Annual Anti-Slavery and Human Trafficking Statement - 2023

Pursuant to the Modern Slavery Act 2015

Overview

This is our sixth annual statement to outline the steps we are taking as an organisation to ensure that slavery and human trafficking is not taking place in our business or the supply chains which serve it. This statement explains what we did in our financial year (FY) ending 31 July 2023 and gives details of our planned actions for our current financial year ending 31 July 2024.

We are a family business and care very genuinely for the welfare of our colleagues, customers and all those who work in our supply chain providing goods or services.

At the heart of our commitment is our membership of Sedex, in conjunction with the buying group we belong to, The Tillington Group. FY 23 has been our third full year of membership of Sedex and further details of how we are using this resource are outlined below. Back in FY20 we redrafted our supplier documents and those of the Tillington Group to make sure that suppliers are aware of our supplier code of conduct. Progress in signing up suppliers to our new documents is explained below.

Our Business

Our company is registered in the UK and our business comprises 16 garden centres with café bars. We also own Barnsfold Nurseries Limited, a grower of bedding plants and perennials. All our premises are located in the South East of England. We are therefore governed and regulated by UK law. We do not employ anyone working outside the UK. We take pride in complying with both the letter and the spirit of UK employment law and best practice and seek to encourage healthy working relationships and a culture of openness throughout our business. This approach is backed up by relevant policies, including our whistle-blowing policy.

Our Modern Slavery Policy

Our policy is a zero-tolerance approach to Modern Slavery. It is vital that all our business relationships are conducted ethically, with integrity and transparency. We are committed to implementing and enforcing effective systems and controls to ensure that Modern Slavery and Human Trafficking are not taking place anywhere within our business or its supply chains.

What actions have we taken since our last statement and what actions are we taking?

1. Our own employment practices

We apply robust recruitment processes and we have up to date policies and procedures in place for all our colleagues which we are committed to promoting and implementing in a fair manner throughout our business. We check that all those we employ have the correct documentation to demonstrate they are legally entitled to work in the UK. All our staff are paid above the minimum wage and have reached school leaving age. Other than when absolutely necessary, for short term sickness or vacancy cover, we do not use agency workers in our garden centres or café bars. In peak season minimal agency assistance may be required at Barnsfold Nurseries. Whenever we need agency staff, we employ reputable UK employment agencies.

2. Tool Kits and Training

In 2018 we registered with Stronger2gether, a collaborative organisation comprising many well- known retailers, other brand leaders and charities which provides guidance, training and other tools on Modern Slavery and Human Trafficking. The senior head office team including the Chairman, Managing Director, Finance Director, Purchasing Director and the Heads of HR, Marketing, Operations and Catering undertook a full day training course given by a Stronger2gether tutor in 2019. This training was cascaded down to our garden centre managers. We are currently in the process of carrying out refresher training for those who have already undergone initial training and training any garden centre managers, café bar managers and key Barnsfold colleagues who have not received the previous training, perhaps because they are newer to the business or have been recently promoted. These e learning modules are provided by British Assessment. During the course of our current financial year this training will be extended to assistant garden centre managers and assistant café bar managers.

3. Our Supply Chain

Our supply chain is complex because of the range of plants and other goods we offer for sale to our customers and the range of food we serve in our cafe bars. 85% of the plants we sell come from UK nurseries. Most of our other products are purchased from UK suppliers with some from EU and EEA suppliers. A very small minority is purchased from non- UK/EU/EEA sources. Whilst we have clear visibility of our direct suppliers it becomes more complex further down our supply chain.

We are members of a buying group, called the Tillington Group, which comprises like-minded family-owned garden centre businesses who co-operate in some buying and marketing activities. Modern Slavery has been discussed as a group by the senior principals of those businesses and their HR professionals. All members are aligned in wanting to do our best to eliminate modern slavery in our supply chains. In addition, awareness is being raised in the negotiator training sessions which are being rolled out during 2023 and 2024.

In order to assist us in taking steps to identify possible issues in our supply chain Tillington has joined Sedex. FY 22 has been our second full year of membership of Sedex. Sedex is a global membership organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains. It assists buyers and suppliers to share and exchange data, helping to manage social and environmental risks better within their supply chain, and positively impact responsible sourcing. Sedex provides a range of tools, services, guidance and training to help companies map and manage risks in their supply chain, with over 50,000 members in 155 countries, across 35 industry sectors, including food, agriculture, financial services, clothing, packaging and chemicals.

In our Financial year 2023 we checked which of our retail suppliers from whom we purchase more than £250,000 of goods at cost are registered with Sedex. 21 out of 36 suppliers from whom we purchase over £250,000 of goods are registered and we are expecting the rest to do so.

Our supplier code of conduct has been approved by the Board. The Tillington Group has also adopted a corresponding code of conduct. Our supplier documents and those of the Tillington Group draw the attention of suppliers to the code and ensure that it is accepted. We expect our suppliers of goods or services to accept our code of conduct or be able to demonstrate equally robust policies and procedures in their own business. We are currently working on how we adopt similar procedures for Barnsfold Nurseries.

During FY 2021 in excess of 100 suppliers signed up to our new supplier documents. In FY 2022 a further 75 signed up. In 2023 another 60 signed up. This figure comprises new suppliers and existing suppliers with whom we are renewing our supply agreements. We have actively prioritised new suppliers, suppliers who are significant in terms of value and those who might be considered higher risk. In the case of the small number of lines we are direct sourcing from the Far East every supplier has signed up to our new supplier documents. In addition, all our suppliers of Christmas decorations for 2023 have signed our new documents.

Over the next year we shall be re-focusing on our nursery suppliers and logistics partner as well as continuing to work down the list of suppliers by value and risk profile explained above. All our nursery suppliers have been sent our new documents and to date 15 out of 38 have signed, up from 8 out of 35 last year. No supplier to whom we have sent our new documents containing our supplier code of conduct has refused to accept them.

If we find instances of non -compliance and/or non- cooperation we will consider what remedial action to take on a case by case basis. This may mean we decide not to take on a new supplier or to cease to trade with an existing supplier. One supplier was de-listed as a result and remains de listed. We will also monitor suppliers failing to cooperate or considered high risk. Where suppliers are manufacturing in countries where modern slavery is a known to be prevalent, we will seek further assurance and evidence of compliance from those

suppliers and/or through the Sedex scheme as applicable. Such suppliers will be considered high risk until satisfactory evidence of compliance is received.

We shall continue to measure our progress and effectiveness going forward and continue to raise awareness of the risks amongst relevant members of our team, our suppliers and our buying group.

Approved by the Board of Directors on 14" December 2023

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Martin Breddy, Managing Director