

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 2023 to 31st December 2023 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 eighth 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 around the world. 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, Ireland and a small number of international locations, 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. Florists in the UK and Ireland can also purchase wholesale sundry items through our own Marketplace website.

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.

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, and due to their size, our flower supplier is also required under the Act to publish their own annual Modern Slavery Statement.

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.

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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.

During 2023, Interflora revisited its Purpose, and as a result of numerous in depth workshops throughout the year with the Senior Management Group (the "SMG"), colleagues, florists, customers and an external Purpose agency, Interflora's purpose was identified and embedded as 'Making Beautiful Things Happen'. This Purpose is further articulated through four priorities, namely 'Bringing People Together', 'Championing Individuality', 'Supporting our Local Communities' and 'Protecting our Natural World'.

As a result of this work on Purpose, the planned 2023 activities around Fair Employment & Human Rights and Sustainable Supply Chains as part of the Buds of Change Sustainability Programme were transitioned across to our Purpose plan. Those activities will now be progressed in 2024 as part of our Purpose work.

Supplier Risk Assessment and Commitment

Our decision in April 2022 to update the requirement in our Supplier Due Diligence ("SDD") process for a signed Modern Slavery Code of Conduct to be submitted from 'requested' to mandatory has driven significant improvement in the full year 2023. A new supplier cannot be approved for payments by our Finance team without a signed Code of Conduct in place, regardless of the perceived low risk or the size of the supplier. In 2022 the number of new suppliers identified without a signed MSA Code of Conduct was 46 – in 2023 this had dropped to zero.

We will continue with our process to review suppliers that decline to sign our MSA Code of Conduct on a case by case basis, to either:

- approve businesses that are deemed to have their own robust modern slavery policy and/or Statement; or
- follow up on smaller suppliers to understand their reasons for declining, reassure on the rationale and detail of the MSA Code of Conduct, and either get to a place of signing or decline to work with the supplier

Training

Our in-house video training course was distributed again in May 2023 for all new starters in the business for the preceding 12 months. The 30min 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, 7 new starters were sent the training video, and 6 of the 7 completed the full course. The colleague who did not complete the training will be resent the video in May 2024 alongside all new starters from the preceding 12 months. We considered refreshing the content of the video, but as there have been no material changes to the law or facts contained in the video, we will review the content again in a year's time.

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We've continued to share posts about Modern Slavery with colleagues via our internal Viva Engage communication site, including general refreshers both for Global Anti-Slavery Day in October, and following our attendance at the Stronger Together 10 Year Anniversary conference in June, the annual Home Office year end statistics for Modern Slavery in the UK in 2022, and the prevalence of modern slavery in the fast fashion industry. Regular content in this channel of communication helps to keep Modern Slavery front of mind for colleagues.

To mark Global Anti-Slavery Day in October 2023, we built on our 2022 activity where we placed 25 posies of flowers around Sleaford, our Head Office location, and surrounding villages alongside information cards detailing what Modern Slavery is, how to identify it, and what to do if you suspect it, including the Modern Slavery Helpline number. We repeated the activity locally to our Head Office, but this year we also opened the activity up to our network of over 1,000 florists which covers the majority of major towns and cities across the UK and Ireland. Uptake by florists was initially quite low, but we hope to build on this annually moving forwards. Again, this year around our Head Office location we saw positive feedback shared on local social media about the activity, and a raising of awareness of the issue in the UK.

Reporting

In 2023 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.

A concern was raised by a florist staff member who flagged perceived poor employment practices in one of our partner florist shops. This was promptly investigated by the appropriate teams and an unannounced visit and spot-check was conducted on the florist premises. This visit found no evidence of any breach of the Modern Slavery Act or any breach of our Policy or MSA Code of Conduct that required further investigation to take place.

What's Next?

As part of our Purpose work on building Sustainable Supply Chains, we will be carrying out work on the following:
Reviewing the content of our Modern Slavery Code of Conduct to ensure fitness for purpose

Incorporating our Modern Slavery Code of Conduct into our wider Sustainable Supply Chain Charter

Updating the detailed modern slavery audit that we ask our highest risk suppliers to complete, following useful feedback from some of our key high-risk suppliers in 2023

Introducing a CSR update requirement at quarterly supplier meetings with key high-risk suppliers, which may include details of their work on tackling Modern Slavery in their own business and wider supply chain
collaborating with a specialist agency who deal with modern slavery to help ensure that all key areas have been covered within our internal documentation and policies

Planned and ad-hoc site inspections where required, with suppliers and florists

Completing the Stronger Together "Employer Good Practice Implementation Checklist" with a view to becoming a Stronger Together Business Partner. This has been paused since 2022 whilst the transition to our new Purpose led approach was completed but is now back on the agenda as a key item for completion in 2024.

Following the success of our Global Anti-Slavery Day activities in 2022 and 2023, we are aiming to expand this further in 2024. We will communicate the activity with our florists far earlier in the year to give them time to understand the requirements, plan and execute the Global Anti-Slavery activity. We will place posies and information cards around the Head Office Sleaford area again, and this year will also ask colleagues to volunteer to take posies and information cards back to place around their home localities.

With hybrid working we now have colleagues working in much wider spread of locations than before which allows us to raise awareness in more places than previously.

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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 2024.

Rhys Hughes

A handwritten signature in black ink, appearing to read "Rhys Hughes", is positioned above the printed name.

President
On behalf of the Board of Interflora British Unit.