

TATA GLOBAL BEVERAGES



SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR TATA GLOBAL BEVERAGES GB LIMITED AND TATA GLOBAL BEVERAGES GROUP LIMITED FOR THE FINANCIAL YEAR ENDING 31 MARCH 2019

BUSINESS STRUCTURE AND SUPPLY CHAINS

This Slavery and Human Trafficking Statement is being made by Tata Global Beverages GB Limited (“TGB”) on behalf of both itself and its indirect UK parent company Tata Global Beverages Group Limited (“TGB Group”) pursuant to Section 54 of the Modern Slavery Act 2015. TGB Group provides intra-group services to TGB and other UK group companies. Tata Global Beverages GB Limited remains the main operating business in the UK. This Statement sets out the steps TGB is taking to address the risks of slavery and human trafficking potentially taking place within TGB’s operations and supply chains.

TGB is a British tea beverage manufacturer with ‘Tetley’ tea being its largest branded tea sold in the UK and around the world. The vast majority of raw tea used to produce Tetley tea is sourced from Africa with the rest from various countries around the world, including India.

Once the raw tea has been sourced, a sophisticated supply chain is required to bring the tea from origin to market. This requires shipment, blending, packing and transporting the product to supermarkets or other onward distribution processes. Our UK factory is based in the North East of England. We also manufacture and pack in various countries, including India, Czech Republic, Poland and Spain.

During 2017, TGB launched a new non-tea squash range in the UK under its Tetley brand, with a UK and European based supply chain.

Location of TGB staff is split between TGB’s tea factory in the North East of England and our offices in Greenford, Middlesex, with some staff working from home.

Further to our previous Modern Slavery and Human Trafficking Statements, this Statement contains updates on:

- our launch in 2018 of a new Supplier Code of Conduct; and
- training of personnel on Modern Slavery.

OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Our Tata Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The Tata Code of Conduct states: *“We shall respect the human rights and dignity of all our stakeholders. It further states: “We do not employ children at our workplaces. We do not use forced labor in any form.”* At the commencement of any employment with Tata Global Beverages, employees are required to acknowledge they have received and read the Tata Code of Conduct and certify they will comply with the provisions at all times during their employment.

TGB recognises and respects each employee’s right to freedom of association, including the right to join trade unions.

TGB carries out appropriate due diligence on all employees prior to them commencing their roles with the business. This includes checking where applicable that the employee has the appropriate right to work documentation and doesn't fall below the minimum legal age to work.

TGB encourages its employees, customers, suppliers and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of the TGB Code, policies or law, including any human rights abuses. We also encourage reporting of any event (actual or potential) of misconduct that is not reflective of our values and principles. Avenues available for raising concerns include:

- Immediate line manager or Human Resources team
- designated ethics officers within TGB
- through our confidential Ethics and Compliance Helpline and Whistleblower Policy

In the event that such issues were to be reported, TGB would undertake an immediate and thorough investigation into the concerns raised. If the investigation confirmed the concerns to be true, we would take firm action to address the issues and protect those affected. For the period covered by this Statement, TGB has not received through its whistleblowing procedure, any reports of forced, compulsory, slave, trafficked or bonded labour in our operations.

OUR DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

We are very aware of our responsibilities to the people who grow and pick our tea, and of our responsibility to help sustain the environment on tea estates. One of the ways in which we are fulfilling these responsibilities is through our collaboration with the Rainforest Alliance and other similar organisations.

Rainforest Alliance Certification

At the start of 2010, Tetley announced its commitment to purchase all of the tea for its branded tea bag and loose tea products from Rainforest Alliance Certified™ farms. We are pleased to report that in FY18/19, 100% of all Tetley branded black and green tea (*Camellia sinensis*) and red/rooibos tea (*Aspalathus linearis*), including flavoured and decaffeinated varieties, sold by TGB is Rainforest Alliance Certified™, and we are working towards full certification.

We also sell small quantities of tea under the brands of Hornimans and Teapigs. The Hornimans tea is 100% Rainforest Alliance certified. The Teapigs "English Breakfast" and "Everyday Brew" tea blends sold in Canada and Australia are 100% Rainforest Alliance certified. Teapigs is committed to sourcing its teas from top quality, well-run estates and is working with the Rainforest Alliance to get more green and herbal tea estates certified.

Rainforest Alliance Certified farms are managed according to rigorous environmental, social and economic criteria designed to protect workers, their families, local communities and increase livelihoods. Farms seeking Rainforest Alliance certification are regularly audited by members of the Rainforest Alliance team or one of its international partners in the Sustainable Agriculture Network (SAN). These visits, along with surprise audits, ensure that farmers are complying with the SAN's comprehensive guidelines and are working to continually improve their operations. Farms that have earned the Rainforest Alliance Certified seal are taking steps to, amongst other things, ensure the well-being of workers and their families by facilitating access to education and healthcare.

Ethical Tea Partnership

TGB is committed to ensuring a better life for our farmers, better tea for the consumer and a better environment for everyone. Tetley is one of the founding members of the Ethical Tea Partnership (ETP), a not-for-profit organisation, helping to create a

thriving, global tea industry that is socially fair and environmentally sustainable. In 2017, Teapigs also joined the ETP as part of its commitment to doing the right thing and sourcing its teas responsibly.

Since it was founded in 1997 the ETP has worked on a wide range of issues that have brought about long lasting improvements for people who live and work on tea estates. These include empowering girls and adolescents with knowledge, necessary life skills and confidence to protect themselves and make informed decisions about their future, improving living and working conditions for tea workers and farmers, and leading coalitions of stakeholders from across the entire tea value chain to create a sustainable tea industry that supports decent work and livelihoods for tea communities.

RISK ASSESSMENTS

TGB's supply chain in respect of tea sold into Europe, US and Canada is 100% Rainforest Alliance certified. This means auditors employed by Rainforest Alliance verify that the tea estates in our supply chain meet the following criteria:

- *No form of forced, compulsory, slave, trafficked or bonded labour*
- *No use of prisoners or soldiers*
- *No debts, threats, monetary fines or penalties used*
- *Regular working hours do not exceed 48 hrs a week except for security guards who work 10 hrs a day and the overtime is paid. There is an hour break for every 6 hrs worked and a rest day for every 6 days worked*
- *All overtime is voluntary and does not exceed a total of 60 hrs a week*
- *All overtime is paid at the rate required by applicable law or as collectively negotiated, whichever is higher. In absence of applicable law for higher overtime pay, overtime is paid at 1.5 times the regular wage level.*
- *Pregnant women and nursing mothers are not assigned heavy duties and once relocated to lighter duties, remuneration is not deducted*

TGB shall continue its work with the Ethical Tea Partnership and the Rainforest Alliance to ensure the tea it buys is ethically produced and sourced.

MANAGING SUPPLY CHAIN RISK

We have hundreds of active suppliers covering tea, packaging and services. A full due diligence assessment is carried out on key supplier before they are on-boarded. This assessment covers a range of topics including regulatory & legal compliance. We have zero tolerance for slavery and human trafficking.

To ensure that all those in our supply chain and contractors comply with our values, the following departments are all alive to the issues around modern slavery and human trafficking and are required to immediately escalate any concerns they may have in this regard: Tea Buying, Internal Audit, Legal and Compliance, Human Resources, Operations and Procurement.

We expect our suppliers to respect fundamental human rights, to treat their workforce fairly, with respect and dignity and evaluate the effectiveness of our policies and strategies by measuring against high performance indicators.

New Supplier Code of Conduct 2018

During FY17/18, we started working on a new Supplier Code of Conduct and launched it in 2018. Under the Code, Suppliers of good and services to TGB are required to comply with the Code which includes a section entitled "Human Rights, Workplace, and Labour Standards". An extract from the Code states that Suppliers must comply with the following requirements:

- Suppliers must respect the human rights and dignity of all stakeholders. Proper measures must be taken to promote a workplace free of harassment, harsh treatment, threats of violence, corporate punishment, or other forms of physical coercion.
- Suppliers shall not use forced labour in any form, including bonded, indentured and involuntary prison labour, inclusive of human trafficking and slavery. Any work performed by an employee that is involuntary and/or performed under threat of physical harm or other penalty is prohibited.
- Suppliers will not confiscate personal documents of their employees, or force them to make payment to the Supplier in order to secure employment or to work with the Supplier. All employment with the Supplier shall be freely chosen and employees will be free to leave the Supplier after a reasonable notice period.
- Suppliers must ensure that working conditions for their employees are safe, healthy, and hygienic, this shall include unrestricted access to drinking water and toilet facilities. Suppliers must implement appropriate controls, safe procedures, and preventative maintenance and protocols for providing appropriate protective equipment in compliance with all applicable laws and regulations, and take all appropriate measures to prevent accidents and minimise hazards.
- Suppliers shall comply with all applicable laws governing the number of maximum work hours, vacation time, leave periods, and holidays. Supply partner employees shall not work beyond the maximum working hours permitted by applicable law. Supply partners will compensate for overtime hours, and legally mandated benefits in accordance with all applicable laws and standards.
- Suppliers shall not tolerate any form of harassment, whether sexual, physical, verbal or psychological.
- Suppliers shall recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with all applicable laws, and allow employees the freedom to join a union, or collective bargaining group acting for them, or allow them to decline if they choose to.
- Suppliers shall comply with all relevant aspects of the Modern Slavery Act 2015 and any related laws or regulations.
- Suppliers shall only employ workers with a legal right to work, which must be validated by Suppliers before the employment by reviewing the relevant documentation.

Since the launch of the Supplier Code of Conduct in 2018, we have engaged with our top 25 non-tea suppliers globally (based on a global risk assessment conducted by Procurement and Compliance and external advisers), and requested their signed commitment to comply with the Code. To date, no supplier has objected to this request and we are seeking near perfect compliance. Our next step is to work towards seeking commitment from our next top 225 suppliers in terms of volume of business and risk scale based on geographical location and industry sector.

Packaging and Services

We recognise that the procurement of packaging and services play a large role in our supply chain and we therefore use supplier due diligence software to help identify regulatory and legal offences committed by a potential supplier.

TRAINING ON SLAVERY AND HUMAN TRAFFICKING

Tata Global Beverages continually seeks to educate its team members responsible for buying, blending and supply chain management about the ethics and principles underlining its standards relating to social issues including slavery and human trafficking.

We have previously carried out face-to-face training to the Human Resources, Procurement and Tea Buying departments across all regions with the objectives of the training being to:

- provide background on the scope of the human trafficking and slavery issue;
- review the legal requirements under the Modern Slavery Act;
- train staff on how to identify slavery in the supply chain;

- provide examples of red flags; and
- remind staff of the organisation's internal reporting procedures.

In September 2019, we carried out face-to-face awareness training to our finance team based in Greenford UK. In the same month, we also trained staff managing our Teapigs brand, owned by TGB's subsidiary Teapigs Limited. This ongoing training has helped to build greater awareness within our business.

Going forward, TGB will train new joiners and carry out refresher training from time to time for those delegates who have previously attended training in this area. In 2018, we also launched a new training program across the TGB global business, focusing on the **TGB Ethics & Compliance Helpline**. As part of that training, staff members were actively encouraged to report concerns of an ethical nature on an anonymous basis without fear of retribution.

PUBLISHING OUR STATEMENTS

Our Statement is published on both of our main UK and global websites which can be found at:

1. www.Tetley.co.uk
2. www.tataglobalbeverages.com

A link to our modern slavery statement can be found on the homepages of each of the above websites. Copies of our previous statements remain on our website and can be viewed at any time. Should there be any difficulty in accessing our websites, please send a written request marked for the attention of the Company Secretary, Tata Global Beverages GB Limited, 325 Oldfield Lane North, Middlesex, UB6 0AZ.

WHAT ELSE

We will continue our efforts to combat slavery and human trafficking. To learn more about Tata Global Beverages responsible business practices, please visit:

> <http://www.tataglobalbeverages.com/sustainability> which details our various social sustainability initiatives.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending **31 March 2019**. This statement has been approved by the Board of Directors of Tata Global Beverages GB Limited and Tata Global Beverages Group Limited.

For and on behalf of Tata Global Beverages GB Limited

Signed.....

Print Name.....MANESH THAKRAR

Position.....Director

Date.....23rd September 2019

For and on behalf of Tata Global Beverages Group Limited

Signed.....

Print Name.....MANESH THAKRAR

Position.....Director

Date.....23rd September 2019