



Slavery & Human Trafficking Statement

July 2018

Typhoo Tea's efforts for stopping Modern Slavery are ongoing. We recently joined forces with ETP (Ethical Tea Partnership) in a collaborative effort (<http://www.ethicalteapartnership.org>).

Typhoo Board remains fully supportive of Ethical Sourcing.

Introduction from the Chief Executive Officer

Typhoo is committed to the UK Modern Slavery Act 2015. Our ethical policy supports initiatives to combat this hidden blight on our global society. We understand that it is our responsibility to be alert to the risks and our colleagues are expected to report concerns and the management are expected to act upon them.

Organisation Structure

Typhoo is a leading manufacturer of branded and own brand tea and beverage products. The Company is jointly owned by Apeejay Surrendra and Global Tea & Commodities.

Our Business

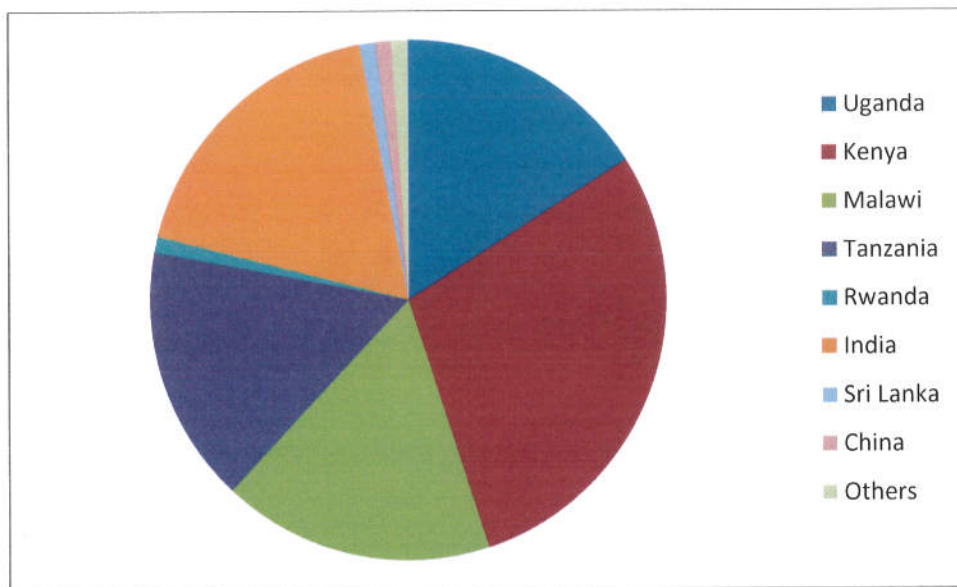
Our business is independent and autonomous with the normal shareholder oversight and direction. Our Head Office is based in the UK on Merseyside and we employ a core staff of around 250 people with up to 50 temporary staff. We do not use agency labour and all our colleagues including temporary employees are paid the living wage.

Our warehousing and distribution is predominately covered by the Peel Ports group in Liverpool and Boughey's distribution in Cheshire.

Our Supply Chains

Our Tea is sourced from over 14 countries around the world and the product is purchased both privately and through public auction. We only source from suppliers who are on our Approved Supplier List. The Approved Supplier list is maintained in accordance with BRC V7 and is controlled primarily via a SAQ (Self Audit Questionnaire) with suppliers who confirm membership of SEDEX/Fairtrade/ETP/Rainforest Alliance being automatically approved. Suppliers can be provisionally approved as long as they agree a process of improvement that includes achieving membership of one or more the above. The balance is reviewed by our Tea Buying and Technical team members. The process is subject to continuous review with all suppliers being assessed on a minimum 3 year rolling cycle.

Countries we currently source from with indicative volume



All other raw materials, goods and services are provided by internally approved suppliers who hold industry recognised accreditations and certificates like BRC and SEDEX. We are in the process of reviewing the slavery statements of all these suppliers and any who are deficient will be subject to contract review.

Our Policy on Slavery and Human Trafficking

Many of the producing countries that we source from have well publicised historic incidents of abuse of human rights and labour laws. We are committed to the best of our ability to ensure that if it exists in our supply chains modern slavery or human trafficking will be uncovered and appropriate remedial action taken. Our anti-slavery statement reflects our commitment to acting ethically and with integrity in all our business relationships and to the implementing and enforcing of effective systems and controls to ensure slavery and human trafficking is not knowingly taking place anywhere in our supply chains.

Due Diligence Processes for Slavery and Human Trafficking

We have been a proud member of the ETI since its conception (ethicaltrade.org). We are also actively engaged with or are a member/licensee of the following organisations:



As part of our initiative to identify and mitigate risk –

- All our primary UK packaging suppliers are SEDEX registered.
- Our existing approved suppliers are undergoing risk assessment via SAQ.
- Our Top 140 tea suppliers are all now accredited by ETP/Fairtrade/Rainforest alliance.
- We are actively supporting the UNICEF project in Assam India which aims to eliminate child trafficking and exploitation.
- We have piloted a system of self-assessment based on the ETI base code at source, that involves a trained team of workers, trade union representatives and the management carrying out audits against the base code.
- We actively work within the ETI to help develop supply chain assessment tools.

Supplier Adherence to our Values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

All UK and EU suppliers will be responsible for compliance for their supplier network and all other suppliers are being risk assessed and where required plans will be put into place for a programme of continuous improvement with the aim of highlighting issues and ultimately eliminating where possible slavery and human trafficking.

Training

To ensure a high level of understanding of the risks of slavery and human trafficking in our supply chains, key employees have had training programmes including SEDEX, ETI, and Ethical audit course SA8000. All Directors have been briefed on the subject. All full time staff will receive a briefing which will include how to recognise and report suspected instances of modern trafficking and slavery via the modern slavery website which includes a helpline 0800 0121 700 or crimestoppers on 0800 555 111. <https://modernslavery.co.uk/report-it.html>

Mitigation

We aim to do no harm to the people identified as being victims of slavery or human trafficking.

Any mitigation will be solely for the benefit of the victims and no action will be taken that is likely to make matters worse for the people concerned. At Typhoo we recognise the complexity of some of our supply chains, especially where small holder farmers are involved in impoverished countries. Any issues that come to light will be fully and carefully investigated. An assessment will follow and full consultation will be taken with collaborative bodies and stakeholders like the ETI and NGOs/Unions before any action is taken.

Only through collaborative working do we believe we can make a positive long lasting difference to the people and their communities. Our experience with the UNICEF project in Assam North India has demonstrated the effectiveness of deploying a well-supported local team into an area to reach over 350 tea communities, protecting over 25,000 vulnerable children against exploitation.

Our Effectiveness in Combating Slavery and Human Trafficking

We are using the following key indicators to measure and monitor how effective our policy is on eliminating slavery and human trafficking from our supply chains.

2016/2017 Objectives & Actions

- Establish a system of VACCP and TACCP risk assessment that includes the continuous monitoring of all media and of social and ethical accountability accreditation schemes like Fairtrade and Rainforest alliance.
STATUS: Complete
- Two fully trained internal ethical SA8000 auditors
STATUS: Complete
- Risk Assess our top 140 suppliers in 14 countries and reviewed their modern slavery statements.
STATUS Incomplete - Many suppliers did not publish within this time span, rolled into 2018.
- Engage with all accreditation bodies and strongly lobby for full visibility of all supplier audits, as many are currently covered by confidentiality agreements.
STATUS: Complete
- Have reviewed all the modern slavery policies within our UK and EU supply chain.
STATUS Incomplete - Many suppliers did not publish within this time span, rolled into 2018.
- Update our SAQ to include a section stating our policy on modern slavery and requiring confirmed supplier compliance.
STATUS: Complete
- All employees will have received a briefing on how to recognise and report suspected instances of trafficking and slavery.
STATUS: Complete
- Re-write our trading terms and conditions to include a clause regarding compulsory compliance with the Modern Slavery Act.
STATUS: Incomplete, rolled into 2018.

2017/2018 Objectives & Actions

- Join the Greater Manchester Modern Slavery Business Network.
Status: Work in Progress
- Join the Bright Future programme
Status: Work in Progress
- Re-write our supplier approval process to include a clause regarding compulsory compliance with the Typhoo Modern Slavery Statement as an alternative to updating trading terms and conditions.
Status: Work in Progress
- Update Induction process to include a section on modern slavery awareness.
Status: Work in progress

2018/2019 Objectives & Actions

- Inform all suppliers about United Nations Guiding Principles (UNGP)
Status: Work in progress
- Review Typhoo supply chains with ETP to determine further action plans.
Status: Work in progress
- Typhoo Tea to support Phase 2 of the Unicef Project in Assam, India; which aims to eliminate child trafficking and exploitation.
Status: Work in progress

This statement will be reviewed at the end of the current 2018/2019 financial year. This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes our Company's slavery and human trafficking statement for the current 2018/2019 financial year.

Typhoo Tea Ltd has taken the steps outlined in the statement above but cannot be held responsible for any instances of slavery beyond our sphere of influence.



Somnath Saha
Typhoo CEO
July 2018