



Business Code of Conduct

This Business Code of Conduct (Code) sets out Tate & Lyle’s standards, expectations, and commitments with respect to key areas of corporate responsibility. Tate & Lyle is committed to upholding high standards of responsible and ethical behaviour in its own operations and to support a similar commitment amongst its business partners.

Vision and Values

Tate & Lyle’s vision is to become the world’s leading manufacturer of renewable food and industrial ingredients. We will grow our business by providing a portfolio of distinctive value-added products and services for our customers built on the foundation of responsible business practices.

Corporate responsibility for Tate & Lyle means applying our four core values – safety, knowledge, innovation and integrity – to the way we run our business. This involves continuous progress in: achieving the highest standards of safety; assessing the environmental impact of every aspect of what we do; and treating our employees, business partners and local communities with dignity and respect.

Scope of Application

This Code applies unconditionally to all operations and subsidiary companies wholly-owned by Tate & Lyle. We will also seek to apply the Code’s principles in those operations where we have a 50% stake or more. For those business operations where we have a minority interest, for our suppliers and contractors (together our “business partners”), we will communicate our Code to them and will actively encourage them to work rigorously towards adopting and implementing its principles within their own operations. We recognize that because these operations encompass many different legal, political, cultural, economic, and social environments, the speed and extent of implementation of the Code’s principles will necessarily vary. Our policy is to work collaboratively with our business partners to assist them in implementing the Code’s principles, including such areas as training and development, raising awareness, and sharing best practice.

Legal Compliance

Tate & Lyle will comply with all applicable local, national, and supra-national laws and regulations in every country in which it operates. In countries, or specific situations, where there is no law or regulation governing a particular activity or operation, Tate & Lyle will seek to conduct operations consistent with the principles of this Code.

Workplace

Tate & Lyle is committed to providing a workplace built on trust, honesty, fair treatment, and respect for basic human values. A successful and sustainable business requires a workforce that is given the opportunities and incentives to develop professionally and to live full lives outside of the workplace. Tate & Lyle applies the following principles which are based on internationally recognized workplace rights:

- Child labor is not allowed under any circumstances. A child is defined as any person less than fifteen years of age, unless local law stipulates a higher age for work or for the continuation of mandatory schooling, in which case the higher age would apply. The one allowable exception is if the country defines the minimum age for work as 14 years in accordance with ILO Convention 138. National laws may permit the employment of children aged 13 to 15 years (12 to 14 years for light work) if the job is not harmful to their health and development, does not interfere with attendance at school or vocation programs, and is not detrimental to their ability to learn.
- All employment relationships are of a voluntary nature. Use of forced or prison labor and/or indentured or bonded labor is not allowed under any circumstances.
- Workers rights of freedom of association are recognized and respected. Workers exercising their rights of freedom of association shall not be discriminated against.
- Hiring and employment decisions, including those relating to compensation, benefits, promotion, training and development, discipline, and termination, are made solely on the basis of the skill, ability, and performance of workers. Discrimination is not permitted on the basis of gender, age, disability, marital status, sexual orientation, religion or other beliefs and ethnic or national origin.
- Wages shall be provided at least equal to the applicable legal minimum wage and any associated statutory benefits. Overtime hours shall be paid at either the legally mandated premium or, in the absence of laws or agreements to that effect, at the same rate as regular hours worked. Working hours (regular and overtime) shall reflect applicable national and local legal norms. When overtime hours are required, every effort shall be made to minimize their impact on workers. Every effort shall be made to provide at least one day of rest during a seven day work period.

Community

Tate & Lyle has a long and distinguished record of supporting the communities in which our operations are located through the donation and investment of financial resources and the direct involvement of our employees. We strive to have a positive impact on communities, and to build relationships with local organizations. Prosperous and healthy communities are central to our view of sustainable business, and we are dedicated to improving our impact by further integrating our community involvement programs throughout the company.

Health & Safety

Tate & Lyle places a high priority on ensuring that its facilities are safe for workers, visitors, and for the communities in which they are embedded. This is not only a legal responsibility, but a business imperative as well. At Tate & Lyle there is no acceptable level of accidents and we have set a target of zero accidents for every operation around the world. Tate & Lyle has an extensive safety and health risk management program that encompasses all of our global operations and includes:

- Complying with applicable national/local laws relating to workplace safety and health;
- Documenting safety procedures and implementation of training programs for workers to ensure that they are aware of workplace hazards;
- Assessing, identifying, and controlling potential hazards;
- Understanding the risks associated with equipment and processes; and
- Monitoring and analyzing safety indicators.

Environment

Tate & Lyle believes that companies must take steps to manage their impact on the natural environment. As a consequence we are committed to conducting our business in a manner that is sensitive to the environmental needs of the communities within which we operate. This aim will be achieved by upholding defined, key environmental standards in all our operations, which include:

- **Management systems:** Integrate environmental management into operational systems and training and monitoring activities, and enforce through a robust reporting system;
- **Continuous improvement:** Seek continuous improvement in reducing the environmental footprint of operations through such means as the use of renewable energy resources;
- **Prior assessment:** Commit to assessing environmental impacts before undertaking a new activity or project and before decommissioning a facility or leaving a site; and
- **Measurement:** Commit to measure and minimize our environmental impact in the three areas where our business most significantly impacts the environment being energy use, water use, and non-hazardous solid waste production.

Tate & Lyle recognizes that companies should take steps to manage their impact on climate change and, to this end we have established a program to analyze our carbon footprint across our manufacturing and transport activities. We are committed both to minimizing our carbon footprint and to reporting our footprint to all stakeholders on an annual basis.

Food Safety and Quality

Tate & Lyle is committed to providing agriculture-based products that are safe and of the highest quality, and will not sell or distribute products if they do not meet applicable company specifications and government laws and regulations.

Bribery & Corruption and Conflicts of Interest

Tate & Lyle will adhere to all national legislation and will seek to maintain high ethical standards in all of our operations around the world. Gifts and entertainment, other than those of nominal value, cannot be accepted without full disclosure, and any understandings regarding benefits in exchange for such gifts are strictly forbidden. Employees must not pay bribes or make illicit payments in order to advance Tate & Lyle's interest and must, in the course of making business decisions and carrying out their job responsibilities, avoid conflicts of interest between personal, direct or indirect interests and the interests of the company and its business objectives. Any person acting on behalf of Tate & Lyle must ensure that the best interests of the company are respected and the use of its assets is intended to benefit the company for a legitimate business purpose.

Fair Competition

Tate & Lyle is committed to the principles of lawful and free competition, and to competing vigorously based strictly on the merits of our products and services. Trust is essential to our business success and to maintaining positive relationships with our customers, suppliers, and other stakeholders. Tate & Lyle does not condone the misrepresentation, concealment, or manipulation of privileged information, and forbids any understanding with competitors on pricing, market allocation, or other efforts to restrict competition. We abide by all applicable anti-trust and competition laws in all countries in which we operate.

Whistle-blowing

Tate & Lyle supports its employees and other legitimate stakeholders to come forward with any information concerning any actual or alleged breaches of this Code. Stakeholders may contact an independent third party, Safecall, to report any concerns. No employee will suffer as a consequence of a good faith effort to bring to light evidence of non-compliance with the Code.

Implementation

Accountability for the implementation of the Code ultimately rests with the Chief Executive and the Board of Directors. Division leaders are expected to oversee the implementation of the Code, and this will include: communicating its content to employees and business partners; taking appropriate steps when needed to enhance its implementation including, when necessary, auditing and monitoring; developing corrective action plans to address deficiencies in implementation; and reporting annually on compliance with the Code.

Review

Tate & Lyle recognizes that the circumstances in which we operate around the world are constantly changing and because of this we will periodically review this Code to ensure that its content and implementation remain effective.