



**THOMAS TUNNOCK LIMITED**  
**MODERN SLAVERY STATEMENT**  
**APRIL 2021**

This is the Modern Slavery Statement of Thomas Tunnock Limited ("**Tunnock's**") for the financial year ending 27 February 2021. 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. The company continues to ensure that Modern Slavery policies are in place and promoted across operations and its business.

**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 which is accessible to all staff via Shared Drives and Policy Folders. 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 have assessed work done in the area of Modern Slavery compliance that their key suppliers have undertaken in an effort to eradicate Modern Slavery in their supply chains, and found that compliance policies and procedures were in place, including as follows:

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 risk from a Modern Slavery perspective and Tunnock's will continue to monitor its supply chain from a Modern Slavery perspective.

#### *Labour*

Almost all of Tunnock's workers, including its logistics personnel, are direct employees. Tunnock's continues to 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, Modern Slavery is now highlighted in employee induction so that employees are made aware of the issue and where and how to report any relevant concerns, of their own or identified from colleagues.

### **APPROVAL**

This statement is made pursuant to section 54(1) of the Act for the financial year ending 27 February 2021 and has been approved by the board of Directors of Tunnock's at a meeting on 6 April 2021.

  
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Director for and on behalf of Thomas Tunnock Limited

  
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Date