

Statement on slavery and human trafficking

This Statement sets out the steps that Tate & Lyle PLC has taken to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business, for the financial year ended 31st March 2016, pursuant to section 54 of the Modern Slavery Act 2015.

Overarching statement

Slavery and human trafficking are abuses of a person's freedoms and rights. We are wholly opposed to such abuses in our direct operations, our indirect operations and our supply chain. We have taken, and will continue to take, a number of steps that seek to ensure that slavery and human trafficking do not take place in any part of our business or our supply chains. We are not complacent as to the risks of slavery and human trafficking and we are committed to the continual improvement of our policies, standards, practices and programmes with respect to effectively combatting it.

Our structure and business

Tate & Lyle is a global provider of ingredients and solutions to the food, beverage and other industries, with operations in over 30 locations worldwide. As at 31st March 2016 we employed 4,326 people globally.

Our manufacturing operations comprise a network of corn wet mills in the US and Europe, a SPLENDA[®] Sucralose facility in the US, and a number of other ingredient processing plants and blending facilities worldwide. We have a US network of corn elevators to collect and store corn from our corn supply chain. We also have a network of applications and technical facilities; our global innovation hub, the Commercial and Food Innovation Centre in Chicago, USA; and, a network of offices worldwide. The Company is headquartered in London, UK.

Further information on our structure and business is made available in our Annual Report 2016 at www.tateandlyle.com

Our supply chains

Most of our products are produced from agricultural crops, predominantly corn which is purchased from the 'corn belts' of the US and Europe, both direct from farmers and indirectly from farming cooperatives and others. We make SPLENDA[®] Sucralose and a portion of our citric acid from sugar, which is purchased from the US, Brazil and (during the financial year ended 31st March 2016) Australia. Our Food Systems business uses smaller volumes of a variety of mainly agricultural products, sourced globally depending on the particular raw material, to produce blended ingredients solutions.

Our direct and indirect supply chains for the things that do not go into our products, but service the operational needs of our manufacturing plants, technical centers and offices, are predominantly located in the countries within which those facilities are located, but can extend globally for any specialist items or materials not readily available locally.

Risk assessment and due diligence

We have operated a risk-based approach in the steps we have taken that seek to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business. Through the use of a broad enterprise-wide slavery and human trafficking risk assessment we seek to focus our relevant policies, standards, practices and programmes on those parts of our supply chain and our business - and upon those geographies - where we believe greatest risk of slavery and human trafficking lies.

The risk of slavery and human trafficking within our own organisation is substantially avoided and mitigated as a result of: the policies, standards, practices and training and awareness programmes that we have in place; the oversight built into our line management structure and business operations; our use of the Sedex social and ethical compliance system (www.sedexglobal.com), including external audits of our manufacturing facilities; and, the knowledge and integrity of our staff.

We consider that the greatest risk of slavery and human trafficking is in our supply chain where we undertake procurement activities, including our procurement of things that do not go into our products, and where operations and managerial oversight are out of our direct control. We work proactively to minimise the risk of slavery and human trafficking within our supply chains through the policies, standards, practices and training and awareness programmes that we have in place.

Policies, standards and practices in relation to slavery and human trafficking

Our overarching global policy concerning slavery and human trafficking is our Code of Ethics: it sets out the behaviours we expect and require in dealings with colleagues, customers, consumers, suppliers, agents, intermediaries, advisers, governments and competitors. A number of other relevant Group policies and standards sit below it, including: Global Human Resources Policies and Standards; Global Procurement Policies and Standards; our Group Engagement of Agents and Payment of Commission Standard; and, our Group Health & Safety Policy.

Our Code of Ethics is made available in 13 languages and is communicated internally via our intranet, through local 'Ethics and Values Ambassadors' across the business, and via training and awareness programmes globally. It is publicly available at www.tateandlyle.com

Externally, we require our suppliers and other business partners to behave in accordance with the principles and the standards set out in our Code of Ethics.

We have utilised the Sedex social and ethical compliance system (www.sedexglobal.com) across our own manufacturing facilities for more than 10 years, including external, third-party audits of our manufacturing facilities against the SMETA 4-Pillar protocol¹ - which includes assessment against the Ethical Trading Initiative (ETI) Base Code requirements. This covers a variety of potential issues including child labour, forced labour, health and safety, freedom of association, the right to collective bargaining, discrimination, disciplinary practices, working hours and remuneration.

In 2012, we established a sustainable agriculture programme, through which we seek to ensure the sustainability of our agricultural supply chain and including potential issues such as child labour, forced labour, health and safety, freedom of association, the right to collective bargaining, discrimination, disciplinary practices, working hours and remuneration. For each individual raw material / ingredient we seek to establish and apply appropriate sustainable agriculture criteria, including external, third-party certification schemes and standards where practically available.

In 2015, as part of our sustainable agriculture programme, we started using the Sedex social and ethical compliance system across our supply chain to promote and assure good practices; including the promotion of external, third-party audits of our suppliers' processing facilities against the SMETA 4-Pillar protocol¹.

We use an external, independent, confidential and anonymous third-party reporting service (or 'whistle-blower hotline') for the reporting of issues or concerns regarding our Code of Ethics or any other matter; through free phone numbers in 47 countries and by email. Use of this line is open to all employees, contractors, suppliers, customers and other third parties. We promote this 'Speak Up' reporting system across the Group, and externally, through various channels including our public website, internal intranet site, and site-level posters and awareness campaigns. Any issues reported are investigated by our Group Speak Up Committee which includes the Group Ethics Director, Vice President - Group Audit and Assurance, Executive Vice President - Human Resources, Executive Vice President - General Council, and our Company Secretary.

Training and awareness programmes

Our Group Ethics Director, local Ethics and Values Ambassadors and legal team provide Code of Ethics training and awareness globally across the Group to help colleagues uphold the Code both internally and in their dealings with our business partners and suppliers - including in relation to the risks of slavery and human trafficking.

Effectiveness and performance review

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 direct employment practices, wider Group policies / standards and / or our Code of Ethics.

Our external, independent third-party reporting service provides a confidential and anonymous mechanism for the reporting of any issues or concerns in relation to slavery or human trafficking. This contributes to our ability to assess and review the effectiveness and performance of the steps we have taken that seek to ensure that slavery and human trafficking do not take place in any part of our business or our supply chains.

Our Group Ethics Director undertakes an annual process whereby management and the Ethics and Values Ambassadors across the business worldwide are required to positively affirm that they are not aware of any breaches of our Code of Ethics, and to confirm that they have reported any breaches or issues that they became aware of during the previous year. The findings of this process are reported to the Board's Corporate Responsibility Committee and would include any issues or concerns in relation to slavery or human trafficking.

This Statement was approved by the Board of Tate & Lyle PLC on 24 May 2016.

By order of the Board

Javed Ahmed
Chief Executive
24 May 2016

1 - the SMETA 4-Pillar audit protocol is a standardised international audit procedure and checklist to audit sites against local laws and international standards for Labour / social compliance, Safety & Health, Environment and Business Integrity; including for labour / social compliance the Ethical Trading Initiative (ETI) Base Code - which is itself based on the ILO (International Labour Organisation) Core Conventions and the UDHR (Universal Declaration of Human Rights). These audits are conducted by independent, third-party accredited audit companies using auditors that are trained and certified to conduct them.