



THOMPSON LLOYD & EWART LTD

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Child & Forced Labour and Modern Slavery Policy

Thompson Lloyd & Ewart Ltd is committed to conducting its business ethically and responsibly. We have zero tolerance for child labour, forced labour or any form of modern slavery in our operations or supply chain.

We are committed to respecting human rights and acting in accordance with applicable laws and internationally recognised labour standards, including the principles of the International Labour Organization (ILO).

This policy applies to:

- All employees, directors and management of Thompson Lloyd & Ewart Ltd
- All suppliers, contractors and business partners
- All business activities and jurisdictions in which we operate

Compliance with this policy is a condition of working with Thompson Lloyd & Ewart Ltd.

Child Labour

Child labour refers to work that is performed by a person below the legal minimum working age in the relevant country of employment or does not comply with the minimum age standards set by the ILO. Workers under the age of 18 must not be employed in hazardous or unsafe work.

Forced Labour and Modern Slavery

Forced labour includes any work or service that is not voluntarily performed and is exacted under threat, coercion, intimidation or penalty. This includes but is not limited to:

- Bonded or debt labour
- Human trafficking
- Compulsory or prison labour
- Retention of identity documents
- Recruitment fees paid by workers
- Restrictions on freedom of movement

Our Commitments

Child Labour

We are committed to ensuring that:

- The minimum age for employment meets all legal and ILO requirements
- Age verification processes are used where appropriate
- Workers under 18 are employed only in non-hazardous roles and in compliance with applicable local laws

Forced Labour

We are committed to ensuring that:

- Employment is freely chosen
- Workers are not required to surrender identity documents
- Workers are not charged recruitment or placement fees
- Workers may leave employment in accordance with legal and contractual notice requirements
- No threats, coercion, abuse or intimidation are present under any circumstances

Wages and Working Hours

We expect all suppliers and business partners to:

- Pay wages that meet or exceed the legal minimum wage in the country of production
- Assess wages against applicable living wage benchmarks where available and work toward meeting or exceeding them
- Maintain transparent and accurate payroll and timekeeping records
- Ensure working hours comply with applicable national laws and collective agreements
- Ensure overtime is voluntary, compensated and within legal limits

The company verifies wage compliance at the farm, cooperative and supplier level through processes such as audits, documentation reviews and other appropriate monitoring mechanisms.

Supplier and Partner Expectations

We expect all suppliers and business partners to:

- Comply with this policy and applicable local labour laws
- Uphold the same standards throughout their own supply chains
- Align with our Supplier's Code of Conduct
- Cooperate with reasonable requests for information or verification

Failure to meet any of these expectations may result in corrective action or termination of the business relationship between the supplier or partner and Thompson Lloyd & Ewart Ltd.

Due Diligence and Risk Management

We take reasonable steps to identify and prevent any forms of child labour or forced labour, including:

- Supplier onboarding assessments
- Contractual commitments to ethical labour standards
- Periodic reviews of supplier practices
- Engagement and dialogue with suppliers where risks are identified

Reporting Concerns

Any individual who is made aware of any forms of actual or suspected child labour, forced labour or modern slavery connected to our business is encouraged to raise concerns promptly.

Reports can be made without fear of retaliation. Any form of retaliation against individuals raising concerns in good faith is strictly prohibited and will not be tolerated.

Breaches and Remediation

Where violations of this policy are identified, Thompson Lloyd & Ewart Ltd will take appropriate action, including but not limited to:

- Requiring corrective measures
- Supporting remediation where feasible
- Suspending or terminating contracts or relationships

Governance and Review

This policy is approved by management at Thompson Lloyd & Ewart Ltd and will be reviewed periodically to ensure it remains effective and aligned with applicable laws and standards. This policy acts as a declaration of our commitment to the UK Modern Slavery Act 2015.

Name & Position: Fergus Berger - Director

Date: 18 / 08 / 2026

Signature & Stamp: FHR Berger