

# 2024 Statement on anti-slavery, forced and 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, forced and 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 2024. The UK Modern Slavery Act of 2015, the Australia Modern Slavery Act<sup>2</sup>, the California Transparency in Supply Chains Act of 2010 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act<sup>3</sup> 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, several steps that seek to ensure that slavery, forced and 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 for the food and beverage industries, operating from 58 locations worldwide. As at 31 March 2024, we employed over 3,300 people globally. The Company is headquartered in London, UK.

As at 31 March 2024, we had manufacturing operations comprising one corn wet mill in the US and two in Europe, a SPLENDA® Sucralose facility in the US, two dietary fibre plants and one stevia production plant in China, a stevia production line in the US, a tapioca modified starch plant in Thailand, and a number of other ingredient processing plants and blending facilities worldwide. We also had a global network of 17 Customer Innovation and Collaboration Centres (labs), one of which is also includes 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

Nearly all our ingredients 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 from sugar, which is purchased predominantly from the US and Brazil. For our stevia plant in China, we buy leaves from farmer cooperatives. Stevia from the US includes stevia extract purchased from Latin America. The supply chain of our Nantong business is from locally sourced corn starch. The supply chain for our tapioca starch plant in Thailand is through a third-party partnership that procures cassava from local farmers. The supply chain for our FOS and GOS dietary fibre business in China (Quantum High Tech – QHT) includes procurement of sugar and lactose from China, US, Latin America (Brazil) and the wider Asia Pacific region. We procure chickpeas from the US and Canada for our Nutriati business. We also use smaller volumes of a variety of mainly agricultural products, sourced globally depending on the particular raw material, to produce blended ingredient solutions.

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.

<sup>1</sup> For the UK, this statement for Tate & Lyle PLC covers the entire Tate & Lyle group of companies, including but not limited to the following UK entities: Tate & Lyle Ventures LP, Tate & Lyle Ventures Limited, Tate & Lyle Ventures II LP, Tate & Lyle UK Limited, Tate & Lyle Technology Limited, Tate & Lyle Pension Trust Limited, Tate & Lyle Overseas Limited, Tate & Lyle Mold UK Limited, Tate & Lyle Investments Limited, Tate & Lyle Investments Brazil Limited, Tate & Lyle Investments America Limited, Tate & Lyle International Finance PLC, Tate & Lyle Industries Limited, Tate & Lyle Holdings Limited, Tate & Lyle Holdings Americas Limited, Tate & Lyle Group Services Limited, Tate & Lyle Export Holdings Limited, HahnTech International Limited, G. C. Hahn and Company Limited, and Astaxanthin Manufacturing Limited

<sup>2</sup> 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.

<sup>3</sup> For Canada, this statement is for Tate & Lyle Solutions USA LLC

## Our Programme

Building upon steps taken in prior years, this year, human trafficking training continued and was enhanced with live training, further risk assessment and due diligence work was completed on our suppliers in relation to human rights risks, we continued our Responsible Sourcing (Supplier Audit) Programme, and we now have two Management Committees: (i) the Modern Slavery Working Group, comprised of representatives from Ethics & Compliance, Procurement, Sustainability, and Human Resources who meet to identify risks/new opportunities in our overall Modern Slavery Programme; and (ii) our Supplier Compliance Committee, made up of Ethics & Compliance and Procurement, to review escalations of risks from our due diligence, audit or Whistleblowing programme related to suppliers.

### Risk Assessment

We believe that the risk of slavery and human trafficking, as well as forced and child labour, 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 as well as key manufacturing suppliers and, the knowledge and integrity of our staff.

We consider that the greatest risk of slavery, forced and 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. In the last year, we updated our risk assessment for human rights risk. We continue to identify as higher risk: (i) our suppliers of ingredients, packaging, and chemicals as well as tollers (collectively Tier 1 suppliers); (ii) manufacturing suppliers of Tier 1 suppliers (collectively identified as non-Tier 1 suppliers); and (iii) from a service perspective, providers of outsourced labour. We have also now expanded the number of countries deemed higher risk for modern slavery. We also conduct risk assessments when new acquisitions occur. We work proactively to minimise the risk of slavery, forced and 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 forced or child 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.

This year, we updated our Engagement of Third Parties policy and procedure, which details our due diligence and audit policies for high risk suppliers. In the update, we highlighted what would be deemed as a red flag when reviewing suppliers, to ensure heightened awareness. We also require our suppliers to adhere to our Supplier Code of Conduct which directly prohibits them from engaging in forced labour, child labour or unfair labour practices. A copy of the Supplier Code of Conduct can be found on our website: Tate & Lyle Supplier Code of Conduct.

We continue to include expanded contractual clauses that address slavery, forced and child labour and forced labour with those suppliers with whom we have a direct contractual relationship.

### Due Diligence and Audits

Our due diligence and audit programmes continued in FY24. We conducted due diligence on new higher risk suppliers prior to their onboarding. We also completed a programme of annual monitoring for high risk suppliers in China, to include our stevia growers in China, and included reviewing all of QHT's Tier 1 suppliers.

As part of our Responsible Sourcing Programme, we have continued to use the Sedex social and ethical compliance system ([www.sedexglobal.com](http://www.sedexglobal.com)) and the SMETA 4- Pillar audit protocol<sup>4</sup> - which includes assessment against the Ethical

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<sup>4</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

Trading Initiative (ETI) base code requirements – in our manufacturing supply chain, whether Tier or non-Tier 1 suppliers. We also expanded the programme to accept certain additional compliance assessments, such as Ecovadis, which many of our North American based chemical suppliers have completed.

In FY24 our programme saw 102 additional audits completed. We have also acknowledged 7 Ecovadis assessments. To date, our Responsible Sourcing Programme has seen over 40% of our highest value Tier 1 suppliers audited, which amounts to c. 75% of our spend with Tier 1 suppliers. Over 85% of our highest value suppliers in high-risk jurisdictions have also now been audited. While encouraging to see the progress over only a few years, in the coming years, it is our intention to expand this coverage, especially for high risk suppliers in high risk jurisdictions.

Also encouraging is that these assessments, whether audits or desktop supply chain assessments, have helped us better understand and better action potential issues at our suppliers' sites including those related to child labour, forced labour, health and safety, freedom of association, the right to collective bargaining, discrimination, disciplinary practices, working hours and remuneration. In FY24, no major issues have been identified in our supply chain through audits, due diligence or Whistleblowing, including no evidence of forced labour, child labour or human trafficking. While certain minor findings were identified during audits that required remediation (for instance a blocked exit), these were followed up with appropriate corrective action plans.

### **Training and Communications**

This year we continued to require employees in certain at-risk roles to complete Modern Slavery training. For new and existing employees, there was a tailored online training. Over 98% of the global employees selected for the annual training completed it. We also reinforced our Supplier Code of Conduct with suppliers in scope for our due diligence or audit programmes.

### **Verification**

To verify the output of our programme 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, to include any issues of concerns related to slavery, child labour, forced labour or human trafficking, 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 annually. This year through this process, we had no unknown issues raised.

We also verify continued compliance by our operating sites by participating in our own SMETA audits. For suppliers, where we have had findings within an audit that identify potential areas of improvement, our escalation procedures and Supplier Compliance Committee are in place to ensure we drive action plans to completion.

Our Supplier Compliance Committee would also be the appropriate forum for any whistleblowing concerns to be discussed, whether raised internally or through SafeCall<sup>5</sup>, about forced, child or other forms of modern forms of slavery. The Supplier Compliance Committee meets monthly (or ad hoc for the most serious cases) to review any escalations.

### **Effectiveness and Performance Review**

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. These are regularly discussed in the Modern Slavery Working Group meetings and periodically reviewed with the Board.

This statement was approved by the Board of Tate & Lyle PLC on 21 May 2024.

Nick Hampton, Chief Executive, By order of the Board, 21 May 2024

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*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.

<sup>5</sup> Safecall is 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, Supplier Code of Conduct 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.

**Attestation**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Signed



Name: Nick Hampton

Title: Chief Executive

Effective Date: 21 May 2024