MODERN SLAVERY ACT 2015/16

T&L Sugars Limited - Modern Slavery Act Transparency Statement for financial year 2015/16

Our business

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

Our primary raw material is raw cane sugar. This is purchased from some of the countries with which the European Union ("EU") has trade agreements. These EU trade agreements cover just 5% of the total amount of sugar that trades globally. Prohibitive EU import tariffs make it uneconomic for us to import from other suppliers.

The majority of our raw cane sugar supply is purchased directly from producers with whom we have long-term relationships. In a small number of cases we purchase from intermediaries.

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 work.

Our policy

T&L Sugars Limited recognises that modern slavery is an abhorrent abuse of human rights. We work to ensure any potential form of modern slavery in our own operations or within our supply chain is identified and eradicated.

Any form of forced labour, slavery or human trafficking is specifically prohibited by our Code of Ethics and Business Conduct and our Ethical Sourcing Policy (ESP). We actively police compliance with our code and ESP by a four step process in our raw cane sugar supply chain.

Step 1 requires our suppliers to adhere to our Ethical Sourcing Policy. This is based on International Labour Organisation conventions as well as other internationally recognized standards.

Step 2 asks every raw sugar supplier to complete an annual self-assessment of their social and ethical practices using the Sedex Supplier Engagement platform. The assessment also covers compliance with labour, health & safety, environmental and business integrity standards. 72 percent of our raw sugar suppliers completed this questionnaire in 2015/16.

Step 3 selects specific suppliers to participate in an independent sustainability audit against the ProTerra Standard, an internationally recognized social responsibility and environmental sustainability standard. For our EU operations, 69 percent of our cane sugar suppliers were audited in the 3-year period up to and including 2015/16 against the ProTerra standard, or certified against a comparable standard. These suppliers provided 75 percent of our EU sugar supply during that period.

Step 4 sees us encouraging and supporting our suppliers to improve in areas of non-compliance.

A number of the suppliers from which we source our sugar are Fairtrade certified. Fairtrade certification is based on regular audits of small holder operations against the Fairtrade standard which prohibits forced labour, slavery and human trafficking.
Within our own operations, our workforce is mostly permanent employees. Our use of temporary employees depends on seasonal peaks in demand for our products but has not been higher than 6% of total employees at any point during 2015/16. Our temporary employees are supplied by labour providers who, like all suppliers, are required to adhere to our Ethical Sourcing Policy which specifically prohibits modern slavery. Further, labour providers must be licensed with the Gangmasters’ Licenceing Authority, which aims to ensure employee’s rights are protected.

Further, 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.

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

Training

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.

Our 2016/17 priorities for further work on modern slavery are:

1. Continue to ensure that employees who may be in a position to spot indicators of modern slavery are independently trained on modern slavery issues and best practice.

2. Ensure employees know how to act if confronted with indicators of modern slavery in our own operations or in our supply chain.

3. Review our non-sugar supply chains to highlight any further areas of risk.

Gerald Mason

Director

T&L Sugars Limited

This statement was reviewed and approved by the Directors of T&L Sugars Limited on 10 April 2017.