

MODERN SLAVERY STATEMENT

THOMAS TUNNOCK LIMITED

This is the Modern Slavery Statement of Thomas Tunnock Limited ("**Tunnock's**") for the financial year ending 24 February 2019. It is made pursuant to s. 54 of the Modern Slavery Act 2015 (the "**Act**").

The Act created offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("**Modern Slavery**"). Tunnock's is committed to combatting all such forms of Modern Slavery.

ABOUT TUNNOCKS

Tunnock's is a family owned baking company founded in 1890 and based in Uddingston, Scotland. Tunnock's manufactures confectionary and baking products which are supplied to the retail sector and which are sold throughout Scotland, the United Kingdom, as well as internationally (including in the Americas, Africa, Asia and across Europe). Tunnock's main operating facility is in Uddingston where all manufacturing takes place.

Whilst Tunnock's manufacturing and operational activities are exclusively in the United Kingdom, its supply chains extend globally, partly owing to the ingredients in Tunnock's products. Tunnock's supply chains involve the provision of raw and packaging materials, utilities, ancillary supplies such as office equipment and stationery, a limited supply of temporary personnel, and services including maintenance and IT services. Tunnock's is aware that it, like other companies in the sector who draw on similar supplies (including ingredients), is exposed to a level of Modern Slavery risk through its UK and global supply chains. For example, Modern Slavery risk in cocoa production has recently been focused on by NGOs.

Set out below is a description of the Modern Slavery policies and procedures that Tunnock's has in place and the steps taken to address Modern Slavery risk within its business and supply chains. In the 2018/2019 financial year Tunnock's engaged an external consultant in respect of Modern Slavery risk, and further steps are currently being considered.

POLICIES AND PROCEDURES

Modern Slavery Policy

Tunnock's is committed to the prevention of any instance of Modern Slavery being connected to its business or supply chains. Tunnock's has a Modern Slavery policy in place that sets out the company's zero tolerance stance. Tunnock's policies and procedures will continue to be kept under review.

TUNNOCKS SUPPLY CHAINS

Raw Materials

Tunnock's products contain, amongst other ingredients, chocolate, flour, egg products, sugar and coconut. These raw materials are sourced from a limited number of reputable, international and UK-based suppliers whom Tunnock's has established relationships with.

Tunnock's has conducted a review of the Modern Slavery compliance steps that key suppliers have taken in an effort to eradicate Modern Slavery in their supply chains. Key suppliers have demonstrated a zero tolerance policy commitment in respect of Modern Slavery. In addition, the suppliers have reported taking further considered and relevant steps including, for example, membership of bodies such as the Ethical Trading Initiative, tracing programs to monitor supply chains from source, engagement with local communities to understand conditions on plantations and at other production sites, detailed risk assessments on their own supply chains, due diligence and certification initiatives, as well as other steps.

Tunnock's appreciates that its ingredients, and the countries they are sourced from, present a risks from a Modern Slavery perspective and Tunnock's will continue to monitor its supply chain.

Labour

Almost all of Tunnock's workers, including its logistics personnel, are direct employees. Tunnock's does draw on the services of one well established recruitment agency. The company has reported having in place a Modern Slavery Policy, training program and other relevant compliance steps including pre-employment checks and random audits including in respect of shared bank accounts, addresses and telephone numbers, which are all red flags in respect of unethical behaviour.

Transport and Distribution

A small, UK-based haulage company provides distribution and haulage services to Tunnock's. The drivers employed by this company are reported to all be direct employees, and no agency drivers are used. The risk is therefore understood by Tunnock's to be low.

Packaging

Tunnock's engage a small number of UK and international suppliers to provide materials used in the packaging of products. Many of these suppliers have reported due-diligence checks on supply chains and internal training on Modern Slavery provided to employees.

Tunnock's will continue to monitor its supply chain in respect of Modern Slavery risk.

OTHER COMPLIANCE STEPS

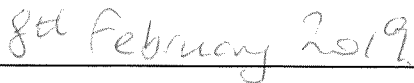
In addition to the above steps, as above, Tunnock's has engaged an external adviser to assist the group with assessing Modern Slavery risk and to further enhance Tunnock's policies and procedures. In the coming months Tunnock's will consider refreshing Modern Slavery training which was conducted prior to the 2018/2019 financial year, and other due diligence steps to enhance its Modern Slavery compliance program.

APPROVAL

This statement is made pursuant to section 54(1) of the Act for the financial year ending 24 February 2019 and has been approved by the board of Directors of Tunnock's at a meeting on 8 February 2019.



Director for and on behalf of Thomas Tunnock Limited



Date