



Attendees of the 2024 Women Farmer Field School in Belize.

Statement under the Modern Slavery Act

2023-2024



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 encourage our Stakeholders to 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's (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 (HRDD) in line with the UN's Guiding Principles on Business & Human Rights and to follow the Organisation for Economic Cooperation & Development's (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 work collaboratively with our supply chain partners, and continue to be open about our progress, we can help reduce the risks of modern slavery and human trafficking in our supply chain.

This statement was reviewed and approved by the Directors of T&L Sugars Limited on 31st March 2025.

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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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 Policy Framework

All of these policies can be found at www.tateandlylesugars.com. Scroll to the bottom of the page to find the [ASR Group Codes and Policies](#) 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. The Code helps us to understand the behaviours expected of us as we conduct business. It shows us how 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

These policies set 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 policies apply 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's (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's Guiding Principles on Business & Human Rights and to follow the Organisation for Economic Cooperation & Development's (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 encourage 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

This policy sets out our approach to preventing 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.



Grievance Mechanism for External Stakeholders

Our Grievance Mechanism complements programmes and processes ASR Group has in place to prevent, identify, and manage grievance concerns throughout our value chain. We are guided by Section 31 of the United Nations Guiding Principles on Business and Human Rights, which sets out the principles for good business-led grievance mechanisms. If a situation of concern arises, ASR Group commits to work with the relevant stakeholders to seek a resolution.

Our Business

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

In October 2024, T&L Sugars Limited purchased a sugar packaging and distribution facility in Normanton, West Yorkshire. All of our policies apply at the Normanton facility, although the supply chain into the new facility is different to our traditional supply chain. We will fully integrate Normanton in our reporting from next year.

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. Many of the sugar producing countries 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. The ILO estimates that the sugarcane industry supports some 100 million rural livelihoods¹. We recognise that buying from sugar producing companies in developing countries brings specific risks and responsibilities particularly relevant to this statement.

1.1 Assessing risks in our supply chain

We gather information from a range of sources in order to identify and monitor potential human rights risks in our supply chain.

The cornerstone of our raw sugar sustainability programme is our audit programme which generates a great deal of data on the policies and practices of our suppliers. The aim of the audits is to understand the policies, practices and controls in our suppliers' operations. Reports generated from the audits are shared with suppliers and we require them to address any problems identified. Since 2013 we have undertaken around 300 audits of mills and farms across our supply chain.

We use the data to identify systemic underlying human rights issues. Despite differences in political and cultural contexts of our suppliers, we find many of the same issues across geographies.

We are well placed to influence the policies and practices of the mills and farms that supply us, where we are able to develop a commercial relationship over time with the supplier. Our access to our suppliers is dependent on UK Government trade policy. One such policy is the Autonomous Tariff Quota (ATQ), which sets an annual limit on the import of tariff-free raw cane sugar from suppliers of our choice. This quota has provided us with access to some of the most sustainable raw sugar suppliers in the world. Currently the future of the ATQ is uncertain and only applies to about 40% of our supply base. If we are not permitted to have long-term certainty that we can choose 100% of our suppliers, it will materially and negatively affect our ability to eradicate modern slavery risk from our supply chain.

Country risk

We analyse the human rights risks associated with the countries we source from using a range of country risk indices. We have identified a small number of countries in our supply chain with high-risk ratings.

These risks relate mainly to the legislative frameworks to protect workers in the countries identified, and do not correlate significantly with our audit data. This may be because companies in high risk countries have implemented their own controls. We continue to monitor these risks.

1. ILO 2017 Child Labour in Primary Production of Sugarcane



Truck drivers waiting to deliver sugar cane to the ASR BSI mill in Belize: Carmito Moguel, Carlos Magana, Felipe Moguel, Ernesto Flamenco, Favio Hernandez, Carlos Magana, Christopher Lopez, Daniel Yam, Carlos Sosa.

1.2 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 these policies can be found at www.tateandlylesugars.com. Scroll to the bottom of the page to find the [ASR Group Codes and Policies](#) link.), T&L Sugars Limited strictly prohibits employees, contractors, and suppliers from engaging in modern slavery related activities.

Our raw sugar sustainability programme is designed to ensure that workers and communities in our raw sugar supply chain are not being exploited, that they are safe and that relevant laws and international standards relating to employment (including wage and working hours), health and safety, and human rights (including freedom of movement and communications) are adhered to.

- All our suppliers are required to adhere to our Ethical Sourcing Policy and Supplier Code of Conduct. These policies are based on International Labour Organisation (ILO) standards and international conventions on child labour, modern slavery, land use, environmental protection, and others.
- Raw sugar suppliers are additionally 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. Sedex provides an electronic system for collecting and analysing information on ethical and responsible practices along supply chains.
- We encourage our suppliers to certify their operations against internationally recognised social and environmental standards such as [Bonsucro](#), [ProTerra](#), [Vive](#), [SAI](#), and [Fairtrade](#); see section 4.1 for an update on our goal to only source certified sugar for our operations. Many of our suppliers are independently audited against ProTerra, a standard that seeks to address the main challenges linked to agricultural production in developing countries. We strive for all our raw sugar suppliers to be assessed against an internationally recognised certification scheme. We are working on a further objective that all our suppliers will become certified.
- 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.

ILO Risk Indicators

The ILO has identified 11 indicators represent the most common signs or “clues” that point to the possible existence of a forced labour case.

- Abuse of vulnerability
- Deception
- Restriction of movement
- Isolation
- Physical and sexual violence
- Intimidation and threats
- Retention of identity documents
- Withholding of wages
- Debt bondage
- Abusive working and living conditions
- Excessive overtime

While the ILO makes clear that these indicators do not automatically imply a forced labour situation, it is the case that some of these indicators are common in agricultural settings where the work is sometimes manual, conditions are hot, some workers may be unable to read or unaware of their rights, and employment is traditionally arranged informally.



Armando Peña, cane cutter in Belize fixes personal protective equipment (PPE) which is essential to keep him safe at work.

2. Other suppliers

For the balance of ASR Group's supply chain, ASR Group requires any potentially at-risk Stakeholders 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. This year it was around 4% 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 Assessing risks in our own operations

Our Code of Ethics and Business Conduct, described in section 1.2 above sets out expectations of all employees. Including the importance of a work environment in which everyone is treated with respect and dignity.

All our sites undergo annual independent SMETA audits. Similar to the audits we use for our suppliers, the SMETA audit is designed to help protect workers from unsafe conditions, overwork, discrimination, low pay, and forced labour among other risks. Our sites are also regularly audited by our customers against similar criteria and any issues fed back to us to address.

More frequently, members of the leadership team undertake cultural audits in which senior management engage informally with colleagues in the factory to understand any concerns about working conditions, safety or other issues.

3.2 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 undergo training provided by Stronger Together, a multi-stakeholder initiative aiming to reduce hidden forced labour, labour trafficking and other third-party exploitation of workers. 87 colleagues in relevant roles undertook the training this year.

The Company adheres to the ETI Base Code, part of which covers freedom of association and that workers have the right to join a trade union of their own choosing.

3.3 Reporting Concerns

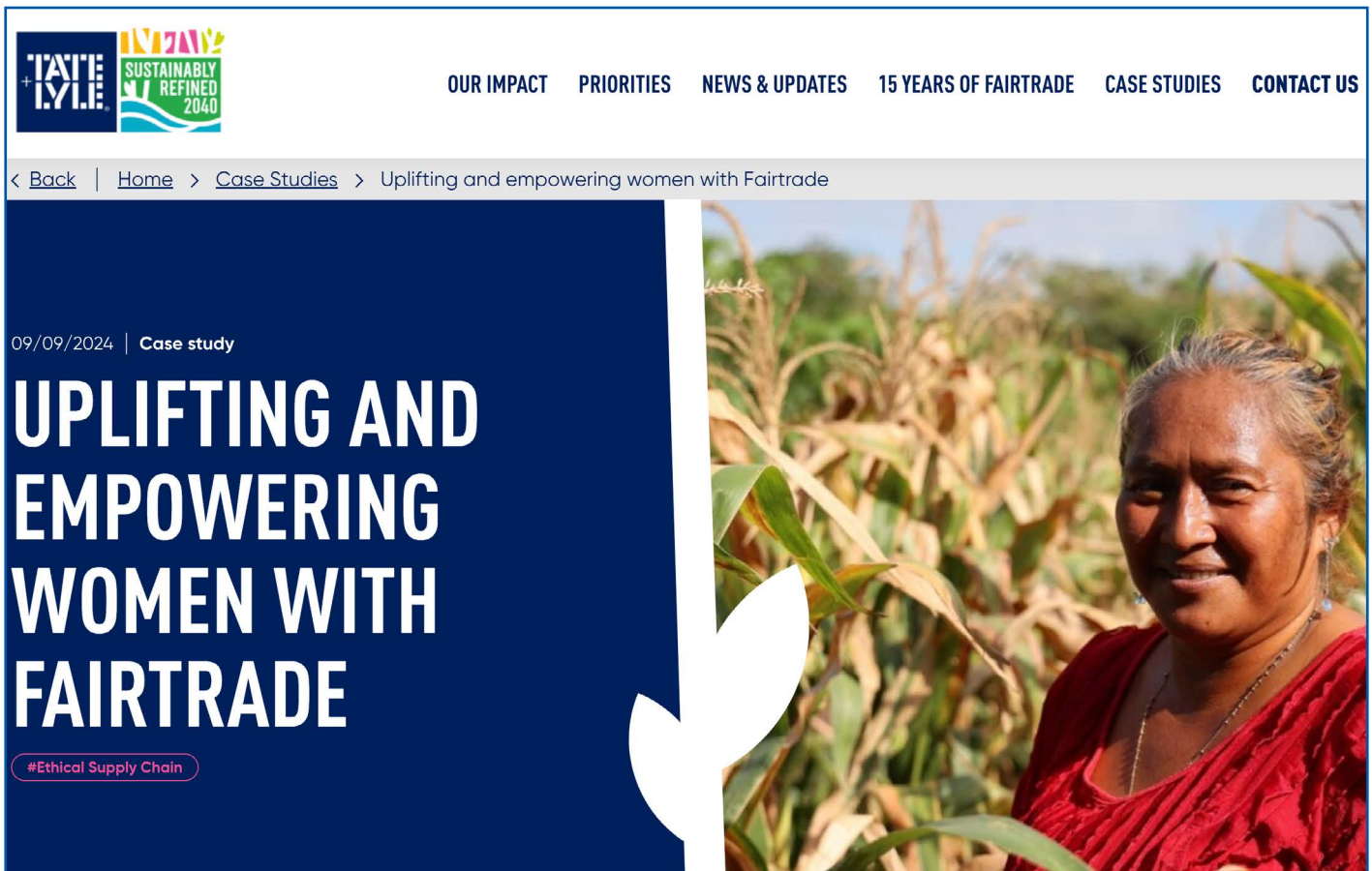
Any employee having knowledge of credible information concerning actual or potential violations of our Code of Ethics and Business Conduct is required to report it immediately.

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

External stakeholders can access the ASR Group Grievance Mechanism for External Stakeholders. All of these policies can be found at www.tateandlylesugars.com. Scroll to the bottom of the page to find the [ASR Group Codes and Policies](#) link.

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, 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.



Sustainably Refined [<https://www.sustainablyrefined.com/>]; our new sustainability website charts our progress towards being an ethical and sustainable business

Our goals

4. Update on 2023/24 progress

Each year we use the opportunity of writing 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 2023/24 are presented below with our progress against each one.

4.1 Our goal is to be able to source only certified raw sugar for our Thames refinery. We have been engaging with our raw sugar suppliers for several years to encourage them to certify their operations against a reputable sustainability standard. In the following section we explain the next stage in our work towards this goal. Meanwhile, we are pleased that **in our financial year 2023/24 66% of the raw sugar we purchased was certified under one of the standards mentioned above.**

4.2 We also committed to complete a human rights due diligence in line with the UN Guiding Principles on Business and Human Rights. **We will publish a summary of our findings on www.sustainablyrefined.com**



The Lyles Local Fund offers grants of up to £5,000 for local social enterprises, schools, charities, community groups and not-for-profits who support safe, prosperous and healthy community activities in Newham.

5. Our 2024/25 objectives for preventing modern slavery

5.1 The improved management systems and external scrutiny required by sustainability verification and certification are effective tools to ensure legal compliance and proper record keeping and helps us deploy controls across our supply chain. Requirements that support the formalisation of hiring policies and processes are particularly effective in reducing risks associated with hiring practices.

From October 1st 2024, we have committed to only buy raw sugar that has been either:

- 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.
- Or, in the event that we are unable to meet all of our raw sugar requirements with certified raw sugar, we will also accept sugar produced from supplying mills which have been assessed against a Proterra Verification audit. This sugar will be paired with Bonsucro credits. We aim to minimise the volume of this sugar where this is reasonably feasible, practically and commercially.

5.2 We will support projects in geographies which we have identified, through our due diligence processes, as higher risk.

One such project in Brazil, co-funded by ASR Group, Barry Callebaut, General Mills, The Hershey Co. and Nestlé, and lead by Proforest and the Brazilian NGO Imaflora aims to create a practical toolkit that guides mills through the due diligence process and offers tools to help implement it. The project will also provide practical tools for interpreting the UNGPs and the OECD guidelines. The aim is to improve human rights in sugarcane mills, as well as among suppliers and service providers.

In a similar project, lead by Fairtrade International, we will work with Fijian smallholder cane farmer association, Lautoka Cane Producer Association and sugar millers, Fiji Sugar Corporation to develop a due diligence process. This project will specifically explore the role that sustainability systems can play in facilitating dialogue and engagement during the development of the human rights due diligence process. We are grateful to the ISEAL Innovations Fund, supported by the Swiss State Secretariat for Economic Affairs SECO who have made this project possible.

5.3 In our own operations, we will review the profile of those included in the Stronger Together training programme with the goal of including a wider cohort of colleagues.



It's important to keep out of the strong sun when attending the 2024 Women Farmer Field School in Belize



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