

# TATA CONSUMER PRODUCTS

## STATEMENT FROM TATA CONSUMER PRODUCTS CANADA INC. FOR FINANCIAL YEAR ENDING 31<sup>st</sup> MARCH 2024

### FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS ACT 2023

#### BUSINESS STRUCTURE AND SUPPLY CHAINS

This Statement (“**Statement**”) for the financial year ending **31<sup>st</sup> March 2024** is being made by Tata Consumer Products Canada Inc ( “**we**” / “**our**” / “**ourselves**”/ “**TCP Canada**”) pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Tata Consumer Products Canada Inc is a Canadian food and drink importer and distributor, and is part of the international Tata Consumer Products group of companies (“**Tata Consumer Products Group**” / “**Group**”). This Statement details steps we take to combat risks of slavery, human trafficking, forced and child labour taking place within our operations and supply chains.

#### Our Brands



Our main product that we sell in Canada is Tetley tea. In addition, we also distribute an Indian tea, Tata Tea, which is produced and exported by our ultimate parent company, Tata Consumer Products Limited (“**TCP India**”), along with much smaller sales of Tata Salt, Tata Sampann Indian foods and our recently launched Joyfull Millets cereal. During the 23 - 24 financial year we also sold a small amount of our “teapigs” teas in Canada however these sales are ceasing in 24 – 25 financial year.

The majority of our Tetley teas are produced by our associate Group company, Tata Consumer Products GB Limited (“**TCP GB**”) based in the United Kingdom, at its factory in the North-East of England; smaller volumes of our Tetley teas are also produced in Poland, and Tata Tea is produced at TCP India’s factory in Cochin, India, which also produces Tata Tea. Tata Coffee, Tata Salt, Tata Sampann and Joyfull Millets are all produced in facilities in India.

Our Canadian team works from our office headquarters in Toronto, Ontario.

#### Sourcing

Each year the Group’s global tea buying and blending team sources close to 32 million kilogrammes of tea from more than 350 different suppliers. Africa is our most significant sourcing region, alongside India. Once raw tea has been sourced, tea is brought from origin to market via a supply chain that includes shipping, blending, packing, transporting, and product supply to supermarkets and other sales channels.

## OUR POLICIES IN RELATION TO FORCED AND CHILD LABOUR

### Tata Business and Human Rights Policy

The Tata Consumer Products Group has affirmed its commitment to 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>.

### Tata Code of Conduct

At the commencement of their employment and afterwards as an annual refresher, Tata employees are required to complete a training module on the Tata Code of Conduct and sign a commitment to uphold the Code. All current Tata Consumer Products employees in Canada have signed the Code and completed their annual refresher. The Tata Code of Conduct 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.***"

All Group companies including ourselves carry out appropriate due diligence on all employees prior to them commencing their roles with the business to confirm their legal ability to work within the relevant jurisdiction. This includes checking where applicable that each employee has the appropriate right to work documentation and is of the minimum legal age to work. [tcoc-booklet-2015\\_0.pdf \(tataconsumer.com\)](#).

### Tata Supplier Code of Conduct ("SCOC")

TCP Canada's main supplier is TCP GB, and TCP GB works to get suppliers to comply with the SCOC. Pursuant to the SCOC, suppliers must comply with the Group's Business and Human Rights Policy. Of TCP GB's non-tea suppliers of packaging and services, as at the date of this Statement, suppliers representing 67% of its spend in this area have signed the SCOC, and TCP GB is working towards getting 100% commitment from all our suppliers in our non-tea supply chains.

## TRAINING ON SLAVERY, FORCED AND CHILD LABOUR, AND HUMAN TRAFFICKING

The Group has a global cross-functional **Business and Human Rights Working Group ("Working Group")** which works to help our business put the Policy into practice.

The Working Group's objectives include the provision of training to support an awareness and understanding of human rights risks in our business and its supply chains, and the assessment, monitoring and review of those risks. .

The Working Group aims to educate relevant staff who are responsible for sourcing and buying raw materials, and supply chain management, on slavery, forced and child labour, and human trafficking. The objectives of the Working Group's training programme include:

- providing colleagues with an understanding of the scope of these human rights issues;;
- training colleagues on how to identify such issues in the supply chain;
- providing examples of red flag warning signs; and
- reminding colleagues of our internal reporting procedures.

A Business & Human Rights training module created by the Tata Sustainability Group is being used to train and educate relevant teams. All employees of TCP Canada have undertaken the training.

### **Ethics and Compliance Helpline and Whistle-blower Policy**

The Group and TCP Canada recognise and respect each employee's right to freedom of association, including the right to join trade unions. All Group employees, customers, suppliers and other stakeholders are encouraged 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. Avenues available for raising concerns include:

- immediate line manager or Human Resources team;
- designated ethics officers within both TCP Canada and the Group; and
- through the Group's 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, child, compulsory, slave, trafficked or bonded labour in our operations through its whistleblowing procedure.

### **Grievance**

Grievance redressal forms part of our Supplier Code of Conduct. Where internal and external stakeholders identify material breaches of the Code's requirements, whether through their employees or third parties, 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

The Group's own internal audits also aim to pick up such issues and any high-risk items are investigated and reported to the relevant Directors.

If the relevant TCP Group company is made aware of an incident which suggests a supplier is falling short of its obligations in this area, that TCP Group company would contact the supplier 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.

A third party partner may in some cases be brought in to provide an independent view of the validity and robustness of the steps being taken.

## **Modern Slavery and Trafficking Compliance Clauses in Supply Contracts**

TCP Canada's main supplier, TCP GB, works to incorporate anti-slavery clauses into major supply contracts whereby suppliers are required to commit that:

- ✓ they shall comply with the United Kingdom's Modern Slavery Act 2015 ("**MSA**");
- ✓ 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;
- ✓ they have implemented due diligence procedures to ensure compliance with the MSA in its business and supply chain; and
- ✓ 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, TCP GB retains the right to invoke sanctions against suppliers who fail to comply with these commitments, including the termination of the business relationship.

## **Supply chain visibility**

The Group is committed to transparency across its supply chain, and companies within the Tata Consumer Products Group are members of SEDEX, with participation in this platform providing some visibility of the sustainability performance within the Group's business and in relation to parts of our supply chain.

## **SUPPORTING COMMUNITIES**

We are attuned to our responsibilities to the communities where we source ingredients for our products and of our responsibility to help sustain the environment on these farms. One of the ways in which we are fulfilling these responsibilities is through TCP GB's collaboration with key partners including Rainforest Alliance and the Ethical Tea Partnership.

## **Rainforest Alliance Certification**

In line with TCP GB's ambition 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, supplied to us by TCP GB are Rainforest Alliance Certified™. All Tata Tea sold in Canada is Rainforest Alliance Certified.

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; and
- 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>.

## **Ethical Tea Partnership**

TCP GB 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 TCP GB is supporting a number of projects to support tea communities.

## **Lighting to make a difference**

Through the Kuwala project with the Ethical Tea Partnership TCP GB has given solar lamps to families working on the estates of two of TCP GB's biggest suppliers in Malawi. 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 individuals being able to complete work or studies after dark. The lamps have created jobs too, around 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.

TCP GB is 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 cell phone; and 50% have been able to add iron sheeting to their homes for the first time.

## **Benefiting from Trees**

TCP GB is supporting a new programme with the ETP which will start with a variety of different seedlings to be nurtured at a Tetley Tree Nursery. Local smallholders will be helped to choose the types of trees that would benefit their smallholding most, whether to provide shade for crops, boundary trees that can survive in less fertile areas or good trees for firewood or fruit for additional income. For trees that mature the farmers will also be able to access a carbon banking system where payments will be made for the carbon the trees absorb when they mature.

## Supporting women

TCP India 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.

## Supporting Sustainable Agriculture & Livelihoods

The ancient grain of millet is a core ingredient of Joyfull Millet Muesli, and TCP India promotes its use on the basis that encouraging the production and consumption of millet on a large scale will improve access to better nutrition and health and enhance the quality of lives for farmers. TCP India is working through a partner Swami Vivekananda Youth Movement (SVYM) to deliver a programme to reach 400 marginalized rural and tribal farmers and communities in HD Kote & Saragur Taluk in Mysore district Karnataka. Supported by Self-Help Groups and the formation of Farmer Producer Organizations (FPO), the far-reaching programme spans education, and training on sustainable organic millet based agricultural practices, including provision of irrigation facilities and training on vermicomposting and Jeevamritha preparation, and capacity building of Government agricultural schemes, empowering the beneficiaries through an Entrepreneurship Development Program and non-farming initiatives including setting up a millet-based processing unit and restaurant.

## PUBLISHING OUR STATEMENTS

Our Statement is published on our Canadian and other Group websites which can be found at:

- [www.tetley.ca](http://www.tetley.ca)
- [www.tataconsumerproducts.com](http://www.tataconsumerproducts.com)
- [www.joyfullmillet.com](http://www.joyfullmillet.com)
- [tataconsumer.ca](http://tataconsumer.ca)

A link to this statement can be found on the homepages of each of the above websites.

## WHAT ELSE

To learn more about Tata Consumer Products Group's 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 Canada Inc.

## For and on behalf of Tata Consumer Products Canada Inc.

Signed.....  
DocuSigned by:  
*Kurt Hatherly*  
EF4276DEBE5142A...

Print Name..... Kurt Hatherly

Position: Director..... Head of Country, Business Head

Date..... 23 May 2024 | 9:21 PM BST