

Interflora Modern Slavery Statement



This statement is made by Interflora British Unit and has been published in accordance with the Modern Slavery Act 2015 (“the Act”). It is a statement made in accordance with section 54 of the Act and covers the financial year 1 January 2016 to 31 December 2016 and outlines the steps Interflora British Unit has taken to prevent modern slavery and human trafficking in its business, its brands and its supply chains.

The Interflora commitment to tackling modern slavery

It is a sad fact that modern slavery exists and is happening in our world today - so we must all play our part in stamping it out. Interflora is committed to protecting the human rights of all.

Our Board of Directors leads Interflora’s activity against modern slavery, looking closely at our business, our member florists, our direct supply chain partners and our own employees. We encourage all our people to take responsibility, not only for ensuring that we conduct ourselves in the right way and with respect for others, but also that we are aware and looking out for signs that any individuals we come across could be experiencing a violation of their fundamental human rights. If that happens, we want to make sure our people know what action to take.

Where we can, we aim to raise working standards and find ways to minimise the risk of modern slavery within our business as well as adhering to the legal requirements of the Act. We also recognise that there is always more that can be done.

This report includes what we have achieved so far, and what we are working towards to further improve our performance in this fundamental responsibility.

The risk of modern slavery in our business and supply chains

Interflora is part of the world’s most established and well-known flower relay organisation. We operate alongside third party partners in the US and Europe. Via this combined network of member florists, we are connected all over the globe, matching orders from consumers with a local provider near the point of delivery, wherever that may be.

The nature of our business model means that our flower supply chains are therefore often diverse and geographically spread.

With respect to our network, in the UK and Ireland, our member florists are all independent traders in their own right. They join Interflora to enable them to send and execute orders nationally and internationally. Our members purchase their own stock of fresh flowers and sundries. They can also make use of our Flower Market to source the fresh flowers they need.

We also fulfil a small proportion of our orders through selected suppliers who create, package and deliver boxed flowers on our behalf via courier.

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What we have done so far?

We have conducted a **thorough review of all internal policies and documents**, with assistance from our external legal advisers, from disciplinary procedures to working time regulations, from dignity at work to whistleblowing. We have identified updates to many of our policies and procedures to incorporate elements relating to the Modern Slavery Act and to ensure we have the right processes and protections in place. Over the coming months we will finalise these policy updates, all of which will be signed off and approved by our Board.

We are also going further by introducing a **new Anti-slavery & Human Trafficking Policy**. This gives specific guidance to our employees and direct suppliers and makes crystal clear our zero-tolerance stance.

Our **existing contracts with member florists have been carefully scrutinised** and updated in line with our approach to modern slavery. We are in the process of **bringing all our members up-to-speed** with these changes and are seeking their active acceptance of their adherence to our new Supplier Code of Conduct. Going forward, any new florists seeking membership of Interflora will have to comply with our new Supplier Code of Conduct as part of their application and assessment process.

Supported by our external legal advisers, we have undertaken **an extensive risk assessment of all our direct suppliers** to understand where a higher risk of modern slavery and human trafficking exists. We conducted this assessment based on internal supplier information, geographical locations, vendor type, financial risk and specific modern slavery and human rights triggers. We discovered the following:

- One of our potential risk areas is in the supply of flowers and sundry items to our member florists.
- We need to consider if bespoke action plans are required in some of the territories where our supply chain partners are operating.
- There is an opportunity to strengthen our standard operating procedures.

What next?

We intend to keep the momentum going with the following activity:

- Over the coming months we will liaise with all our existing direct suppliers to raise awareness of modern slavery and obtain undertakings, where necessary, of their commitment to compliance with our Anti-slavery & Human Trafficking Policy.
- The most effective way for us to institute change is to implement a phased approach dealing with our higher risk direct suppliers first. This will be done over the next six months and this group includes all our floral and sundry suppliers.
- We will modify our process for appointing new suppliers to build in compliance with our Anti-slavery & Human Trafficking Policy.
- We will introduce training for our employees to help them detect and report modern slavery concerns.
- We will welcome and enable third parties, including customers, to report any concerns regarding the treatment or safety of any individual in relation to Interflora and its supply chain. To facilitate this, we will set up a Modern Slavery Helpline, see details below, and any reports will be investigated and acted upon.

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- As part of our ongoing commitment to detecting and preventing modern slavery, we will dig deeper into our supply chain and work with our direct suppliers to ensure modern slavery is addressed at all levels.
- We will review our Anti-slavery & Human Trafficking Policy annually and update our internal policies in accordance with any changes.

This statement was approved by the Board of Interflora British Unit June 2017.

A handwritten signature in black ink, appearing to read 'Rhys Hughes'.

Rhys Hughes
President
Interflora British Unit
June 2017