Tereos

Tereos UK & Ireland Ltd. (TUKI)

Modern slavery statement for financial year 2022/23

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that TUKI has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. TUKI has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and having effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

Tereos UK and Ireland Ltd (TUKI) is a wholly owned subsidiary of Tereos, the world's 2nd largest sugar group. In the UK we have a turnover of circa £61m, supplying sugar to both retail and industrial customers. We employ around 60 people operating at one site based in Normanton, West Yorkshire. We pack sugars imported from around the world into retail packs under our Whitworths brand as well as packing in larger formats for our industrial customers.

Our Risk Areas

TUKI have been working with the supplier ILLOVO which could be deemed as a risk due to the location of the business in Malawi. However, this risk is mitigated by the fact that in 2018, Malawi made a moderate advancement in efforts in labour conditions. The government published the results of the National Child Labour Survey and continued to implement the Trafficking in Persons Act of 2015 by training officials on the law and launching the National Plan of Action against Trafficking in Persons. The risk is also mitigated by the conduct of regular audits of their facilities and practices. Policies and Illovo Child Labour and Forced Labour Guidelines are available on their website. (https://www.illovosugar.co.za/Group-Governance/Forced-and-Child-Labour-Guidelines).

We also source cane sugars from Reunion Island in the Indian Ocean (Tereos Indian Ocean). However, French stringent labour law applies.

Where temporary labour is used within TUKI Operations, the provider is regulated by the GLAA and is audited as required by our trained team. Labour providers used in any connected parent company activity in France are audited by a local team there.

Ripley Drive, Normanton Industrial Estate
Normanton, West Yorkshire, WF6 1RY
United Kingdom

Tel.: +44 (0)1924 245300
Fax.: +44 (0)1924 896920

Tereos UK & Ireland - Ltd.
Head office: Ripley Drive, Normanton Industrial Estate
Normanton, WF6 1RY – United Kingdom
Registered in England No. 09344403
VAT GB 203754038

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Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a confidential whistleblowing policy so that all employees know that they can raise concerns confidentially regarding, among other ethical topics, labour conditions within our business or supply chain, without fear of reprisals This includes a confidential whistle blowing line: Signal@Tereos.com
3. Ethical Audits. Our Business has been and will be regularly audited to SMETA 4 pillar standard. TUKI also are members of SEDEX and use this membership as a tool in the supplier approval process.
4. Training. Compliance Rules and Good Business Practices training is provided for all Managers within our business. This training explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
5. Ethical Charter and Ethics Code. These policies assert the principles and rules of conduct required by our Group.

Our Suppliers

TUKI operates a supplier approval procedure. We conduct due diligence on all suppliers before allowing them to become a supplier. This includes supply chain risk and vulnerability assessments supported by a scoring matrix that utilises Sedex and other data to establish levels of risk and act accordingly. We then work with the suppliers who have the highest risk assessment score, with the aim of continuously improving our supplier base.

All suppliers are required to operate to the rules of the Tereos Ethical Charter, a document founded on the principles of the Universal Declaration of Human Rights, the Conventions of the International Labour Organisation (ILO) and the United Nations International Convention on the Rights of the Child.

Training

We conduct training for our colleagues in order that they understand and can spot the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. Further to this, specific training of our Procurement/Supply chain and Technical colleagues takes place, which includes:

1. Tereos Ethical Charter (founded on the Universal Declaration of Human Rights, the Conventions of the International Labour Organisation (ILO) and the United Nations International Convention on the Rights of the Child).
2. Compliance rules and good business practices.

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3. Training in the auditing of labour providers.
4. Specific Ethical Trade Training.
5. Association of Labour Providers training.

Our Performance Indicators

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instance would be a non-compliance and breach of employment laws. Our supplier risk assessment tool indicates actions to be taken to show improvements and demonstrate our commitment to continuously improving our supply chain.

Continuous Improvement

TUKI are committed to ensuring our supply chain in no way supports Human Slavery or Trafficking. To this end we regularly review our policies and procedures, driving continuous improvement in this area and compliance within our supply chain. This is supported by regular multidisciplinary meetings and an Ethical Action Plan.

Approval for this statement

This statement was approved by the Board of Directors.

Name (Director) Olivier Leducq

Signature .....

Date ...April 6, 2022.....