

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 2022 to 31st December 2022 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 seventh 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.

This Statement details what we have achieved over the last year as part of our fundamental responsibility to eradicate modern slavery from our supply chains, and looks ahead to our plans for next year, and 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, and can also purchase wholesale sundry items through our own MarketPlace website. 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 partners, and delivered by our carrier partners. Through one of these supply partners we also deliver ornamental plants for the Interflora brand

In 2022 we appointed new flower and plant suppliers, and an additional carrier, and as part of the due diligence process we carried out site visits which included a focus on modern slavery risk. Our flower and plant suppliers have their own strong Modern Slavery Act compliance programmes in place, not just for themselves but also for their supply chains. Agriculture and horticulture are high risk sectors for modern slavery both in the UK and overseas, and so we take care to work with partners that have robust policies in place both in the packing houses in the UK, and at growers and packers overseas, particularly in Kenya and South America. Their policies apply to those people and organisations further up our supply chains, requiring 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.



In addition to our flowers and plants orders, we also deliver hampers nationally through a third-party party hamper supplier. As with our flower & plants suppliers, 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

Our existing partner florists have all agreed to comply with our Anti-Slavery & Human Trafficking Policy (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.

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 decline to work with such direct supplier.

In October 2022, Interflora launched its Buds of Change Sustainability Programme, a far-reaching ambitious plan, and one that spans the next 5 years and beyond. The Programme incorporates 12 distinct projects covering a number of topics across environment, people and communities. Two of these projects are closely linked to modern slavery: *Fair Employment & Human Rights*, and *Sustainable Supply Chains*. Whilst the Programme is still in its early stages at the time of writing, modern slavery will form one of the touch points for both projects.

#### **Supplier Risk Assessment and Commitment**

From April 2022, we updated the requirement in our Supplier Due Diligence (SDD) process for a signed Modern Slavery Code of Conduct to be submitted from 'requested' to mandatory, for all suppliers regardless of risk or size. This means that new suppliers cannot be approved for payments without a signed Code of Conduct in place. In 2022, this has reduced our new suppliers without a signed Code of Conduct from 68 to 46.

Following research into best practice, and consultation with Stronger Together, we also worked on updating the matrix in our SDD that colleagues use to identify high risk suppliers, making the process more transparent and less onerous. This will be implemented in 2023.

We continued with our process to review those without a signed Code of Conduct to either:

- approve businesses that are deemed to have their own robust modern slavery policy and/or Statement or
- follow up on smaller suppliers that do not

In 2022, of the 46 suppliers that had not signed our Code of Conduct, only 35 required additional follow up, and all were deemed either lapsed or went on to sign following further conversations with internal stakeholders. These tend to be very low value payments made using company credit cards, for example for hotel accommodation.

#### Training

In 2021 we created and launched an in-house video training course, and in May 2022 all new starters in the business in preceding 12 months the training video were required to complete the video training.



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

In total, 16 new starters were sent the training video, and 14 of the 16 completed the full course. The 2 colleagues who did not complete the training will be resent the video in May 2023. We will continue to issue this mandatory training course every May for all new starters in the preceding 12 months, and going forwards will ensure that any non-completers are followed up.

We've continued to share posts about Modern Slavery with colleagues via our internal Yammer communication site, including the Home Office statistics for suspected Modern Slavery in the UK in 2021, the NCA's Ethical Consumer Choices Campaign, and media reporting on various Modern Slavery stories, for example the impact the war in Ukraine is having on victims in the UK.

To mark Global Anti-Slavery Day in October 2022, we placed 25 posies of flowers around Sleaford, our Head Office location, and surrounding villages. Each posy was accompanied by a knitted 3-link chain to represent slavery, contributed by a local church, and a card detailing what Modern Slavery is, how to identify it, and what to do if you suspect it, including the Modern Slavery Helpline number. The information cards encouraged the finders of the posies to take them home – we saw some positive feedback shared on local social media about the activity, and one posy was picked up and taken into a Sleaford primary school and discussed, exactly the kind of community engagement we were hoping to achieve.

#### Reporting

In 2022 we did not receive any contact via our helpline to flag potential modern slavery risk, and nor did we identify any suppliers that we chose to cease trading with or declined to use. Should we receive any reports, they will be promptly investigated and acted upon appropriately.

#### What's Next?

As we initiate the work on our *Fair Employment & Human Rights*, and *Sustainable Supply Chains* projects within the Buds of Change programme, we will ensure that modern slavery remains a key focus for the outputs from those projects.

We will do further work to improve the robustness of our existing processes, including:

- reviewing the content of our Code of Conduct to ensure fitness for purpose
- completing the Stronger Together "Employer Good Practice Implementation Checklist' with a view to becoming a Stronger Together Business Partner, which we were unable to finalise during 2022 due to resource constraints
- Requesting our highest risk suppliers complete a detailed modern slavery audit that will increase our visibility of their actions and how they are working to reduce the risk both within their own business and their wider supply chains

Our Supply Executive holds the responsibility for managing our in-house Modern Slavery work and is our key contact for our most 'at risk' suppliers. He will be attending Stronger Together's 10<sup>th</sup> Anniversary training event in May 2023.



Following the success of our Global Anti-Slavery Day activity in Sleaford, in 2023 we are planning to grow the concept, asking our florist network to get involved - this will allow us to expand community awareness of Modern Slavery across multiple locations rather than just around the Head Office locality in Lincolnshire. The Interflora network includes around 900 florist shops in village, town and city locations across the UK and Ireland; we plan to ask our florists to drop one or more small posies around their localities, with the accompanying information card about Modern Slavery and the Helpline. Even if we only achieve engagement from 10% of our florist network, that would be 80+ locations covered nationally, compared to 25 in one locality in 2022.

Our Product and Supply department 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 date June 2023.

**Rhys Hughes** 

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President On behalf of the Board of Interflora British Unit.



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



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