

# 2020 Statement on anti-slavery, child labour and human trafficking

This Statement sets out the steps that Tate & Lyle PLC<sup>1</sup> is taking to avoid and prevent slavery, child labour and human trafficking from taking place in our own operations and facilities and throughout our supply chain. The UK Modern Slavery Act of 2015, The Australia Modern Slavery Act and the California Transparency in Supply Chains Act of 2010 require certain businesses to provide public statements in this regard. Tate & Lyle reviews and updates this statement annually.

## Overarching statement

Slavery, the use of child labour and human trafficking are abuses of a person's freedoms and rights. We are wholly opposed to such abuses wherever they occur. We have taken, and will continue to take, a number of steps that seek to ensure that slavery, child labour and human trafficking do not take place in any part of our business or our supply chain. We are committed to continual improvement of our policies, standards, practices and programmes with respect to effectively eliminating these practices from any part of our business or activities.

## 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 31<sup>st</sup> March 2020 we employed over 4,100 people globally.

The Company is headquartered in London, UK. Our manufacturing operations comprise a network of corn wet mills in the US and Europe, a SPLENDA<sup>®</sup> Sucralose facility in the US, a citric acid plant in Brazil, a polydextrose plant in China 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, US; and, a network of offices worldwide. Further information on our structure and business is made available on our website at [www.tateandlyle.com](http://www.tateandlyle.com).

## Our supply chain

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<sup>®</sup> Sucralose and a portion of our citric acid from sugar, which is purchased predominantly from the US and Brazil. Our F&BS business uses smaller volumes of a variety of mainly agricultural products, sourced globally depending on the particular raw material, to produce blended ingredient solutions. In FY2019, we acquired a 15% stake in Sweet Green Fields, a stevia producer in China that buys stevia leaves directly from farmers.

In addition to ingredients for our products, our supply chain also provides services to cater for the operational needs of our manufacturing plants and other elements of our business. Our suppliers are often located in the same country as our facilities.

## Our Programme

The Modern Slavery Working Group formed in FY19 continues to meet regularly to review the programme and determine what additional steps we can take to prevent modern slavery from occurring in our direct operations and supply chain. The group is comprised of representatives from Ethics & Compliance, Procurement, Sustainability and Human Resources.

We are entering year two of the three-year plan established in FY19. This year we have re-assessed the risk of modern

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<sup>1</sup> This statement for Tate & Lyle PLC covers the entire Tate & Lyle group of companies, including but not limited to the following UK entities: Astaxanthin Manufacturing Limited; Cesalpinia (UK) Limited; G.C. Hahn and Company Limited; Hahntech International Limited; Harvey Steel Sugars Limited; Histopark Limited; Robinson Milling Systems (Tewkesbury) Limited; T.L.S.S. Pension Nominees Limited; Tate & Lyle Export Holdings Limited; Tate & Lyle Group Services Limited; Tate & Lyle Holdings Americas Limited; Tate & Lyle Holdings Limited; Tate & Lyle Industrial Holdings Limited; Tate & Lyle Industries Limited; Tate & Lyle International Finance PLC; Tate & Lyle Investments (Gulf States) Limited; Tate & Lyle Investments America Limited; Tate & Lyle Investments Brazil Limited; Tate & Lyle Investments Limited; Tate & Lyle L.P.; Tate & Lyle Overseas Limited; Tate & Lyle Pension Trust Limited; Tate & Lyle Share Shop Limited; Tate & Lyle Technology Limited; Tate & Lyle UK Limited; Tate & Lyle Ventures II LP; Tate & Lyle Ventures Limited; Tate & Lyle Ventures LP.

slavery being used in the ingredients and raw materials we purchase, launched a new Supplier Code of Conduct that specifically addresses modern slavery and are in the process of creating an online training module that will be rolled out to employees in specific roles in early April. We have also developed an escalation and mitigation plans should modern slavery be identified in our operations or supply chain.

## **Risk Assessment**

We believe that 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](http://www.sedexglobal.com)) including Sedex Members Ethical Trade Audits (SMETA) external audits of our manufacturing facilities; and, the knowledge and integrity of our staff.

We consider that the greatest risk of slavery, child labour and human trafficking is in our supply chain where we undertake procurement activities, and where operations and managerial oversight are out of our direct control. We worked with an external consultant to develop a risk assessment of the raw materials and ingredients that we procure as they relate to sustainability and corporate social responsibility associated risks, including modern slavery. The assessment will inform our efforts to mitigate the risks identified. We work proactively to minimise the risk of slavery, child labour and human trafficking within our supply chains through the policies, standards, practices and training and awareness programmes described in this statement.

## **Policies**

Tate & Lyle's commitment to respecting human rights and operating in compliance with all laws and in accordance with fair labour practices as evidenced by our Code of Ethics. The Workplace and Human Rights section of our Code provides a clear directive to both our employees and business partners that we do not use child or forced labour, we respect employee's rights of freedom of association and we follow the direction of the International Bill of Human Rights. Our Group Human Resources Policy, Contingent Worker Policy, Global Procurement Policy and Group Environment, Health and Safety Policy support our Code.

We have launched a new Supplier Code of Conduct in FY20 that directly prohibits our suppliers from engaging in forced labour, child labour or unfair labour practices. In addition, we have started including compliance with our Supplier Code of Conduct as a requirement in our terms and conditions with suppliers. A copy of the Supplier Code of Conduct can be found on our website: <https://www.tateandlyle.com/sites/default/files/2020-03/tl-supplier-code-conduct-feb-2020.pdf>

We have also rolled out expanded contractual clauses that address slavery, child labour and forced labour with those suppliers with whom we have a direct contractual relationship.

## **Training and Communications**

We have tailored an online training module to increase awareness of the risk of modern slavery amongst our employees in key positions in Manufacturing, HR and Procurement. This module will be rolled out in April 2020 and we will report on completion rates next year. We also provided in-person training to the staff at Sweet Green Fields in China.

## **Verification and Audits**

We use SafeCall, 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 encourage anyone who has relevant information to report suspected violations of this policy either directly to senior management within Tate & Lyle or through SafeCall. We promote this service through both our internal and external websites, site posters and communications campaigns. All reports are investigated and, if substantiated, remediated.

We have utilised the Sedex social and ethical compliance system ([www.sedexglobal.com](http://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 protocol<sup>2</sup> - 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.

## Effectiveness and Performance Review

We do not have key performance indicators specifically in relation to anti-slavery, child labour 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, child labour 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.

The Head of Ethics & Compliance undertakes an annual process whereby management worldwide is required to certify that it is not aware of any breaches of our Code, 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 Audit Committee and would include any issues or concerns in relation to slavery, child labour or human trafficking.

We have not received any credible concerns in FY20 about slavery, child labour or human trafficking.

This Statement was approved by the Board of Tate & Lyle PLC on March 25, 2020.

Nick Hampton  
Chief Executive

By order of the Board  
March 25, 2020

<sup>2</sup> 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.