A message from our Chief Executive Officer

We work in close partnership with our growers, customers and communities in all aspects of our operation. We continue to build for future generations, through resilience and a commitment to operate in the interests of all of our stakeholders. Our business exists because of people — in our farms, our packhouses and our global network of growing partners — which makes what we do possible every day. Protecting their rights, their safety and their dignity is not something separate from how we operate. It is how we operate.

We publish this statement in accordance with Section 54 of the UK Modern Slavery Act 2015. It describes the steps that Flamingo Group International Limited and its subsidiaries in scope of the Act have taken during the financial year to identify, prevent and address the risk of modern slavery and human trafficking in our business and in our supply chain.

Our approach is grounded in the UN Guiding Principles on Business and Human Rights and the Ethical Trading Initiative Base Code. It is supported by a group-wide Corporate Code of Conduct, a Responsible Sourcing Policy that sets explicit expectations for our suppliers, and a Board-level Sustainability Committee chaired by our Non-Executive Director Rosalind Kainyah, MBE. We also report more broadly on our human rights, social and environmental performance in our Sustainability Report 2025, which should be read alongside this statement.

Modern slavery and labour abuse exist in global agricultural supply chains, and we recognise the risks of this. We are committed to making a sustained effort to identify any potential risks, and to act when we find them. We work with our suppliers, customers and external experts to mitigate them to the greatest extent possible. I am personally committed to this, and I expect the same of every colleague, supplier and partner.

This statement was approved by the Board of Directors of Flamingo Group International Limited and signed on December 2025 on behalf of the Board.

Olivia Streatfeild
ChiefExecutiveOfficer, Flamingo Group International Limited
December 2025

1. About this statement

This statement is made byFlamingoGroup International Limited (the Group) on behalf of itself and all its subsidiaries within the scope of Section 54 of the UK Modern Slavery Act 2015. A list of those subsidiaries is set out at Appendix A.

It covers the financial year ending [FY25 year-end date] and describes the steps the Group has taken during that period to ensure that slavery and human trafficking are not taking place in any of its own operations or in its supply chain.

This statement should be read alongside the Flamingo Group International Sustainability Report 2025 and the Group's Corporate Code of Conduct (which incorporates the Responsible Sourcing Policy). Together, these three documents set out the Group's human rights approach in full. This statement focuses specifically on the modern slavery dimension of that approach.

In line with our commitment to continuous improvement, each year we aim to make this statement more substantive than the last — disclosing more about what we have done, what we have found, and what we plan to do next. We welcome feedback on this statement from any reader, which should be directed to our Chief Sustainability Officer at [contact details].

2. About Flamingo Group International

Flamingo Group International Limited is a leadingsupplier and grower of flowers, plants and premium produce into the UK and European retail markets. The Group aims to be the world's most resilient and best-value farm-direct grower, operating at the lowest carbon footprint. It operates its own farms across Kenya, Ethiopia and France and has built a strategic global network of growing partners, with an emphasis on packing at source.

Our structure

The Group operates through four lines of business:

Afriflora

oneof the world'slargest straight-line rose growers, based in Ethiopia.

Flamingo Flowers

grows and sells all-year-round flowers into the UK and Europe, with farming operations in Kenya.

Flamingo Produce

grows and sells all-year-round fresh produce into the UK, with farming operations in Kenya.

Bigot Seasonals

grows and sells seasonal flowers in France.

The Group operates eight own farms, seven onshore packing and distribution facilities across the UK, the Netherlands, France and Germany, and sources from 22 countries worldwide. It employs 26,794 people, of whom approximately 95% are based on our East African farming operations.

During the financial year, the Group produced 446 flower and plant varieties, sold 2.1 billion flower stems and 30,000 tonnes of produce.

Our governance

The Board of Directors has ultimate responsibility for the Group's approach to modern slavery, human rights and sustainability. The Board operates a dedicated Sustainability Committee, chaired by our Non-Executive Director Rosalind Kainyah MBE, which oversees the Group's sustainability strategy including human rights and ethical trade.

Day-to-day leadership of the Group's modern slavery and ethical trade strategy rests with our Chief Sustainability Officer, who reports to the Chief Executive Officer and has a direct reporting line to the Board's Sustainability Committee. The Group Sustainability / ESG Team supports the Chief Sustainability Officer and works with Sustainable Business Leads embedded in each line of business, ensuring that policy translates into practice on the ground.

Our legislative reporting
This statementispublished pursuant to the UK Modern Slavery Act 2015. The Group is also subject to human rights and sustainability reporting requirements under other legislation, including French duty of vigilance law; German Lieferkettengesetz and the EU Corporate Sustainability Reporting Directive. Our disclosures under these regimes are consistent with, and complementary to, this statement.

3. Our value chain

Understanding ourvaluechain is the foundation of our modern slavery due diligence. We describe it here in three parts: our direct operations, our upstream supply chain, and our downstream value chain.

3.1 Direct operations

Ourdirect operations comprise our eight farms and seven onshore facilities. At our farms we undertake the full horticultural cycle — propagation, growing, harvesting, grading, packing and quality control. At our onshore facilities we perform final processing, bouquet assembly, value-adding, order fulfilment and distribution to customers.

The table below summarises our direct operations by geography.

Countr y	Operation type	Scale	Principal worker categories
Kenya	Farming (flowers & produce), packing	447 ha Flowers (Naivasha, Mt Kenya); 429 ha produce	Direct-hire permanent agricultural workers; some seasonal workers during peak periods
Ethiopia	Farming (roses), packing	561 ha across 3 farms (Ziway, Koka, Adami Tulu)	Direct-hire permanent agricultural workers
France	Farming (tulips, peonies, lily of the valley), packing	65 ha (Bigot Seasonals)	Direct-hire permanent workers; seasonal workers during peak harvest
United Kingdom	Onshore packing, bouquet assembly, distribution	Multiple facilities (Stevenage, Sandy, and Weston)	Direct-hire permanent staff; agency workers used to cover peak periods
Netherlands	Onshore packing, distribution	Facility operations	Direct-hire permanent staff; agency workers
Germany	Sales, packing and distribution (Omniflora GmbH)	Facility operations	Direct-hire permanent staff
France	Sales and distribution (FFBV)	Facility operations	Direct-hire permanent staff

Our East African operations are the most labour-intensive and therefore receive the most concentrated due diligence focus. 100% of our farms in Ethiopia and Kenya are Fairtrade certified.

3.2 Supply chain (upstream value chain)

Oursupply chaincomprisesgoods suppliers, service suppliers, and contract labour providers. We categorise our suppliers by commodity type, tier and sourcing relationship.

Flowers and plants
In flowers and plants we source approximately 50% of our total volumes from our own farms (Kenya, Ethiopia, France). The remaining volumes are sourced from a network of 75 supply partners across 5 countries — with a further 40% of the balance bought directly from partner growers and approximately 10% sourced via flower auctions and agents.

Fresh produce
Infreshproduce we source approximately 40% from our own farms in Kenya and from Kenyan smallholder

farmers. A further 40% comes from our direct preferred growing partners, and 20% from other suppliers. In total we work with 84 fresh produce supply partners across 20 countries and source 34 different produce crops.

Principal sourcing countries
Our principal sourcing countries for flowers and plants include Kenya, Ethiopia, the Netherlands, Colombia and the United Kingdom. For fresh produce, principal sourcing countries include Kenya, Peru, Mexico, Morocco, Spain and Guatemala. A country-level supplier summary is set out at Appendix B.

Goods, services and contract labour
In addition to cut flowers, plants and fresh produce, we procure a range of goods and services in support of our direct operations. These include: packaging materials (cardboard, plastic sleeves, labels, buckets and trays); agricultural inputs (seeds, fertilisers, pesticides — use of which is governed by our Integrated Pest Management programme); farm and facility equipment; freight and logistics services (air, sea and road);
professional services; and contract labour — principally agency workers used in the UK and Netherlands to cover peak demand periods.

3.3 Downstream value chain
Our downstream value chain is primarily our customers — the retailers, wholesalers and florist chains who sell our flowers, plants and produce to the end consumer. We supply 11 of the largest 15 supermarkets in the UK and mainland Europe. We also supply several online flower retailers and florist chains and sell via European flower auctions.

We consider our downstream value chain to be lower-risk for modern slavery than our direct operations and supply chain, because our customers are principally large, publicly-listed retailers in jurisdictions with mature labour-rights frameworks. Nonetheless, we engage actively with our customers on ethical trade — both to meet their expectations and to learn from their own due diligence programmes.

3.4 Improvement in our knowledge of our value chain
During the financial year we made material progress in extending our understanding of our value chain. For the first time, we aggregated greenhouse gas emissions data across all subsidiaries in the Flamingo Group, which required us to map supplier relationships and volumes at a granularity we had not previously achieved. This exercise has improved our traceability in the supply chain and our ability to identify human-rights-relevant risks by supplier type, country and commodity. We will continue to deepen this mapping in the year ahead.

4. Our salient modern slavery risks
The UN Guiding Principles on Business and Human Rights direct businesses to prioritise their most salient human rights risks — those which are most severe by virtue of their scale, scope and irremediability. We apply this lens to our modern slavery risk assessment.

Our salient human rights risks, as identified in our Sustainability Report 2025, are:

- 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
- Child labour

Of these, the risks most directly relevant to modern slavery — as defined by the UK Modern Slavery Act 2015 and the International Labour Organization indicators of forced labour — are forced labour, child labour, and the underlying risk factors of poor contracts, irregular employment, and vulnerability. We describe below how these risks may manifest in different parts of our value chain.

4.1 Risks in our direct operations
The most significant modern slavery risks in our direct operations relate to our East African farming operations

and to our use of agency labour in UK and Netherlands facilities.

In Ethiopia and Kenya, our own workforce is directly employed on permanent contracts, and both countries' operations are 100% Fairtrade certified — which requires adherence to ILO Core Conventions and independent verification by FLO-CERT. The residual risks we consider most material are: (a) vulnerability of workers who have migrated internally from other regions to work on our flower farms, particularly around the Naivasha and Ziway regions, and (b) the broader community-level pressures of employing a large workforce in a concentrated geography.

In our UK and Netherlands onshore facilities, we use agency labour to cover peak demand periods — most notably Valentine's Day and Mother's Day. Agency labour is associated with a higher modern slavery risk profile than direct employment because of the potential for recruitment-fee practices, document retention by agencies, and reduced worker visibility into their employment relationships. We mitigate this risk through careful agency selection, contractual protections, and (in the UK) third-party audit of our labour providers.

4.2 Risks in our supply chain

The most significant modern slavery risks in our supply chain arise from:

- Cut flowers sourced from regions with weaker labour-rights enforcement (for example, certain operations in Latin America), where migrant and seasonal labour is common.
- Fresh produce sourced from countries where agricultural labour is disproportionately performed by migrant workers (for example, some operations in southern Europe, Peru, Mexico and Morocco).
- Lower tiers of the supply chain — including packaging suppliers, agricultural input manufacturers, and the sub-suppliers of our direct suppliers — where our visibility and leverage are more limited.
- Seasonal demand spikes, particularly Valentine's Day and Mother's Day, which create upstream pressure on suppliers and their workforces and can exacerbate risks around excessive working hours, use of contract and temporary labour, and recruitment practices.

4.3 Risks in our downstream value chain

We consider the modern slavery risk in our downstream value chain to be comparatively lower, on the basis that our direct customers are primarily large European retailers operating in mature labour-rights jurisdictions and that many of them have their own extensive due diligence programmes. Nonetheless, we remain alert to the risk that our own commercial practices — in particular, forecast variability, short lead times in peak periods, and pricing pressure passed along the chain — could exacerbate labour rights risks further upstream. We address this directly in Section 9.

4.4 What we don't yet know

We believe an honest assessment of modern slavery risk must acknowledge the limits of our current visibility. The following are areas where we have less visibility than we would like, and where we are working to improve:

- Sub-tier-one suppliers in our supply chain — particularly the sub-suppliers of our agricultural input, packaging and freight partners.

5. Our policies

Ourapproach tomodern slavery is supported by a structured set of Group-level policies, each of which is aligned to international human rights standards and is cascaded through contractual arrangements to our suppliers and business partners.

5.1 Corporate Code of Conduct

Our Corporate Code of Conduct is the Group-wide statement of the standards we expect of ourselves and of those with whom we work — colleagues, suppliers, customers and other partners. The Code contains a substantive Human Rights section that explicitly commits the Group to the UN Guiding Principles on Business and Human Rights, and to the three duties these impose on businesses: to respect human rights, to protect against adverse impacts, and to provide access to remedy. The Code names the principles we uphold: non-discrimination, freedom of association, fair wages and working conditions, no child labour, and no forced labour.

The Code was issued under the authority of the CEO and is reviewed annually. It is available in full on our corporate website.

5.2 Stand-alone Human Rights Policy

The Human Rights commitment set out in our Code of Conduct is also published as a stand-alone Group Human Rights Policy, explicitly aligned to the UN Guiding Principles on Business and Human Rights. The policy is available on our corporate website and is provided to suppliers as part of onboarding.

5.3 Responsible Sourcing Policy

The Group's Responsible Sourcing Policy is our primary supplier-facing policy. It applies to all suppliers of goods, services and contract labour to the Group and is incorporated into our contractual arrangements with suppliers.

The Policy requires suppliers to respect human rights in line with the UN Guiding Principles and the Universal Declaration of Human Rights, and to conduct their operations in a way that does not contribute to human rights abuses. It sets explicit minimum standards on equal opportunities, harassment and bullying, health and safety, fair wages, child labour (aligned to ILO minimum-age provisions), forced labour and modern slavery (including trafficking, servitude, bonded and involuntary labour), and freedom of association. It names permanent, temporary, contract agency and migrant workers as distinct worker categories to be protected.

Importantly, the Policy imposes a cascade obligation: suppliers must take steps to ensure that their own employees, contractors, sub-contractors, agents and other third parties understand and adhere to the Policy and must conduct appropriate due diligence within their own supply chain for both new and existing suppliers. Suppliers are also required to promote adherence to the Policy within their own supply chains.

The Policy sets a clear corrective-action framework for non-compliance, with defined remediation expectations and — in cases of serious, material or persistent non-compliance — the potential termination of the supplier relationship. Termination, where necessary, follows the UN Guiding Principles approach, which requires consideration of impacts on workers.

5.4 Other relevant policies

The policies set out above are supported by a wider framework including our Whistleblowing Policy (see Section 7), our Anti-Bribery and Corruption Policy, our Safeguarding Policy (covering protection of children and at-risk adults), and operational policies on recruitment, health and safety, and grievance handling at each site.

5.5 How our policies are developed and reviewed

Our policies are developed by the Group Sustainability / ESG Team, in consultation with the relevant operational teams, and are approved by the Executive Management team. Material updates — including to the Code of Conduct and the Responsible Sourcing Policy — are reviewed and approved by the Board's Sustainability Committee.

In developing our policies, we draw on the guidance of external stakeholders including the Ethical Trading Initiative, the Food Network for Ethical Trade, Fairtrade International, the Floriculture Sustainability Initiative, and the Centre for Child Rights and Business. We expect to continue and deepen this engagement in the year ahead — including structured input into the forthcoming revision of our Responsible Sourcing Policy.

5.6 How our policies are communicated

Our Code of Conduct and Responsible Sourcing Policy are published on our corporate website and are provided to all colleagues at onboarding. Suppliers acknowledge the Responsible Sourcing Policy as part of their contractual arrangements with the Group. The Code is supported by annual training on its core principles, including anti-bribery and whistleblowing, and by role-specific training on modern slavery for staff in higher-priority roles (see Section 7).

6. Governance and accountability

Responsibilityforourmodernslaveryapproachoperates at three levels: the Board, the Executive, and the operational implementation teams.

6.1 Board-level oversight

TheBoard ofDirectors has ultimate responsibility for the Group's approach to modern slavery and human rights. The Board has established a dedicated Sustainability Committee, chaired by our Non-Executive Director Rosalind Kainyah MBE, which meets bi-monthly and reviews the Group's sustainability strategy, including modern slavery, human rights, climate, and community investment. The Sustainability Committee reviews this statement, approves material updates to our human-rights-related policies, and monitors progress against our modern slavery commitments.

6.2 Executive accountability

Day-to-day leadership of the Group's modern slavery and ethical trade strategy rests with the Chief Sustainability Officer, who is a member of the Executive Management team and reports directly to the Chief Executive Officer. The Chief Sustainability Officer has direct reporting access to the Board's Sustainability Committee.

6.3 Implementation

TheGroup Sustainability / ESG Team leads the delivery of our modern slavery strategy across the Group. Sustainable Business Leads are embedded within each of our four lines of business (Afriflora, Flamingo Flowers, Flamingo Produce and Bigot Seasonals) and are responsible for day-to-day implementation of the Group's modern slavery policies, including risk assessment, supplier engagement, training, and grievance handling.

Specific functional teams also play defined roles in our modern slavery approach, including:

- People (HR) teams, who are responsible for recruitment practices, employment terms, worker engagement, and first-response grievance handling at each site.
- Technical and Ethical Trade teams, who conduct supplier due diligence, audit prioritisation, and corrective action management.
- Procurement teams, who are responsible for embedding our Responsible Sourcing Policy in supplier contracts and for engaging with suppliers on performance against it.
- Legal and Company Secretariat, who support compliance with modern slavery legislation across the jurisdictions in which we operate.

7. Find it — due diligence in practice

Finding modern slavery isthe hardest partof addressing it — and it is the area in which we invest the most effort. This section describes how we identify, assess and manage the risks of modern slavery across our direct operations, our supply chain and our downstream value chain.

7.1 Our risk assessment methodology

Ourrisk assessment isgrounded in theUN Guiding Principles criteria of scale, scope and irremediability, and is framed from the perspective of the worker or rights-holder rather than the business. We draw on both desk-based analysis and direct stakeholder engagement, and we seek to integrate data from on-site audits back into our risk assessment process so that findings translate into improved prioritisation in the following cycle.
We update our modern slavery risk assessment annually, with an interim review triggered whenever we materially change our sourcing footprint, enter a new country or commodity, or identify a significant issue through our audit, grievance or stakeholder engagement channels.

Inputs to our risk assessment

Our riskassessment integratesthe following inputs:

- Desk-based risk data, including the Walk Free Foundation Global Slavery Index, the US Department of Labor List of Goods Produced by Child Labor or Forced Labor, and sector guidance from the Ethical Trading Initiative, Stronger Together and Fairtrade.
- Supply chain data gathered through the SEDEX platform, including Self-Assessment Questionnaires and SMETA audit results for our direct suppliers.
- Engagement with multi-stakeholder initiatives of which we are an active member — including the Ethical Trading Initiative, the Food Network for Ethical Trade (FNET), the Floriculture Sustainability Initiative, the Kenya Flower Council, and the Centre for Child Rights and Business.
- Direct worker dialogue, including SMETA worker interviews, our welfare committees, Fairtrade Premium Committees, and — increasingly — the Ngaje worker voice platform, which we are deploying across our operations to gather confidential, multilingual worker feedback at scale.

- Community dialogue, including the community grievance mechanism we established in our Kenyan farming communities in 2024.

7.2 Risks in our direct operations — how we manage them

In our East African operations our approach is anchored in Fairtrade certification, which requires compliance with ILO Core Conventions, regular third-party audits by FLO-CERT, and the operation of democratically-governed Fairtrade Premium Committees. All our Kenyan and Ethiopian farms are Fairtrade certified, and have been for many years — since 2007 in Ethiopia, and since 1996 for Kenya Flower Council Gold Standard certification.

On top of this certification baseline, we operate:

- An on-site People (HR) function at each farm, with local grievance handling and welfare-committee support.
- Occupational health clinics staffed by 75 health professionals and 90 support staff in Ethiopia (which also serve the surrounding community).
- Quarterly mental health clinics in Kenya run by external professionals, alongside 11 Mental Health First Aiders across our UK sites.
- Welfare committees and employee representative committees in Europe and East Africa.
- Targeted programmes to address specific risks — notably the Inua Dada programme, delivered in partnership with Co-op Retail, which has supported over 2,300 female workers in our Naivasha operations with financial literacy, health interventions and leadership training.

In our UK and Netherlands onshore operations, where agency labour is used to cover peak demand, we:

- Conduct twice-yearly third-party audits of our UK labour providers, including worker interviews, using the Complyer audit tool, aligned to the British Retail Consortium standard.
- Contractually require labour providers to operate to the same standards as Flamingo, including our Responsible Sourcing Policy.
- Provide Stronger Together modern slavery training to our HR and Technical teams.

7.3 Risks in our supply chain — how we manage them

Our supplier due diligence is risk-based, audit-supported, and progressive in its expectations. We describe below the key mechanisms.

Supplier onboarding

All suppliers sign our Responsible Sourcing Policy as part of their contractual arrangements with the Group, which cascades expectations through their own supply chain. Suppliers are registered on the SEDEX platform and complete a Self-Assessment Questionnaire.

Risk prioritisation

We prioritise suppliers for deeper audit and engagement based on a combination of factors, including: country of operation (drawing on the Global Slavery Index and the US DOL List), commodity and sector risk profile, trading volume, relationship duration, and any site-specific indicators from previous engagement.

Supplier audits

During the financial year, over 63% of our flowers and plants supply partners and over 70% of our produce supply partners were subject to SMETA ethical audits. In higher-risk geographies and commodities, we supplement standard SMETA audits with additional due diligence — including unannounced visits, off-site worker interviews, and in specific cases targeted bespoke audits drawing on the specialist expertise of our Technical teams and external partners.

Our buying and technical teams also conduct regular supplier visits. These are not formal audits, but they are an important opportunity to assess on the ground how our supplier partners are implementing our standards, and to strengthen our direct relationships with them.

Supplier capacity building

Our Grower Empowerment Model (introduced during the year) is the framework through which we work with our supplier partners on agronomic knowledge, logistics, packaging, innovation and — increasingly — ethical

trade practices. We are currently extending the model to include explicit modules on modern slavery risk identification and management.

7.4 Risks in our downstream value chain — how we manage them

We engage with our retail customers on ethical trade in quarterly senior leadership meetings on quality and resilience of supply; through bi-annual crop planning conversations; through joint farm visits; and through various reporting channels on sustainability indicators including human rights practices. These engagements are a two-way exchange — we hear our customers' expectations, and we share our own due diligence findings.

7.5 Supply chain transparency

We recognise that modern slavery due diligence is only as strong as the visibility on which it rests. During the year we made meaningful progress in mapping our supply chain: we now disclose our supply partner numbers (75 flowers, 84 produce), our country-level sourcing footprint (22 countries), and the principal commodities we source from each. A country-level supplier summary is set out at Appendix B.

Beyond tier one, our visibility is less complete. For our own farming operations, we have good visibility of our agricultural input and packaging sub-suppliers, but for our third-party grower partners we rely primarily on their own supply chain due diligence. Improving our sub-tier-one visibility — particularly for packaging, agricultural inputs and freight.

7.6 Modern slavery training

All new Flamingo colleagues receive training on our Code of Conduct at onboarding, which includes the Group's position on modern slavery. In addition, members of our HR and Technical teams — who are responsible for the operational implementation of our modern slavery approach — receive specialist training through the Stronger Together programme. During the year, 120 employees in our Türkiye supplier programme also received tailored training on child labour prevention, occupational health and safety, grievance mechanisms and heat stress. In the year ahead, we will extend specialist modern slavery training to additional procurement, technical and senior leadership staff, building on the foundation established through our existing training programme.

7.7 Grievance and whistleblowing mechanisms

We believe that every worker in our value chain should be able to raise concerns about their working conditions, safely, confidentially, and without fear of retaliation. Our grievance and whistleblowing architecture is built around this commitment.

At site level, each of our operations maintains its own grievance channels, supported by on-site HR functions, employee representative committees, and — in Kenya — a dedicated community grievance mechanism established in 2024 for individuals or groups outside our direct employment who believe our operations have had an adverse impact on them.

Group-wide, our Whistleblowing Policy covers all areas of our operations and supply chains. Concerns can be raised through line management, trusted colleagues, HR, or — where preferred, or where the issue involves senior personnel — through a confidential reporting channel. Reporters may remain anonymous. All concerns are investigated by trained personnel, and retaliation against reporters is not tolerated. Reporters receive updates, and appropriate corrective action is taken. The process is reviewed regularly, with performance monitored via KPIs and user feedback.

For workers in our supplier supply chains, our Responsible Sourcing Policy requires suppliers to provide their own confidential, non-retaliatory channels for their employees to raise concerns — and further permits direct reporting to Flamingo where this is preferred. Our emerging Ngaje worker voice deployment will expand the practical accessibility of this channel across our operations over the next reporting cycle.

Whistleblowing reportsonmodernslaveryandlabourabuse

We are building the reporting discipline to enable us to publish aggregate whistleblowing report numbers relating to modern slavery and labour abuse in our next statement.

7.8 Where cases arise

We recognise that in a business operating at our scale, and in an industry where modern slavery and labour

abuse occur globally, we must be prepared to act when issues are identified — whether through our own audit programme, worker dialogue, grievance channels, or external notification.

Where we identify a suspected or actual case of labour abuse or modern slavery in our own operations or supply chain, we follow a structured response:

- Immediate welfare: our first priority is the safety and welfare of those affected. We act promptly to stabilise the situation and, where necessary, to remove individuals from harm.
- Investigation: we investigate the facts carefully and confidentially, drawing on internal and (where appropriate) external expertise.
- Remediation: where wrongdoing is confirmed, we work to remedy the impact — including, where appropriate, through restitution, compensation, support for affected workers, and systemic changes to prevent recurrence.
- Systemic change: we investigate root causes and amend our policies, procedures, training or supplier engagement as needed to reduce the likelihood of recurrence.
- Learning: we share lessons learned across the Group and, where relevant, with our industry peers through the collaborative bodies we are part of.

Our expectation — set out in our Responsible Sourcing Policy — is that our suppliers follow the same structured approach in their own operations, and that they implement effective remedy to victims where modern slavery issues arise.

In line with our commitment to continuous improvement, we intend that future statements will provide more explicit disclosure of cases of labour abuse identified through our due diligence, and of the remediation steps taken in response. Building the reporting discipline to enable this is a priority for the year ahead.

8. Fix it — remediation and systemic change

8.1 Our remediation framework

Our Code of Conduct commits the Group to the UN Guiding Principles duty to provide access to remedy. In practice, this commitment is operationalised through:

- Internal escalation — any suspected case of labour abuse or modern slavery is escalated without delay to the Chief Sustainability Officer, who convenes a response team drawn from HR, Technical / Ethical Trade, Legal and (where relevant) operational leadership.
- A response team with clear authority — the response team has the authority to commit resources, to engage external experts, and to make operational decisions (including pausing work, redeploying workers, and engaging law enforcement where appropriate).
- Multiple types of remedy — we consider the full range of remedies contemplated by the UN Guiding Principles, which may include restoration of wages, return of documents, provision of safe accommodation, medical and psychological support, assistance with legal processes, and — where appropriate and supported by the individuals affected — financial compensation.
- External partnership where specialist support is needed — we recognise that effective remediation often requires expertise that sits outside our business, and we work with NGOs, specialist advisers and local authorities where appropriate.
- Verification of outcomes — we verify the effectiveness of remedy through follow-up engagement with the individuals affected (where this is safe and welcomed by them) and through post-remediation monitoring.

8.2 Systemic changethrough industry collaboration

We recognise that the root causes of modern slavery are often systemic and cannot be addressed by a single company acting alone. The Group therefore engages actively with a number of industry and multi-stakeholder initiatives working on modern slavery prevention and remediation, including:

- The Ethical Trading Initiative (ETI) — we are an active participant in ETI's work on fresh produce and flowers, including the ETI Türkiye flowers programme in which we participated during the year, working alongside The Centre for Child Rights and Business, Ethica CSR, and flower retailers and suppliers sourcing from Türkiye. The programme trained over 120 employees on key issues including child labour

prevention and delivered 29 internal policy improvements, along with family-friendly farm-level action plans.
- The Food Network for Ethical Trade (FNET) — which we have recently joined and to which we contribute on systemic issues affecting the UK fresh produce supply chain.
- The Floriculture Sustainability Initiative (FSI) — a key multi-stakeholder initiative for the flower sector. 78.9% of our volumes meet FSI Sustainability targets for responsible production.
- Fairtrade International — all our East African farms are Fairtrade certified, and we are a leading grower of Fairtrade roses globally.
- The Kenya Flower Council — we hold Gold Standard certification under the KFC's Flowers and Ornamentals Sustainability Standard.
- The Kenya Collective Action Project — a WRAP-funded project in the Lake Naivasha Basin which has driven an 89% improvement in compliance with water abstraction regulations across 329 organisations; though water-focused, the project supports the wider resilience of our farming communities.

We also engage bilaterally with our major retail customers on shared ethical trade challenges, including through retailer-supplier forums and sector conferences. We aim — over the period covered by our next statement — to take a more explicit leadership role in one or two industry-wide initiatives on modern slavery prevention in the flower and fresh produce sectors.

9. Prevent it — preventing future harm

This section sets out the measures we take, beyond finding and remedying modern slavery where it occurs, to prevent it from occurring in the first place.

9.1 Modern slavery goals and KPIs

We set and report against a set of modern slavery goals and key performance indicators. These are designed to track our progress on the structural conditions that reduce modern slavery risk — including supplier audit coverage, training reach, grievance channel accessibility, and the delivery of our planned operational improvements.

Our current goals are:

- Goal 1: Maintain our 100% SMETA audit coverage across the Flamingo supply chain in High-risk areas and sectors as defined by SEDEX and FNET risk assessments.
- Goal 2: Extend our worker voice access program through the Ngaje platform across our supply chain key partners in 2026.
- Goal 3: Complete Human Rights Impact Assessments in our two high-risk geographies — KPI: HRIA completion in Kenya and Ethiopia. Target: complete both HRIAs by 2026.
- Goal 4: Extend specialist modern slavery training to all priority roles — KPI: % of staff in supervisory positions, operational management, procurement, HR, technical and senior leadership roles who have completed specialist modern slavery training within the past 24 months. Target: 100% by the end of 2026.

9.2 Corrective action and responsible exit

Where a supplier does not meet the standards set out in our Responsible Sourcing Policy, our corrective action framework requires the supplier to either demonstrate material progress or come into full compliance within a defined and reasonable time period. The escalation steps available to us include additional supplier engagement, formal corrective action plans with time-bound milestones, targeted retraining, increased audit frequency, and — where warranted — stop-work instructions.

In cases of serious, material or persistent non-compliance, we reserve the right to terminate the supplier relationship. Where we do so, we follow the UN Guiding Principles approach, which requires us to consider the impact of the termination on workers and to seek to minimise adverse consequences for them. In practice, this means that before terminating a supplier relationship we consider whether continued engagement and capacity-building could achieve a better outcome for workers, and — where termination is unavoidable — we seek to provide reasonable notice, to work with other supply chain partners where relevant, and to avoid abrupt withdrawals that could leave workers unpaid or stranded.

9.3 Recruitment and employment practices

Our employment practices are a principal line of defence against modern slavery risk in our direct operations. For our directly-employed workforce, we offer permanent employment contracts as our default, with fair wages that significantly exceed local minimum wages in our East African operations (in Kenya, our entry-level salary is 68% higher than the government minimum wage, and ahead of both the industry CBA and the Fairtrade certification standard). We are full-compliant with National Living Wage and sector-specific collective bargaining agreements in the UK, France, Germany and the Netherlands.

Our recruitment practices are designed to protect workers from the risks most associated with modern slavery:

- We do not charge workers recruitment fees of any kind, and we expect the same of any recruitment agencies or intermediaries with whom we engage. The cost of recruitment is borne by the employer, not by the worker.
- We do not retain workers' identity documents. Where document checks are required for right-to-workor immigration compliance purposes, we verify and return documents promptly.
- We provide employment terms in writing and in languages that workers understand, and we explain key terms at induction.
- For agency labour in the UK, we engage only with licensed labour providers and conduct twice-yearly third-party audits (including worker interviews) of our UK labour providers.
- For workers who have migrated internally to our East African farms, we provide enhanced support — access to healthcare, and engagement with our welfare committees and Fairtrade Premium Committees.

9.4 Responsible purchasing practices

We recognise that a company's own purchasing practices — including pricing, lead times, payment terms, forecast variability, and order cancellation — can have a material effect on the working conditions of workers in its supply chain. Where buyers apply inappropriate pressure, suppliers may respond by cutting wages, extending working hours, engaging undeclared contract labour, or taking other steps that increase modern slavery risk. As one of the larger purchasers of flowers and fresh produce in our markets, we consider this an area in which we have a specific responsibility.

Our Grower Empowerment Model, introduced during the year, is the foundation of our approach to responsible purchasing. Through the Model we work with our supplier partners on long-term relationships that provide the stability and visibility they need to invest in their workforce. Key elements include:

- Long-term contracts with our preferred growing partners, providing certainty of supply and a stable financial planning horizon.
- Sustained engagement on agronomic knowledge, logistics, packaging and innovation — supporting suppliers to improve efficiency and margins rather than extracting through price.
- Fairtrade pricing opportunities for our East African operations, under which producers receive a minimum price covering sustainable production costs, plus a Fairtrade Premium, which is democratically managed by worker-led Fairtrade Premium Committees to fund social, economic and environmental improvements.

We also recognise that an honest assessment of our own purchasing practices must go further than asserting partnership. Over the next reporting cycle we will conduct and publish a self-assessment of how our purchasing practices may affect the working conditions of workers in our supply chain. The self-assessment will examine the specific factors identified by the UK Home Office Transparency in Supply Chains guidance — including pricing, payment terms, lead times, forecast variability, and the handling of order changes — across each of our principal commodity types and sourcing geographies. We will engage with our major supplier partners in the design of this self-assessment, and will publish our findings and any resulting action plan in our next statement.

Linked to this, we are developing a Living Wage Road Map for our Kenyan operations that sets out how we measure and progressively move our entry-level workers toward a living wage, drawing on external benchmarks (including those developed by FNET and the Global Living Wage Coalition). We will extend this approach to Ethiopia in due course. A central principle of the Road Map is that living wages must be enabled by pricing that supports them — which is why the Road Map and our Purchasing Practices self-assessment are being developed together.

9.5 Engagement with workers and those with lived experience

Ourapproach to modernslavery is materially strengthenedby listening to workers and those with lived experience of labour abuse. We engage workers through our welfare committees, Fairtrade Premium Committees, the Ngaje worker voice platform (currently being expanded across our operations), SMETA worker interviews, and — for specific projects — structured focus groups. In the ETI Türkiye programme during the year, for example, we used focus group discussions with working parents to identify the barriers they faced in accessing childcare, healthcare and education, and the resulting family-friendly action plans were co-developed with these workers.

We recognise that engaging with individuals who have personally experienced modern slavery requires particular care. Engagement must be trauma-informed, confidential, and must never re-exploit. We are developing a partnership with an external NGO with expertise in this area, which will allow us to safely incorporate the insights of lived experience into our policy and programme design. We will report on this partnership in our next statement.

10. Continuous improvement

10.1 What we have improved this year

We describebelow how our modern slavery approach has evolved over the year.

- We formalised our sustainability governance, with the appointment of a Chief Sustainability Officer, the establishment of a Board-level Sustainability Committee chaired by a Non-Executive Director, and the embedding of Sustainable Business Leads within each line of business.
- We published our first Group-wide Sustainability Report, which for the first time aggregates and discloses our human rights, climate and community data across all subsidiaries.
- We reviewed and began the update of our Corporate Code of Conduct, with roll-out to suppliers and stakeholders planned during the year ahead.
- We established a formal community grievance mechanism in our Kenyan farming communities.
- We began the deployment of the Ngaje worker voice platform, which will significantly extend our direct-to-worker listening capability.
- We participated in the ETI Türkiye flowers programme, delivering tailored training to over 120 workers and 29 internal policy improvements at three flower farms in Antalya.
- We scoped Human Rights Impact Assessments for our Kenyan and Ethiopian operations.
- We commenced development of our Living Wage Road Map for our Kenyan workforce.

10.2 What we will focus on in the year ahead

Our priorities for the next reporting cycle are:

- Publish a stand-alone Group Human Rights Policy
- Complete our first Human Rights Impact Assessment in Kenya, and begin the Ethiopian HRIA.
- Complete and publish our Purchasing Practices self-assessment and the associated action plan.
- Publish our Living Wage Road Map and first annual performance update.
- Roll out our updated Code of Conduct and Responsible Sourcing Policy, including supplier engagement and training.
- Extend Ngaje worker voice coverage across our direct operations, and report on reach and workers-raised issues.
- Extend specialist modern slavery training to all procurement, HR, technical and senior leadership staff.
- Build the reporting discipline to enable disclosure, in our next statement, of aggregate whistleblowing reports received relating to modern slavery and labour abuse, and of aggregate labour abuse non-conformances identified through our audit programme.
- Establish an NGO partnership on lived experience engagement.
- Upload this statement to the UK Government Modern Slavery Statement Registry — and maintain this practice annually going forward.

10.3 Monitoring, evaluation and learning

Ourmodern slavery approach is reviewedannually by the Board's Sustainability Committee, which receives a formal update from the Chief Sustainability Officer including progress against our goals and KPIs, material incidents and their resolution, and any material changes to risk assessment. The Committee's review informs the following year's priorities and any updates to policies or processes.

At the operational level, Sustainable Business Leads in each line of business conduct regular reviews of modern slavery risk and performance in their area, with findings fed back into the Group-level review cycle.

We are committed to reporting openly on what we are learning — including where progress has been slower than planned, or where findings from due diligence have required us to change our approach. In the year ahead we will build additional monitoring and evaluation capability, including the reporting discipline to support more quantitative disclosure in our next statement.

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Appendix A — Subsidiaries in scope of the UK Modern Slavery Act 2015

This statement is made on behalf of Flamingo Group International Limited and the following subsidiaries within the scope of Section 54 of the UK Modern Slavery Act 2015:

Flamingo Produce Ltd. Registered Address: Flamingo House, Cockerill Close, Stevenage, Hertfordshire, SG1 2NB. Principal activity: Distribution of vegetable products

Flamingo Flowers Ltd. Registered address: Flamingo House, Cockerill Close, Stevenage, Hertfordshire, SG1 2NB. Principal activity: Flower and plant distributor.
Appendix B — Country-level supplier summary

Our principal sourcing countries for the financial year were as follows. We intend to extend this disclosure, in future statements, to include an approximate share of procurement spend and the principal products sourced from each country.

Commodity	Principal sourcing countries	Number of supply partners
Flowers and plants	Kenya, Ethiopia, Netherlands, Colombia, United Kingdom	75 supply partners across 5 countries (plus own farms)
Fresh produce	Kenya, Peru, Mexico, Morocco, Spain, Guatemala and others	84 supply partners across 20 countries (plus own farms and smallholder farmers in Kenya)

In the year ahead we will extend this summary to include a country-level breakdown of our tier-one supply partners with associated commodity information, in line with the transparency expected by the UK Home Office’s Transparency in Supply Chains guidance.