receiving a written acknowledgement and acceptance of the policy from the contractor to abide by this policy document.

We reserve the right to terminate relationships with farm labor contractors that do not abide by this policy. When appropriate, we will work to remediate the issue to ensure the immediate problem is resolved and that affirmative steps are put in place to prevent recurrence.