



MODERN SLAVERY STATEMENT

JZ Flowers International Limited

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Definition

Our understanding and definition of slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 and is guided by the UN Universal Declaration of Human Rights and the conventions of the International Labour Organisation (ILO) in relation to forced or compulsory labour.

The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour, Human Trafficking and slavery-like practices such as debt bondage, sale or exploitation of children and forced marriage.

This all involves a person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

Our Commitment

Under Section 54 of the Modern Slavery Act 2015 JZ Flowers International Ltd (JZ Flowers) is required to provide our modern slavery statement. JZ Flowers is fully committed to understanding modern slavery risks and we have a zero tolerance approach to Modern Slavery.

We have developed an Ethical Trading Strategy which is comprised of robust governance structures and supplier engagement to ensure that we appropriately tackle modern slavery risks in our business and supply chains.

Our Business & Supply Chain

JZ Flowers is a manufacturing company supplying flower bunches to the supermarket chains, primarily Aldi and Coop in the UK and Aldi in Ireland. We have around 450 colleagues over 3 sites in Newport, Spalding and Ireland. Our Head Office in Newport, East Yorkshire has 350 colleagues on site and around 10 to 15% Agency labour on any given day.

JZ Flowers supply chain is worldwide including Europe, Africa and Colombia and we take very seriously our commitment to ensuring that we closely monitor all labour standards within our UK sites and in our global supply chain.

JZ Flowers understands that Ethical behaviour is about the culture of an organisation as well as its policies and processes. We are fully committed to a program of ethical and social responsibility in our employment practices and regarding our employee's human rights.

Statement Review

JZ Flowers' progress in delivering the company's ethical trade strategy and modern slavery commitments will be revised on an annual basis by the internal JZ Ethical Committee.

The first proposed review date will be September 2018. We will revise our strategy, objectives and key performance indicators as part of this annual review. Input will be sought on an annual basis from a selected group of staff, customers and suppliers.

Our Current Position

Ethical Trade Officer

We have employed an Ethical Trade Officers whose sole responsibility is to nurture and facilitate JZ Flowers ethical stance and support the business in all of its ethical requirements and direction, including tackling and mitigating Modern Slavery within JZ Flowers and its supply chain.

JZ Ethical Committee

We have an Ethical Committee in place which is comprised of the senior management team and is set up to ensure that Ethical Trade & Modern Slavery risks of a particular level of importance are discussed on a regular basis and executive business decisions are raised and agreed as appropriate.

The Ethical Committee is underpinned by the JZ Flowers Ethical Strategy and Retail Ethical Forums.

Training

All of our colleagues take responsibility for our anti-slavery initiatives. Our Human Resource, Buying and Commercial teams have all attended The Gangmasters and Labour Abuse Authority (GLA) and Stronger Together workshops and are trained in what to look for when they are on site and take an active role in monitoring the supply chain.

We constantly review our processes to promote a work place which treats everyone with respect and does not discriminate against anyone on the basis of race, colour, gender, age, nationality, religion or any other legally protected characteristic.

Awareness

We recognise that a vital step in properly tackling Modern Slavery is raising awareness of the Modern Slavery Act and what are some of the behaviours and acts people should be aware of when thinking about Modern Slavery.

We have Stronger Together posters on our staff notice boards which provide internal contact details and GLA contact numbers if a member of our workforce is being affected or knows someone who is being affected by Modern Slavery.

Stakeholder Collaboration

Our Ethical Trade Officer represents JZ Flowers in external forums and working groups to actively engage with industry stakeholders.

We attend retail level strategic forums and Stronger Together workshops to collaborate with different markets and industry's sharing best practice and risk awareness.

We have built strong working relationships with a select core of set strategic partners who we have partnered with over many years and as a result are fully engaged with JZ Flowers and its ethical values.

GLA Licensed

The Gangmasters and Labour Abuse Authority (GLA) are a Non Departmental Public Body (NDPB) governed by an independent Board of experienced and knowledgeable sponsors.

The Licensing scheme regulates businesses who provide workers to the fresh produce supply chain and horticulture industry, to make sure they meet the employment standards required by law.

Auditing

We audit our labour providers to check they meet the GLAA licensing standards which cover health and safety, accommodation, pay, transport and training and JZ Flowers only uses labour providers who hold a GLA license or REC membership (The Recruitment & Employment Confederation) and we advise all of our UK suppliers to adhere to this approach also.

Policy

Our Ethical Trading Policy and Modern Slavery Agreements profoundly prohibits the use of forced, bonded or involuntary prison labour as well as the slavery or trafficking of persons in any form.

The JZ Flowers Ethical Trade Policy defines the ethical standards of fair business practices, corporate ethics, and corporate governance required from suppliers and is overseen by the JZ board of directors and lead by the Ethical Trade Officer.

The policy clearly sets out the expectations and strict standards that we expect all of our suppliers to meet with annual reviews being conducted to uphold awareness and adherence to the policy.

We will formally communicate these policies to our suppliers and we require all of our suppliers to attend internal Modern Slavery courses and be in agreement with our policies.

Our Future Plans & Strategy

Whilst JZ Flowers has fully committed to tackling Modern Slavery through extensive training, people investment, industry engagement and internal governance; we recognize the potential risks we have across our business and our supply chain and as a result the following strategy has been developed to drive the business forward with its Modern Slavery agenda.

The JZ Ethical Trade Strategy is comprised of robust and effective due-diligence, governance structures and is underpinned by effective supplier engagement, collaboration and support.



Ethical Trade Strategy

Our mission is to take a proactive and collaborative approach to ensuring our business and our supply chains operate ethically. We will achieve this by working towards four objectives. These objectives have been developed in line with the Stronger

Together guidance and industry standard leading practices.

We Commit

JZ Flowers International Limited and its board of directors has fully committed to tackling any forms of Modern Slavery within its supply chain. JZ Flowers is fully committed to the continual improvement of its ethical performance and fully recognizes the risks of Modern Slavery in its global supply chain.

We Govern & Assure

The JZ Flowers ethical strategy and approach is comprised of ethical governance tools and standards and is underpinned by effective supplier engagement to provide comprehensive direction and control against our Modern Slavery risks.

Modern Slavery and Ethical Trading policies are in place and all of our suppliers will be required to agree to these standards and as a result be fully aware of the risks around Modern Slavery and the expectations from JZ as a business partner.

JZ Flowers will adopt a robust ethically centered procurement process whereby our suppliers are reviewed against our Ethical Standards and contractual terms being agreed, is reliant on these standards being met. Due to this approach JZ Flowers is only supplied by a select core of set strategic partners who we have built effective relationships with over many years and who will be fully engaged with Modern Slavery standards and its associated risks.

We Support & Engage

We will proactively engage and collaborate with all of our suppliers and raise awareness of Modern Slavery and gain an understanding of the challenges and knowledge suppliers have of Modern Day Slavery.

Our Ethical Trade Officer will engage with our key strategic growers to drive standardized ethical standards across our supply chain. We will create supplier platform for robust discussion and to allow

suppliers to share best practice throughout our supply chain.

We will be driving a value centric strategy, not compliance. We will energize our suppliers through ethical values and behaviors to drive real change and risk awareness.

We Improve & Grow

We stay engaged with the industry and are striving to become a business partner of the stronger together organization.

We have an Ethical Trade Officer in role whose sole responsibility is to drive and embed ethical values throughout the organization and who represents JZ Flowers in external forums and working groups to engage in industry best practice and emerging risks.

To effectively track performance within the business, we have set a range of Ethical Key Performance Indicators (KPI). Our KPI's are clear measurable values designed to demonstrate how effectively JZ Flowers and its suppliers are achieving its key ethical objectives.

Engagement

Supplier Collaboration

In producing the JZ Flowers Modern Slavery Statement, we recognized our biggest risk to Modern Slavery is within our global supply chain. We further recognized that to properly tackle Modern Slavery and for proper mitigation against Modern Slavery risks to occur, effective supplier communication and awareness was paramount.

In 2017 we will issue a [Modern Slavery agreement](#) and provide guidance to our key strategic suppliers based on best practice advise from organisations including Stronger Together and the GLAA.

In 2018, we will directly speak to all UK suppliers and our global strategic suppliers, about Modern Slavery and ensure that they understand what signs to look for, discuss the due-diligence they should have in

place and also what to do if they do identify a case of Modern Slavery.

We will also issue guidance to all suppliers based on best practice advice from organisations including Stronger Together and the GLAA.

Modern Slavery Agreements

Our CEO will write to our key strategic suppliers to raise awareness of the Modern Slavery Act and Human Rights. This letter will clearly illustrate our zero tolerance approach to human rights abuses and set out the robust governance tools we will have in place to periodically check and review our suppliers against these standards.

Within the letter we will be putting in place Modern Slavery agreements which we require all suppliers to understand and accept.

Industry Collaboration

Our Ethical Trade Officer will continue to represent JZ Flowers in key external forums and working groups to actively engage with industry stakeholders, ensuring JZ Flowers is at the forefront of industry best practice and aware of emerging/trending risks.

JZ Flowers will work collaboratively with the Sedex Stakeholder Forum (SSF) and Cooperative Ethical Trade Forum and will attend Stronger Together and ETI training workshops in order to build relationships with other suppliers and to understand best practice.

Risk Assessment

JZ Flowers supply chain is short relative to other industries and limited to approximately 30 regular sources of flowers. This size and scale has enabled us to undertake an initial risk assessment based on inherent risks associated with each country. We have also identified 14 strategic suppliers based on volumes and country-risk who are named within our CSR strategy.

Our initial risk assessment will be based **only on country risk** using country specific socio-political risks and Global Slavery Index Data. This will be used in our first year to identify High and Medium risk suppliers who should be prioritised during this period.

Upon high risks being identified, a Modern Slavery self-assessment questionnaire will be issued and the Ethical Trade officer will engage with the supplier directly to ensure appropriate controls are put in place to continually monitor and mitigate risks against Modern Slavery.

Additional Supply Chain Mapping

As part of the ethical trade strategy, we will further develop the above risk assessment in 2018 and 2019 in three stages

Stage 1: Building on the risk assessment above to consider the findings of the most recent audit, product volumes, and specific product industry characteristics

Stage 2: Further development of risk assessment tool to consider inclusion of site-specific risks using data from the SEDEX risk assessment tool which includes audit findings and the findings of JZ Flowers Modern Slavery questionnaire

Stage 3: Inclusion of relevant site visit information to mitigate inherent and site-specific risks (including ethical audits)

Assurance

In order to ensure that all suppliers within our supply chain are in accordance with this Policy, the Ethical Trade Officer conducts onsite evaluation of suppliers and periodic checks of Modern Slavery awareness and policy agreements.

All our suppliers are required to register themselves onto the Sedex system and to allow us to see their audit results and self-assessment details.