

Correct PPE, rest and rehydration are important for safe work



**2022-2023**

**TATE & LYLE SUGARS**

**Statement under the Modern Slavery Act**



Modern slavery is a crime and a violation of fundamental human rights. Modern slavery can take many forms, including slavery, servitude, forced and compulsory labour, child labour and human trafficking, all of which results in common deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We recognise that modern slavery exists in every region of the world and in most types of economies, whether industrialised, developing or transitional. No industry or sector can be complacent or be considered immune.

## Our Vision

T&L Sugars Limited recognises that we have a responsibility to address any adverse human rights impact that may be present in our operations and to use our leverage to require our stakeholders respect human rights in our extended supply chain.

T&L Sugars Limited respects and promotes all fundamental human rights outlined in the United Nations (UN) International Bill of Human Rights and the International Labour Organisation (ILO) Core Conventions, as set forth in the Declaration of Fundamental Principles & Rights at Work. We are also committed to conducting ongoing human rights due diligence in line with the UN Guiding Principles on Business & Human Rights and to follow the Organisation for Economic Cooperation & Development (OECD) Due Diligence Guidance for Responsible Business Conduct.

We will continue to advocate in our supply chains and beyond in the fight against modern slavery. The issues are global, complex and unfortunately, there is no quick fix; however, we firmly believe that if we play our part, we can help to end modern slavery and human trafficking.

This statement was reviewed and approved by the Directors of T&L Sugars Limited on 31st March 2024.



**Gerald Mason**  
SVP Corporate Affairs, Tate & Lyle Sugars



This statement describes the activities T&L Sugars Limited is undertaking to prevent modern slavery and human trafficking in our business operations and supply chain. It has been published in accordance with the UK government's Modern Slavery Act (2015).

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# Our Policy Framework

All of these policies can be found at [www.asr-group.com](http://www.asr-group.com), at the bottom of the page, under the Document Downloads link.



## Code of Ethics and Business Conduct

The Code contains a summary of many of the most important ASR Group policies that set forth the legal and ethical behaviour required of us as employees of ASR Group. The Code helps us to understand the behaviours expected of us as we conduct business. It requires us to uphold the law and act according to the highest ethical standards at all times. It also guides us in making ethical decisions and identifying potential legal or ethical misconduct. Mandatory training ensures all employees are aware and understand these requirements.



## Supplier Code of Conduct and Ethical Sourcing Policy

This policy sets out ASR Group's commitment to purchase goods and services that are produced and delivered under conditions that uphold fundamental human rights; do not involve the abuse or exploitation of any persons; are grown, produced, manufactured and sold in accordance with the applicable laws; and minimise adverse impacts on the environment. The Policy applies to any individual or entity that supplies goods or performs services for or on behalf of ASR Group, including vendors, contractors, consultants, agents, brokers, intermediaries, introducers, agents, and other third parties.



## Human Rights Statement

ASR Group respects and promotes all fundamental human rights outlined in the United Nations (UN) International Bill of Human Rights and the International Labour Organisation (ILO) Core Conventions, as set forth in the Declaration of Fundamental Principles & Rights at Work. ASR Group is committed to conducting ongoing human rights due diligence in line with the UN Guiding Principles on Business & Human Rights and to follow the Organisation for Economic Cooperation & Development (OECD) Due Diligence Guidance for Responsible Business Conduct.

This Statement recognises that we have a responsibility to address any adverse human rights impact that may be present in our operations and to use our leverage to require our stakeholders to respect human rights in our extended supply chain.



## Environmental, Health and Safety Policy

ASR Group's policy is for each of its facilities to meet or exceed the requirements of the environmental, health and safety regulations, and relevant industry standards applicable to its location.



## Human Trafficking Policy & Modern Slavery Statements

These statements set out our approach to preventing modern slavery and human trafficking in our business operations and supply chain. Published in accordance with the UK Government's Modern Slavery Act (2015) and relevant legislation in other jurisdictions in which ASR Group operates.

# Our Business

T&L Sugars Limited is a leading UK supplier of cane sugars and syrups. These products are produced by us at our two factories in east London or, in some cases, purchased directly from suppliers. T&L Sugars Limited is part of ASR Group.

## 1. Raw Sugar Procurement

Sourcing raw cane sugar for refining is at the heart of our business. We purchase raw sugar from suppliers around the world; from countries with tropical and subtropical climates with high levels of rainfall. Many of the producers from which we buy are developing countries. Such countries tend to have some challenges in common, such as widespread poverty, low education levels, and little or no social support for vulnerable people.

The sugar industry in the countries that supply us are often the backbone of the local community and play a significant social and economic role in the local economy. We recognise that buying from sugar producing companies in developing countries brings specific risks and responsibilities particularly relevant to this statement.

We believe that the highest risk of modern forms of slavery in our supply chain is in raw cane sugar sourcing. This is because this supply chain includes developing economies and some seasonal workers.

### 1.1 Our Raw Sugar Sustainability Programme

As set out in our Code of Ethics and Business Conduct, Ethical Sourcing Policy and Supplier Code of Conduct (all of which are posted on ASR Group's website [www.asr-group.com](http://www.asr-group.com) under the tab "DOCUMENT DOWNLOADS"), T&L Sugars Limited strictly prohibits employees, contractors, and suppliers from engaging in modern slavery related activities. To ensure that T&L Sugars Limited's supply chain, and in particular its raw sugar supply chain, does not engage in modern slavery, we follow a compliance process in the sourcing of raw sugar:

All our raw sugar suppliers are required to adhere to our Ethical Sourcing Policy and Supplier Code of Conduct. These policies are based on International Labour Organization (ILO) standards and international conventions on child labour, modern slavery, land use, environmental protection, and others.

We encourage certification against internationally recognized social and environmental standards such as ProTerra, Bonsucro, SAI, and Fairtrade.

We require all our raw sugar suppliers, who are not yet certified, to be assessed against an internationally recognized certification scheme, additionally, these suppliers are asked to complete self-assessment questionnaires (SAQs) annually using the Supplier Ethical Data Exchange (Sedex) platform to evaluate their compliance with our Ethical Sourcing Policy.

<https://www.sedex.com/>

<https://www.proterrafoundation.org/>

<https://bonsucro.com/>

<https://www.fairtrade.org.uk/>

<https://saipatform.org/>



Additionally, ASR Group contracts with several raw cane sugar suppliers who are Fairtrade certified. The Fairtrade standard prohibits modern slavery, and the certification is earned and maintained by completing annual audits.

## **2. Other Suppliers**

For the balance of ASR Group's supply chain, ASR Group is rolling out a programme to risk assess suppliers, and to request selected suppliers to participate in an independent social audit based on the Sedex SMETA 4 Pillars Protocol

## **3. Our own operations**

Within our own operations, our workforce is mostly permanent employees. Our use of temporary employees depends on seasonal peaks in demand for our products. Usually, it is around 6% of total employees.

In 2020 T&L Sugars Limited became an accredited Living Wage employer certified by the Living Wage Foundation. The Foundation independently calculates a real Living Wage that meets the cost of living and being accredited means we commit to paying this to all direct employees and contractors.

### **3.1 Controls in our own operations**

If T&L Sugars Limited engages labour agencies to provide temporary employees, these agencies must comply with ASR Group's Code of Ethics and Business Conduct, Ethical Sourcing Policy, and Supplier Code of Conduct. Additionally, they must be licensed with the Gangmaster's Labour Abuse Authority, an organisation that aims to ensure employees' rights are protected.

T&L Sugars Limited employees who have direct responsibility for supply chain management in both sugar and non-sugar areas have undergone training run by Stronger Together, a multi-stakeholder initiative aiming to reduce hidden forced labour, labour trafficking and other third-party exploitation of workers.

All of our own operations go through a comprehensive annual social audit performed by independent third-party firm Accordia. This social audit is performed against the Sedex SMETA 4 Pillars Social Responsibility protocol, which is a formal review of a company's efforts to conduct business in a lawful, humane and ethical manner.

### **3.2 Reporting Concerns**

Any employee having knowledge of credible information concerning actual or potential violations of our Code of Ethics and Business Conduct is required to report it immediately.

All employees can access an internal whistle blowing line which is advertised around our sites.

We do not tolerate retaliation or threats of retaliation against anyone who raises a concern under the Code of Ethics and Business Conduct. Any employee who engages in retaliation or threats of retaliation will face disciplinary action. We have a Modern Slavery Protection Plan to further address the risk of modern slavery in our own operations. The policy document sets out the steps to enable that, at each of our operations, our colleagues are aware of their roles and responsibilities in preventing these crimes and how to protect the potential victim, the evidence, other colleagues and our business if they suspect that colleagues may be victims of such crimes.



*Women Cane Farmers Field School educates and empowers farmers in Belize*



*Youth Advisory Committee, BSI.*

# Update on 2022/23 progress

Each year we use our Modern Slavery Statement to set goals to further our activity in reducing the risks in our operations and supply chain.

The objectives we set for our financial year 2022/23 are presented below with our progress against each one.

**4.1. We retain our commitment to audit suppliers representing 95% of our raw sugar.** In fact 97% of the sugar purchased between October 21-September 22 was sourced from suppliers whose milling and farming operations were audited by third party auditors against a globally recognised sustainability standard.

**4.2. In the period under review, we committed to encourage more suppliers to certify their operations against a reputable sustainability standard.** We have been encouraged by the number of our raw sugar suppliers who have taken up this challenge. It is not an easy task to undergo the process of reviewing, amending and documenting policies and processes that are required to pass certification audits. We look forward to congratulating several of our suppliers in the coming months as they complete this process.

68% of the sugar purchased between October 21-September 22 was sourced from suppliers whose milling and farming operations were fully certified against a globally recognised sustainability standard.

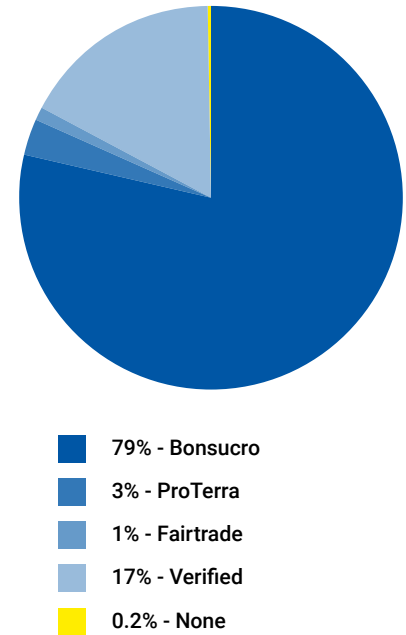
**4.3. We committed to establish a functioning, accessible and effective grievance mechanism so that external stakeholders can raise concerns relating to T&L Sugars Limited operations or those of our suppliers.**

The ASR Group Grievance Mechanism - External Stakeholders is now available on all of the group's websites: <https://www.asr-group.com/asr-group-grievance-mechanism-external-stakeholders>. No concerns regarding violations of our Code of Ethics and Business Conduct or other corporate codes and policies have been reported since the policy was made publicly available.

**4.5. We committed to continue to work with the Living Wage Action Group to increase the number of accredited Living Wage Employers in the Royal Docks by 50% by 2025.**

We are pleased that as of November 2023 there are 31 accredited Living Wage Employers in the Royal Docks. This is an increase of 11 since June 2022 (the Group's baseline date). Across the whole of Newham (of which the Royal Docks is a sub area) there has been a 100% increase in accredited Living Wage Employers since 2021. The Living Wage Action Group is considered a driving force behind this and won the Community Wealth Builder Award at the Newham Civic Awards.

**Verified and certified sugar supplied to Thames Refinery (Financial Year 2023)**







*Correct PPE, rest and rehydration are important for safe work.*



*On stage at the Newham Civic Awards; two employees alongside many others in the Royal Docks Living Wage Action Group receive the Community Wealth Builder Award from the Mayor and Chief Executive of London Borough of Newham .*

# Our 2023/24 objectives for preventing modern slavery



It has long been our goal to be able to source 100% certified raw sugar. To this end, we have been engaging with our raw sugar suppliers for several years to encourage them to certify their operations against an internationally recognised sustainability standard. **It is our objective to meet this challenge in 2025.**

Our commitment will be to only buy raw sugar that has been independently certified against any of the following standards: Bonsucro, ProTerra, Fairtrade, Vive, SAI-FSA or selected local standards. These standards require management controls such as policies, procedures and practices to ensure human rights and labour rights are respected.

Where a standard only applies to agricultural activity, we will also require an audit report of the mill dated within the prior 12 months against the SMETA (4 pillar) standard or similar.



In addition to targeting this ambitious goal, in 2024 **we will complete a human rights due diligence review process in line with the UN Guiding Principles on Business and Human Rights.**

This process will be a review of the impact on human rights of our raw sugar supply chain and the policies and programmes we have in place to mitigate this in order to understand how to further evolve our approach in 2025 and beyond. We will publish a summary of the document when it is completed.



# Celebrating our allies

We could not achieve what we do without the support of other stakeholders from whom we learn and with whom we collaborate to deliver our work.





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