

Modern Slavery Act – Policy

MODERN SLAVERY ACT – TRANSPARENCY IN SUPPLY CHAINS

POLICY AND STATEMENT

1. The principal business activities of *Tilda*® are: the purchase of rice; the milling of brown (cargo) rice into milled rice; the manufacturing of ‘ready-to-heat’ flavoured rice pouches and the sale of broken rice and other by-products of the milling process.
2. *Tilda*® is committed to the highest level of ethical standards and sound governance arrangements, and sets high standards of impartiality, integrity and objectivity in relation to the management of its activities.
3. *Tilda*® adopts zero tolerance to corruption and bribery and this policy is endorsed by our Board.
4. We fully support the UK Government’s objectives to eradicate modern slavery, child labour and human trafficking.
5. The main sources of brown rice, the company’s most substantial raw material are India or Pakistan for Basmati, Thailand, North America, Uruguay and Cambodia for other fragrant and long grain rice. We operate a zero tolerance approach to child labour throughout our supply chain.
6. The market prices for grains are widely quoted and the system is very transparent.
7. Our suppliers will be subject to regular audits to ensure that they maintain the required standards and actions will be determined by risk assessment.
8. Our annual statement will provide information to supplement this policy, including details of our activities and supply chains and actions we are taking to support the Government in these objectives.
9. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the Government eradicate the injustice and brutality of modern slavery and human trafficking.

Slavery and Human Trafficking Statement 2021

1. This statement sets out the actions taken by *Tilda*® to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions taken during the calendar year ending December 2021.
2. As a member of the UK Rice Association (RA) and a member of the All India Rice Exporters’ Association (AIREA), the company recognises that it has a responsibility to take a robust approach to slavery and human trafficking. It is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking.

Supply Chain Policy

3. The main business of the company is the milling of brown (cargo) rice into milled rice; the manufacturing of ‘ready-to-heat’ recipe rice pouches and the sale of broken rice and other

by-products of the milling process. The main sources of our rice are Argentina, Cambodia, Canada, India, Pakistan, Thailand, the United States of America, Uruguay and Vietnam.

4. Our purchases of rice are governed largely by standard contracts terms of the London Rice Brokers Association (LRBA).
5. We expect all suppliers of rice and other materials to fully comply with the Modern Slavery Act 2015 and to operate systems that are transparent, accountable, readily auditable and free from ethical ambiguity.
6. Individuals with evidence of non-compliance with the Modern Slavery Act in connection with our supply chains are encouraged to report it either to us or to the authorities. Posters are displayed on notice boards with who to contact should anyone wish to raise a concern.
7. All agencies supplying manual labour to Tilda® UK must hold a Licence from the Gangmasters & Labour Abuse Authority (GLAA) and be on the GLAA's public register, although it not a statutory requirement for that work category.

Steps taken by Tilda® during the calendar year ending December 2021

1. Management Responsibility and General Awareness

- Reported progress to our senior management and Board;
- All new employees learn about our proactive commitment to the Modern Slavery Act as part of their induction process,
- Raised awareness of this published statement by notifying organisations with which we regularly engage in our supply chain;
- Prepared the fifth annual statement.

2. Risk Assessment

- We undertook a review exercise of this policy against our activities to establish whether the approach we have taken follows emerging best practice by:
 - Assessing and interpreting any recent or emerging case law and best practice;
 - Benchmarking our activities against statements and action plans undertaken by similar public and private organisations;
 - Re-evaluating the risk of non-compliance as part of our enrolment of all suppliers into SEDEX.

3. Risk Mitigation

- We have acted promptly if and when a compliance breach has been identified or flagged;
 - Continued to feedback lessons learned into the compliance risk management process.
- Tilda® is a full buyer/supplier (AB) member of the SEDEX ethical supply-chain auditing database. Sedex stores information on ethical and responsible practices covered by ILO Conventions, ETI Base Code, SA8000, ISO14001 and other industry specific codes of conduct.

- Tilda® has full visibility via the Sedex platform of all its suppliers ethical audit performance so that any issues can be identified and appropriate action taken.
- Tilda® is part of Ebro Foods S.A. which is a corporate member of the Sustainable Rice Platform (SRP). This program includes socio-economic elements as part of its sustainable farm assessment tools. Its aim is to achieve constant improvement towards a more sustainable supply chain.

Signed on 21st December 2021

Jean-Philippe LABORDE

Managing Director, Tilda®