



2021-2022

TATE & LYLE SUGARS

Statement under the Modern Slavery Act

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery can take many forms, including slavery, servitude, forced and compulsory labour, child labour and human trafficking, all of which results in common deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We recognise that modern slavery exists in every region of the world and in most types of economies, whether industrialised, developing or transitional. No industry or sector can be complacent or be considered immune.

Our Vision

Tate & Lyle Sugars recognises that we have a responsibility to address any adverse human rights impact that may be present in our operations and to use our leverage to encourage our stakeholders to respect human rights in our extended supply chain.

Tate & Lyle Sugars respects and promotes all fundamental human rights outlined in the United Nations' (UN) International Bill of Human Rights and the International Labor Organisation's (ILO) Core Conventions, as set forth in the Declaration of Fundamental Principles & Rights at Work. We are also committed to conducting ongoing human rights due diligence in line with the UN's Guiding Principles on Business & Human Rights and to follow the Organisation for Economic Cooperation & Development's (OECD) Due Diligence Guidance for Responsible Business Conduct.

We will continue to advocate in our supply chains and beyond in the fight against modern slavery. The issues are global, complex and unfortunately, there is no quick fix; however, we firmly believe that if we work collaboratively with our supply chain partners, and continue to be open about our progress, we can help to end modern slavery and human trafficking in our supply chain.

This statement was reviewed and approved by the Directors of Tate & Lyle Sugars on 31st March 2023



Gerald Mason
SVP Corporate Affairs, Tate & Lyle Sugars

This statement describes the activities Tate & Lyle Sugars is undertaking to prevent slavery and human trafficking in our business operations and supply chain. It has been published in accordance with the UK government's Modern Slavery Act (2015).

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COVER IMAGE

Emmanuel Hall, Extension Officer at Belize Sugar Cane Farmers' Association have set up a youth inclusive community based monitoring and remediation system to prevent, detect and address instances of child labour.

Our Policy Framework

All of these policies can be found at www.asr-group.com. Scroll to the bottom of the page to find the Document Downloads link.



Code of Ethics and Business Conduct

The Code contains a summary of many of the most important ASR Group policies that set forth the legal and ethical behaviour required of us as employees. The Code helps us to understand the behaviours expected of us as we conduct business. It shows us how to uphold the law and act according to the highest ethical standards at all times. It also guides us in making ethical decisions and identifying potential legal or ethical misconduct. Mandatory training ensures all employees are aware and understand these requirements.



Supplier Code of Conduct and Ethical Sourcing Policy

This Policy sets out ASR Group's commitment to purchase goods and services that are produced and delivered under conditions that uphold fundamental human rights; do not involve the abuse or exploitation of any persons; are grown, produced, manufactured and sold in accordance with the applicable laws; and minimise adverse impacts on the environment. The Policy applies to any individual or entity that supplies goods or performs services for or on behalf of the ASR Group, including vendors, contractors, consultants, agents, brokers, intermediaries, introducers, agents, and other third parties.



Human Rights Statement

ASR Group respects and promotes all fundamental human rights outlined in the United Nations' (UN) International Bill of Human Rights and the International Labour Organisation's (ILO) Core Conventions, as set forth in the Declaration of Fundamental Principles & Rights at Work. ASR Group is committed to conducting ongoing human rights due diligence in line with the UN's Guiding Principles on Business & Human Rights and to follow the Organisation for Economic Cooperation & Development's (OECD) Due Diligence Guidance for Responsible Business Conduct.

This Statement recognises that we have a responsibility to address any adverse human rights impact that may be present in our operations and to use our leverage to encourage our stakeholders to respect human rights in our extended supply chain.



Environmental, Health and Safety Policy

ASR Group's policy is for each of its facilities to meet or exceed the requirements of the environmental, health and safety regulations, and relevant industry standards applicable to its location.



Human Trafficking Policy & Modern Slavery Statements

Sets out our approach to preventing slavery and human trafficking in our business operations and supply chain. Published in accordance with the UK government's Modern Slavery Act (2015) and relevant legislation in other jurisdictions in which ASR Group operates.

Our Business

Tate & Lyle Sugars is a leading UK supplier of cane sugars and syrups. These products are produced by us at our cane refinery in East London or, in some cases, purchased directly from suppliers. Tate & Lyle Sugars is part of ASR Group.

1. Raw Sugar Procurement

Sourcing raw cane sugar for refining is at the heart of our business. We purchase raw sugar from suppliers around the world; from countries with tropical and subtropical climates with high levels of rainfall. Many of the sugar producing countries from which we buy are developing countries. Such countries tend to have some challenges in common, such as widespread poverty, low education levels, and little or no social support for vulnerable people.

The sugar industry in the countries that supply us are often the backbone of the local community and play a significant social and economic role in the local economy. We recognise that buying from sugar producing companies in developing countries brings specific risks and responsibilities particularly relevant to this statement.

We believe that the highest risk of modern forms of slavery in our supply chain is in raw cane sugar sourcing. This is because this supply chain includes developing economies and some seasonal workers.

1.1 Our Raw Sugar Sustainability Programme

As set out in our Code of Ethics and Business Conduct, Ethical Sourcing Policy and Supplier Code of Conduct, Tate & Lyle Sugars strictly prohibit employees, contractors, and suppliers from engaging in modern slavery related activities. To ensure that Tate & Lyle Sugars' supply chain, and in particular its raw sugar supply chain, does not engage in modern slavery, we follow a four-step compliance process in its raw sugar supply chain as follows:

Step 1 Suppliers are required to adhere to our Supplier Code of Conduct, which is based on internationally recognised standards.

Step 2 Suppliers are requested to complete an annual self-assessment of their social and ethical practices using the Sedex Supplier Engagement platform, which includes compliance with labour, health, safety, environmental and business integrity standards.

<https://www.sedex.com/>

Step 3 Suppliers are required to participate in independent sustainability audits based on social and environmental sustainability standards. Those standards include SMETA, ProTerra, Bonsucro, Fairtrade, SAI and other recognised standards.

<https://www.sedex.com/>

<https://www.proterrafoundation.org/>

<https://bonsucro.com/>

<https://www.fairtrade.org.uk/>

<https://saipatform.org/>

Step 4 Suppliers are encouraged to improve in areas of non-compliance, and ASR Group supports suppliers with those efforts.

Additionally, ASR Group contracts with several raw cane sugar suppliers who are Fairtrade certified. The Fairtrade standard prohibits modern slavery, and the certification is earned and maintained by completing annual audits.

2. Other Suppliers

For the balance of ASR Group's supply chain, ASR Group requires any potentially high-risk stakeholders to participate in an independent social audit based on the Sedex SMETA 4 Pillars Protocol.

3. Our own operations

Within our own operations, our workforce is mostly permanent employees. Our use of temporary employees depends on seasonal peaks in demand for our products. Usually, it is around 6% of total employees, however, as a result of staff absences and increased headcount needs during the Covid pandemic, the number of temporary employees increased significantly.

In 2020 Tate & Lyle Sugars became an accredited Living Wage employer certified by the Living Wage Foundation. The Foundation independently calculates a real Living Wage that meets the cost of living and being accredited means we commit to paying this to all direct employees and contractors. Prior to becoming an Accredited Living Wage employer we had very few direct employees below the living wage rate, but around 40 contractor colleagues, such as cleaners and security staff, received an uplift in pay as a result of accreditation.



Packing operators on the sugar packing lines at Thames Refinery.

3.1 Controls in our own operations

If Tate & Lyle Sugars engages labour agencies to provide temporary employees, these agencies must comply with ASR Group's Code of Ethics and Business Conduct, Ethical Sourcing Policy, and Supplier Code of Conduct. Additionally, they must be licensed with the Gangmaster's Labour Abuse Authority, an organisation that aims to ensure employees' rights are protected.

Tate & Lyle Sugars employees who have direct responsibility for supply chain management in both sugar and non-sugar areas have undergone training run by Stronger Together (www.stronger2gether.org), a multi-stakeholder initiative aiming to reduce hidden forced labour, labour trafficking and other third-party exploitation of workers.

All of our own operations go through a comprehensive annual social audit performed by independent third-party firm Accordia. This social audit is performed against the Sedex SMETA 4 Pillars Social Responsibility protocol, which is a formal review of a company's efforts to conduct business in a lawful, humane and ethical manner.

3.2 Reporting Concerns

Any employee having knowledge of credible information concerning actual or potential violations of our Code of Ethics and Business Conduct is required to report it immediately.

All employees can access an internal whistle blowing line which is advertised around our sites.

We do not tolerate retaliation or threats of retaliation against anyone who raises a concern under the Code of Ethics and Business Conduct. Any employee who engages in retaliation or threats of retaliation will face disciplinary action.

We have a Modern Slavery Protection Plan to further address the risk of modern slavery in our own operations. The policy document sets out the steps to ensure that at each of our operations, colleagues are aware of their roles and responsibilities regarding preventing these crimes and how to protect the potential victim, the evidence, other colleagues and our business if they suspect that colleagues may be victims of such crimes.



Smallholder cane farmers in Belize.

Update on 2021/22 progress

Each year we use the opportunity of writing our Modern Slavery Statement to set goals to further our activity in reducing the risks in our operations and supply chain.

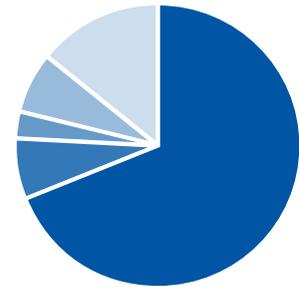
The objectives we set for our financial year 2021/22 are presented below with our progress against each one.

4.1. We retain our commitment to **audit** suppliers representing 95% of our raw sugar. In fact 86% of the sugar purchased between October 2021 - September 2022 was sourced from suppliers whose milling and farming operations were audited by third party auditors against a globally recognised sustainability standard.

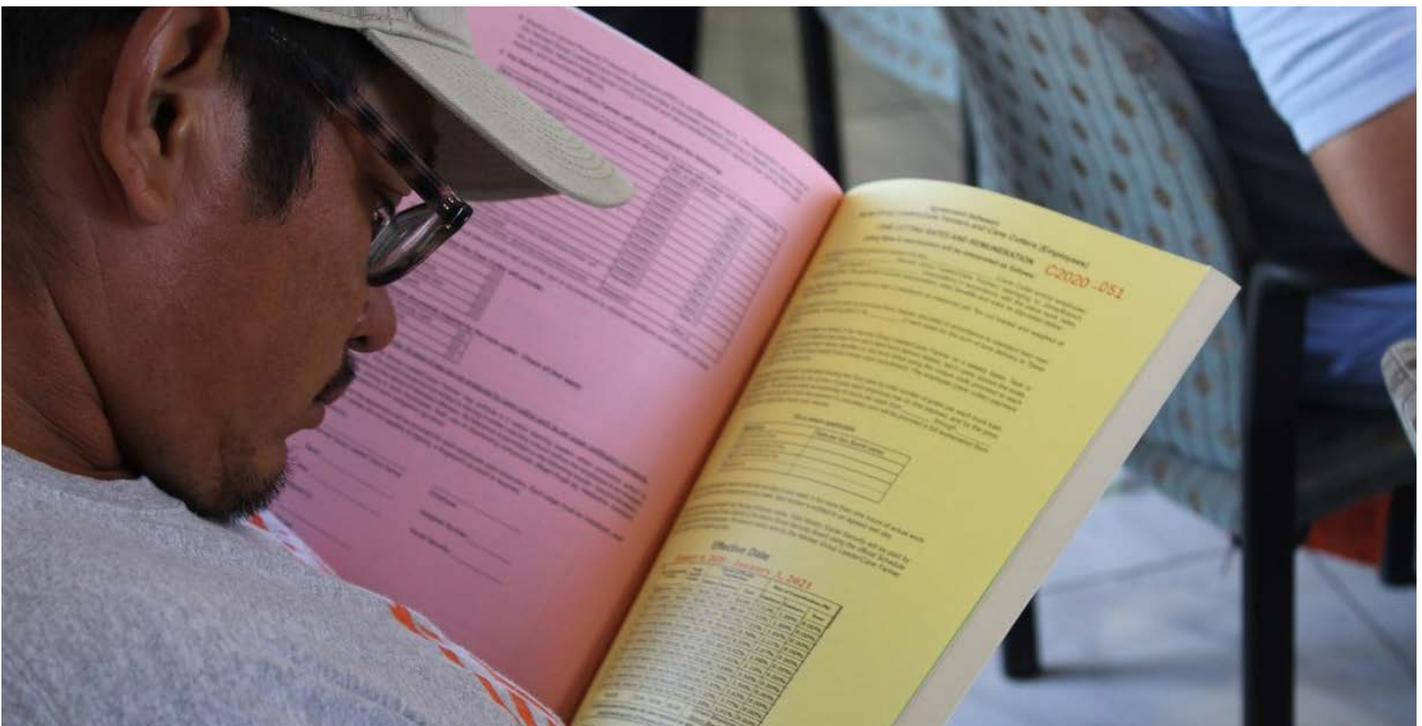
4.2. In the period under review, our target was that 65% of our raw sugar would be purchased from operations **certified** against a globally recognised sustainability standard. In fact, we achieved 79%.

4.3. We committed to build on work already undertaken to promote good hiring and working practices in smallholder cane farms and to extend this work to include truck drivers and loader drivers. The introduction of contracts for workers in this sector is still ongoing; progress has been slower than we hoped. We will continue to support this important project until the objective is achieved.

Verified and certified sugar supplied to Thames Refinery (Financial Year 2022)



- 69% - Bonsucro
- 7% - ProTerra
- 3% - Fairtrade
- 7% - Verified
- 14% - None



Workshop participant reviews a draft contract; a collaborative approach is essential for the success of the projects.

4.4. We committed to campaigning to make our neighbourhood, the Royal Docks, a Living Wage Place. To this end, we have helped create the Royal Docks Living Wage Action Group, a coalition of local public, private and third sector accredited employers and community members, formally recognised by The Living Wage Foundation. Additionally, we have supported events and publicity for the Royal Docks Living Wage Action Plan. We also encourage other businesses and organisations in the area to become accredited. This work will help improve employment conditions in the communities around us, as well as make people more aware of poor pay and modern slavery in our communities.



Two employees spoke on a panel at the Living Wage Week 2022 event organised by Newham Council, The Royal Docks Living Wage Action Group and the Living Wage Foundation.



An engineer at Thames Refinery.

Our 2022/23 objectives for preventing modern slavery

- 1 Objective One**

We retain our commitment to audit suppliers representing 95% of our raw cane sugar.
- 2 Objective Two**

We will continue to encourage more suppliers to certify their operations against an internationally recognised sustainability standard on our journey to our longer-term goal to achieve 100% by 2025.
- 3 Objective Three**

We will establish a functioning, accessible and effective grievance mechanism that enables external stakeholders to raise concerns relating to Tate & Lyle Sugars operations or those of our suppliers.

For the purpose of the grievance mechanism we consider external stakeholders to include investors, customers, suppliers and members of the communities where we and our suppliers operate.
- 4 Objective Four**

We will continue to work with the Living Wage Action Group to increase the number accredited Living Wage Employers in the Royal Docks by 50% by 2025.

Celebrating our allies

We could not achieve what we do without the support of other agencies from whom we learn and with whom we cooperate to deliver our work.



In October 2022 we were delighted to be awarded a "highly commended" award in the [Coop Treating People Fairly awards](#) for the innovative project part funded by Coop.



Tate & Lyle Sugars

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