Interflora Modern Slavery Statement



This statement is made by Interflora British Unit and has been published in accordance with section 54 of the Modern Slavery Act 2015 ("the Act"). The statement covers the financial year 1 January 2017 to 31 December 2017 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

Interflora remains committed to protecting the human rights of all. This is the second annual Modern Slavery Statement to be published by Interflora, see also <u>our 2017 statement</u>.

Our Board of Directors leads Interflora's activity against modern slavery, looking closely at our business, our partner 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 details what we have achieved so far as part of our ongoing work to fulfil 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 partner 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 partner florists are all independent traders in their own right. They join Interflora to enable them to send and execute orders nationally and internationally. Our partner florists 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, and purchase other items through our recommended suppliers.

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

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Our continued progress

Internal Policies and Documents

We periodically review our Anti-Slavery & Human Trafficking Policy, and all other internal policies and documents, with assistance from our external legal advisers. We ensure that they are updated to incorporate elements relating to the Modern Slavery Act and to ensure we have the right processes and protections in place. Once finalised, policy updates are signed off and approved by our Board.

Existing contracts with our partner florists are up to date in line with our approach to modern slavery. Our partner florists are made aware of our policy and we seek their active acceptance and adherence to our Supplier Code of Conduct. All new florists seeking partnership with Interflora have to comply with our Supplier Code of Conduct as part of their application and assessment process.

Supplier Risk Assessment & Commitment

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

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

Based on this risk assessment, we seek commitment from our higher risk direct suppliers to our Anti Slavery and Human Trafficking Policy and their active acceptance and adherence to our Supplier Code of Conduct. Some of our suppliers have their own relevant policies and codes of conduct, which we review to establish their commitment.

Our rigorous process for the selection of new direct suppliers also ensures such a commitment. Where we are not satisfied of a florist or direct supplier's commitments to the principles contained in our Anti Slavery & Human Trafficking Policy and Supplier Code of Conduct, we will cease to work with those suppliers.

Training

We also provide training for our employees to help them detect and report modern slavery concerns. We are in the process of implementing additional more specific training for employees who deal directly with our florist partners and direct suppliers and who are most likely to be in a position to detect modern slavery concerns.

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Modern Slavery Helpline

We 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 operate a Modern Slavery Helpline, see details below, and any reports are investigated and acted upon.

Future Developments

We recognise that the fight against modern slavery is ongoing and subject to continual change. In addition to the application and maintenance of our policies and procedures, we seek to further develop our approach. We have re-organised our business to create renewed focus on all aspects of product and supply from a dedicated team. This team will further develop our approach to Modern Slavery in the future.

This statement was approved by the Board of Interflora British Unit June 2018.

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Rhys Hughes President Interflora British Unit June 2018