


# Smiths Group Plc (John Crane)



## Supplier visit (Modern Slavery and Human Rights)

## Jenny Flowers International (United Arab Emirates)

(April 2023)



Distributed to:

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## I. Company information

Jenny Flowers International <sup>(1)</sup> was established in Dubai, UAE in 1988 by the current Owner/Managing Director. The company is specialised in floral design, landscape gardening and plant maintenance both in-doors and out-doors. It also operates an online flower and gifts delivery service with the ability to deliver internationally, primarily to India and the UAE. The company has a branch presence in India.

At present, Jenny Flowers International employs c.140 people, of which c.110 are blue collar workers. Staff in the UAE is located in the Dubai, Sharjah and Abu Dhabi emirates. Approximately 10 staff are female.

Labourers are primarily sourced from India (c.80%), Pakistan, Bangladesh and a few African countries. Recruitment is done in-house from India without the assistance of recruitment agencies. Training at onboarding also takes place in India. Once trained, the necessary paperwork is completed to allow the new recruits to relocate to and work in the UAE.

Jenny Flowers International houses some of its male staff in a labour camp in the Sharjah emirate, whilst families and female workers receive a housing allowance of minimum AED500/month which they can put towards private accommodation.

The company has a broad variety of customers ranging from large government entities to banks and well reputed companies, as well as private individuals (online business). The owner is known for its charitable donations and charitable work for children with special needs and giving back to the community.

For the purpose of our review, we have compared the company's employment practices to the UAE's Federal Decree-Law No. (33) of 2021 Regarding the Regulation of Employment Relationships (including its amendments effective as of 1<sup>st</sup> February 2022) as well as the Ministerial Resolution No.44 of 2022 Regarding Occupational Health & Safety and Labour Accommodation.

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1 In section III. Detailed Observations and Recommendations, we refer to Jenny Flowers International as "JFI".

## II. Summary of Key Observations and Recommendations

Based on the information provided to us during and after our meeting with JFI, as well as our visit to its labour camp, there are no apparent factual acts of modern slavery, child labour, or violations against human rights. The company has clear and formal policies in place around child labour, a grievance / non-retaliation policy and policies around non-discrimination.

To conclude on our findings, we used the following colour codes:

Green	Pass
Yellow	Best practice – for consideration
Amber	Warning – urgent remediation required (completion within 6 months)
Red	Fail – immediate remediation required (completion within 1 month)

We report a few areas for improvement, which reflect best practice but no observations are coded amber or red. Management at Jenny Flowers International have formally agreed to the observations and recommendations.

### III. Detailed Observations and Recommendations

Topic	Observation	Recommendation	Priority level
<b>A. Ethics governance</b>			
Existence of a Code of Ethical Business Conduct	JFI has a Code of Conduct in place, issued in 2019 and endorsed by the owner of the company.	None.	Pass
The Code of Conduct is publicly available	JFI has not publicly published its Code of Ethics. The document would need some rework first, making it less of an internal document.	Publishing a Code of Ethics on the company's website would increase the credibility of the company's commitment to its Code. <b>JFI response:</b> we will add the code of conduct in our web site. Asked our service provider to do the needful urgently	Best practice
Awareness of the Smiths Code of Business Ethics, and Supplier Code of Conduct	During our meeting with local management, we noted that they were not aware of the Smiths Code of Business Ethics, nor the Smiths Supplier Code of Conduct.	JFI will familiarise itself with both Smiths Codes. These can be found on the Smiths Group website. <a href="https://www.smiths.com/anti-modern-slavery-and-transparency-statements">https://www.smiths.com/anti-modern-slavery-and-transparency-statements</a> <b>JFI response:</b> we have arranged a training programme to our workers in June 2023. Asked our Landscape Manager to add this point also in the training.	Best Practice
Employee Handbook	We were provided with a variety of written policies, including a grievance policy, H&S policy, a policy on the payment of wages (including leave), a medical leave policy, and other policies covering non-discrimination and more.  JFI has no employee handbook as such however the company has an "open door" policy where people can ask questions, including to the owner/Managing Director. The Human Resources Manager visits the labour camp monthly and in his absence, staff can talk to the camp boss or their supervisor.	None.	Pass

Topic	Observation	Recommendation	Priority level
Other Internal policies and procedures around employment, anti-modern slavery, health & safety, and anti-bribery & anti-corruption	<p>“Human Rights policy” (issued 01/2020): this is a fairly comprehensive policy focusing on non-discrimination and anti-harassment; it mentions that it does not only apply to the internal work space, but also business partners, such as off-site client meetings, business travel, social events and to electronic communication.</p> <p>“Policy on the prevention of child labour” (issued 12/2016): in this policy JFI commits to not employing staff younger than 15 years old (the legal minimum age in the UAE) and a policy around young workers (up to the age of 18). The policy states that it applies to both JFI staff and its subcontractors/suppliers.</p> <p>“Policy on Pregnancy Test” (not dated): this policy commits to not requiring females to take a pregnancy test and being discriminated on that basis.</p>	None.	Pass
Whistle-blowing process	<p>JFI has a “Grievance Redressal Policy”, which describes the process of raising a concern and the assurance of investigation and non-retaliation.</p> <p>JFI’s Human Rights Policy, also, encourages employees to speak up and raise their concerns.</p>	None.	Pass

Topic	Observation	Recommendation	Priority level
<b>B. Employment practices</b>			
Employment contract	An offer letter containing the terms of employment is signed by both parties, followed by the labour contract approved by the MoHRE (Ministry of Human Resources and Emiratisation). Only the MoHRE approved contract is legally valid and legally binding.	None.	Pass
Probation period	The probation period is a standard six months. This is the maximum period foreseen by the UAE labour law. The length of the probation period is the same for both white and blue collar staff.	None.	Pass
Employment termination	The notice period is one month, in compliance with the UAE labour law. The termination period is the same for both white and blue collar staff.	None.	Pass
Staff turnover	JFI informed us that staff turnover is very low and that quite a few employees have been with the company for 15 to 30 years; there are employees that had left and came back later. JFI believes that the company's social culture and freedom makes staff loyal to the company.	None.	Pass
Training	During onboarding, training is provided in India. This includes practical, technical (e.g. irrigation, agriculture) and HSE training, including training on chemicals and machinery. Once the employee has arrived in the UAE, training is extended by on-the-job training and "shadow" training.	None.	Pass
Working hours, shifts and overtime	Employees only work one shift. Shop working hours are from 8am to 6pm. Staff at customers sites work from 5am to 1pm (8 hours). Management explained that overtime is rare. When overtime work is required, it is paid out at 150% of the base salary or taken in lieu; this is compliant with UAE labour law.	None.	Pass
Time recording	Time is manually recorded and approved by the site supervisor. The timesheets are submitted to the payroll department for processing.	None.	Pass
Time off / leave	Leave entitlement is captured in JFI's written "Workman wages policy" as well as in the "Medical Leave policy" and is in compliance with the UAE labour law.	None.	Pass

Topic	Observation	Recommendation	Priority level
Payment of wages	Wages are paid through the WPS system controlled by the MoHRE and the Central Bank of the UAE. The WPS agent used by JFI is Joyalukkas Exchange, and they are registered with the MoHRE to provide payroll services.	None.	Pass
Minimum age	Management informed us that the youngest worker is older than 20 years of age.	None.	Pass
Minimum wage	UAE labour law does not foresee a minimum wage. Based on the information provided to us by Management, the total wage (base wage plus allowances) at JFI is above the market average.	None.	Pass
Arrangement of work visa/ residence permit	This is done internally, between the branch in India and the headquarters in Dubai. There is no cost to the employee. The responsibility for paying the work permit / employment visa is captured in the written "Workmen Wages Policy".	None.	Pass
Personal documents keeping	Passports are held in the company's safe upon the request of the employee only, and mainly during visa processing. Employees could ask for safekeeping of their passport for safety (e.g. fire risk) or security reasons (loss or damage). JFI has a "Passport Retention" policy, which describes the process around passports and the responsibilities of both the employee and the employer.	None.	Pass
Freedom of association	Freedom of association is not foreseen in UAE labour law. The authority that is primarily responsible for the protection of employees' rights is the Ministry of Labour / MoHRE.	N/A	N/A

Topic	Observation	Recommendation	Priority level
<b>C. Recruitment agencies</b>			

N/A –

No third party agencies are used for the recruitment of staff. UAE recruitment is mainly done through references and the initial phase takes place in India.

Topic	Observation	Recommendation	Priority Level
<b>D. Work health &amp; safety measures</b>			
Safety records	Management informed us that there have been no major accidents in the past five years and none since the company was established in 1988. JFI has a H&S policy in place, where it refers to compliance with various ISO standards, although the company does not have the specific ISO certificates related to HSE. JFI is ISO9001:2015 certified until August 2025 which only indirectly covers safety procedures.	None.	Pass
PPE (protective equipment)	PPE is provided to staff free of charge and the type of PPE provided depends on the job performed. PPE can consist of safety goggles, gloves, safety shoes, and jackets.	None.	Pass
Production floor, warehouse, and work stations	N/A – work takes place off-site at customer premisses.	N/A	N/A
Facilities (locker rooms, showers, toilets, and canteen)	N/A – work takes place off-site at customer premisses.	N/A	N/A
Emergency action plan	N/A – all work is performed either in the open air or at customer premisses.	N/A	N/A



Topic	Observation	Recommendation	Priority level
<b>E. Shared staff accommodation (dormitories, hostels, labour camps)</b>			
<b>Accommodation visited:</b> Sharjah			
Safety measures	Smoke detectors are installed in the common corridor and kitchens. There is sufficient ventilation in both the bathrooms and kitchens. A check of a random sample of fire extinguishers and fire hose indicated up to date maintenance and the equipment being in good order. However, electrical wiring, electrical connection points and sockets could be improved in some of the rooms as they may pose a health hazard.	JFI may want to check the use of extension leads and the condition of electrical wiring and electricity sockets in all rooms and ensure that they are safe to use.	Best Practice
Security measures	The labour camp is situated on the ground floor of a small gated compound.	None.	Pass
Overall cleanliness / hygiene standards	The common spaces are clean. Staff are required to clean their own room and their en-suite kitchen and en-suite shower rooms and toilets. Most rooms, whilst not at all tidy (except for one), are of an acceptable hygiene standard. One room (last room at the end of the corridor on the right) however, at the time of our visit, was unbearably smelly and the whole room needed a thorough clean with food waste to be removed from the kitchen to avoid attracting rodents and insects that could potentially affect the other rooms as well.	JFI may want to consider performing regular checks on the cleanliness of all rooms and put a process in place around taking appropriate action when someone fails to meet acceptable hygiene standards. <b>JFI response:</b> we have deployed a staff only for cleaning purpose. He will ensure cleaning of all rooms and surroundings all time.	Best Practice
Room space and organisation	Rooms are spacious, with maximum four people in one room, although more beds are available in the same room. Due to the size of the rooms, bunk beds are at a distance from each other allowing for sufficient personal space. Some rooms only have single beds instead of bunk beds.	None.	Pass
Room ventilation, heating/cooling	Ventilation in the rooms is assured by the windows in the en-suite kitchens. All rooms have air-conditioning units and/or fans in good working order.	None.	Pass
Lockers	Each room has sufficient locker cabinets – some old, some new. It appeared that some people bought their own wardrobe and drawers.	None.	Pass

Topic	Observation	Recommendation	Priority level
Kitchen	Each room has an en-suite kitchen, which contains all necessary facilities.	None.	Pass
Potable water	Potable water fountains are available in the rooms.	None.	Pass
Grocery	There are plenty of grocery stores within walking distance of the accommodation.	None.	Pass
Dining room	There is no common dining room and food is cooked and consumed in the rooms at a small table.	None.	Pass
Waste disposal	All kitchen waste bins have a lid however not all employees use them. Collective waste bins are available outside, at the end of the corridor.	JFI may want to consider introducing a policy around waste disposal and put a process in place around taking appropriate action when someone fails to comply with the policy. <b>JFI response:</b> the person deployed will remove all waste everyday and dispose to the waste bin of Municipality, which is kept at entrance of our staff accommodation	Best Practice
Sanitary facilities (toilets, showers, wash basins)	There are no big-scale communal sanitary facilities at the accommodation. Instead, all rooms have their own en-suite shower rooms and flushing toilets, shared only by the room occupants. Shower cubicles are equipped with "telephone" showers and taps. All shower rooms and toilets were clean.	None.	Pass
Barber service/ hairdresser	There is no permanent barber shop on-site, but a barber visits every Sunday.	None.	Pass
Relaxation area	There is no common relaxation area, but the rooms are sufficiently large to allow personal space and relaxation. Some rooms had been given a personal touch by their occupant(s), such as an aquarium, plants, memorabilia or other.	None.	Pass

Topic	Observation	Recommendation	Priority level
First aid room	There is no first aid room as such however two employees have been trained in first aid and can handle basic medical emergencies at the accommodation. If something happens at the customer site, there is always a JFI vehicle that can be used to drive an employee to the nearest hospital if need be.	None.	Pass
Laundry room	There is a common laundry room to wash personal clothes. The cleaning of uniforms is handed over to a third party. Some rooms have their own washing machine. There are sufficient racks for drying freshly washed clothes.	None.	Pass
Emergency evacuation	The camp is small and located on the ground floor of the compound, with one common corridor giving access to an open space on either side. All rooms are accessible through this corridor.	None.	Pass