



THOMAS TUNNOCK LIMITED
MODERN SLAVERY STATEMENT
SEPTEMBER 2023

This is the Modern Slavery Statement of Thomas Tunnock Limited ("**Tunnock's**") for the financial year ending 25 February 2023. 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, based in Uddingston, Scotland. Tunnock's manufactures confectionary and baking products which are supplied to the retail sector and are sold throughout the United Kingdom, as well as internationally (including in the Americas, Africa, Asia and across Europe). Tunnock's 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 and monitor these closely.

Tunnock's have a distinguished heritage and brand and work to preserve these in all decisions made and this includes the engagement of suppliers and staff recruitment and retention.

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. This policy was updated in 2022 and is regularly reviewed and still relevant at this time.

TUNNOCKS SUPPLY CHAINS

Raw Materials

In line with the Tunnock's Family Values, Tunnock's products only use the finest ingredients and contain, amongst others chocolate, flour, egg products, sugar and coconut. These raw materials are sourced from a limited number of reputable, international and UK-based suppliers from whom Tunnock's have built partnerships to ensure they have a robust and transparent supply chain. Ethical trading is important to Tunnock's and as such the Palm Oil purchased and used in our products is classified as sustainable by RSPO (The Roundtable on Sustainable Palm Oil).

The Company work closely with their suppliers and are satisfied that their key suppliers have demonstrated a zero-tolerance policy commitment in respect of Modern Slavery and where necessary have reviewed and updated their procedures and plans to combat any issues raised.

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 Tunnock's workers, including its logistics personnel, are direct employees. All employees 'Right to Work' in the UK are rigorously checked by the HR Department.

In its commitment to ensure compliance with Modern Slavery policies both in our own business or with labour providers, the company include awareness training as part of its Induction programme for new starts, Manager and Supervisor awareness communications and visible posters on site highlighting potential issues and how to report these. In 2019, Tunnock's put in place a Whistleblowing Policy which allows employees to report any unethical conduct within our organisation to an independent third party via telephone, e-mail or website. To-date there have been no reported alerts from this service.

In addition to this, Tunnock's financial audits conduct checks on compliance with regards to pre-employment checks and random audits of shared: bank accounts, addresses and telephone numbers, which are all potential red flags in respect of unethical behaviour.

Tunnock's works closely with one well established recruitment agency for additional labour. This agency hold a Gangmasters Licence, and ensures all Agency staff are made aware of Modern Slavery, their Code of Conduct and Whistleblowing helpline with no reported breaches and is held to account by annual compliance audits.

Transport and Distribution

A 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. This Company has effective systems and controls in place to safeguard against any form of Modern Slavery, therefore the risk is understood by Tunnock's to be low and to date no issues have been raised.

Packaging

Tunnock's engage a small number of UK and international suppliers to provide materials used in the packaging of products. 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.

APPROVAL

This statement is made pursuant to section 54(1) of the Act for the financial year ending 26 February 2022 and has been approved by the board of Directors of Tunnock's at a meeting on 29 September 2023.



Director for and on behalf of Thomas Tunnock Limited



Date