

Appendix 1 – ETI Transparency Commitments

This appendix sets out Flamingo’s public transparency commitments in line with the Ethical Trading Initiative Corporate Transparency Framework requirements. It should be read alongside the Flamingo Group International Limited Sustainability Report 2025 and our Modern Slavery Statement which provides further narrative on governance, stakeholder engagement, the value chain, workers in the value chain, communities and business conduct.

1.1 Company commitment

Flamingo is committed to respecting internationally recognised labour rights across its own operations and supply chain activities. Our approach is guided by the ETI Base Code, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and applicable national law. We recognise that responsibility for labour rights extends beyond direct employment and includes how we source, contract, manage supplier relationships, hear worker concerns, address risk and provide or support remedy where harm is identified.

We are committed to a world of work in which people are treated with dignity, are free from exploitation and abuse, and can work in safe conditions with access to fair treatment and effective representation. This commitment applies to workers in our own operations, workers in supplier sites connected to our products and services and, where relevant, communities affected by our business activities.

1.2 Governance and accountability

Human rights and ethical trade oversight sit within Flamingo’s wider sustainability governance framework. Board oversight is exercised through the Sustainability Committee. Day-to-day leadership is led by the Executive Team and the Group Sustainability / ESG Team, and overall responsibility for ethical trade strategy and human rights due diligence rests with the Chief Sustainability Officer. Staff working on ethical trade have clear reporting lines to board-level positions.

Operational accountability is supported through Flamingo’s lines of business and sustainable business leads, who are responsible for implementation, execution of actions and input into reporting and data collection. Issues are tracked and escalated through Flamingo’s grievance and incident management processes so that labour-rights risks can be identified, managed and reported through established business controls.

1.3 Human rights risk identification and prioritisation

Flamingo identifies and prioritises labour-rights risks using a human-rights-based risk assessment that prioritises risks to workers rather than risks to the business. This process is based on supply-chain mapping across all tiers, desktop research, engagement with internal and external stakeholders, and assessment of sector, geographic and sourcing-model risks. To determine salience, Flamingo applies the UN Guiding Principles criteria of scale, scope and irremediability.

This approach is supported by supplier registration and self-assessment, risk-based SMETA audits and regular supplier visits by buying and technical teams. Flamingo recognises the limitations of audits and self-assessment and therefore uses them as

part of a broader risk-based due diligence approach rather than as standalone proof of compliance.

1.4 Supply chain description, geographical spread, highest-risk locations and first-tier disclosure

Flamingo is a leading supplier and grower of flowers, plants and produce into UK and European retail markets. The Group operates its own farms in Kenya, Ethiopia and France and works with a strategic global network of growers, with an emphasis on packing at source. Flamingo operates 8 own farms, 7 onshore facilities and sources from 22 countries. Flowers and plants are sourced from 75 supply partners across 5 countries, while produce is sourced across 34 crops from 84 supply partners across 20 countries. Flamingo's value chain spans sourcing, growing, packing, distributing and selling.

Flamingo's value chain is centred on East Africa, with other important sourcing geographies identified as Peru, Mexico and Morocco for produce, and Colombia, the Netherlands and the United Kingdom for cut flowers. Based on Flamingo's current transparency appendix and risk-based approach, the principal regions prioritised for enhanced labour-rights due diligence are East Africa, North Africa, Central America and South America.

In line with the ETI framework, Flamingo maintains and will continue to update a first-tier supplier list on the Open Supply Hub. This disclosure covers supplier name, geographical location and nature of supplier.

1.5 Trade union rights, freedom of association and collective bargaining

Flamingo supports workers' rights to unionise, to freely form and join organisations of their choice and to engage in collective bargaining. Where trade union membership exists within a farm or industry, Flamingo engages with representatives and honours recognised collective bargaining agreements. We view freedom of association and effective worker voice as essential components of human rights due diligence and as important in identifying, preventing and addressing labour-rights risks.

In practice, this approach is supported through employee representative committees, welfare committees, Fairtrade Premium Committees and gender-rights committees in relevant operations. Flamingo supports worker committees and regular dialogue between workers and management as part of its wider ethical trade strategy.

1.6 Salient risks identified and plans made to mitigate risk

Flamingo has identified the following salient labour-rights risks for workers in its supply chain: health and safety; just and favourable working conditions, including living wages; gender-based harassment and discrimination; poor contracts and irregular employment; freedom of association and union representation; gender-based discrimination and vulnerability; land, water and resource rights and community impacts; forced labour and modern slavery; and child labour.

Flamingo's mitigation approach includes supply-chain mapping across tiers, supplier registration and self-assessment, risk-based SMETA audits, regular supplier visits, listening to workers, reflecting stakeholder input in due diligence processes, investigating root causes, and operating formal grievance mechanisms aligned with the

UN Guiding Principles. Where severe labour abuses are identified, Flamingo documents the steps taken to provide remediation and prevent recurrence.

Flamingo also works through collaborative mechanisms, including ETI, Fairtrade, the Floriculture Sustainability Initiative and the Food Network for Ethical Trade. Our Sustainability Report highlights active participation in the ETI Türkiye flowers programme in 2024-26, including work to strengthen management systems, improve social compliance policies, enhance workers' understanding of their rights and support child- and family-friendly environments.

Flamingo's current forward-looking priorities in this area include Gender based violence and harassment, living wages, worker voice, effective confidential and multilingual grievance mechanisms, support for freedom of association, transparent reporting and continued collaboration to address systemic risk.

1.7 Currency of information

Flamingo intends this appendix and the related Sustainability Report to reflect the most up-to-date information available at the time of publication. This appendix will be reviewed at least annually and updated where there are material changes to governance arrangements, salient risks, grievance mechanisms, supplier disclosure, mitigation measures or other aspects of Flamingo's human rights due diligence process. This reflects ETI's expectation that public reporting should describe the most up-to-date information available at the time of publishing.

Related policies and disclosures

Relevant public disclosures include the Flamingo Group International Limited Sustainability Report 2025, Flamingo's Modern Slavery Statement and the Group Code of Conduct. Our Sustainability 2025 Report also confirms Flamingo's whistleblowing commitments, anti-bribery and corruption controls, and due diligence on supplier onboarding.