

MM Flowers FY25 Modern Slavery Statement

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1. Introduction

Modern Slavery is a crime and violation of fundamental human rights. Modern Slavery exists in many forms including forced and compulsory labour, bonded and child labour, human trafficking, servitude, and slavery. Whilst varying in nature, all guises of Modern Slavery result in deprivation of a person's liberty by another for commercial or personal gain. MM Flowers recognises that Modern Slavery is a global issue, and that no country, sector or industry can be complacent or considered immune.

We recognise and understand our responsibility to prevent, mitigate and remediate the risks of Modern Slavery in our operations and supply chain. MM Flowers will always treat people fairly and with respect. We continuously review and improve our practices to ensure we have effective responses to prevent, mitigate and remediate any negative impacts on human rights.

MM Flowers falls within the reporting scope of the UK Modern Slavery Act 2015 and in line with section 54 this is MM Flowers' ninth Modern Slavery Statement covering FY25, running from 1st September 2024 - 31st August 2025. This document details MM Flowers' policies, procedures, controls, and actions taken to identify, prevent and eradicate Modern Slavery, within our operations and supply chains.

2. Our Business

This statement covers MM Flowers and its subsidiaries namely, Alconbury Packing Solutions Limited, Apex Plant Research Limited, MM Investment Holdings Limited and MM Flowers (Plants) Limited. In this reporting year the MM Flowers business expanded with the acquisition of the UK's largest Tulip Grower, Poplar Farm Flowers, in October 2024 and Green+ in April 2025, a supplier of plants to UK retailers. In the previous financial year, MM Flowers acquired a majority shareholding in Moolenaar, a Dutch horticultural business who supply the world's largest retail chains with a range of bulbs and gardening products. With these acquisitions in mind, MM Flowers now operates across 6 sites, largely supplying UK and European retail customers via in-store and online channels. MM Flowers production sites include:

- MM Flowers headquarters and main business activity operation in Huntingdon, Cambridgeshire primarily handling cut flowers and bouquets sourced from around the world.
- An additional packing facility in Chatteris, Cambridgeshire primarily handling plants and gifting hampers.
- A field crop packing centre in Holbeach, Lincolnshire primarily handling cut flower bouquets sourced from seasonal outdoor field crops in the UK.
- Poplar Farm Flowers in Spalding, Lincolnshire primarily producing forced tulips in heated glasshouses and outdoor seasonal field crops.

- MM Flowers Europe BV located in Aalsmeer, Netherlands primarily handling cut flower bouquets sourced from around the world (site not included in this report due to location outside of UK).
- Moolenaar BV located in Voorhout, Netherlands primarily handling consumer gardening products including bulbs, seeds and garden plants (site not included in this report due to location outside of UK).

MM Flowers is owned by three shareholder companies: AMFRESH Group, Vegpro Group and The Elite Group. MM Flowers is governed by a shareholder board with two Directors from each of the three owners. The board meets three times a year and holds ultimate accountability for Modern Slavery. The Group Chief People Officer holds responsibility for Modern Slavery at MM Flowers production sites and the Group ESG Director holds responsibility for Modern Slavery in our supply chains.

MM Flowers benefits from a vertically integrated supply chain with a significant proportion of the flowers we source being grown on large scale equatorial shareholder farms in Kenya, Ethiopia, Colombia, and Ecuador. The remainder largely comes from strategic growers in the Netherlands and UK where we hold long-standing, trusted relationships. This means that we have full visibility, in-depth knowledge of day-to-day operations and significant influence across much of our value chain, which is critical when addressing broader sustainability challenges. This ensures functions such as Environment, Social and Governance are aligned across the group to drive impact.

More information can be found in the MM Flowers Annual report.

3. Our Approach

MM Flowers' overall approach to upholding Human Rights and tackling Modern Slavery is underpinned by internationally recognised standards, codes and declarations including:

- [The Ethical Trading Initiative \(ETI\) Base Code](#)
- [The amfori BSCI Code of Conduct](#)
- [The United Nations Sustainable Development Goals \(SDGs\)](#)
- [The United Nations Declaration on Human Rights](#)
- [The United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#)
- [The United Nations Global Compact](#)
- [The International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)

MM Flowers' social sustainability strategy focuses on salient Human Rights issues, sourcing origin country level risks and known industry concerns. The approach is informed by customers and aims to prioritise areas where we have considerable influence to drive positive change either through shareholder growers or volumes of products sourced. We expect our suppliers to cascade our requirements and expectations along their supply chains.

4. Policies and Procedures

Issues of Modern Slavery are addressed through our internal worker-facing and external supplier-facing policies and procedures which together implement the principles of the Ethical Trading Initiative (ETI) Base Code and align with that of our customers. MM Flowers will always endeavour to work collaboratively with any supplier however, if they repeatedly do not meet our requirements, after relevant support is provided by MM Flowers, we reserve the right to terminate sourcing relationships as a last resort.

Policies applicable internally for our own operations:

Whistleblowing Policy: MM Flowers' whistleblowing process including protections afforded to whistleblowers which include confidential multilingual options

Grievance Policy: MM Flowers' grievance policy including how to raise an issue in the workplace and how this will be followed up and resolved

Policies applicable internally for our own operations and externally to our supply chain:

Human Rights Policy: details our approach to respect, protect and promote Human Rights within our own operations and those within or affected by our extended supply chain

Policies applicable externally for our supply chain:

Responsible Sourcing Code of Conduct: explains the requirements we expect of our suppliers including the ETI Base Code, performance in ethical audits and approach to worker welfare

5. Risk Identification and Assessment

Modern Slavery risks change quickly, and we are aware there may be the risk of Modern Slavery within our own operations and supply chains. As a result, we regularly assess and respond to risks through a risk assessment process to identify business activities with the greatest risk and identify what steps and actions we can take to mitigate these risks.

To maintain up-to-date knowledge of current and developing Modern Slavery risks the ESG Team and HR Department conduct regular horizon scanning. This includes general research as well as inputs from professional bodies, networks, NGOs and internal intelligence.

5.1 UK Own Operations

We are aware that due to the low-skilled, manual nature of the work within our operations, the business is exposed to a heightened risk of Modern Slavery. This risk is particularly high during peak floral events such as Valentine's Day when demand for labour can quadruple, resulting in reliance on agencies for short, intense periods. At these peak times over 32 nationalities are represented across our sites with 30 languages spoken presenting challenges such as communication and training.

5.2 Supply Chain

Regular risk assessments are conducted by our procurement, ESG and technical teams for all supplying sites which focus on 5 key areas:

- 1) **Management systems:** Accreditations, certifications, and industry recognised standards
- 2) **Length of relationship:** Trust, transparency and sharing of business risks
- 3) **Sourcing country:** Inherent country risk identified as high, medium or low
- 4) **Labour:** Policies and practices to promote worker welfare
- 5) **Previous ethical compliance:** Social audit performance plus insight from in-person visits

Our supply chain can be split into perishable and non-perishable products. Our sourcing models and close commercial relationships with suppliers ensures that we maintain a good overview of how our suppliers operate their businesses, the risks that they face and the actions they are taking.

5.2.1 Perishable Suppliers

Our Flowers, Plants, Foliage and Fillers are sourced from approximately 366 grower sites spanning 23 different countries, predominantly across East Africa, Europe, the UK, and South America. Overall, our growers can be divided as follows:

Directly Owned and Partner farms: Approximately 97% of our perishable material comes from farms which are either directly owned and managed by our shareholders or from partner farms who we have built up strong long-term relationships with and have regular open conversations. We are proud to have strong working relationships with these farms through joint projects, support and regular in person visits. All ESG priorities between MM and shareholder farms are aligned through shareholder ESG leads and farms mostly employ permanent workers and have well-developed worker voice and grievance mechanisms.

Auction/Agents: Approximately 3% of our perishable material comes via auctions or agents where we do not have a direct relationship with the grower. We reduce risks by ensuring minimum certification standards and satisfactory supply chain traceability for all purchases.

5.2.2 Non-Perishable Suppliers

Packaging and sundries cover a range of different materials including cardboard, plastics and novelty items sourced from 60 direct suppliers spanning 8 different countries. We are aware that these supply chains are likely more complex compared to perishable supply chains with additional stakeholders involved. This is an area of identified risk and suppliers are subject to specific due diligence requirements.

6. Preventing, Managing and Mitigating Risks

6.1 Own Operations

Permanent colleagues are engaged through an open and transparent recruitment process with the HR Department securing and checking individual bank details, emergency contact and home-address details.

To ensure well-managed recruitment of agency colleagues, our UK production facilities use the labour provider Staffline, which is one of the largest labour providers in the UK and is Gangmasters and Labour Abuse Authority (GLAA) licensed. Our HR team formally meets with Staffline every week. They are audited every six months using 'Complyer', which is a comprehensive tool for auditing legal compliance in agency labour provision. Any second-tier agencies are also audited by both Staffline and MM Flowers.

MM Flowers provides an external, independent, and confidential whistleblowing hotline, where anyone can raise issues of concern. The contact details are provided to all employees, and the phone number is displayed at numerous locations across our production sites. Any incidents are reported back to the HR Department and relayed to the senior leadership team to be dealt with as appropriate.

Our grievance policy clearly sets out the steps colleagues can take to raise issues of concern within their working environment in a safe and supportive way. Our employee forum, "The Voice", provides a platform for all MM Flowers employees and agency colleagues to express opinions, views and share ideas about their work and workplace with members of the leadership team. It meets every month with the aim to strengthen relationships, improve colleagues' engagement and to encourage constructive two-way communications allowing our people to have a real voice. It also provides a platform for leaders to provide business updates, share projects and listen to the views of colleagues who work for us.

We also undertake an anonymous worker voice engagement process called nGaje which electronically collects colleagues' views on a range of categories. Workers complete the survey in their own language on either their personal smartphone or a laptop which is provided in a confidential location. The results from the survey are shared internally with senior management and shared with retail customers.

6.2 Supply Chain

We remain alert to the risks of Modern Slavery within our supply chains. We require suppliers to follow our below three-pillar due diligence approach to help identify, prevent, and mitigate Modern Slavery:

- 1) Responsible Sourcing Code of Conduct:** our sustainability due diligence pack sets out the ethical and environmental standards that we require from our suppliers. The pack raises the issue of Modern Slavery and provides a link for UK growers to undertake Stronger Together Training. We also request that they provide us with their plans to identify, prevent and remedy Modern Slavery, trafficking, and hidden labour exploitation plus their Modern Slavery Statement where applicable.
- 2) Registration on SEDEX:** we require that all supplying sites are registered on SEDEX and have annually completed to 100% the Self-Assessment Questionnaire. We monitor responses to key questions and risk assess according to the answers such as provision of accommodation, percentage of permanent workers, and gender split.
- 3) Ethical audits:** suppliers located in high-risk origins as defined by the amfori BSCI country risk rating, or as per customers' needs, are required to undertake a regular SMETA or similar ethical audit. We work closely with suppliers to close out non-conformances, and we share good practice to help resolve issues as quickly and effectively as possible to help prevent issues reoccurring.

6.3 Access to Remedy

MM Flowers recognises the responsibility we share, with our suppliers, to provide remedy to those victims of Modern Slavery or forced labour. We know that successful remediation is difficult to implement and requires a victim-led, multi-stakeholder, consultative process where protecting victims of Modern Slavery is the most fundamental principle. The below details our procedure for potential victims of Modern Slavery:

- Taken to a place of safety with appropriate security
- Vulnerabilities considered, for example, disability, gender, age
- Supported by a colleague or member of the HR team, who can speak in an understood language
- Provided with reassurance and welfare (food, drink, medical assistance)
- Informed of the third parties involved (if any)
- Informed of the business's remediation procedure and the support that is available to them
- Asked what remediation they are seeking, e.g., financial, psychological support etc.

MM Flowers will help to provide access to relevant government or third-party remediation services such as the police (if it is safe to do so) or other recognised remediation authority within the UK or relevant country.

7. Modern Slavery Training and Capacity Building

Every employee's induction includes a dedicated section on Modern Slavery and human trafficking awareness plus where to find more information or seek help if they believe themselves to be a victim of Modern Slavery. This training is delivered in several different formats including written case studies, interactive face-to-face demonstrations by the HR team, videos created by Stronger Together which can be watched with subtitles in various languages and includes case studies from workers who have been victims of Modern Slavery and now share their story to help other vulnerable individuals.

Information on staff responsibility in creating a working environment without discrimination or harassment is also included in the induction and posters are produced in a variety of languages. During the year we held several Modern Slavery awareness-raising events including:

- Stronger Together videos played on the canteen TV screens
- Posters, proactive emails and social media communications on how to spot and report concerns including Modern Slavery displayed in both the canteen and washrooms

The HR Director has attended the Stronger Together Workshop within the last 12 months and awareness training forms part of our Manager Compliance Training which all senior managers are required to complete annually.

8. Progress This Year

There have been no known or recorded instances of Modern Slavery at MM Flowers, its subsidiaries or supply chain in FY25.

Due to MM Flowers' recent business expansion, it has been decided that the 8 KPI's reported in previous Modern Slavery Statements are no longer fit for purpose and are not representative of the wider business performance. Updated Modern Slavery KPIs are being designed and will be implemented ready for reporting in FY26.

In June 2025 we ran a Stronger Together UK Modern Slavery awareness workshop in collaboration with two other leading UK horticultural suppliers. In total 21 organisations attended the event including over 80% of MM's UK growers which provided insight into how to prevent, spot and report Modern Slavery. The quote overleaf is provided by Hannah Lerigo-Stephens, Head of Business Engagement at Stronger Together:

Stronger Together were pleased to partner with MM Flowers, alongside their industry peers JZ Flowers and Flamingo, to deliver a day of capacity building on Modern Slavery for their UK growers. The workshop agenda featured 4 experts sharing expertise on the crime of modern slavery and forced labour, looked at new trends and challenges for the horticulture sector, best practice for due diligence on labour providers and ended with a chance to put learnings into practice. The workshop was well attended with great engagement from all 30 attendees, and it was fantastic to see such positive collaboration between the UK horticulture suppliers for the second consecutive year of running this event.

MM Flowers is a member of the Modern Slavery Intelligence Network (MSIN), a pioneering non-profit organisation proactively sharing intelligence to combat Modern Slavery. Throughout the year MSIN has organised training, insight sharing and member meetings which MM Flowers have attended and used to implement improvements particularly around design of employee application forms to better spot signs of forced labour. The payroll team undertake monthly checks on all workers using intelligence data shared by MSIN to ensure no MM Flowers employees have been highlighted as at risk of Modern Slavery.

Since 2023 MM Flowers has been part of a multi-supplier led collaborative project aimed at reducing the risks of child labour and promoting family-friendly, child-safe practices on carnation farms in Antalya, Turkey. The initiative has been governed by the ETI and predominantly funded by UK and European retailers. In 2025 the project entered its third phase with the objectives below:

- Expand the scope of support offered to improve Human Rights due diligence and best practice better aligning with the expectations and requirements of UK and European retailers
- Create family friendly safe spaces on farms including play areas, games rooms and cooking/meal areas
- Incorporate 3 new carnation growers in the project
- Investigate how the Turkish Flower Group whose members include approximately 90% of Turkish growers can cascade learnings from the project more broadly across the industry
- Visit the smaller farms operated by the growers located in the Isparta region of Turkey

MM Flowers undertook site visits alongside two other UK based cut-flower suppliers with the support of two Turkish consultants specialising in child rights. Overall, the combination of improved trust between growers and suppliers, site visits, training sessions and dedicated action plans has provided a strong foundation for improved ethical due diligence in Turkey. The implementation of phase 3 has expanded the reach of the initiative and provides continuous improvement in social compliance and worker welfare standards across the participating farms.

9. Future Plans and Commitments

We will continue to focus on building our knowledge, capacity and procedures to prevent, identify and mitigate Modern Slavery in our own operations and global supply chain through:

- Enhancing the accuracy of the data we capture and analyse utilising sophisticated consultancy-developed supply chain management system enabling issues in our supply chain to be quickly identified, investigated and rectified
- Review and enhance Modern Slavery training modules and materials including the scope of mandatory training for all managers both online and in person to reflect the growth of the business
- Senior members of the HR team will attend the advanced Stronger Together training to increase the number of individuals within the business who have an in-depth knowledge of Modern Slavery
- Finalise roll-out of SMETA 7 and associated auditing guidance documents for our supply chain and own operations to strengthen ethical auditing regularly taking place
- Strengthening our internal people policies to reflect the growth of the business

- Engaging with our suppliers and customers on best practice and emerging risks
- Review how grower due diligence is monitored and managed to ensure compliance with MM Flowers expectations and that all compliance reporting is fit for purpose and regularly reviewed by the operational leadership team

We will continue to track and report on our progress, review our KPIs, commitments and priorities.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Chief Executive Officer on 28th February 2026.

A handwritten signature in black ink, appearing to read 'Phil Whelan', with a long horizontal flourish extending to the right.

Phil Whelan, Chief Executive Officer