

2022 Statement on anti-slavery, child labour and human trafficking

This statement sets out the steps that Tate & Lyle PLC¹ 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 for the period ending on 31 March 2022. The UK Modern Slavery Act of 2015, the Australia Modern Slavery Act² 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 a view 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 March 2022, we employed over 4,200 people globally. The Company is headquartered in London, UK.

As at 31 March 2022, we had manufacturing operations comprising a network of corn wet mills in the US and Europe, a SPLENDA® Sucralose facility in the US, a citric acid plant in Brazil, a polydextrose plant in Nantong, China, a stevia production facility in Anji, China, a tapioca modified starch plant in Thailand and a number of other ingredient processing plants and blending facilities worldwide. We had a US network of corn elevators to collect and store corn from our corn supply chain. We also had 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.

Note that by the time of publication, Tate & Lyle's structure will have changed as we will have sold, as planned, a controlling interest in our Primary Products business in the Americas to KPS Capital Partners, LP (KPS). Our next Modern Slavery Statement will reflect both an updated structure and supply chain in light of this change, but with the same commitment to ethics and compliance.

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® 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 FY21 we increased our ownership in Sweet Green Fields, a stevia producer in China that buys leaves directly from farmers, to 100%. We also acquired an 85% stake in Chaodee Modified Starch, a tapioca starch manufacturer in Thailand that buys cassava directly from farmers.

In addition to ingredients for our products, our supply chain also provides services to cater for the operational needs of our

¹ 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; Histonpark 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.

² While we are not required to file a statement with the Australian government due to the size of our operations, we do comply with the spirit of the law.

manufacturing plants and other elements of our business. Our suppliers are often located in the same country as our facilities.

Our Programme

Building upon steps taken in prior years, this year, human trafficking training continued, further risk assessment and due diligence work was completed on our suppliers in relation to human rights risks, we launched our Responsible Sourcing (Supplier Audit) Programme, and the Modern Slavery Working Group, comprised of representatives from Ethics & Compliance, Procurement, Sustainability, and Human Resources continued to meet to identify risks/new opportunities.

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) 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 have 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 has informed 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 is 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 policies, Contingent Worker Policy, Global Procurement Policy and Group Environment, Health and Safety Policy support our Code.

Our Supplier Code of Conduct directly prohibits our suppliers from engaging in forced labour, child labour or unfair labour practices. Compliance with our Supplier Code of Conduct is 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 continue to include expanded contractual clauses that address slavery, child labour and forced labour with those suppliers with whom we have a direct contractual relationship.

Due Diligence and Audits

We have continued to target due diligence on those suppliers identified by our ingredient risk assessment. We have also integrated a new sustainability questionnaire into our supplier onboarding for ingredient suppliers.

This year, we created a new supplier due diligence plan and workflow with Procurement which will determine the requirements for lower or high-risk suppliers.

We have used the Sedex social and ethical compliance system (www.sedexglobal.com) across our manufacturing facilities for more than 10 years, including external, third-party audits of our manufacturing facilities against the SMETA 4- Pillar protocol³ - which includes assessment against the Ethical Trading Initiative (ETI) base code requirements. This

³ 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.

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. This same framework has informed our new Responsible Sourcing (supplier audit) Programme which has been rolled out to our supply chain where relevant. We will report on progress in next year's statement.

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 is part of new starter induction and will continue to form part of our training cycle.

Verification

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.

In addition, our Head of Ethics & Compliance undertakes an annual process which requires management worldwide to certify they are not aware of any breaches of our Code, and/or 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 include any issues or concerns in relation to slavery, child labour or human trafficking.

Effectiveness and Performance Review

We have not received any concerns in FY22 about slavery, child labour or human trafficking.

We have introduced certain key performance indicators (KPIs) to allow us to assess and review the effectiveness 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 of our supply chains.

This statement was approved by the Board of Tate & Lyle PLC on 31 March 2022.

Nick Hampton
Chief Executive

By order of the Board
31 March 2022