



Modern Slavery Statement

UK & IE Flora Group Ltd
2023-2024

Contents

Contents	2
Definition	3
Our Business	3
Supply Chain	4
Modern Slavery Strategy	4
Risk Assessment	4
Due Diligence	5
Supplier Requirements.....	5
Minimum Requirements.....	5
Additional Requirements.....	5
Labour Providers	5
Supplier Monitoring Program	6
Floriculture Sustainability Initiative (FSI2025)	6
Key Objectives of FSI.....	6
Our Policies.....	7
Grower Engagement & Support.....	7
Training And Capacity Building.....	8
2024 Priorities and Roadmap	8
UK & IE Daffodil Supply Chain	8
Awareness and Training	8
Labour Provider Audits & Governance (Own sites and supply chain).....	9
2024 Ethical Trading KPIs.....	9

Definition

Our comprehension and characterisation of Modern Slavery and Human Trafficking are grounded in the definitions stipulated by the Modern Slavery Act 2015, guided by the UN Universal Declaration of Human Rights, and aligned with the conventions of the International Labour Organization (ILO) pertaining to forced or compulsory labour.

The Act delineates offenses such as Slavery, Servitude, Forced or Compulsory Labor, Human Trafficking, and slavery-like practices like debt bondage, the sale or exploitation of children, and forced marriage. These offenses involve one person depriving another of their liberty to exploit them for personal or commercial gain.

This statement is initially published to comply with the Modern Slavery Act and, concurrently, aligns with the UN Sustainable Development Goals. It serves to communicate our approach and commitment to addressing and preventing Modern Slavery offenses within our operations and supply chain.

Our Business

UK & IE Flora Group Ltd which is a proud member of Dutch Flower Group (DFG). UK & IE Flora Group Ltd includes the brand names JZ Flowers and SuperFlora who are manufacturing companies supplying flower bouquets to the UK supermarket chains.

Our flagship site and head office in Newport, is the largest DFG production facility in the UK and Ireland, distributing over 44 million bunches to both store and online retailers.

Our second site is based in Holbeach and located in the heartlands of the Lincolnshire growing community. Our Holbeach site specialises in British seasonal flowers including Daffodils, Tulips, Sunflowers, and Peonies.

Our third site, based in Naas, has allowed us to build a strong presence in Ireland, helping us to champion Irish growers and establish robust relationships with them. Our Naas site was the first floral packhouse in Ireland to be Bord Bia certified, and we work closely with our Irish growers to expand the selection of seasonal Irish flowers, including Tulips, Daffodils, Gladioli, Sunflowers, Peonies, Lilies, Sweet Williams, and Scented Stocks.



Newport



Holbeach



Naas, Ireland

Supply Chain

The UK & IE Flora Group supply chain is a global one including hundreds of direct producers and over 50,000 international workers. We have long standing relationships and commitments with strategic partners in Ethiopia, Kenya, Turkey, Colombia, Netherlands, and UK.

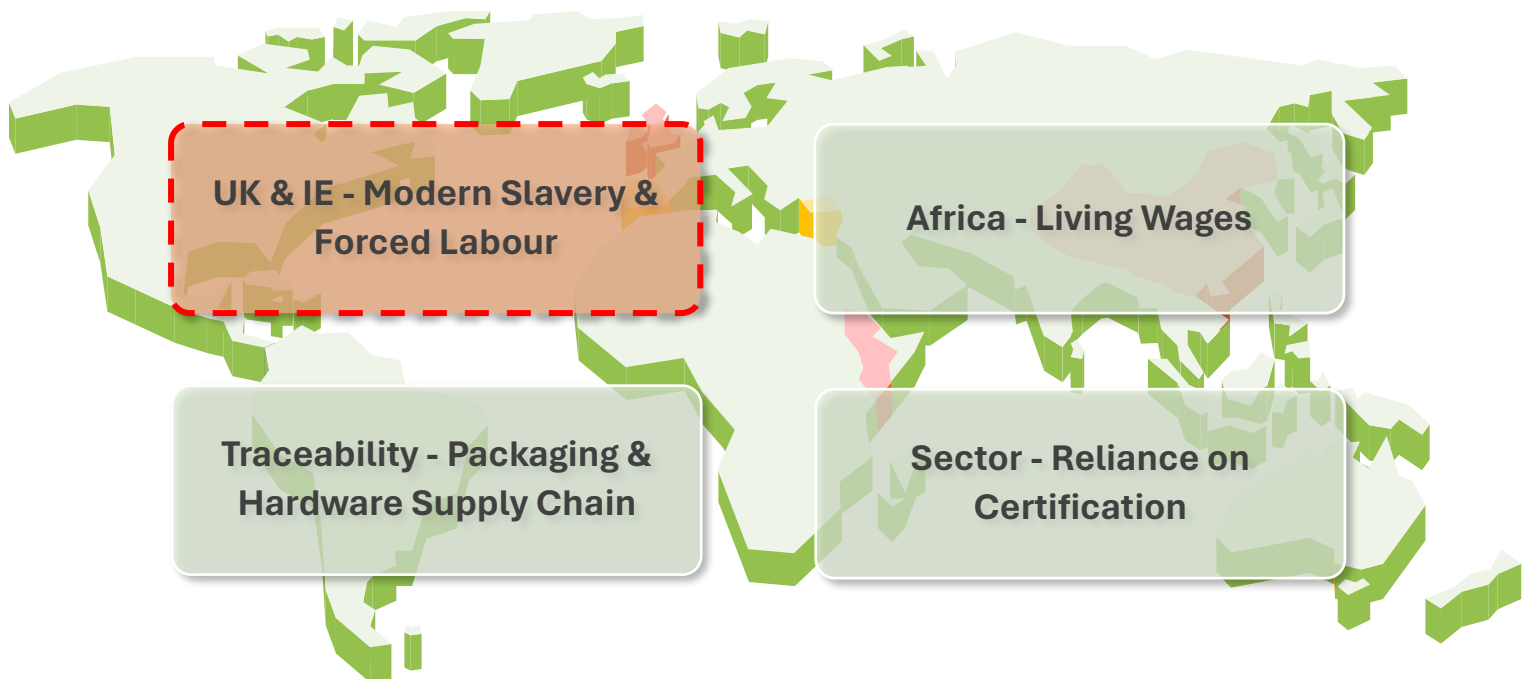
Building long term relationships with our producers and suppliers is a key piece of our procurement strategy and allows us to embed ethical trading values and investments. All direct producers are robustly monitored through certification and auditing as required within our supplier approval procedure and policies.

Modern Slavery Strategy

Risk Assessment

In 2023 we updated our human rights risk assessment tool to include more detailed analysis of the risks associated with specific sites, products, and labour profiles within the supply chain. We use a range of data sources for country risk scoring which include FNET risk assessments, Sedex Radar Tool, US Dept Labour, Global Slavery Index Data, International Trade Union Confederation (ITUC) Global Rights Index reporting and Fairtrade Risk mapping.

Following our risk assessment and alongside broader ethical trade and human rights issues, Modern Slavery and forced labour risks were highlighted within the UK & IE Daffodil supply chain. As a result, UK & IE Daffodils will be a priority area within our 2024 program with increased mitigations and controls needed.



Other priority areas identified but with mitigations and controls already in place include:

- **Spain & Portugal - Wild Harvested Flowers**
- **Turkey - Child Labour Risks**
- **Sector - Climate Change**
- **Sector - Plastics & Packaging**
- **Ethiopia - Gender**

Due Diligence

Supplier Requirements

Our due diligence processes provide the system of rules, practices, and processes by which we mitigate and manage ethical trade risks. They are informed by our risk assessment and enable us to integrate the findings of the risk assessment and to take action. Our due diligence is comprised of:

Minimum Requirements

All new and existing suppliers will be required to adhere to the following minimum requirements:

- Registration on SEDEX
- Completion of the SEDEX Self-Assessment Questionnaire at 100%
- Agreement to adhere to UK & IE Flora Group Ltd Ethical Trade policy
- Agreement to adhere to UK & IE Flora Group Ltd Modern Slavery policy

Additional Requirements

All UK & IE Flora Group Ltd own sites, high and medium/ high risk supplying sites and strategic suppliers in high and medium/ high risk countries and in the UK will be required to adhere to the following minimum requirements:

- Visible ethical audits **as per FSI2025 benchmarking and basket** conducted in the last two years
- No overdue Non-Conformances
- Labour Provider audits with no outstanding non-compliances (for labour providers to own sites only)
- Provision of Fairtrade certificates (Fairtrade certified sites only).

Labour Providers

- Labour providers to UK & IE Flora Group Ltd are audited every two years
- The findings of the audit will be discussed with the labour provider and an action plan drawn up to address any issues identified
- Labour providers will be asked to provide visibility via SEDEX of any third party ethical audits conducted on their businesses and to communicate progress against their Corrective Action Plan

Failure to address non-conformances raised by audits, repeated breaches and failures to comply with UK & IE Flora Group Ltd Ethical Trade policy and the ETI Base Code will require the development of an immediate corrective action plan by suppliers. Failure to initiate appropriate plans and make timely, appropriate responses made to non-compliances found may result in termination of supplier agreement and cease the supply of products in question.

Supplier Monitoring Program

A fundamental aspect of our ethical trade strategy lies in our supplier monitoring program. Proactively monitoring our global suppliers is vital for UK & IE Flora Group Ltd to gauge and enhance performance in accordance with our ethical trade standards. This approach allows us to continuously improve and effectively mitigate the risks associated with modern slavery.

Supplier expectations are outlined in the UK & IE Flora Group ethical trade policy, which establishes the social benchmarks for all our suppliers. We monitor these requirements monthly through the ethical trade KPI tracker and sustainable sourcing scan.


In cases where suppliers fail to meet these requirements, our responsible sourcing manager engages with them to identify necessary corrective actions. Together, we establish formalised plans and timelines to ensure compliance is achieved.

Floriculture Sustainability Initiative (FSI2025)


The Floriculture Sustainability Initiative (FSI) is a market-driven initiative that brings together members of the international floriculture sector. Towards 2025, FSI members will continue to build on the progress made on transparency, responsible production and trade, positive impact, and improvement in the floriculture supply chain.




Key Objectives of FSI



90% responsibly produced and traded volumes by 2025



Reduction of the carbon footprint for selected products by 2025



Reduction of the living wage gap of workers at farm level by 2025



Members to integrate due diligence reporting by 2025

Our Policies

Issues of modern slavery and trafficking are addressed through our due diligence procedures as well as the implementation of the Ethical Trading Initiative (ETI) Base Code and reporting requirements of Supplier Ethical Data Exchange (Sedex) and Floriculture Sustainability Initiative (FSI). These requirements are aligned with that of our customer's policies and codes of practice as well as our own policies and procedures.

UK & IE Flora Group policies and due diligence require all to also comply with all applicable national laws and policies as a minimum. If any suppliers do not meet these terms and fail to deliver the agreed corrective actions, appropriate actions will be taken which can lead to suppliers being delisted.

Key policies within our ethical trade program include:

- **Ethical Trade & Human Rights Policy**
- **Workforce Incident Management Team (WIMT) Procedure**
- **Supplier Modern Slavery Agreement & Code of Conduct**
- **Whistleblowing Policy**
- **Grievance Policy**

Our grievance policy clearly sets out what steps workers can take to raise issues of concern within their working environment in a safe and supportive way. When a grievance or issue is raised, our WIMT procedure is then initiated with a team of trained professionals in place to manage any potential cases of slavery with all procedures putting the victim at the heart of all decisions.

We recognise that modern slavery, forced labour and other ethical issues, are closely linked to, and affected by, environmental issues, and vice versa hence why our IMPACT25 strategy has a central focus on environmental risks within 'Our Planet' pillar.

Grower Engagement & Support

We understand the limitations of audits and certification which is why we focus heavily on producer engagement and providing direct support and training on Modern Slavery and wider human rights risks within the supply chain.

We regularly visit growers both in the UK and globally, focusing specifically on ethical trade issues and best practices to combat modern slavery. Our dedicated Ethical & Compliance Manager spearheads the delivery of our ethical trade strategy.

Throughout 2023, we actively engaged with our strategic suppliers to assess their ethical trade capabilities. We conducted site visits in key sourcing countries, including the UK and Kenya, to address ethical trade challenges and evaluate performance.

We emphasize the importance of supplier engagement in effectively managing the risks of modern slavery within our supply chain. We maintain ongoing dialogue with all suppliers, educating them on recognizing signs of modern slavery and appropriate actions to take. Our guidance is based on best practices advocated by organizations such as Stronger Together and the GLAA.

In 2023, after conducting numerous visits to growers in the UK, we identified a risk related to how producers audit their labour providers. Many lacked the necessary tools and knowledge for effective auditing. Consequently, we initiated a project with an external consultant and developed a labour agency toolkit for growers to implement within their businesses. This toolkit aims to enable growers to conduct thorough audits of their labour providers.

Training And Capacity Building

All members of the UK & IE Flora Group HR and Compliance team have attended Stronger Together Modern Slavery training with our Ethical & Compliance Manager attending more advanced training within Stronger Together and ETI.

Within our UK business, each employee's induction includes a focus on raising awareness and understanding of modern slavery factors. The induction pack is mandatory for all JZ workers and agency workers we have on site and provides access to resources and support for any potential victims of modern slavery.

Throughout the year we held several events raising awareness and capacity across JZ sites, these included:

- Stronger Together videos played on canteen screens.
- Posters on how to spot and report concerns including modern slavery in both the canteen and in the washrooms and in main languages spoken on site.
- Social media posts with information on how to spot modern slavery and contact numbers.
- Internal refresher training for all production staff including management and supervisors.

2024 Priorities and Roadmap

UK & IE Daffodil Supply Chain

- Deliver a specific Modern Slavery training program for flower growers and own site staff with Stronger Together.
- Reviews of induction procedures and labour provider audits within the Daffodil supply chain to effectively highlight the indicators of forced labour.
- By Q2 2024, we will conduct Modern Slavery farm assessments across all strategic and tier 1 farms across UK & IE.
- By Q4 2023, all corrective action plans fully delivered and compliant ready for the 2025 season.

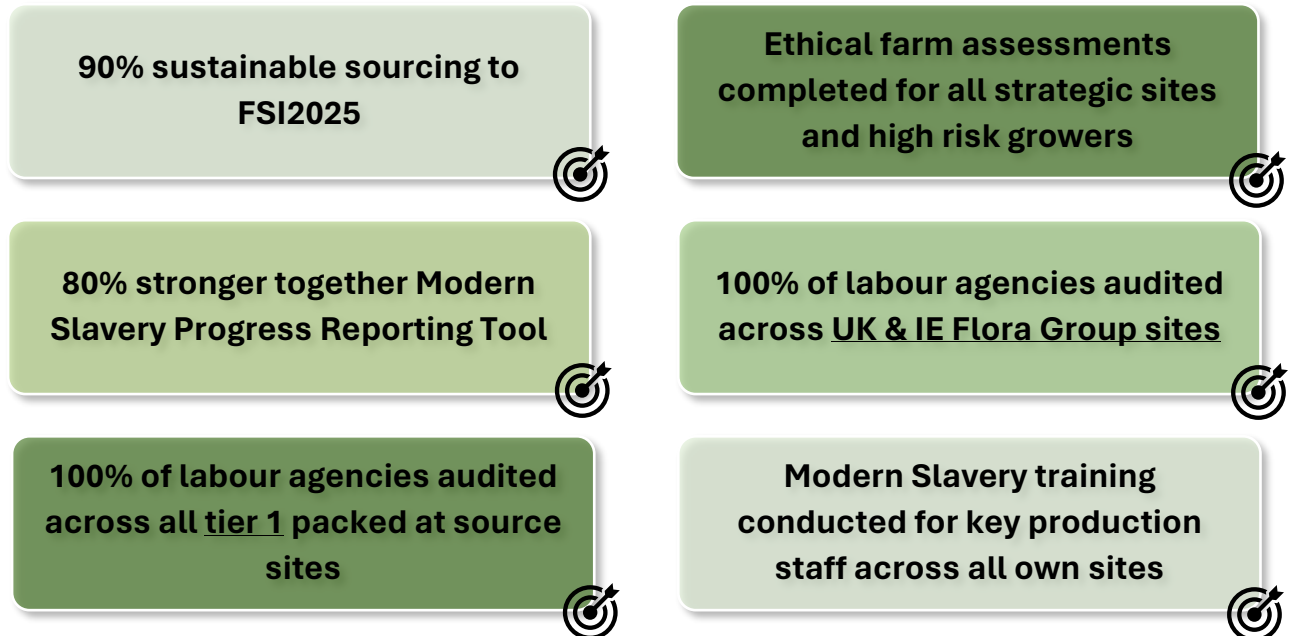
Awareness and Training

- Focus on building capacity, knowledge and understanding of Modern Slavery.
- By Q2 2024, Training program with Stronger Together delivered for all own UK and tier 1 sites aimed at building understanding of Modern Slavery & forced labour indicators and best practice in terms of due diligence, controls, and response.
- Quarterly KPI reporting on ethical trade and internal updates on progress and challenges.
- Site sustainability dashboards also issued quarterly providing a wider view of compliance, and H&S which will encompass labour audit performance.

Labour Provider Audits & Governance (Own sites and supply chain)

- By Q2, all UK & IE Flora Group Ltd labour providers audited.
- By Q3, labour provider audits conducted for all tier 1 packed at source sites.

2024 Ethical Trading KPIs



We will publicly report progress against these objectives within our 2025 statement.

Tessa Zwemstra
Managing Director
JZ Flowers

Remco Salome
Managing Director
SuperFlora