

Flamingo Group International

Corporate Code of Conduct



Message from our Group CEO

This Corporate Code of Conduct (the “Code”) is the document which outlines the standards, expectations and commitments that we have, both of ourselves, as well as those with whom we work in partnership.

These standards are anchored on our commitment to human rights that have always run deep in our business. We have a long and proud history of doing the right thing and I am personally committed to ensuring that we continue to do so for future generations to come.

What are our expectations of you?

As an employee, partner or stakeholder it is your role to uphold this Code, built on the core values of our business. It doesn’t matter where you are in the world, the role that you have or the length of your association to Flamingo: we expect you to protect our future generations in upholding the standards and principles in this Code.

Please take the time to read through it thoroughly and if you are not sure of anything or require further detail on any of the matters covered then please speak to your line manager. Your commitment and support are deeply valued. I would also remind you that, whilst comprehensive, this Code cannot cover every eventuality, and it is critical that you always apply your own judgement to every situation – it is ultimately no more complicated than what we said...doing the right thing.

Thank you again for your continued commitment to creating a sustainable and successful business for all our key stakeholders.

Olivia Streatfeild

Chief Executive Officer
Flamingo Group International

Flamingo Policies

Our Code of Conduct is supported by company policies that turn our values into practical guidance for everyday situations, such as safety, compliance, respect, and data protection. These policies are adapted where needed to reflect local laws and cultures, ensuring they stay relevant across all our locations. Training helps bring these policies to life by supporting everyone to apply them confidently and consistently. Together, our code and policies help build a respectful, accountable, and ethical workplace.

History and Flamingo Values: Our Circle of Empowerment

The Flamingo Group of today is very much born from both our Kenyan and Ethiopian roots, principals which were established by our founders Richard “Dicky” Evans and the Barnhoorn family and are still relevant today. Everything we do starts and ends with our people and communities.

In the early days, Dicky could see that the local courgette, bean and chilli growers were not receiving a fair price via wholesalers to UK supermarkets, so he became relentless in his quest for rewarding growers properly. In 1994 he set about creating his unique operating model, installing a sea freight refrigerated container in his garden to store vegetables before they went onto the airport (due to the lack of a cold storage facility there). This “direct to market” approach not only maintained temperatures and the quality of the fresh produce itself but also guaranteed a decent price for the growers.

Ignited by Dicky’s restless leadership, our Kenyan teams developed ground-breaking water capture and irrigation technologies to maintain our flower and vegetable crops for up to 4 months without rain; he inspired Africa’s first integrated pest management business, giving rise to the widespread adoption of non-chemical ways of controlling harmful pests; and he led the way in onsite solar energy generation.

Dicky always sought to do the right thing for his growing communities. Whether that was passing on a fair day’s pay for a fair day’s work, pioneering the concept of ‘safe usage’ on his farms with pesticides, machinery and personal protection, or providing everyday essentials for families when times were tough.

Soon after this in 2005, in Ethiopia’s quiet village of Ziway, another pioneering family, the Barnhoorn’s, created the country’s first rose farm, Sher Ethiopia. They had a similarly bold vision to match their farming investment with the amount they supported their surrounding community. They steadfastly stuck to their principle of adding a hospital or school room for every greenhouse that was required. And now these schools, hospitals, roads and the water infrastructure we have built stand as pillars of progress. Every day, over 6,500 Ethiopian students receive free education, and over 100,000 patient visits are made at our medical facilities each year, with Sher employees being treated for free, while locals are cared for at a reduced rate.

We are as proud of transforming Ziway into the thriving and bustling town that it is today, as we are of becoming the world’s largest rose exporter and leading grower of Fairtrade roses, exporting a previously unimaginable 4 million roses every day.

This belief in the benefits of working together and of being bold and brave is woven into the very essence of our people. Whether it is our operational teams relentlessly engineering out time & touch, our customer teams continuously innovating to drive customer share, or our strategic growing partners systematically increasing the value they add on their farms, our core values of boldness, togetherness, and commitment to building for future generations are the golden threads that unify us across Ethiopia, Kenya, UK, Holland, France and Germany.

Our circle of empowerment demonstrates that when we empower our communities and our people, they deliver resilience, value and sustainability; this will in turn allow our customers to win in their markets and power growth, the value of which we are able to reinvest into our communities and further empower our people.

This principle is at the heart of what we do.

Flamingo Values

Our Empowerment Model

We measure our success not just by our business growth, but by the lives we enrich, the communities we enhance, and the relationships we build.

We are all driven by belief that by empowering our people and supporting our communities, we create a virtuous circle of growth and prosperity for us all, our customers, communities and stakeholders.



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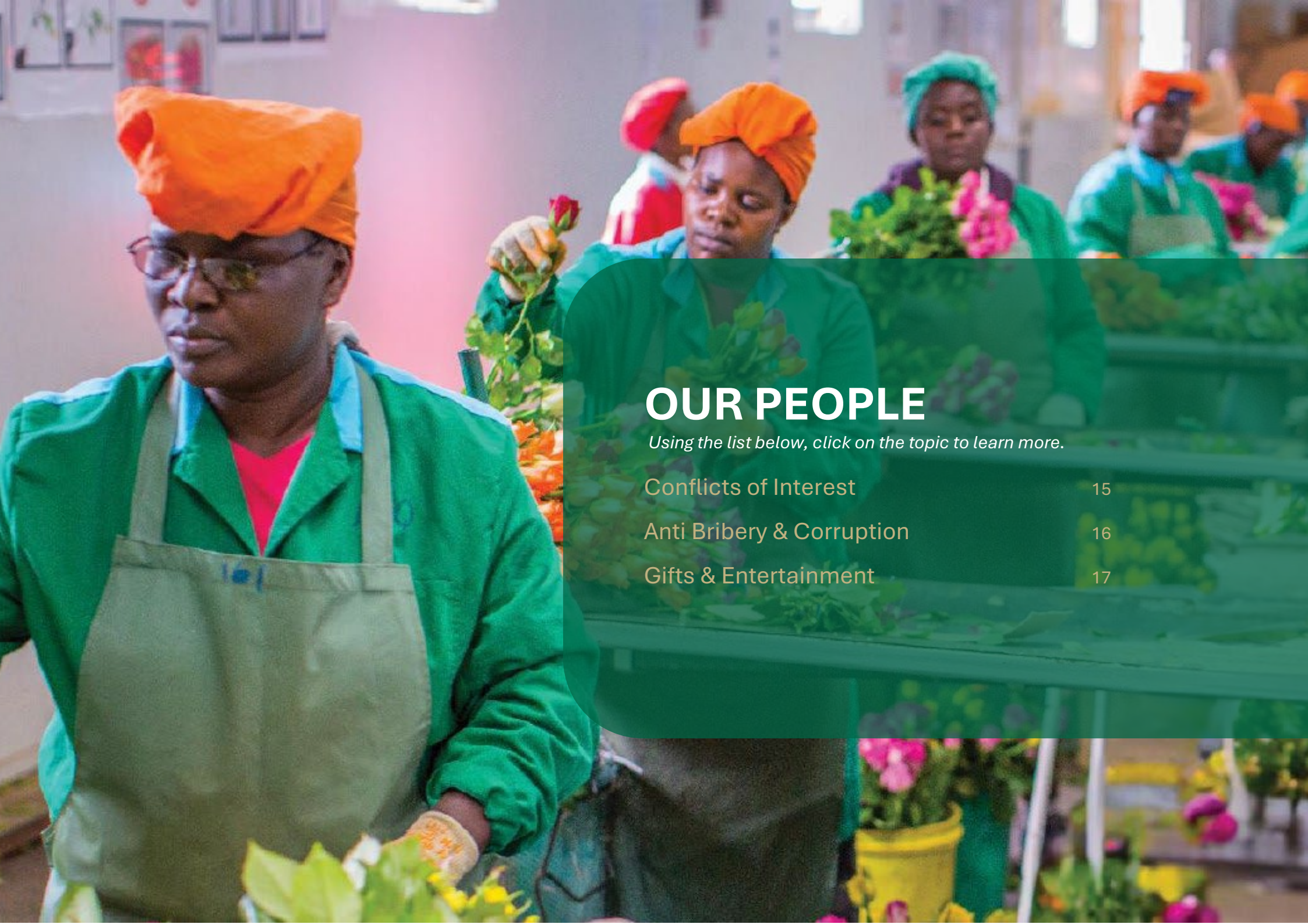


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Human Rights

Human rights are the fundamental freedoms and protections that every individual is entitled to, regardless of their background. Flamingo is committed to respecting and promoting these rights in all aspects of our business, ensuring fair treatment, dignity, and equality for all employees, partners, and communities.

Our Commitment

We believe that respecting human rights is fundamental to our business operations. We recognise our responsibility to uphold international human rights standards in everything we do. Our commitment to this is reflected in our values of Flamingo Horticulture and guides our relationships with our employees, suppliers, customers, and communities. We are guided by the United Nations Guiding Principles on Business and Human Rights, which outline the responsibility of businesses to respect, protect, and remedy human rights, which means

- **Respecting human rights:** We will avoid infringing on the human rights of others.
- **Protecting human rights:** We will take steps to prevent or mitigate adverse human rights impacts.
- **Remedying human rights:** We will provide access to remedy for those whose human rights are adversely impacted by our business activities.

We are committed to upholding the following human rights principles:

- **Non-discrimination:** We prohibit discrimination based on race, colour, religion, sex, sexual orientation, gender identity, national origin, disability, age, or any other protected characteristic.
- **Freedom of association:** We respect the right of our employees to form and join trade unions and to bargain collectively.
- **Fair wages and working conditions:** We will ensure that all workers in our operations and supply chains are paid a fair wage and work in safe and healthy conditions.

- **No child labour:** We have zero tolerance for child labour in any form.
- **No forced labour:** We prohibit all forms of forced labour, including human trafficking and slavery.

We work with business partners who share our commitment to human rights. We encourage all our business partners to adopt clear commitments to ethical business practices that are consistent with this statement. Any party operating on our behalf must ensure that their actions comply with our policies and standards. We believe that collaboration is essential to addressing complex human rights challenges. We will work with our suppliers, industry peers, NGOs, and other stakeholders to promote human rights and drive positive change in our supply chains and communities.

The role you play:

We expect all employees to uphold the highest ethical standards in all business activities and to respect the human rights of others. This means:

- **Treating everyone with dignity and respect** – it is the responsibility of all employees, suppliers, customers and other 3rd parties to treat each other with dignity and respect.
- **Speaking up if you see or suspect any human rights violations.**
- **Reporting any concerns through the appropriate channels, including our Whistleblower hotline.**

We are committed to fostering a workplace culture where everyone feels safe and empowered to raise concerns about potential human rights violations. We will not tolerate any form of retaliation against anyone who reports a concern in good faith.

We will regularly assess our human rights performance, identify areas for improvement, and take corrective actions to address any negative impacts

Whistleblowing

Whistleblowing is the act of reporting suspected wrongdoing, misconduct, or breaches of company policy or the law. It helps protect our people and organisation by ensuring concerns are raised and addressed in a safe, confidential, and responsible manner.

Our Commitment

We are committed to maintaining a safe, respectful, and supportive working environment across all areas of our operations and supply chains. We actively promote a culture of transparency and accountability, where whistleblowing is encouraged and protected. All colleagues have the right to raise concerns about unethical, illegal, or harmful practices without fear of retaliation. We value those who speak up, recognising whistleblowing as an important part of safeguarding integrity and trust within our company.

The role you play:

We expect all colleagues to uphold the highest standards of integrity, professionalism, and respect in their daily work. This includes following company policies, treating others with dignity, and ensuring our workplaces remain safe, inclusive, and free from harmful behaviours such as discrimination, harassment, or misconduct. Everyone shares responsibility for supporting a culture built on trust, fairness, and accountability.

We encourage colleagues to speak up through our whistleblowing process if they witness or suspect any breaches of company policy or the law—whether related to human rights violations, financial misconduct, safety risks, environmental harm, cyber incidents, or other unethical behaviours. Reporting concerns helps protect our people, our business, and the communities we serve. Colleagues can do so without fear of retaliation, knowing their concerns will be taken seriously and handled appropriately.

Raising Concerns

- **Reflect & Consult:** Consider the impact of the issue and whether it aligns with the company's values and policies. Seek guidance if unsure.
- **Speak Up:** Raise concerns with a trusted colleague, leader, or HR team member. Use the confidential reporting channel if preferred or if the issue involves senior personnel.
- **Report Responsibly:** Report concerns promptly, providing detailed and factual information, including potential impact. You may choose to remain anonymous.
- **Investigation & Protection:** All concerns are taken seriously, investigated confidentially, and handled by trained personnel. Retaliation against reporters is not tolerated.
- **Follow-Up & Action:** Reporters receive updates, and appropriate action is taken based on investigation outcomes, including corrective measures if necessary.
- **Continuous Improvement:** The process is regularly reviewed, with performance monitored via KPIs and user feedback to ensure trust, awareness, and effectiveness.

Accessing Whistleblowing is easy using the below methods:

By mail: Strictly Private & Confidential Group Chief People Officer c/o Flamingo House Cockerell Close Stevenage, Herts SG1 2NB UK

By email: Whistleblower@flamingo.net

By phone: UK (0044) 01438 904911 / Kenya (00254) 0701-839-068

Lobbying and Political Contributions

Lobbying and political contributions are ways in which individuals, organisations, or businesses seek to influence public policy and political decision-making. Lobbying typically involves engaging with government officials, legislators, or regulatory bodies to advocate for specific policies, laws, or regulations that may affect a company's operations or industry. Political contributions refer to the financial support given to political parties, candidates, or campaigns. While both practices are legal and recognised forms of democratic participation, they must be approached with transparency, integrity, and accountability to prevent undue influence or unethical conduct.

Our Commitment

We are committed to engaging with governments, regulators, and political organisations in a transparent, ethical, and lawful manner. This includes ensuring that all lobbying activities and political interactions are aligned with our values and uphold the highest standards of corporate responsibility.

Our Lobbying and Political Donations Policy, which forms part of our broader Code of Conduct, provides a clear framework for how we approach these engagements.

We are firmly opposed to bribery and corruption in any form. As such, we strictly prohibit any political donation made with the intent of securing an unfair business advantage, influencing government decisions improperly, or gaining preferential treatment. Any lobbying efforts we undertake must be

accurate, evidence-based, and carried out respectfully, with full adherence to applicable laws and internal procedures.

The role you play:

We recognise and fully respect the right of employees to engage in political activities in their personal capacity. Political beliefs and affiliations are a matter of personal choice, and the company supports the freedom of individuals to participate in democratic processes.

However, employees must always ensure that their personal political involvement does not conflict with their professional responsibilities. This means avoiding situations where personal political views or actions could be perceived as representing the views of the company. Employees are strictly prohibited from using company resources, branding, facilities, or work time to support political campaigns, parties, or candidates. When expressing personal political views, employees must not imply company endorsement or association.

Raising Concerns:

Employees are encouraged to seek guidance from their managers or designated compliance personnel on any matters related to lobbying or political donations. Any concerns about potential violations of this policy should be reported immediately through our established reporting channels.

By adhering to this policy, we aim to ensure that our engagement in the political process is conducted ethically, responsibly, and in a manner that maintains public trust.

Data Privacy, Ethics & AI

Our Commitment

At Flamingo Horticulture, we are committed to upholding the highest ethical standards in the management of data, including data used in AI systems. This covers the responsible collection, use, storage, and sharing of information, ensuring that all activities comply with legal requirements and our internal policies. By maintaining these standards, we protect the privacy and rights of individuals, foster transparency, and promote trust within our business and with external stakeholders.

In addition, Flamingo is dedicated to maintaining accurate, complete, and reliable records as a fundamental part of our business integrity. We expect all colleagues to act with honesty, integrity and ensuring that all records are factual and free from misrepresentation or omission.

The role you play:

All employees are responsible for ensuring the accuracy and completeness of the information they record and report. This includes financial transactions, such as time & attendance, expense reports, production and sales figures as well as other business-related information. Managers are further accountable for establishing and maintaining appropriate internal controls, reviewing records to ensure accuracy and providing guidance to employees on proper record-keeping practices.

Raising Concerns:

All employees are obligated to report any suspected inaccuracies, irregularities, or concerns related to record-keeping practices.

Protection of Company Assets

Our Commitment

At Flamingo, we recognise that our company assets are essential to our operations and success. All employees are responsible for protecting these assets and ensuring their appropriate and responsible use.

Types of Company Assets:

- Company assets encompass a wide range of tangible and intangible items, Treating physical property with care and ensure its security; unauthorized use or removal is prohibited.
- Handling financial resources responsibly, following controls and providing accurate documentation.
- Protecting confidential information by adhering to data privacy policies and reporting security breaches.
- Using technology systems appropriately, limiting personal use and complying with security and acceptable use guidelines.

This commitment helps safeguard our resources, maintain trust, and support the smooth running of our business.

Violations of this policy may result in disciplinary action, up to and including termination of employment. Employees may also face civil or criminal liability for actions that result in the loss or misuse of company assets.

Further Reading:

- Flamingo Data Protection Policy
- Flamingo Information Security Policy
- Group IT Policies

Conflicts of Interest

What is a conflict of interest? It occurs when an individual's personal interests interfere, or appear to interfere, with their responsibilities to the company. This can manifest in many ways, some specific examples are:

- **Financial interests:** Having a financial stake in a company that does business with us, directly or indirectly.
- **Relationships:** Hiring or supervising family members or close associates or allowing personal relationships to influence business decisions.
- **External activities:** Engaging in activities that compete with our company or could affect job performance.

Our Commitment

At Flamingo Horticulture, we believe that transparency and integrity are paramount to our success. We recognise that conflicts of interest can arise in various business situations and have the potential to erode trust and compromise our decision-making. To ensure we uphold the highest ethical standards, we operate a robust Conflicts of Interest process as part of our Code of Conduct.

We are committed to creating an environment where ethical behaviour is not only expected but fully supported. Our leadership sets the tone from the top, encouraging openness and reinforcing the importance of putting the company's interests above personal gain. We regularly review our policies and provide training to ensure employees are equipped to identify and handle conflicts appropriately.

By proactively managing conflicts of interest, we not only safeguard the integrity of our operations but also reinforce the confidence our partners, customers, and stakeholders place in us. This commitment extends to every level of the organisation, reflecting our core values and our dedication to doing business the right way.

The role you play:

Flamingo requires all employees to:

- Disclose any potential conflict of interest to their line manager promptly. We understand that business and personal lives can overlap. What's crucial is ensuring there's no perception of a conflict. Open communication is key to managing these situations effectively.
- Actively manage any identified conflicts of interest. This may involve removing oneself from specific decisions, divesting from financial interests, or adjusting external activities. Our management team will provide support and guidance in developing appropriate action plans.

In addition to these actions, employees are expected to regularly review their roles and relationships—both inside and outside the organisation—to identify any new or emerging risks. Where appropriate, written declarations or updates to previous disclosures should be made to maintain a clear and up-to-date record.

We also encourage employees to speak up if they observe potential conflicts involving others. Creating a safe space for such conversations helps us collectively maintain our ethical standards.

Our goal is to create a culture of awareness and accountability where employees feel comfortable discussing and managing conflicts of interest. We believe this approach fosters transparency, protects our company's reputation, and ensures that decisions are made in the best interests of the company.

To declare a conflict of interest, please follow the below link to complete our internal form:

<https://forms.office.com/e/6E1RqZVNex>

Anti Bribery and Corruption

Bribery involves offering, giving, receiving, or soliciting anything of value—such as cash, gifts, or special treatment—to improperly influence a decision.

Corruption includes dishonest or fraudulent conduct by those in power, often involving bribery, extortion, or abuse of authority for personal gain.

Our Commitment

At the heart of our Code of Conduct is a strong anti-bribery and corruption policy, reflecting our zero-tolerance approach to unethical behaviour. Even minor acts of bribery can seriously damage trust, distort fair competition, and harm society, particularly vulnerable communities. This applies to all forms of bribery—whether direct or indirect, including facilitation payments and inappropriate gifts or hospitality.

We are committed to prevention through clear rules, transparent practices, and ongoing education which includes annual training. This includes conducting due diligence on partners, maintaining accurate records, and ensuring employees are well-informed. These measures help us protect our integrity, uphold legal and ethical standards, and foster a culture of accountability and fairness.

In addition, we monitor evolving legislation and industry best practices to ensure our anti-bribery framework remains strong and effective. We actively engage with business partners and suppliers to communicate our expectations and reinforce our standards. Whether operating locally or internationally, we hold ourselves to the same high standards of ethical conduct, ensuring that all business decisions are free from corruption and improper influence.

Our commitment goes beyond compliance—it is rooted in doing what is right. By embedding integrity in everything we do, we continue to earn the trust of our stakeholders and contribute to sustainable, ethical business practices across the supply chain.

The role you play:

As an employee, you are responsible for upholding our zero-tolerance stance on bribery and corruption. This means acting with integrity at all times; avoiding any actions that could be perceived as seeking or offering improper influence and refusing to participate in or condone unethical practices—regardless of local customs or business pressures.

You must familiarise yourself with the company's policies and comply with all related procedures, including those governing gifts, hospitality, facilitation payments, and third-party relationships. Any concerns or suspicions of misconduct must be reported immediately through the appropriate channels.

It is also your responsibility to remain vigilant and speak up if you encounter any behaviour that seems questionable—even if you're unsure. Early reporting can prevent issues from escalating and demonstrates your commitment to protecting the organisation's integrity. We provide confidential mechanisms for raising concerns and ensure that no one faces retaliation for doing the right thing.

By committing to these standards, you help protect the company's reputation, ensure compliance with legal obligations, and support a fair and transparent business environment. Your actions play a vital role in upholding our ethical culture and setting an example for others, both inside and outside the organisation.

Raising Concerns

All concerns should be reported immediately through our appropriate confidential channels, including our Whistleblower communication channels.

Gifts and Entertainment

We are committed to building strong, ethical relationships with customers and stakeholders while maintaining the highest standards of integrity. Our Gifts and Entertainment policy ensures that any giving or receiving of gifts or hospitality is transparent, appropriate, and never used to influence decisions.

Our Commitment

Flamingo Horticulture commits to upholding ethical business conduct. To support this, the company has implemented a clear and practical Gifts and Entertainment policy. All gifts and entertainment must be modest, appropriate, and must never create a sense of obligation or be seen as an attempt to influence business decisions. Cash or cash equivalents, such as gift cards, are strictly prohibited, and all employees are expected to maintain accurate records of any gifts or entertainment offered or received.

Clear thresholds have been established locally to guide decision-making, and regular training will help employees recognise acceptable practices and potential red flags. As a guide, any gift greater in value than £50 (or equivalent) or entertainment greater in value than £250 (or equivalent) should be declared directly to a member of the Executive Leadership Team at the time or before being in receipt of it.

This policy helps us promote fairness, avoid conflicts of interest, and protect the reputation of Flamingo and its employees. It ensures that our business decisions remain impartial and based solely on merit and mutual benefit—not on undue influence or favour. Upholding these standards consistently strengthens our relationships with customers, suppliers, and business partners by building trust through transparency and integrity.

We will continue to review and update the policy as needed to reflect evolving risks, regulatory expectations, and global best practices. Our commitment to doing business the right way means everyone at Flamingo is accountable for

ensuring gifts and hospitality are handled with care and in line with our values.

The role you play:

As an employee, you are expected to follow the company's Gifts and Entertainment policy by acting responsibly and ethically in all business relationships. You must seek pre-approval for any gifts or entertainment offered or received, assess their value and frequency, and ensure they align with local policy guidelines. You are also required to record all gifts and entertainment accurately and in a timely manner.

Your actions should reflect Flamingo's values at all times. Even if a gift or invitation seems customary in a particular region or culture, it's essential to consider how it could be perceived by others—internally or externally. When in doubt, always err on the side of caution and transparency.

If you're unsure whether something is appropriate, you should speak with your manager or a member of the People (HR) team. They can provide guidance to ensure your actions align with our standards and help you navigate any grey areas. It's always better to ask in advance than to risk compromising your integrity or the company's reputation.

By making ethical decisions, declaring gifts and entertainment promptly, and encouraging open discussion, you help create a workplace culture where integrity is second nature. This not only protects you but also strengthens Flamingo's reputation as a trusted, fair, and responsible business partner.

Raising Concerns

We encourage you to speak up and want all of our employees to feel safe reporting any concerns.

All concerns should be reported immediately through our appropriate confidential channels, including our Whistleblower communication channels.

Safeguarding

Flamingo Horticulture is dedicated to protecting children and at-risk adults from harm in all areas of its work, ensuring a safe and respectful environment for everyone.

Our Commitment

Flamingo Horticulture adopts a zero-tolerance approach to harm and is committed to safeguarding all individuals regardless of age, disability, gender, race, religion, or sexual orientation. The company actively supports community projects and enforces a comprehensive safeguarding policy that covers staff, associates, and partners involved in its operations.

This policy focuses on preventing harm, providing clear and accessible reporting channels, responding fairly with a survivor-centered approach, and continuously improving safeguarding practices. All reports are treated confidentially and handled promptly to protect those affected.

The role you play:

Flamingo Horticulture adopts a zero-tolerance approach to harm and is committed to safeguarding all individuals regardless of age, disability, gender, race, religion, or sexual orientation. The company actively supports community projects and enforces a comprehensive safeguarding policy that covers staff, associates, and partners involved in its operations.

This policy focuses on preventing harm, providing clear and accessible reporting channels, responding fairly with a survivor-centered approach, and continuously improving safeguarding practices. All reports are treated confidentially and handled promptly to protect those affected.

Raising Concerns

All concerns should be reported immediately through our appropriate confidential channels, including our Whistleblower communication channels.

Competition and Antitrust

We are committed to competing fairly and ethically, fully complying with all competition and antitrust laws to promote innovation, consumer benefit, and economic growth.

Our Commitment

Flamingo complies with all applicable competition and antitrust laws and promote competition based on the quality and innovation of our products and services. We prohibit any unfair or anti-competitive practices, including:

- Price fixing, bid rigging, and market allocation agreements.
- Abuse of dominant market positions, such as predatory pricing or exclusionary contracts.
- Sharing or unlawfully obtaining competitively sensitive information.

We maintain transparency and independence in business decisions, and caution employees to avoid discussing sensitive information at industry events or gatherings. We also take care to ensure that former employees of competitors respect confidentiality obligations.

The role you play:

Employees are expected to comply with all competition laws & our policy by:

- **Making business decisions independently** and competing fairly on product and service merit.
- **Avoiding any conduct that restricts competition**, including the prohibited activities listed above.
- **Being cautious during events** and when engaging with competitors or former competitor employees to prevent disclosure of sensitive information.
- **Refraining from anti-competitive or disparaging public comments**, including on social media.
- **Reporting any suspected breaches** of competition laws or company policy immediately through the appropriate channels.

By following these principles, you help protect Flamingo Horticulture's reputation and ensure our commitment to ethical and lawful business practices.

Sanctions and Export Controls

Flamingo Horticulture is fully committed to complying with all applicable sanctions, export control laws, and regulations to ensure ethical and lawful business operations worldwide.

Our Commitment

We adhere strictly to sanctions and trade restrictions imposed by authorities such as the United Nations, European Union, UK Foreign and Commonwealth Office, and the U.S. Office of Foreign Assets Control (OFAC). Our commitments include:

- Complying with all relevant sanctions and export control laws in every country where we operate.
- Refusing to conduct business, directly or indirectly, with sanctioned persons, entities, governments, or countries unless authorised by the appropriate agency.
- Conducting due diligence by knowing our customers, vendors, and partners, verifying the origin and destination of goods, and ensuring transparency in all transactions.
- Maintaining a robust compliance program.

The role you play:

As an employee, you are responsible for:

- Familiarising yourself with this policy and all relevant sanctions and export control laws.
- Completing required training and staying updated on changes to sanctions and export control regulations.
- Exercising due diligence in every transaction by verifying the identity of customers, vendors, and partners, screening all parties against sanctions lists, and understanding the origin and destination of goods and services.
- Immediately reporting any suspected violations or concerns through the appropriate channels.



Anti-tax Evasion and Money Laundering

Money laundering is the process by which criminals attempt to disguise the illegal origin of their funds, making it appear as though the money comes from legitimate sources.

Tax evasion is the illegal non-payment or underpayment of taxes.

Our Commitment

Conducting business with integrity and transparency is paramount. We strictly prohibit any activity that facilitates tax evasion or money laundering and comply with relevant anti-money laundering (AML) and anti-tax evasion laws in every jurisdiction where we operate.

Our robust compliance principles include:

- Implementing due diligence measures such as identity verification, background checks, and source of funds verification.
- Monitoring transactions and business relationships continuously to detect suspicious activity.
- Prohibiting transactions designed to avoid tax liabilities or reporting obligations, assisting in tax evasion, or accepting payments linked to criminal activity.
- Providing regular employee training and clear resources to help identify and manage risks related to money laundering and tax evasion.

We are committed to building a culture of financial integrity, where the risk of financial crime is identified early and acted upon responsibly. Our policies are not just about regulatory compliance—they reflect our ethical obligation to operate fairly, protect the financial system, and contribute to the fight against organised crime and corruption.

We also work closely with partners and third parties to ensure they share our standards. This includes contractually binding commitments, risk assessments, and ongoing monitoring of high-risk relationships. Through these efforts, we continue to reinforce our position as a responsible and trustworthy organisation, safeguarding our operations, people, and communities.

The role you play:

As a colleague, you must avoid engaging in or facilitating any activities related to tax evasion or money laundering. You should remain vigilant for warning signs such as reluctance to provide business information, unusual payment methods, overpayments, or large cash transactions. It is essential to complete all required training and adhere strictly to internal policies and procedures.

You are expected to conduct thorough due diligence on customers, partners, and transactions by verifying identities and sources of funds. Any suspicious activities must be reported immediately through the appropriate channels to help protect the company and uphold ethical standards.

Raising Concerns

All employees have a responsibility to report any suspected money laundering or tax evasion. Concerns can be reported to line managers or through whistleblowing reporting channels. We will not tolerate retaliation against anyone who reports a concern in good faith.

By upholding this policy, we reinforce our commitment to ethical conduct, legal compliance, and maintaining the trust of our stakeholders.

External Stakeholders

We are committed to building respectful, transparent, and mutually beneficial relationships with the communities where we operate.

Our Commitment

Flamingo Horticulture recognises the profound impact our operations can have on local communities. We are committed to acting as a responsible partner by upholding internationally recognised human rights and respecting the cultural values and traditions of the communities we engage with. Through open communication and transparent engagement, we proactively share information and welcome feedback to inform our decision-making. We conduct social impact assessments to identify and mitigate any potential negative impacts and maintain clear grievance mechanisms to ensure concerns are addressed fairly and promptly.

Our approach supports long-term community development by prioritising local employment, procurement, and investment in initiatives such as education, healthcare, and infrastructure. We work closely with community stakeholders to build lasting partnerships based on trust, shared value, and accountability, and we continually monitor our performance to ensure we are delivering positive outcomes.

The role you play:

As a colleague, you are expected to engage with local communities respectfully, with cultural sensitivity and a strong awareness of your potential impact. You should uphold human rights, listen openly to community concerns, and contribute positively to the areas where we operate. This means supporting our initiatives to hire locally, using local suppliers where appropriate, and representing Flamingo Horticulture in a manner that promotes trust and partnership.

You are also responsible for helping to identify any community risks or issues and raising them through appropriate channels, supporting our shared goal of creating sustainable, respectful, and responsible relationships in every community we touch.

Protecting our Environment

We are committed to protecting the environment through responsible resource use, regulatory compliance, and proactive sustainability practices across our operations and supply chain.

Our Commitment

Flamingo Horticulture is dedicated to complying with all applicable environmental laws, regulations, and industry standards. We are committed to minimising our environmental impact by managing natural resources responsibly, promoting efficient use of water, energy, and materials, and questioning unsustainable practices. We recognise the urgency of climate change and integrate climate-related risks into our risk assessments, taking proactive measures to reduce our footprint across the supply chain.

Our commitment extends to preserving biodiversity through responsible land management and pollution reduction, as well as supporting initiatives that conserve natural habitats. We hold our suppliers to high environmental standards, ensuring sustainable practices are upheld throughout our value chain. Through these actions, we aim to drive long-term environmental stewardship that reflects our values and responsibilities.

The role you play:

As a colleague, you play a vital role in supporting our environmental objectives. You are expected to follow all environmental policies and procedures, use resources efficiently, and speak up if you notice wasteful or harmful practices. You should integrate sustainability into your everyday decisions—whether it's reducing energy use, minimising waste, or supporting environmentally responsible suppliers.

By participating in our environmental programmes and staying informed about our climate and conservation goals, you contribute to a culture of shared responsibility and continuous improvement, helping us protect the planet for future generations



Sources of Information

The International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work

<https://www.ilo.org/topics-and-sectors/fundamental-principles-and-rights-work>

The Children's Rights and Business Principles

<https://www.unicef.org/documents/childrens-rights-and-business-principles>

The UN Guiding Principles on Business and Human Rights

<https://www.ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights>

The UN Women's Empowerment Principles

<https://unglobalcompact.org/take-action/action/womens-principles/>

The UN Global Compact

<https://unglobalcompact.org/>

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Revision Date	Version No. Revised	Amendment	Issued by:	Approved by:	New Version No.
March 2025	08	Update to CoC in all areas			09
July 2025	09	Update to CoC in all areas			10