

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR TATA CONSUMER PRODUCTS GB LIMITED AND TATA CONSUMER PRODUCTS UK GROUP LIMITED FOR THE FINANCIAL YEAR ENDING 31 MARCH 2022

BUSINESS STRUCTURE AND SUPPLY CHAINS

This Slavery and Human Trafficking Statement (“**Statement**”) is being made by Tata Consumer Products GB Limited (**Tata Consumer Products GB** / “**we**” / “**our**”) and its parent company Tata Consumer Products UK Group Limited (“**UK Group**” / “**we**” / “**our**”) pursuant to Section 54(1) of the Modern Slavery Act 2015 (**MSA**), and is our slavery and human trafficking statement for the financial year ending **31st March 2022**. GB and UK Group are both part of the wider Tata Consumer Products Group (“**TCP**”). This Statement includes updates on actions that have been taken since that date. Tata Consumer Products GB is a British beverage manufacturer and food distributor, and this Statement sets out the steps we are taking to combat any risks of slavery and human trafficking taking place within our operations and supply chains.

Our Brands



teapigs.



Our “Tetley” tea brand is our largest tea brand by volume and value and is sold both 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, transporting, and supplying the product to supermarkets and other sales channels. Our UK factory is based in the North East of England. The location of our staff is split between our tea factory in the North East of England and our offices in Greenford, Greater London, with some staff working from home. We also manufacture and pack tea in various countries, including India, Poland and Spain. In addition, since April 2020 we have been selling tea and other beverages in the UK and Europe under the Good Earth brand, with a UK and European supply chain. Likewise our Tetley branded squash drink that we sell in the UK also has a UK and European supply chain. During 2021, we also started selling water and food products in the UK that are manufactured and packaged in India by our TCP parent company Tata Consumer Products Limited, under the brands of ‘Tata Tea’, ‘Tata Salt’ and ‘Himalayan’ water. These food and water products are transported directly from India to our UK and European retailers. We have started the process of reviewing the supply chains for these products for modern slavery risks.

OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Tata Code of Conduct

Our Tata Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships. It 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, employees are required to acknowledge they have received and read the Tata Code of Conduct and certify they will comply with its provisions at all times during their employment.

Tata carries out appropriate due diligence on all employees prior to them commencing their roles with the business. This includes checking where applicable that each employee has the appropriate right to work documentation and is of the minimum legal age to work.

Ethics and Compliance Helpline and Whistle-blower Policy

Tata recognises and respects each employee's right to freedom of association, including the right to join trade unions. Tata 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 Tata Code of Conduct, 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 Tata
- through our confidential and independent Ethics and Compliance Helpline and Whistle-blower Policy

If any such issues were reported, Tata 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, Tata has not received through its whistleblowing procedure, any reports of forced, compulsory, slave, trafficked or bonded labour in our operations.

Supplier Code of Conduct (“SCOC”)

Suppliers of good and services to Tata are required to comply with the SCOC, which includes a section entitled “Human Rights, Workplace, and Labour Standards”. An extract from the SCOC provides 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 MSA 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.

In 2022, we strengthened our SCOC by placing further obligations on our Suppliers, including for example:

- ✓ Suppliers shall ensure human trafficking and slavery does not exist in their own operations and supply chain.
- ✓ Suppliers shall adhere to Tata's Business and Human Rights Policy and comply with Tata's salient human rights which include equal opportunity and fair wages for all workers; no use of forced labour or contemporary forms of slavery; consider human rights in value chain; and non-harassment of workers.
- ✓ Suppliers shall respect the rights of migrant labour and endeavour to include migrant labour coverage in their pay, non-discrimination, labour, working hours policy.

We have engaged our top 1,000 non-tea suppliers of packaging and services (this is because we already have certification in place for the tea supply via Rainforest Alliance) globally and sought their commitment to comply with the SCOC. Currently, suppliers representing approximately 73% of our total non-tea spend value have agreed to comply with our SCOC and we are working towards getting 100% commitment from all our suppliers in our non-tea supply chains. We know corrupt practices can lead to poor treatment of workers and have therefore taken our efforts further by requesting the completion of due diligence questionnaires by those suppliers we deem might fall into a higher risk category. Responses from the questionnaires will be reviewed and appropriate action taken where we consider suppliers to fall below the standard we expect.

Tata Business and Human Rights Policy

The Tata Consumer Products Group has further affirmed our commitment to all human rights both within and outside the workplace through the establishment of a formal **Business and Human Rights Policy**. This Business and Human Rights Policy is aligned with the principles contained in the Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights. The policy was approved by the Board of Directors of Tata Consumer Products Limited on 22 October 2021. A copy of the policy can be found at <https://www.tataconsumer.com/sites/g/files/gfwrlq316/files/2021-10/business-and-human-rights-policy.pdf>.

The Business and Human Rights Policy requires us to:

1. Constitute a governance structure to oversee human rights commitments.
2. Integrate an approach that respects and protects human rights in business strategy and risk frameworks.
3. Foster an understanding of human rights across all rightsholders of the business.
4. Advocate protection of human rights from adverse impacts resulting from or caused by business.
5. Set up a fair, transparent and consultative remediation framework to address adverse human rights impacts.
6. Disclose progress on human rights performance in line with national and/or global reporting frameworks.

Our **Business and Human Rights Committee** (formerly known as our Human Rights and Modern Slavery Working Group) has developed a number of key objectives to ensure we put the Policy into practice.

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

In line with our commitment to purchase all of the tea for our branded tea bags and loose tea products from Rainforest Alliance Certified™ farms we are pleased to report that since 2019, 100% of all Tetley branded black and green tea and red/rooibos tea, including flavoured and decaffeinated varieties, sold by Tata Consumer Products GB are Rainforest Alliance Certified™, and we are working towards ensuring our Tetley botanical range is produced from sustainable sources.

Our Teapigs brand, managed by our wholly owned affiliate Teapigs Limited, is committed to sourcing its teas from top quality, well-run estates. Teapigs' "English Breakfast" and "Everyday Brew" tea blends are 100% Rainforest Alliance Certified™ and Teapigs is working with the Rainforest Alliance to get more green and herbal tea estates certified. Teapigs is passionate about sustainability and is committed to giving back to the communities that grow the tea. Teapigs is B Corp certified which requires teapigs to analyse its impact on its workers, customers, community, and environment and meet the highest standards of social and environmental performance, accountability, and transparency. Teapigs is also an approved supplier of the Sustainable Restaurant Association which helps guide restaurants in all areas of sustainability – from the way they source their products, to the way they impact society, staff and the environment. You can learn more about Teapigs' sustainability values here: <https://www.teapigs.co.uk/pages/sustainability-values>

We are also pleased to report that the entirety of our Good Earth tea (black and green) range is Rainforest Alliance 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, are intended to check whether farmers are complying with the SAN's comprehensive guidelines and are working to improve their operations. In order to earn the Rainforest Alliance Certified™ seal, Farms are expected to show they are taking steps to, amongst other things, facilitate the well-being of workers and their families by providing access to education and healthcare.

In June 2020, the Rainforest Alliance published its **2020 Certification Programme** which set out improvements in respect of IT data systems and tools to better monitor performance. It also included the new **Rainforest Alliance Sustainable Agriculture Standard Farm Requirements**. Chapter 5 of this Standard states:

*"Child labor, forced labor, discrimination and workplace violence and harassment are not tolerated on Rainforest Alliance Certified farms. **The 'assess-and-address' system requires certificate holders have specific measures in place to monitor and mitigate risks related to child labor, forced labor, discrimination, workplace violence and harassment.** When cases are identified on Rainforest Alliance certified farms or on farms that apply for certification, they must be remediated. Severe cases, if not remediated, and/or violations of applicable law, will lead to a negative certification decision, suspension or cancellation of the certificate."*

A copy of the new Rainforest Alliance Sustainable Agriculture Standard Farm Requirements can be found on the Rainforest Alliance website at <https://www.rainforest-alliance.org/wp-content/uploads/2022/01/2020-RA-Sustainable-Agriculture-Standard-Farm-Requirements.pdf>.

If a farm loses or no longer holds Rainforest Alliance certification, we shall act promptly to suspend any further purchases of tea from that farm.

Ethical Tea Partnership

We are committed to ensuring a better life for tea growers, 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 membership organisation, helping to create a thriving, global tea industry that is socially fair and environmentally sustainable. Teapigs is also a member of the ETP in its own right, as part of its commitment to doing the right thing and sourcing its teas responsibly.

Since it was founded in 1997, 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 help 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.

If a tea estate's membership with the Ethical Tea Partnership is lost or suspended, we shall act promptly to suspend any further purchases of tea from that estate.

Business and Human Rights Committee (formerly "Human Rights and Modern Slavery Working Group")

Since August 2020 we have operated a global cross-functional working group within the Tata Consumer Products Group, now operating as the Business and Human Rights Committee. The fundamental purpose of this Committee is to enhance our ability to identify and combat any risks of modern slavery occurring in our global supply chains. Its objectives include the development of further training plans to support awareness and understanding of those risks through the business, and the development, monitoring and review of risk assessments and audits in relation to our suppliers. The scope and membership of this Committee has been expanded to include the food business that TCP acquired from Tata Chemicals in 2020. During the relevant period a draft MSA risk register has been prepared in relation to our global tea and coffee supply chains. We have started the process of reviewing the Tata Tea, Tata Salt and Himalayan water supply chain into UK and Europe in order to identify any MSA risks in relation to those supply chains.

Modern Slavery and Trafficking Compliance Clauses in our Contracts

We continue to incorporate anti-slavery clauses into all our major supply contracts whereby suppliers are required to commit that:

- ✓ they shall comply with the Modern Slavery Act 2015;
- ✓ neither the supplier nor any of its officers, employees, agents or subcontractors is aware of any circumstances within its supply chain that could give rise to an investigation relating to an alleged offence under the MSA or prosecution under the MSA;
- ✓ they have implemented due diligence procedures to ensure compliance with the MSA in its business and supply chain; and
- ✓ for the avoidance of doubt, the supplier undertakes not to purchase any resource or raw materials or products that have been sourced from producers or manufacturers using forced or child labour in its operations or practices.

As part of these clauses, we are retaining the right to invoke sanctions against suppliers who fail to comply with these commitments, including the termination of the business relationship.

RISK ASSESSMENTS

Our 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

Our continued work with the Ethical Tea Partnership and the Rainforest Alliance demonstrates our commitment to buy tea which has been ethically produced and sourced.

MANAGING SUPPLY CHAIN RISK

We have hundreds of suppliers covering tea, 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. We expect all our suppliers to respect fundamental human rights, to treat their workforce fairly, with respect and dignity. Our staff are aware of the worldwide concern around modern-day slavery and human trafficking and are encouraged to immediately escalate any concerns they may have in this regard.

Ethical Tea Partnership - Revitalisation Programme in Malawi

Since 1st April 2020, we have partnered with the ETP to help fund a full range of interlinking programmes to help tea farmers in Malawi to improve and transform their livelihoods and those of their families, for the better. By increasing farmers' tea farming knowledge, incomes, ability to diversify and savings opportunities, as well as helping them develop improved business skills, these programmes are improving their lives and longer-term prospects.

Teapigs - Educational opportunities for vulnerable people in Rwanda

By working with a charity called the Point Foundation, Teapigs has helped to fund educational opportunities for vulnerable people in Rwanda. This has ranged from support to fund schools; sponsoring vulnerable children through university education; funding vocational skills training; providing donations to help fund equipment, animals and training for local community farming projects in Rwanda.

Please visit <https://www.teapigs.co.uk/pages/ethical-scheme> to learn more about Teapigs' ethical schemes.

TRAINING ON SLAVERY AND HUMAN TRAFFICKING

We seek to continue to educate our staff responsible for tea buying and blending, and supply chain management, about slavery and human trafficking. The objectives of our training programme include:

- providing colleagues with an understanding on the scope of the human trafficking and slavery issue;
- training colleagues on how to identify slavery in the supply chain;
- providing examples of red flags; and
- reminding colleagues of our internal reporting procedures.

We intend to carry out further training with relevant business functions during the 2022 – 23 financial year.

PUBLISHING OUR STATEMENTS

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

1. www.tetley.co.uk
2. www.tataconsumerproducts.com
3. www.tetleyfoodservice.co.uk
4. www.goodearth.co.uk
5. www.teapigs.co.uk

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 www.tataconsumerproducts.com website and can be viewed at any time (follow the link <https://www.tataconsumer.com/modern-slavery-statement--uk>). Should there be any difficulty in accessing our websites, please send a written request marked for the attention of the Company Secretary, Tata Consumer Products GB Limited, 325 Oldfield Lane North, Middlesex, UB6 0AZ.

WHAT ELSE

To learn more about Tata Consumer Products' responsible business practices, please visit: <http://www.tataconsumerproducts.com/sustainability> which details our various social sustainability initiatives. This statement has been approved by the boards of directors of Tata Consumer Products GB Limited and Tata Consumer Products UK Group Limited.

For and on behalf of Tata Consumer Products GB Limited

Signed..... *A J M*

Print Name..... *AOM BURTON*

Position: Director.....

Date..... *26/5/2022*

For and on behalf of Tata Consumer Products UK Group Limited

Signed..... *A J M*

Print Name..... *AOM BURTON*

Position: Director.....

Date..... *26/9/2022*

