

OUR 2026 MODERN SLAVERY STATEMENT

Introduction

At Bloom & Wild Group, our mission is to be the destination for making life a little more thoughtful and beautiful. This thoughtfulness extends to how we do business and the great care we take at every stage of our supply chain.

We know that modern slavery and human trafficking are serious issues that persist globally, including in the UK. We are committed to ensuring everyone involved in our business and supply chain is treated with fairness and respect.

This statement explains the ongoing steps we take to identify and prevent modern slavery and human trafficking in our operations. It details our approach, covering our business structure and supply chains, our guiding policies, our processes for assessing risk, the due diligence we carry out, the training we provide, and how we measure our effectiveness.

This statement relates to actions and activities during the financial year 1 April 2025 to 31 March 2026. It is made by Bloom and Wild Limited and describes the operations of the wider Bloom & Wild Group.

We will publish this statement with a clear link from our homepage and upload it to the UK Modern Slavery Statement Registry.

About Bloom & Wild Group

Our Business and Structure

We're a UK-based, online flower delivery company. Founded in 2013, we created the first bouquet that could be posted through the letterbox. Today, we offer a wide range of hand-tied flowers, plants, and thoughtful gifts.

Bloom and Wild Group's head office is in London, with offices in Amsterdam and Paris, and warehouses in Nuneaton (UK), Amstelveen (NL), and Clichy (FR). Most of our team are directly employed, and we also partner with reputable agencies to hire seasonal workers during our busiest periods.

Our supply chains

Our supply chain is made up of a wide network of trusted partners who help us deliver our thoughtful gifts. This network has three main parts.

It begins with our **product suppliers**, including the talented growers who cultivate our flowers and plants in Europe and Africa, particularly in the Netherlands and Kenya. We also source other gifts, like chocolates and vases, from carefully vetted primary partners. Sourcing from both continents allows us to follow the natural growing seasons, helping us ensure consistent quality while reducing our environmental impact by avoiding the need for energy-intensive heated greenhouses in winter. For more on this, see our sustainability reports.

Next are our **service partners**, such as the logistics companies that deliver orders to our customers' doors and the contractors who provide essential services like cleaning in our warehouses.

Finally, our **people supply chain** involves partnering with reputable, licensed agencies in all of our operations to hire temporary workers who support our teams during busy peak seasons.

Our policies

We continually review and update our policies. We have policies in place that are intended to provide clear guidelines and rules on how we tackle modern slavery. These policies are aimed internally for our employees as well as towards our suppliers. Oversight sits with the Governance, Risk & Compliance committee. Day-to-day ownership rests with Sustainability and Legal.

Please find below our policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

For our suppliers:

- **Supplier code of conduct:** This code sets out our expectations for our suppliers on human rights and ethical practices. It includes clear standards on fair pay, decent working hours, occupational health and safety, and the prohibition of child labour and forced labour. We require all suppliers to either sign our code or show us that their own code meets the same high standards.
- **Responsible sourcing policy:** We expect our suppliers and their subcontractors to meet our standards on human rights and labour. For our floriculture suppliers, we look for certification from the FSI basket of standards where applicable. We assess alignment through self-declarations and desk reviews, and may require audits where non-compliance is suspected. Suppliers must provide safe, confidential and non-retaliatory channels for workers and stakeholders to raise concerns; Bloom & Wild also offers a confidential route at ethics@bloomandwild.com. Where adverse impacts are identified, suppliers are expected to take prompt corrective action and cooperate with us on fair, timely remediation.

For our employees:

Employee code of ethics: Our code makes clear to employees the actions and behaviour expected of them when representing the organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing our supply chain.

Agency workers policy: We use licensed, reputable agencies only and verify compliance before engagement and periodically thereafter. In line with responsible-recruitment expectations, we screen labour providers, prohibit workers paying recruitment fees, monitor recruitment processes, and require corrective action if issues are found.

Equal opportunities policy: Our equal opportunities policy sets out the duties of the Company and all its staff and representatives concerning Diversity, Inclusion and Equal Opportunities. It covers how we ensure equal opportunities, and eliminate discrimination, in our terms of employment and our recruitment and selection processes. It provides information on what would be considered discrimination, how employees can escalate this and how the business will respond.

For everyone:

Speak Up (Whistleblowing) Policy: We encourage everyone - employees, customers, and other business partners - to report any concerns related to our business or supply chains, including anything that might increase the risk of modern slavery. Our confidential procedure is designed to make it easy to make disclosures without fear of retaliation.

Human Rights & Grievance Policy: Reviewed and approved by the Bloom & Wild Group Board of Directors, this policy aligns our operations with the UN Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. It applies to all individuals and communities affected by our own operations and our value chain, and anyone can raise a grievance at grievance@bloomandwild.com. We confirm receipt within 48 hours, decide within 7 days whether the issue is a human rights grievance, and aim to investigate and facilitate a resolution within 30 days. Raisers can remain anonymous, we have zero tolerance for retaliation, and no one involved in a grievance takes part in deciding it.

Assessing and managing risk

As a part of our due diligence process, we formulate an annual sustainability strategy informed by stakeholder consultations and external expertise. This strategy reviews what parts of our operational model, supply chains, and partners are most at risk of modern slavery violations.

We have undertaken an assessment whereby we have considered the following factors:

- Risk of the activity
- Materiality of this activity / size of our business
- Scope of control

In other words: we look to prioritise the highest risk areas, with our biggest business volumes or number of people involved, particularly in areas where we have a direct business relationship.

Areas of highest risk

Overseas flower growers

Some of our flowers are grown overseas, including in economically developing countries. While sourcing from these regions brings benefits such as increased employment and financial investment, we are aware that they can also present a higher risk of human trafficking and labour exploitation. Specific risks known to exist within the sector include workers being charged recruitment fees and issues related to excessive overtime. This combination of factors makes overseas growers a key area of focus for our risk management and due diligence efforts.

Production

We partner with labour agencies to support the fluctuating needs of our production facilities. We recognise that the warehousing sector has grown rapidly, and the high demand for workers during intense seasonal peaks can increase the risk of labour exploitation.

Multi-category: cacao supply chains

Among our newer and growing product categories, the chocolate sector is the highest-risk sector and also one of our biggest categories, making it the most material.

Overseas manufacturers

Some of our hardware such as plant pots or vases is manufactured overseas, which can limit visibility over recruitment and employment practices.

Our Due Diligence Processes

We apply targeted due diligence to address the risks identified above. Our core measures include policies, supplier onboarding controls, certifications/audits where relevant, engagement with workers and suppliers, and grievance and remediation processes. We also maintain ongoing monitoring and escalation routes. Based on this assessment, we prioritise the following due-diligence actions:

Overseas flower growers

We stay informed using frameworks and guidance from expert organisations such as SEDEX, LaborShield, from the Bureau of International Labor Affairs (ILAB), Fairtrade Risk Map, and the Floriculture Sustainability Initiative (FSI) guidance. We require our flower growers in higher-risk countries to hold credible social certifications as designated by the FSI, and we monitor this monthly to track activities and certification status or progress.

We are proud to work closely with our key Kenyan grower partners, who prioritise worker wellbeing, for example by supporting gender equality through equality committees, offering ethical awareness training, subsidised food and canteen facilities, and health awareness programmes.

Various members of our senior leadership team, including our CEO and COO, have also visited our main growers overseas. We maintain constant dialogue with the senior leadership of these growers to understand their recruitment and employment practices and how they are mitigating any associated risks.

Production

We only work with specified, reputable agencies and verify new agencies before placement. Agency suppliers and freelancers must have practices to mitigate modern slavery risk aligned with country-specific requirements, including appropriate policies, relevant certifications or equivalent oversight (**GLAA** in the UK; **SNA** in the

Netherlands; **DREETS** oversight and **URSSAF** obligations in France), and effective response plans. To build awareness, we train relevant workers—including agency workers—to identify signs of modern slavery and to report concerns via designated channels. We audit our agency partners every year, shortly after our peak trading periods. As part of each audit we check right-to-work records, compare a random sample of payslips against the payments we authorised, and review worker handbooks. In 2025 we audited all four of our key UK labour and cleaning agencies, and all four passed. Where we found an issue, such as an expired right-to-work share code for one cleaning contractor's employee, it was resolved the same day and the agency changed its process. In Amstelveen we audited two of our three labour agencies in early 2026 and the third in May 2026, and all three passed. At one agency we found room for improvement: it has a whistleblowing line and a named person responsible for human rights, but no formal modern slavery policy, no checks for shared addresses and phone numbers, and no modern slavery training for its managers. We have shared these points with the agency and will check progress at the next audit. Our agencies provide modern slavery training to their own workers, and we ask them to show evidence of this during our audits.

Multi-category: cacao supply chains

As we expand into other categories, we apply additional and tailored due diligence there. As a high priority sector, the due diligence we conduct for our chocolate suppliers involves an assessment of the supplier and their supply chain to identify and mitigate risks. We ask our chocolate suppliers to conduct risk assessments of their own suppliers, particularly those in high-risk countries. This includes reviewing supplier policies, conducting on-site audits, and engaging with third-party organizations that specialize in ethical labor practices.

We prioritize suppliers with commitments to ethical sourcing: This focuses on ensuring that the raw materials, especially cocoa, are sourced responsibly. Many companies partner with certified organizations like Fairtrade, Rainforest Alliance, or Tony's Open Chain, which have strict standards for labor practices, including a prohibition on forced and child labor. These certifications often involve regular audits and provide farmers with a premium for their cocoa, which helps to improve their livelihoods and reduce the economic pressures that can lead to exploitative labor.

In 2026 we launched a formal tender for our own-label chocolate. We score prospective suppliers on a weighted sustainability scorecard, which gives particular weight to child labour monitoring and remediation systems, forced labour and payment of a living income, full physical traceability of cocoa, and deforestation risk. We have since selected our own-label partners based on this score and on verified credentials such as Fairtrade, Tony's Open Chain or a ranking on the Chocolate Scorecard.

General due diligence with key suppliers

All of our suppliers are asked to sign and comply with our Supplier Code of Conduct. This requirement has become the norm across our supply base, and nearly all of our major partners have signed. New suppliers cannot be onboarded without this commitment.

All multi-category suppliers and logistics providers complete our due diligence questionnaire, which goes beyond simple yes/no answers. Suppliers are asked to upload policies, disclose detailed information about their workforce (such as numbers, nationalities, and contract types), confirm whether workers pay recruitment fees, and provide evidence of audits or certifications. We check these responses carefully and follow up where answers are incomplete or raise concerns.

Remediation and grievance mechanisms

We want anyone connected to our business or supply chain to be able to raise concerns and seek remedy if something is wrong. We provide multiple grievance channels, including our speak-up hotline and email address (speakup@bloomandwild.com) and our human rights grievance channel (grievance@bloomandwild.com), which are open not only to our employees but also to agency workers, suppliers, customers and other third parties. These channels are designed to allow anonymous reporting and to protect individuals from retaliation.

Each year our Legal Director and Sustainability Director review all grievances received and our CEO reports on them to the Group Board in an [Annual Review](#), a report of which we publish on our website.

To build awareness, we include information about modern slavery risks and reporting routes in our training for warehouse managers, team leaders and agency workers. We also use posters in warehouses to remind workers of how to report concerns.

At present, we do not yet have a formal survivor-centred remediation protocol in place. We recognise that terminating contracts alone is not enough, and that remedy must focus on restoring outcomes for affected workers. In line with the latest Home Office and Stronger Together guidance, we are developing a step-by-step remediation protocol to ensure that if forced labour or exploitation is identified, workers can access meaningful remedy. Our Human Rights & Grievance Policy already commits us, where we have caused, contributed to or are linked to a negative impact, to provide for or cooperate in fair remediation through legitimate processes.

Supply Chain Requirements

We continually assess the risk of human trafficking and slavery within our supply chain and will not enter into business with any suppliers who are knowingly involved in such activities. This commitment is communicated to all employees, partners, suppliers and contractors. We also aim to cascade our ethical standards throughout our supply chains.

Our pre-qualification questionnaire for suppliers helps us understand their employment and recruitment practices - and their own risk assessment methodologies - as well as making sure we understand the full supply chain from end to end. We continue to risk assess each of our partners on an ongoing basis or when the respective risk profile changes.

At a minimum, we require our suppliers to adopt the following principles:

- Employment must be freely chosen
- Child labour must not be used
- Staff must be paid legal minimum wages
- Working conditions must be safe and hygienic
- The Employer Pays Principle (no worker should pay for a job)

All new multicat and add-on supplier contracts concluded in FY25/26 include these principles. We periodically review, renew, and update our contracts with existing suppliers too. We reserve the right to audit and review the controls of our suppliers (including unannounced visits) and to work with them to address and resolve any issues we find, including cooperating on timely, fair remediation where harm is identified (See Remediation section).

We work to have as much dialogue and interaction about these issues with the senior leadership teams of our suppliers and also their employees, which helps us better understand and identify any risk ourselves.

Lastly, until December 2025 our Modern Slavery Steering Committee, chaired by our Chief Operating Officer, met every quarter with the teams involved to review how we manage modern slavery risks. It met three times in FY25/26. From 2026 we have folded this work into our existing governance: people and agency worker topics are covered by our Occupational Health & Safety steering committee, supply chain topics by our monthly sustainability meeting, and group-wide legal requirements such as this statement by our Governance, Risk & Compliance committee. Human rights risks are reported to the Executive Committee, typically every quarter, with urgent findings escalated straight away. The overall oversight takes place within the Governance, Risk & Compliance committee.

Training

We adhere to all relevant employment legislation when it comes to hiring, onboarding and training our employees. On top of this, we always work to support the mental and physical wellbeing - and professional development - of our team.

We've developed an Equal Opportunities & Diversity policy which guides our People Team (and all employees) on the avoidance of discrimination at work. We also give mandatory training on diversity and inclusion, which covers conscious inclusion, race and ethnicity and LGBTQ+ topics. We also have policies in place to protect employees at Bloom & Wild Group throughout their employment. And all employees have access to our policies online, which include a code of ethics, anti-harassment

and bullying, anti-bribery and corruption and speak up whistleblowing policies. All employees experience a rigorous induction process which covers all of these points and ensures they have a clear understanding of what's expected of them when representing the company from the very beginning of their employment.

We have implemented a robust training program specifically tailored for the front-line workforce, recognising their crucial role and heightened exposure to potential risks. Our training encompasses key aspects such as awareness, identification, and prevention of modern slavery, and equipping employees with the knowledge to respond effectively to suspicious activities. Moreover, we emphasise the importance of taking immediate action if slavery or human trafficking is suspected. Employees are trained on the initial steps to be taken, including reporting concerns through designated channels and not attempting to intervene directly where there might be a risk to safety. Furthermore, our training addresses the escalation process for potential slavery or human trafficking issues, detailing how employees can promptly and securely escalate concerns to the relevant parties within the organisation.

Members of the People Team as well as our most senior managers based in our warehouse locations and those responsible for some of our larger supplier relationships, have all undergone specialised training in collaboration with Stronger Together, ensuring they possess the knowledge and skills necessary to lead by example and foster a culture of vigilance within their teams. In FY25/26 we also added modern slavery training to HowFEM, the multi-language training platform we use for warehouse staff, so that everyone can take it in their own language and we keep a record of who has completed it. In Amstelveen, 22 colleagues completed it in FY25/26. Since the end of the reporting period, 45 colleagues at our Nuneaton warehouse have also completed a modern slavery refresher session. In October 2025 we ran a two-day in-company training programme on international responsible business conduct, led by an external specialist and supported by the Netherlands Enterprise Agency (RVO). 26 colleagues from 7 functions took part. It covered the full due diligence cycle, from mapping our value chain to remedy, using real scenarios from our own supply chains. Through targeted training sessions, visual posters around the warehouses, and continuous education, our workforce is equipped with the tools to identify and report potential instances of modern slavery.

Collectively we are committed to building a resilient front-line that actively safeguards against modern slavery risks.

Measuring effectiveness

We track a small set of indicators to check whether our approach is working. We plan to report on the same indicators each year, so that progress is visible from one statement to the next.

- 86.46% of our flowers came from fully FSI-certified growers in calendar year 2025.
- Over 95% of the flowers we source from Kenya came from Fairtrade-certified farms.
- 100% of new multicat and add-on supplier contracts concluded in FY25/26 include our minimum principles on forced labour, child labour, wages, working conditions and recruitment fees.
- 22 colleagues in Amstelveen completed our modern slavery training on HowFEM.
- 26 colleagues from 7 functions completed our two-day due diligence training.
- All seven of our key labour and cleaning agencies in the UK and the Netherlands were audited, six during FY25/26 and one shortly after, and all seven passed.

Our priorities for the coming year are:

- Finalise our remediation protocol.
- Add modern slavery to the induction at our Nuneaton warehouse and repeat the refresher session there every year.
- Follow up with the agency where we found room for improvement, and check its progress at the next audit.
- Build out more guidance and more detailed selection criteria for new suppliers in new product categories.

Reporting Concerns

If you have a concern, report these to us without delay. You can find our speak up channels in our Whistleblower Policy. It's always best to voice any concerns before they turn into anything more serious, or even a violation. These speak up channels are open to our employees, agency workers, suppliers, customers and anyone else to use. If you need advice or are unsure about whether to report something, please connect with speakup@bloomandwild.com. We will regularly review and evaluate the effectiveness of our measures to ensure compliance with the Modern Slavery Act.

This statement was approved by the Board of Directors of Bloom and Wild Limited on October 12 and signed by Aron Gelbard, director and CEO.

Aron Gelbard