



# Statement under the Modern Slavery Act

**2024-2025**

## 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 to end 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 2026.



**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 serious crime and a violation of fundamental human rights. It includes practices such as slavery, servitude, forced and compulsory labour, child labour, and human trafficking, all of which involve the exploitation of individuals through the loss of their liberty for personal or commercial gain. Modern slavery exists in every region of the world and across all types of economies. No industry or sector is immune, and none can afford to be complacent.

# Our Policy Framework

T&L Sugars Limited is a subsidiary of ASR Group International, Inc. ("ASRGI"), which has established policies for itself and its subsidiaries. References to "ASR Group" in this Statement refer to ASRGI and its subsidiaries. All of these policies can be found at [www.tateandlylesugars.com](http://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. Regular 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'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 & Modern Slavery Statements

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 the 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 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.

## 1. Raw Sugar Procurement

Sourcing raw cane sugar for refining is at the heart of our business. Our procurement team purchase raw sugar from sugar mills in countries with tropical and subtropical climates; the conditions that sugarcane needs to grow. The mills, in turn, buy sugarcane from farmers who are generally located close to the mills in order to minimise transport time and ensure the best quality.

In our fiscal year 2025 (1st October 2024 to 30th September 2025), raw sugar was purchased for refining in

London from sugar mills in Belize, Brazil, Eswatini, Guyana, Honduras, South Africa. Additionally, sugar was purchased for packing directly from mills in Colombia, France, Mauritius, Nicaragua and Paraguay.

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 often plays a significant social and economic role in the local economy. The ILO estimates that the sugarcane industry supports some 100 million rural livelihoods<sup>1</sup>. We recognise that buying from sugar producing companies in developing countries brings specific risks and responsibilities particularly relevant to this statement.



**Delio Chan**, Cane Farmer | Corozal Sugar Cane Producers Association, Belize

1. ILO 2017 Child Labour in Primary Production of Sugarcane

### ILO Risk Indicators

International Labour Organisation (ILO) has identified 11 indicators which 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, some workers may be unable to read or are unaware of their rights, and employment is traditionally arranged informally.

*Elsy Smith, Health & Safety Officer, Belize Sugar Industries*



### 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.

For many years, the cornerstone of our raw sugar sustainability programme has been 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 over 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 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. We are pleased that the annual limit was increased from January 2026. This will ensure improved access for T&L Sugars Limited to some of the most sustainable raw sugar suppliers in the world.

### 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.

## 1.2 Risk Management: Our Raw Sugar Sustainability Programme

As set out in our Code of Ethics and Business Conduct, Ethical Sourcing Policy and Supplier Code of Conduct (see page 4), 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 encouraged to certify their operations against internationally recognised social and environmental standards such as **Bonsucro, ProTerra, Vive, SAI, and Fairtrade**.

Those who have not yet achieved certification are requested to comply with our sustainability verification programme which includes:

- annual self-assessment questionnaires (SAQs) 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.

- to undertake, every three years, an independent audit against the ProTerra standard. The ProTerra standard seeks to address the main challenges linked to agricultural production in developing countries.
- Additionally, T&L Sugars Limited 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.

It is our goal that all our raw sugar suppliers be assessed (certified or verified) against an internationally recognised sustainability standard. This was achieved in 2025.

### ASR Group human rights due diligence report

In 2025 ASR Group published a report which describes the salient human rights issues we have identified and how, collaborating with our suppliers and stakeholders, we aim to facilitate improvements in human rights at mills and farms through monitoring, capacity building and knowledge sharing practices. The report shares information on the findings of our work, including our third-party social assessments, and our human rights due diligence approach.

The report can be found on our website: <https://www.sustainablyrefined.com/news-updates/human-rights-in-our-raw-sugar-supply-chain/>



Margarita Leiva, Sales, Operations & Planning Supervisor | Belize Sugar Industries

## 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.

T&L Sugars Limited is 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 regular cultural audits in which senior management engage informally with colleagues in the factory to understand any concerns about working conditions, safety or other issues.



*Owen Peralta, Truck Driver | Progressive Sugar Cane Producers Association, Belize*

### 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 whistleblowing line which is advertised around our sites.

External stakeholders can access the ASR Group Grievance Mechanism for External Stakeholders which is available at [www.tateandlylesugars.com](http://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.



**Marcia Smith**, Orders Clerk | Belize Sugar Industries

## 4. Update on 2024/25 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.

**4.1** From 1st October 2024, we committed to only buy raw sugar that has been either and independently certified against a globally recognised sustainability standard; or produced from supplying mills which have been assessed against a Proterra Verification audit.

This objective has been met. In 2025, 81% of the raw sugar we refined at our Thames refinery in 2025 was from suppliers certified by either Bonsucro, Fairtrade or Proterra. The balance of the raw sugar we refined was sourced from suppliers verified through independent audits against the Proterra Standard.

**4.2** We also committed to support human rights due diligence initiatives in Fiji and North East Brazil. In Brazil, a project lead by Proforest and the Brazilian NGO Imaflora, co-funded by the Bonsucro Impact Fund and ASR Group, Barry Callebaut, General Mills, The Hershey Co. and Nestlé, aimed to create a practical toolkit to guide mills through the due diligence process. Three mills engaged with the programme through workshops involving 127 participants. 93% of participants said that they had strengthened the implementation of their human rights due diligence processes. All 3 of the mills said they would like to continue to engage with the programme

and we are currently considering how to facilitate this. To see the guide that was produced see <https://www.humanrightsspotlight.net/>.

In Fiji, Fairtrade International lead a project with Fijian smallholder cane farmer association, Lautoka Cane Producer Association, sugar millers, Fiji Sugar Corporation and T&L Sugars Limited to discuss human rights risks with the aim of developing a due diligence process. Similarly to the Brazil initiative, the dialogue helped participants to understand the human rights impacts of the industry and encouraged them to work to mitigate negative impacts. As above, participants have agreed to continue the dialogue. We are grateful to the ISEAL Innovations Fund, supported by the Swiss State Secretariat for Economic Affairs SECO who have made this project possible.

**4.3** In our own operations, we increased the number of colleagues included in the Stronger Together training programme to include personnel at our new Normanton site. Additionally, in August, we also ran a special in person training session for PWA, our contract cleaning team at Thames refinery, with a discussion afterwards. The Sanitation Manager for Thames, Matthew Solo, and the Owner/Director of PWA, Peter Wigington commented afterwards that the team agreed that the session had helped them understand the risks of modern slavery and forced labour and how easily it can be overlooked in any work setting.

**Mac MacLachlan**, VP Country Manager, Belize



## 5. Our 2025/26 objectives for preventing modern slavery

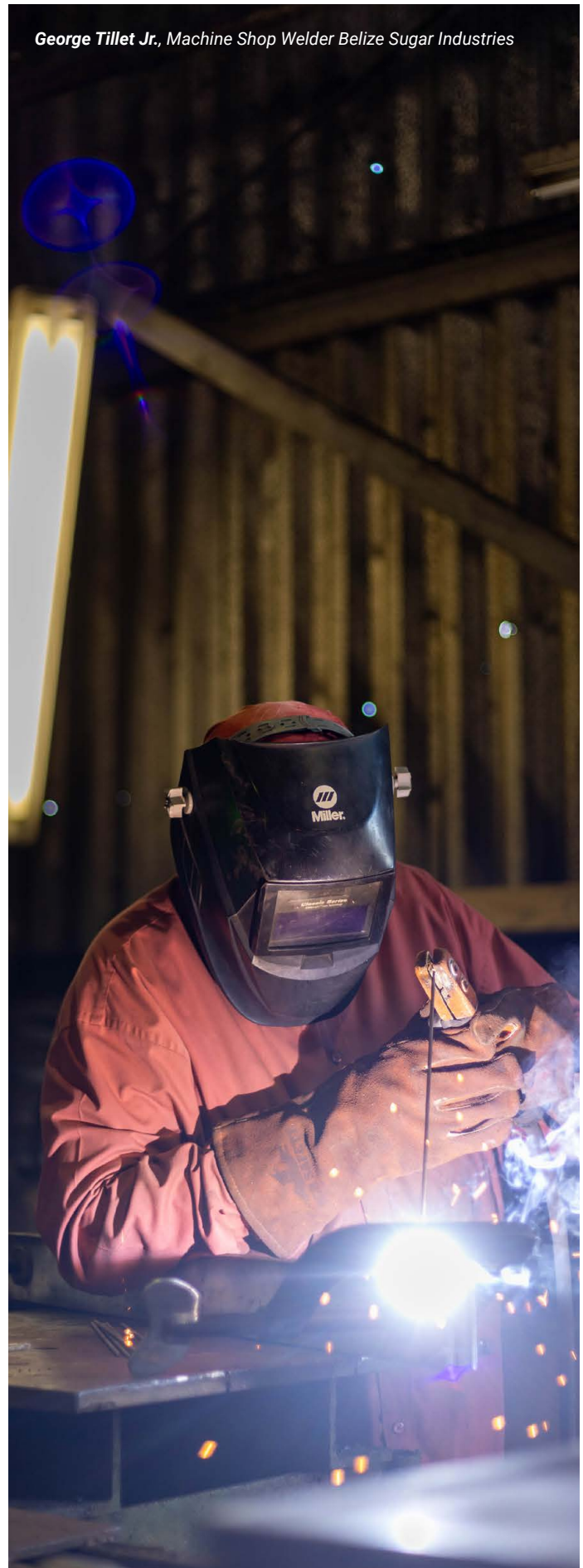
**5.1** The strengthened management systems and external oversight required by sustainability verification and certification help ensure legal compliance, accurate record keeping, and the effective implementation of controls throughout our supply chain. In particular, requirements that formalise hiring policies and procedures are highly effective in reducing risks related to recruitment practices.

We will retain our commitment made in October 2024, 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.

While there are many variables determining our sugar purchasing programme, we are optimistic that the expanded UK Autonomous Tariff Quota (ATQ) will help us increase the percentage of the raw sugar we purchase from suppliers certified against credible voluntary sustainability standards.

**5.2** Building on the Human Rights Due Diligence work in Fiji, which we have agreed to continue; we have undertaken to adapt our regular audit programme in 2025/26 to incorporate capacity building for participants in the Fiji sugar industry. Through this initiative we hope to effect change in policies and processes. The training took place in October 2025 and we will continue to follow up to monitor the impact.



*George Tillet Jr., Machine Shop Welder Belize Sugar Industries*



*Elvis Tablada Jr., Wharf Foreman, Belize Sugar Industries*

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