

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 2021 to 31st December 2021 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 sixth 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 are 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, and what our plans are for the future.

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 & plant supply chains are 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, plants 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. These orders are fulfilled through selected florists who create and package the flowers in a box to be delivered via courier on our behalf.

For our Flying Flowers business, orders are packed and distributed from our chosen flower & plant supply partner. Through this supply partner we also delivered ornamental plants for the Interflora brand in 2021. 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. Our flower & plant supply partner'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.

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In addition to our flowers and plants orders, we also deliver hampers nationally through a third-party hamper supplier. As with our flower & plant supplier, our hamper supplier is required to sign and adhere to our Supplier Code of Conduct on Modern Slavery.

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 and 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 highest 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 high-risk area, our Product and Supply Team continually look to implement changes to mitigate such risk. Wherever possible we aim to work with UK based suppliers, to give us the benefit of 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, effectively providing a convenient one-stop shop for our florists. Mitigating the risk of modern slavery is a very important factor that we consider during any new supplier selection process.

We have dedicated resources within our Product and Supply team who are responsible for understanding and mitigating the risk of Modern Slavery within our business and raising awareness of the issue with colleagues and suppliers.

This year we launched a Corporate Social Responsibility working group, focusing on Our World, Our Community, Our People. Action on modern slavery was one of the tasks allocated to the 'Responsible Sourcing' workstreams of this working group.

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Training

We continue to provide training to our colleagues to help them enhance their ability to detect and report modern slavery concerns. This year we launched a new in-house training course which all colleagues were required to complete. The 1-hour video training course focusses on the following:

- Explaining the wide range of abuse and exploitation that constitutes Modern Slavery
- Identifying the high-risk areas for modern slavery in Interflora's supply chain
- Describing who is at risk of modern slavery, and how they are trapped
- Reinforcing the Modern Slavery Act 2015 and defining its importance to Interflora
- Advising colleagues on the signs to look for that may indicate modern slavery is taking place
- Setting out clear steps on what colleagues should do if they suspect modern slavery is happening

Going forwards, this training video will be released each May to all new employees within the preceding 12 months, with a requirement to complete the training within eight weeks.

Providing increased training opportunities to our colleagues and suppliers continues to be one of our goals as we believe that better understanding of the issue is the key to preventing modern slavery. We have continued to build on training for our Product and Supply colleagues who deal directly with our florist partners and direct suppliers and who are therefore most likely to be exposed to situations where Modern Slavery may exist. This year, a colleague who works closely with our flowers, plants and hamper suppliers attended Stronger Together's training on "Tackling Modern Slavery in Global Supply Chains". A further two colleagues from the team who manage our wholesale sundries business attended "Tackling Modern Slavery through Purchasing Practices". A summary of these courses were subsequently shared on our internal colleague intranet "Yammer" for all colleagues.

As part of our commitment to increasing awareness of modern slavery issues among all our colleagues, we continue to use Yammer to share Stronger Together and Walk Free content, and other relevant media content in the form of articles. This has really helped bring to life modern slavery issues with our colleagues.

This year we marked Global Anti-Slavery Day by sharing video content from The Clewer Initiative with colleagues throughout the week, releasing five videos over five days showing the impact of modern slavery on women in the UK. This was introduced with a short 'refresher' video reminding colleagues of what constitutes modern slavery, where it is occurring, and how it is hidden in plain sight.

Reporting Modern Slavery Concerns

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 have a dedicated anti-slavery email address to which reports can be sent (see details below). To date we have received no reports via 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.

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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 be reviewing the modern slavery risk assessment section of our Supplier Due Diligence documentation, to make it more efficient for colleagues to score the risk of potential new suppliers. We also aim to complete the Stronger Together "Employer Good Practice Implementation Checklist" with a view to becoming a Stronger Together Business Partner.

We are also developing a set of KPIs that will allow us to demonstrate progression each year in the areas of:

- (1) Supplier Audits
- (2) Supplier Code of Conducts
- (3) Staff Training

We will launch our compulsory in-house training module again in May 2022 for all new employees and will continue to raise general awareness through Yammer and 'lunch & learns'.

We will also be looking at ways to mark Global Anti-Slavery Day again on the 18th October 2022.

From June 2022, Modern Slavery will form part of the remit of Interflora's wider CSR Strategic Programme, which will assist in further coordinating efforts to ensure we have minimum risk of occurrence in our various supply chains.

How do we measure our MSA compliance?

All 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. This year, we have introduced two new procedures to supplement our Supplier Code of Conduct:

- (1) a detailed modern slavery audit, to be completed by all suppliers deemed as 'high-risk' during Supplier Due Diligence, by virtue of their sector and/or geographic locations; and
- (2) a site visit checklist to assist colleagues with 'what to look out for' when visiting 'high-risk' suppliers

Our Product and Supply team 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 17th June 2022.

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

Rhys Hughes
President

On behalf of the Board of Interflora British Unit
June 2022

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If you have any questions, please email us at antislavery@interflora.co.uk