

UK & IE Flora Group Ltd



Modern Slavery Statement 2025

Contents

1. Introduction	3
2. Our Business and Supply Chain	3
3. Policies and Commitments	3
4. Governance and Responsibility.....	5
5. Risk Assessment and Management.....	6
6. Due Diligence Framework.....	7
7. Training and Capacity Building.....	9
8. 2024 Program Review	10
9. Future Plans and Commitments	11

1. Introduction

Our understanding and characterisation of modern slavery and human trafficking are grounded in the definitions set out in the Modern Slavery Act 2015, informed by the UN Universal Declaration of Human Rights, and aligned with the International Labour Organization (ILO) conventions on forced or compulsory labour.

The Act defines offences including slavery, servitude, forced or compulsory labour, human trafficking, and slavery-like practices such as debt bondage, the exploitation or sale of children, and forced marriage. These offences involve the deprivation of a person's liberty for the purpose of personal or commercial exploitation.

This 2025 statement is published in compliance with the Modern Slavery Act 2015 and also supports the principles of the UN Sustainable Development Goals (SDGs). It outlines our approach, actions, and ongoing commitment to identifying, addressing, and preventing modern slavery and human trafficking within our operations and global supply chain.

2. Our Business and Supply Chain

Our Business

UK & IE Flora Group Ltd is a proud member of Dutch Flower Group (DFG). UK & IE Flora Group Ltd includes the brand names JZ Flowers and SuperFlora, both manufacturing companies supplying flower bouquets to leading 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 annually to both store and online retailers.

Our Naas site in Ireland strengthens our presence in the Irish market, allowing us to champion local growers and build strong partnerships. Naas was the first floral packhouse in Ireland to achieve Bord Bia certification, and we continue to work closely with Irish growers to supply our customers a range of seasonal flowers including Tulips, Daffodils, Gladioli, Sunflowers, Peonies, Sweet Williams, and Scented Stocks.

Our approach to human rights and ethical sourcing is grounded in JZ Flowers' values of 'People, Passion, Flowers', and we are committed to building long-term, trusted relationships with our suppliers that promote dignity, fairness, and sustainability.

Our Supply Chain

The UK & IE Flora Group operates a global supply chain involving hundreds of direct producers and over 50,000 international workers. We have long-standing relationships and strategic partnerships with growers and suppliers in Ethiopia, Kenya, Turkey, Colombia, the Netherlands, and the UK.

We maintain a strong system of supplier approval, underpinned by rigorous certification and third-party auditing. Through supply chain mapping, we have identified all tier 1 direct producers and mapped into tier 2 where appropriate.

3. Policies and Commitments

At UK & IE Flora Group, issues of modern slavery and human trafficking are addressed through our due diligence procedures and the implementation of the Ethical Trading Initiative (ETI) Base Code, as well as compliance with the Floriculture Sustainability Initiative (FSI) requirements.

These align with our customers' policies, industry standards, and our own internal policies and procedures.

All suppliers are required to comply with applicable national laws and our ethical standards as a minimum. If suppliers fail to meet these expectations or complete agreed corrective actions, we take appropriate steps, which can include removal from our approved supplier list.

Key policies supporting our ethical trade and modern slavery commitments 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 sets out clear steps for workers to raise concerns safely and confidentially. Where a concern is raised, our WIMT procedure ensures that trained professionals manage the case, with the victim's safety and wellbeing at the centre of all decisions.



Floriculture Sustainability Initiative (FSI)

Through DFG, we are a proud member of FSI, a market-driven initiative uniting members of the international floriculture sector. As part of FSI, we support its commitment to strengthening transparency, promoting responsible production and trade, and delivering positive impact and continuous improvement across the global floriculture supply chain.

Fairtrade Partner

We are proud members of Fairtrade, and this partnership plays a key role in supporting strong social standards, governance structures, and worker protections, particularly in some of our higher-risk sourcing countries. Fairtrade certification helps to ensure that producers operate in line with internationally recognised labour rights standards, including freedom of association, safe working conditions, and the prohibition of forced labour. It also promotes transparent supply chain practices, strengthens local dialogue and grievance mechanisms, and provides a framework for ongoing improvement through audits and capacity building.



Our collaboration with Fairtrade supports our human rights due diligence programme and enhances our ability to identify and respond to modern slavery risks across our global supply chain.

2024 Fairtrade Sourcing Figures



CSR Strategy – IMPACT2030

We operate under a group-wide CSR strategy – IMPACT2030, which includes a dedicated strategic pillar focused on Human Rights Due Diligence. This shared roadmap spans all companies within the Dutch Flower Group and provides a consistent framework to identify key risks and drive positive outcomes across social, environmental, and ethical dimensions.

Under the Acting Responsibly pillar of IMPACT2030, we are committed to:

- Strengthening human rights due diligence by embedding structured policies, risk assessments, monitoring systems, and remediation processes across all operations and sourcing.
- Preparing for compliance with the EU Corporate Sustainability Due Diligence Directive (CSDDD) through enhanced due diligence practices that align with the OECD Guidelines and UN Guiding Principles on Business and Human Rights.
- Ensuring certified sourcing through Floriculture Sustainability Initiative (FSI) benchmarks and other internationally recognised ethical standards aligned to client policy requirements.

This strategic approach ensures a robust foundation for identifying and preventing modern slavery risks within our value chain by fully integrating human rights due diligence into our wider business functions.



4. Governance and Responsibility

Our modern slavery and human rights work is guided by clear governance structures and embedded across our operations and group CSR strategy IMPACT2030 which outlines our group led ambitions across social, environmental, and ethical responsibility.

IMPACT2030 is governed by the DFG Executive Board, ensuring group level accountability for human rights due diligence and ethical sourcing. Within UK & IE Flora Group Ltd, oversight is led

by the Senior Management Team of JZ Flowers & SuperFlora, who are responsible for delivering actions and reporting progress in line with the group strategy.

Operational ownership sits with our Responsible Sourcing Manager, supported by the HR, Compliance, and Sourcing teams. Governance and monitoring include:

- Quarterly ethical trade KPI reviews at site and group level
- Senior leadership accountability and board-level engagement
- Integration into corporate risk management and audit processes
- Cross-functional alignment between compliance, sourcing, and sustainability

5. Risk Assessment and Management

For 2025, we have continued to review, strengthen, and update our human rights risk assessment tool. This includes the integration of detailed risk data, country-specific risks, and sector-specific issues relevant to our operations and supply chain.

We use a broad range of external data sources to inform our risk scoring, including:

- FNET Risk Assessments
- Sedex Radar Tool
- US Department of Labor Reports
- Global Slavery Index Data
- International Trade Union Confederation (ITUC) Global Rights Index
- Fairtrade Risk Mapping

Our risk assessment identifies and prioritises both country-level and commodity-level risks. Modern slavery and forced labour continue to be recognised as critical issues, particularly within seasonal agricultural supply chains.

Following our 2024 assessment, and based on updated data for 2025, we have continued to identify heightened risks within the UK & IE Daffodil supply chain, particularly regarding the reliance on seasonal labour and varying levels of worker engagement and awareness around human rights and modern slavery risks. As a result, UK & IE Daffodils remain a priority focus area for our 2025 programme, requiring further strengthened mitigations and controls.

Two core risks have been identified for targeted action:

- The complexity of human rights risks: Modern slavery is often hidden within broader, complex labour rights issues. A strong need remains to enhance understanding at all levels of the supply chain, from farm managers to seasonal workers.
- Gaps in labour provider agency due diligence: There is an ongoing need to improve oversight of labour providers, with increased auditing, verification, and monitoring of labour agencies and recruitment practices, particularly across our UK seasonal flower supply chain.

Through our 2025 programme, we will focus on addressing these risks by:

- Increasing engagement and training with producers and labour providers.
- Conducting targeted agency audits and building deeper due diligence within the supply chains.
- Enhancing seasonal induction processes to raise awareness of workers' rights and protections.

Our ongoing risk assessment process enables us to continually review, update, and refine our mitigation strategies to ensure the highest standards of responsible sourcing across our supply chains.

6. Due Diligence Framework

Our due diligence processes establish the system of rules, practices, and controls by which we identify, mitigate, and manage ethical trade and human rights risks across our operations and supply chains. These processes are directly informed by the outcomes of our risk assessments and enable us to integrate findings into actionable steps.

Our due diligence programme is aligned with the OECD Due Diligence Guidance for Responsible Business Conduct. This 6 step framework supports us in identifying, preventing, and addressing risks of modern slavery and labour exploitation across our operations and supply chain.



Embed Responsible Business Conduct into Policies and Management Systems

We have embedded ethical sourcing within our core governance through our IMPACT2030 CSR strategy, with senior leadership accountability, dedicated policies and supplier Codes of Conduct aligned with the ETI Base Code and FSI standards.



Identify and Assess Adverse Impacts

Using data tools from Sedex Radar, Global Slavery Index and Fairtrade risk mapping, we conduct regular risk assessments to identify high risk areas, particularly in seasonal supply chains and assess labour provider risks.



Cease, Prevent or Mitigate Adverse Impacts

We mitigate risks through supplier monitoring, training and capability training, ethical audits, labour provider oversight, and corrective action plans. High-risk suppliers are required to meet enhanced due diligence criteria, including third-party audits and certification.



Track Implementation and Results

Through tools like our Ethical KPI Tracker and Sustainability Dashboards, we monitor supplier compliance monthly, track audit outcomes, and evaluate the effectiveness of mitigation strategies.



Communicate How Impacts Are Addressed

We publish an annual Modern Slavery Statement, share ethical trade progress internally and externally, and collaborate with partners like Fairtrade and Stronger Together to increase transparency and promote sector-wide improvement.

Supplier Requirements

All new and existing suppliers must meet the following baseline requirements:

- Registration on Sedex.
- Completion of the Sedex Self-Assessment Questionnaire (SAQ) at 100%.
- Agreement to adhere to the UK & IE Flora Group Ethical Trade Policy with baseline certification requirements for all producers regardless of risk.

All UK & IE Flora Group sites, and suppliers assessed as high or medium-high risk (based on country, sector, or operational profile) must also meet:

- Valid and visible ethical audits conducted within the last two years, meeting FSI 2025 benchmarking standards.
- No overdue non-conformances arising from ethical audits.
- Completed and cleared labour provider audits (for suppliers providing workers to UK & IE Flora Group-owned sites).
- Valid Fairtrade Certification where relevant (Fairtrade-certified sites).

Labour Providers

We place additional requirements on labour providers supplying workers to UK & IE Flora Group Ltd sites:

- Labour providers must undergo an ethical audit every two years.
- Audit findings are reviewed jointly with the provider, and corrective action plans are drawn up to address any issues.
- Labour providers are asked to share visibility of any third-party ethical audits through Sedex and to demonstrate ongoing progress against corrective actions.

Supplier Monitoring Program

Proactive supplier monitoring is a core pillar of our ethical trade programme. Through our Ethical Trade KPI Tracker and Sustainable Sourcing Scan, we track supplier compliance monthly against our standards and benchmarks.

Our monitoring system ensures:

- Continuous performance tracking across all suppliers.
- Early identification of emerging risks or areas needing intervention.
- Clear expectations communicated through our Ethical Trade Policy.

Where suppliers fail to meet these expectations:

- Our Responsible Sourcing Manager will engage the supplier to agree a formal corrective action plan and timeline.
- Continued non-compliance, failure to address non-conformances, or repeated breaches of the ETI Base Code or our Ethical Trade Policy may lead to termination of supplier agreements and cessation of trade.

Automated Risk Monitoring and Supplier Approval

We have further enhanced our due diligence programme using Floridata and FSI automated monitoring tools, enabling real-time tracking of ethical risks across our global supply base.

All new producers and suppliers undergo a formalised supplier approval process which ensures that:

- Human rights, modern slavery, and wider ethical risks are assessed before approval.
- Continuous visibility and traceability are maintained throughout the supplier relationship.
- Risk-based prioritisation drives resource allocation and action planning.

This approach ensures that due diligence is not a one-time activity, but an ongoing process designed to support continual improvement and responsible sourcing across our supply chain.

7. Training and Capacity Building

We recognise that audits and certifications alone are not sufficient to identify or prevent modern slavery risks. Therefore, we focus heavily on direct producer engagement, support, and building capacity within our supply chain to strengthen ethical practices.

Grower Engagement and Site Visits

We maintain regular engagement with our growers and suppliers both in the UK and globally, with site visits focused specifically on ethical trade, human rights risks, and modern slavery awareness.

Our Ethical & Compliance Manager leads the delivery of our ethical trade strategy, supported by trained members of the compliance and sourcing teams.

In 2023 and 2024, we conducted visits to strategic suppliers in key sourcing countries, including Portugal, Uganda, India UK and Kenya, to:

- Assess ethical trade performance.
- Provide hands-on support and training.
- Address identified risks related to labour providers and seasonal worker protections.

We have ongoing, structured dialogue with suppliers, including guidance and best practice sharing based on methodologies promoted by Stronger Together and the Gangmasters and Labour Abuse Authority (GLAA).

Labour Provider Audits and Support Tools

Through our UK grower visits, we identified gaps in how growers audited and managed their labour providers.

In response, we commissioned a project with an external consultant to develop a Labour Provider Audit Toolkit for growers.

This toolkit enables growers to:

- Conduct effective, structured audits of their labour providers.
- Strengthen oversight of temporary labour practices.
- Increase resilience against risks of modern slavery within their operations.

Grower Training and Awareness

In 2025, we hosted a Grower Workshop Day in conjunction with Stronger Together, specifically targeting our UK seasonal supply chain.

The workshop provided training to growers on recognising modern slavery risks, improving labour provider management, and building stronger internal reporting mechanisms.

It also created an opportunity for open dialogue on real-life challenges and best practices, increasing overall awareness and capability within the seasonal sector.

This event was a key action under our 2024/25 priority program to strengthen human rights protections within our UK Daffodil supply chain and broader seasonal operations.

Training and Capacity Building for Our Teams

All UK & IE Flora Group HR and Compliance team members have completed Stronger Together Modern Slavery training.

Our Ethical & Compliance Manager has completed advanced training courses through Stronger Together and the Ethical Trading Initiative (ETI).

Awareness Raising Activities in 2024

Throughout 2024, we held several initiatives to continuously raise awareness of modern slavery risks across our operations:

- Stronger Together awareness videos played regularly on canteen screens.
- Awareness posters displayed in canteens, washrooms, and key staff areas, in the main languages spoken on site.
- Internal refresher training sessions for all production staff, supervisors, and management teams.

Our commitment is to ensure that all staff, suppliers, and growers are fully aware of the risks associated with modern slavery, feel empowered to identify issues, and are equipped with the tools and support necessary to prevent and respond appropriately.

8. 2024 Program Review

In 2024, UK & IE Flora Group Ltd focused on strengthening our due diligence, supplier oversight, and worker protections across both our UK operations and global supply chain, with a particular emphasis on seasonal labour risks and modern slavery indicators.

Daffodil Supply Chain

- We successfully delivered a targeted Modern Slavery training programme to flower growers and our own site staff, in partnership with Stronger Together.
- A full review of induction procedures and labour provider auditing practices was completed within the Daffodil supply chain, enhancing our ability to identify and respond to forced labour indicators at an early stage.
- Modern Slavery farm assessments were conducted across all strategic and tier 1 farms in the UK & IE by Q2 2024.
- All corrective action plans arising from the 2023 season were fully implemented and verified as compliant by Q4 2023, ensuring readiness for the 2025 season.

Awareness and Training

- A bespoke training programme on Modern Slavery, forced labour risks, and ethical best practices was delivered to all UK own sites and tier 1 suppliers in Q2 2024, in collaboration with Stronger Together.
- Internal reporting was strengthened through the introduction of quarterly KPI updates on ethical trade progress, challenges, and corrective actions.
- We launched and rolled out quarterly Sustainability Dashboards across all sites, integrating compliance, health and safety, and labour audit data to provide a comprehensive view of operational risk.

Labour Provider Audits and Governance

- By Q2 2024, we completed full audits of all labour providers supplying our own UK & IE Flora Group sites.
- In Q3 2024, we expanded labour provider audits to cover all tier 1 packed-at-source sites across our global supply chain.
- Audit findings were reviewed collaboratively with growers and suppliers, with corrective action plans developed and actively monitored to ensure timely improvements where needed.

9. Future Plans and Commitments

In 2025, we will continue to:



Integrate Ethical Sourcing: Further embed ethical trade and modern slavery due diligence into sourcing decisions to drive responsible procurement across the supply chain.



Strengthen Labour Risk Checks: Conduct deeper due diligence on recruitment and labour agency risks across the DFG network, targeting high risk areas with seasonal and migrant labour.



Improve Supply Chain Oversight: Enhance traceability and oversight of subcontracted growers and recruitment practices, particularly within tier 2 sites.



Enhance Staff Onboarding and Training: Strengthen onboarding and induction training for all JZ staff, ensuring awareness of labour rights, ethical conduct, and reporting channels from day one.

This statement has been approved by the Board of Directors of UK & IE Flora Group Ltd on 07/08/2025

Signed:

Tessa Zwemstra – Managing Director, JZ Flowers
Remco Salome – Managing Director, SuperFlora

Tessa Zwemstra
Managing Director
JZ Flowers

Remco Salome
Managing Director
Superflora