

Modern Slavery Statement for Financial Year 2016/17

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps that TSUKI has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. TSUKI has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

Tereos UK and Ireland Ltd (TUKI) is a wholly owned subsidiary of Tereos, the world's 3rd largest sugar producer. In the UK we have a turnover of circa £175m, supplying sugar to both retail and industrial customers, and employ around 150 people operating over 2 sites based in Normanton, West Yorkshire, and Stallingborough in Lincolnshire. At Normanton we pack sugars imported from around the world into retail packs, both private label and our Whitworths brand.

Our high risk areas

TSUKI sources some sugar products from ILLOVO Malawi. Due to the seasonal nature of the work in the sugar cane industry and the location of this Business, it could be deemed as high risk. TSUKI have worked with this supplier for many years and regularly audit their facilities and practices. Policies and Illovo Child Labour and Forced Labour Guidelines are available on their website. (<https://www.illovosugar.co.za/Group-Governance/Forced-and-Child-Labour-Guidelines>)

Other cane sugar sources are also audited and approved, conforming to the required standards.

Where temporary labour is used within TSUKI Operations, the provider is regulated by the GLA.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Our Business has been audited to SMETA 4 pillar standard. TSUKI also utilise SEDEX as a tool in the supplier approval process and have done so for many year.

4. Compliance Rules and Good Business Practices training is provided for all Managers within our business. This training explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.
5. Ethical Charter and Ethics Code - The purpose of these policies is to guide and inform all of Tereos's behaviours, actions and decision making by asserting the principles and rules of conduct required.

Our suppliers

TSUKI operates a supplier approval procedure and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a supplier. This includes supply chain vulnerability assessments and Sedex membership.

Training

We regularly conduct training for our procurement/buying/supply chain teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

This includes:

1. Tereos Ethical Charter.
2. Compliance rules and good business practices.

Our performance indicators

We do not have key performance indicators specifically in relation to slavery or human trafficking as any instance would be a non-compliance and breach of employment laws.

Continuous Improvement

TSUKI are committed to ensuring our supply chain in no way supports Human Slavery or Trafficking. To this end we regularly review our policies and procedures, driving continuous improvement in this area and compliance within our supply chain.

Approval for this statement

This statement was approved by the Board of Directors.

Name (Director)	Mark Haslam
Date	January 2017