

TATA CONSUMER PRODUCTS

SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR TATA CONSUMER PRODUCTS GB LIMITED & TATA CONSUMER PRODUCTS UK GROUP LIMITED FOR THE FINANCIAL YEAR ENDING 31 MARCH 2023

BUSINESS STRUCTURE AND SUPPLY CHAINS

This Slavery and Human Trafficking Statement (“**Statement**”) for the financial year ending **31st March 2023** 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**). GB and UK Group are both part of Tata Consumer Products Group (“**TCP**”). This Statement includes information about our business that is only relevant after 31st March 2023.

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



In the UK we have three core tea brands: Tetley, Good Earth and teapigs which are sold in the UK and other markets around the world.

Each year our buying and blending team source close to 32 million tonnes of tea from more than 350 different suppliers. Africa is our most significant sourcing region, with 60% of our teas sourced from Kenya and 23% from Malawi, with the rest from different countries around the world, including India. Once raw tea has been sourced, tea is brought from origin to market via a tightly controlled supply chain including shipping, blending, packing, transporting, and supplying product to supermarkets and other sales channels.

Our UK factory is based in the North-East of England and our teas are brought into the country via the Port of Tyne from where products are also exported. We also manufacture and pack tea outside of the UK, including in India, Poland and Spain.

The location of our staff is split between our tea factory in the North-East of England and our offices in Greenford, Greater London, and some staff are home based.

In addition to our core tea brands we also sell food and drink 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', Tata Sampann, Tata Joyfull and Tata Raasa. These products are transported directly from India to UK and European retailers.

OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Tata Business and Human Rights Policy

The Tata Consumer Products Group has affirmed its commitment to all human rights within and outside the workplace through the establishment of a formal **Business and Human Rights Policy** 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.

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>.

Our global cross-functional **Business and Human Rights Working Group ("Working Group")** works to ensure we put the Policy into practice.

TRAINING ON SLAVERY AND HUMAN TRAFFICKING

Part of the Working Group's objectives are to provide training 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.

We seek to continue to educate our staff responsible for tea buying and blending, and supply chain management, on 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.

During the 22 – 23 financial year, members of our non-tea procurement team received training. Following subsequent changes of personnel, further training is intended to be carried out in FY 23 – 24.

OUR DUE DILIGENCE PROCESSES

Tata Code of Conduct

At the commencement of their employment, all Tata employees are required to commit to and sign the Tata Code of Conduct which reflects our commitment to act ethically and with integrity in all business relationships.

The Code of Conduct specifically 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.***"

Tata conducts 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 any reports of forced, compulsory, slave, trafficked or bonded labour in our operations through its whistleblowing procedure.

Tata Supplier Code of Conduct (“SCOC”)

For our major tea suppliers this requirement is documented in our Procurement policy which the business must adhere to. Under this, suppliers commit to ensuring that working conditions for their employees are safe, healthy, and hygienic, including unrestricted access to drinking water and toilet facilities.

Suppliers must implement appropriate controls, safety procedures, and preventative maintenance and protocols for providing appropriate protective equipment in compliance with all applicable laws and regulations, they must also take all appropriate measures to prevent accidents and minimise hazards.

Of our non-tea suppliers of packaging and services, as at the date of this Statement, suppliers representing 67% of our spend in this area have signed our SCOC, and we are working towards getting 100% commitment from all our suppliers in our non-tea supply chains.

Grievance

Grievance redressal forms part of our Supplier Code of Conduct agreement. Where internal and external stakeholders identify material breaches of the Code’s requirements, whether through their employees or third parties, including Tata Consumer Products, our Ethics & Compliance Helpline Process includes the following reporting mechanisms available to all:

Phone:

- | | |
|---------------|------------------|
| India | - 1800 3000 0053 |
| US and Canada | - 1-844-371-0217 |
| UK | - 0808-234-1815 |

Our own Internal audits also pick up any such issues as part of our reviews and any high-risk items are investigated and reported to the Board

If we are made aware of an incident which suggests a supplier is falling short of its obligations in this area, we will contact them to understand the circumstances of the issue and the steps being taken to support those involved and impacted, and the measures being taken to mitigate risk and to protect workers.

If necessary, we will also involve the Ethical Tea Partnership to provide a third-party view of the validity and robustness of the steps being taken.

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.

SUPPORTING COMMUNITIES

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 key partners including Rainforest Alliance and the Ethical Tea Partnership.

Rainforest Alliance Certification

In line with our commitment to only buy teas from estates that have been certified and independently audited by the Rainforest Alliance or Trustea in India, 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.

As part of the certification process independent auditors verify that the tea estates in our supply chain meet requirements for:

- 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

A copy of the 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>.

All our Good Earth teas are also Rainforest Alliance certified as is our teapigs everyday brew. teapigs is passionate about sustainability and is an approved supplier of the Sustainable Restaurant Association.

Ethical Tea Partnership

We are one of the largest contributors to the Ethical Tea Partnership, supporting multiple projects throughout the supply chain.

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.

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. Working in partnership with the ETP we are supporting a number of projects to support tea communities.

Lighting to make a difference

Through our Kuwala project with the Ethical Tea Partnership we have given solar lamps to families working on the estates of two of our biggest suppliers in Malawi. So far, 5,410 families have received a light enabling people to meet outside after dark and do tasks that they would otherwise be unable to do once darkness falls, this includes being able to extend the trading hours of small businesses and children and adults being able to complete work after dark. The lamps are also creating jobs, so far 45 people have been trained to service and repair the lamps, so they have as long a life as possible

Savings & Loans

In Malawi, families that cannot access affordable loans can struggle to pay for basic things like school, healthcare, and everyday essentials like food or home repairs.

We are working with the ETP to support a scheme which helps families set up and run their own 'banking system', known as Village Savings Loan Associations (VSLA). They are like a community bank

where workers get together to save money as a group. Each group has a leader who is trained on the rules of how to run the VSLA, and the group is given tips on ways to grow their income.

Once set up, savers get interest on their savings, they can access their own money and request loans to start their own business.

143 VSLAs have been formed, 50% of savers are women, 41% have been able to use their savings to buy a mobile phone; and 50% have been able to add iron sheeting to their homes for the first time.

Supporting women

Our Indian parent company Tata Consumer Products Limited is one of the funding partners of the UNICEF-ETP project in Assam that works to improve the lives of children, young people, and women living in the state's tea communities. The UNICEF-ETP Improving Lives programme aims to tackle the systemic issues affecting women and children in 206 tea estates across eight districts of Assam, which is over one-fourth of formal tea estates in the region. The project has expanded to education, health and nutrition, and water & sanitation challenges.

Teapigs - Educational opportunities for vulnerable people in Rwanda

By working with a charity called the Point Foundation, our Teapigs business continues to help 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. Visit <https://www.teapigs.co.uk/pages/ethical-scheme> to learn more about Teapigs' ethical schemes.

RISK ASSESSMENTS

Our supply chain in respect of tea sold into Europe, US and Canada is 100% Rainforest Alliance certified.

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.

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
6. www.joyfullmillet.com
7. www.raasa.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 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: 

Name: ADAM BURTON.

Director

Date: 26/9/2023.

For and on behalf of Tata Consumer Products UK Group Limited

Signed: 

Name: ADAM BURTON

Director

Date: 26/9/2023.