

Annual Anti-Slavery and Human Trafficking Statement – 2024

Pursuant to the Modern Slavery Act 2015

Overview

This is our seventh 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 2024 and gives details of our planned actions for our current financial year ending 31 July 2025.

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 24 has been our fourth 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. These are regularly reviewed and updated. 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. The directors of Barnsfold signed its first anti modern slavery statement on 12 January 2024 and this will be reviewed early in the New Year. 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.

In the course of 2024 we took the cleaning of our premises in house and the team who had been working for the cleaning company we had used were transferred to our employment under TUPE. This gives us total transparency in the employment relationship.

We also audited our payroll to check if there were any cases where the pay of more than one employee was going into the same account. We found only one case and it concerns a married couple with a joint bank account.

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 continue to carry out refresher training for those who have already undergone initial training and to train 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 Stronger2gether

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. The Chairman of Squire's includes anti modern slavery as part of her presentation to members attending negotiator training sessions and management training sessions which are now in their second year.

In order to assist us in taking steps to identify possible issues in our supply chain Tillington has joined 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. We continue to look at how the Tillington Group can use the information available through Sedex more effectively

In our Financial year 2024 we checked which of our retail suppliers from whom we purchase more than £250,000 of goods at cost are registered with Sedex. 12 out of 26 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.

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. In 2024, a further 46 suppliers have signed up to our new supplier documents. 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 2024 have signed our new documents.

Over the next year we shall be continue to focus on our nursery suppliers and logistics partner as well as working 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 22 out of 35 have signed, up from 15 out of 38 last year, and 8 from 35 in 2022. 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 27 November 2024

A handwritten signature in black ink, appearing to read 'S. Squire', with a horizontal line extending from the end.

Sarah C E Squire

Director