

UK & IE Flora Group Ltd

Ethical Trade & Human Rights Policy

Respect for human rights is fundamental to the sustainability of UK & IE Flora Group and the communities and countries in which we source our flowers. In our company and our supply chain, we are absolutely committed to ensuring that people are treated with dignity and respect.

The UK & IE Flora Group Ethical Trade & Human Rights Policy is guided by the international human rights principles encompassed in the ETI Base Code, Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and the United Nations Guiding Principles on Business and Human Rights.

This policy, in conjunction with our Modern Slavery Statement, defines the ethical standards of fair business practices, human rights standards, corporate ethics, and corporate governance required from our global supplier base.

The purpose of this policy is to ensure that staff within all our UK sites and global supply chain are clear about the ethical and human rights standards UK & IE Flora Group holds. This policy applies to all UK & IE Flora Group staff and suppliers including labour providers, flower producers and plant producers.

UK & IE Flora Group is committed to ethical trading systems that develop transparent working processes and ethical trading relationships. UK & IE Flora Group takes full responsibility for the working conditions of the people who manufacture the products they sell.

Through transparent national and international trading relationships, we uphold the integrity and quality of our products, as well as respecting fair remuneration and work conditions for all colleagues in our global supply chain.

We expect all our suppliers to have ethical processes and policies focused on human rights and we monitor supplier compliance with this policy through a range of governance tools to support the risk management, continuous improvement and capacity building of our suppliers, including the requirements for suppliers to provide reasonable information as evidence of compliance to the Ethical Trade & Human Rights Policy.

Risk Assessment

The UK & IE Flora Group risk assessment is based on a range of different risk factors on potential human rights abuses within our own business and supply chain. This includes location and country specific socio-political risks, the Cooperative Code of Conduct risk scoring, Global Slavery Index Data, specific product characteristics, Sedex SAQ's and audit data. The risk assessment tool will be used to identify High and Medium risk suppliers and to allow us to prioritise suppliers within our supply chain.

Supplier Requirements – Raw Material

Minimum Requirements

All new and existing low/medium risk suppliers will be required to adhere to the following minimum requirements:

- Registration on Sedex
- Completion of the Sedex Self-Assessment Questionnaire at 100%

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- Environmental and GAP certifications per the FSi (Floriculture Sustainability Initiative) basket of standards framework
- For British suppliers, completed Labour Sourcing Self-Assessment

Additional Requirements

All UK & IE Flora Group own sites, high risk supplying sites and strategic suppliers will be required to adhere to the following minimum requirements.

- Additional Social certification as per the FSi basket of standards framework
- No overdue Non-Conformances
- Labour Providers reviewed via internal self-assessment and audits where deemed necessary
- Annual review of Fairtrade certification via E-Cert (Fairtrade certified farms only)

Certification

Where relevant certifications are not in place as per the Fsi basket and our supplier requirements, an internal risk assessment will be conducted by the Responsible Sourcing Manager and appropriate plans and timescales agreed with the grower to achieve certification and for supply to continue. These action plans will be created, monitored and escalated within the monthly Ethical Committee meetings and framework.

Ethical Trade Standards

Our ethical trading standards are based on the Ethical Trading Initiative (ETI) Base Code. The ETI Base Code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

1. Employment is freely chosen

1.1 There is no forced, bonded or involuntary prison labour.

1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. Freedom of association and the right to collective bargaining are respected

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organizational activities.

2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

3. Working conditions are safe and hygienic

3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

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3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; “child” and “child labour” being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO standards.

5. Living wages are paid

5.1 Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.

5.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.

5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week.*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven day period only in exceptional circumstances where all of the following are met:

- This is allowed by national law;

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- This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
- Appropriate safeguards are taken to protect the workers' health and safety;
- The employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.

6.6 Workers shall be provided with at least one day off in every seven day period or, where allowed by national law, two days off in every 14 day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. No discrimination is practiced

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular employment is provided

8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

9.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Supplier Requirements – Labour Providers

All labour providers will be reviewed and approved by the Responsible Sourcing & Compliance Manager and are required to complete the UK & IE Flora Group labour provider self-assessment. The review of labour providers will be conducted by the Compliance Manager based on risk and recorded within QMS.

We will work in partnership with our customers and industry leading programs like Stronger Together to raise awareness of responsible recruitment standards and ensure compliance to employment legislation with regular attendance to employment seminars and extensive training within the HR Team.

Management Systems

UK & IE Flora Group has developed an Ethical Management System which comprises of robust ethical governance and policy frameworks. This management system along with supplier engagement, underpins the whole UK & IE Flora Group Ethical Strategy and safeguards supplier compliance to the Ethical Trade Policy. This system of rules, practices and processes by which our ethical standards and direction is shaped, provides a control platform in which solutions can then be made to mitigate ethical risks.

The UK & IE Flora Group Responsible Sourcing Manager will be responsible for the ongoing management of the requirements set for UK & IE Flora Group own sites and their supplying sites including:

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- Reporting on compliance against requirements internally and to customers.
- Reading suppliers' ethical audits uploaded onto Sedex and grading those audits as Critical, Major or Minor depending on the number of non-conformances in the audit that are graded Critical, Major or Minor against Sedex's published grading guidance for non-compliances (guidance available to Sedex members).
- Communicating the grading of audits non-compliances to suppliers and discussion with suppliers on an action plan to address critical issues.
- If critical non-compliances with the ETI Base Code are not addressed within the timeframes stipulated by the auditor, the Responsible Sourcing Manager will arrange an emergency meeting with the relevant Account Managers and the Managing Director to advise of the ethical risk and for appropriate business decisions to be made.
- A monthly report on compliance against UK & IE Flora Group minimum and additional requirements will be provided to the UK & IE Flora Group Senior Leadership Team.

New Suppliers

UK & IE Flora Group wherever practical will source new products from existing Approved Suppliers, where this is not possible there is a need to locate and approve a new supplier. Upon a new supplier being selected, engaged and or contractual terms agreed, the Responsible Sourcing Manager will be engaged and notified of a new supplier coming into UK & IE Flora Group;

- The Responsible Sourcing Manager and/ or relevant associates will contact the farm and check on Sedex to verify if minimum ethical standards are being met.
- For high high-risk suppliers or strategically deemed partners, additional requirements must also be met.
- If new suppliers do not meet the minimum or additional requirements, a meeting will be arranged by the Responsible Sourcing Manager with the relevant Account Manager, Head of Procurement, Head of Technical and Managing Director to advise of the ethical risk and for appropriate decisions to be made.
- New suppliers progress in meeting the requirements will be discussed on an ongoing basis in the monthly Ethical Committee and appropriately logged.

Adhoc Suppliers

For any adhoc/contingency suppliers, basic ethical data will be collected through an internal ethical trade self-assessment and be discussed and reviewed by the Responsible Sourcing Manager with the relevant Account Manager, Head of Procurement, Head of Technical and Managing Director to advise of the ethical risk and for appropriate decisions/approval to be made.


If an ethical audit is available, this will be reviewed and graded appropriately. Contingency suppliers will be made aware that they may be subject to ad hoc unannounced ethical audits, conducted at UK & IE Flora Group cost and discretion.

Critical Issues

Failure to address non-conformances raised by audits, repeated breaches, and failures to comply with UK & IE Flora Group 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.

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