

# Interflora Modern Slavery Statement



This 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"). This Statement covers the financial year 1st January 2019 to 31st December 2019 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. Unless the context indicates otherwise, the terms "Interflora," "we," "its," "us" and "our" refer to Interflora British Unit.

## The Interflora commitment to tackling modern slavery

This is our fourth Modern Slavery Statement and our Board of Directors (our "Board") continue to lead 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 of 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 actions 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 Statement 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. We also operate Flying Flowers which is a boxed floral delivery service.

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

With respect to our Interflora 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 purchase sundry items through our MarketPlace portal. There is a small proportion of Interflora orders, mostly to remote areas, where we do not have an Interflora florist available to fulfil the order. In this scenario the order is fulfilled through selected suppliers who create, package and deliver the flowers in a box on our behalf via courier.

For our Flying Flowers business orders are packed and distributed from our chosen flower wholesaler partner. We work closely with this partner who has a strong Modern Slavery Act compliance programme in place not just for themselves but also for their supply chain.

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Our supplier's compliance programme digs deeper into the supply chain and requires their suppliers to take responsibility not only for their employees but also for their contractors, sub-contractors, suppliers and agency workers to ensure they are all treated fairly and are aware of their requirements under the Modern Slavery Act.

## Our continued progress

### Internal Policies and Documents

We periodically review our Anti-Slavery & Human Trafficking Policy (our "Policy"), and all other internal policies and documents, with assistance from our external legal advisers. We ensure that our Policy incorporates the pertinent elements of the Act and that we have the right processes and protections in place to help ensure our compliance with the Act. All updates to our Policy are approved by our Board.

Our existing partner florists have all agreed to comply with our Policy and our Supplier Code of Conduct. In addition, all new florists seeking to partner with Interflora must agree to comply with our Policy and the Supplier Code of Conduct as part of their application and assessment process.

### Supplier Risk Assessment & Commitment

Supported by our external legal advisers, we undertook 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. Our risk assessment showed that our potential risk areas are in the supply of flowers and sundry items to our partner florists.

Based on this risk assessment, we require commitment from our higher risk direct suppliers to our Policy and to their own relevant policies and codes of conduct, which we review to ensure that they align with the Act and our Policy.

Our rigorous process for the selection of new direct suppliers also ensures such a commitment. Where we are not satisfied with a direct supplier's adherence to the principles contained in our Policy and Supplier Code of Conduct, we will cease to work with such direct supplier.

Having identified the supply of flowers and sundry items as a risk area, our Product and Supply Team continually look to implement changes to mitigate such risk wherever possible. As previously reported, we reorganised our business to include a new focus on product and supply, which included onboarding many new direct suppliers to provide floral sundries e.g. flower wrap, flower boxes, gift cards and add-ons such as balloons and soft toys. Wherever possible we try and work with UK based suppliers, to give us the benefit of not only building much closer working relationships with them but also the ability to visit and assess these suppliers on a regular basis. All products we source for our florists are available via our Marketplace portal,

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effectively providing a convenient one-stop shop for our florists. Mitigating the risk of modern slavery is a very important factor that we considered during any new supplier selection process.

We have designated a certain number of our employees as MSA Champions. Our MSA Champions are responsible for ensuring compliance with the Act within their respective areas of operation, which includes liaising with suppliers on issues related to the Act, increasing awareness of modern slavery issues within their respective department, and being the “go-to” person in their respective department on any modern slavery related matter.

## Training

We continue to provide training to our employees to help them enhance their ability to detect and report modern slavery concerns. We started with training for employees who deal directly with our florist partners and direct suppliers and are therefore most likely to be exposed to situations that may involve modern slavery concerns. Such training has included attending Stronger Together training sessions on Tackling Modern Slavery in UK Business and Tackling Modern Slavery through Purchasing Practices. Providing increased training opportunities to our employees and suppliers remains one of our goals moving forward.

As part of our commitment to increasing awareness of modern slavery issues, we use our internal intranet to facilitate internal discussions about the issue and we have held Modern Slavery Lunch and Learn sessions for our employees. These sessions generated a lot of interest and resulted in people volunteering to be champions of our efforts to ensure compliance with the Act within our supply chain.

## Modern Slavery Helpline

We welcome and enable third parties, including customers, to report any concerns regarding violations of fundamental human rights by Interflora or within its supply chain. To facilitate this, we operate a Modern Slavery Helpline and have a dedicated email address to which reports can be sent (see details below). To date we have received no reports via our helpline or our dedicated email address. Should we receive any reports, they will be promptly investigated and acted upon appropriately.

## Future Developments

We recognise that the fight against modern slavery is ongoing and subject to continual change. We will continue to review and update, as needed, our internal policies and documents, including our Policy, to reflect any such changes. In addition to ensuring that our policies and procedures are up to date and enforced, we seek to further develop our approach to addressing modern slavery wherever we can and continue to do this by maintaining awareness internally of the risks of modern slavery taking place within our supply chain. We will also continue to research our supply chain through our Environment and Sustainability Programme and work closer with growers involved with the supply of flowers to our florists.

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## How do we measure our MSA compliance?

All of our florist partners have signed up to our Supplier Code of Conduct and any new florists wanting to partner with us must comply with our Policy and Supplier Code of Conduct.

Our Supplier Due Diligence process requires any new suppliers to sign up to our Policy and Code of Conduct.

Our MSA Champions continue to work with our partner florists and suppliers to help ensure their ongoing compliance with our Policy and Supplier Code of Conduct. Should we find any partner florist or supplier not in compliance, our policy is to cease working with them. To date we have not had to enforce this policy with any of our partner florists or suppliers.

This statement is approved by the Board of Interflora British Unit June 2020.

A handwritten signature in black ink, appearing to read "Rhys Hughes". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Rhys Hughes  
President  
Interflora British Unit  
June 2020