

THOMAS TUNNOCK LIMITED
MODERN SLAVERY STATEMENT
AUGUST 2024

This is the Modern Slavery Statement of Thomas Tunnock Limited ("**Tunnock's**") for the financial year ending 24 February 2024. 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 confectionery 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 chain is diverse and in order to produce our world renowned biscuits we rely on a wide range of suppliers including:

- Raw Material suppliers to ensure we can produce good quality products
- Packaging Suppliers to ensure our products are packed well and compliant with legislation
- Vehicles and fuel to distribute our products to stores and wider distribution centres
- Utility Supplies to help keep our factories running
- Maintenance services to ensure our manufacturing equipment is kept in great condition
- Laundry services to ensure our food handlers and auxiliary staff are compliant with food standards
- Agency Labour to supplement our staffing levels during peak production
- Software and IT equipment to ensure we keep records of our business transactions
- Professional advisors to help us meet our legal duties.

Tunnock's like other businesses is exposed to a level of Modern Slavery risk through its UK and global supply chains and monitors these closely and recognises that many of suppliers will be low risk compared to others.

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 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

Tunnock's Family Values – Working Together, Authenticity, Future, Excellence and Reputation is at the heart of what the company does, both internally with their own staff and externally with all customers and suppliers. In 2023, Tunnock's put in place a Behavioural Code of Conduct to confirm the standard expected by everyone on site in their interactions with each other and with external stakeholders.

In 2023, we expanded our HR Department, to ensure that we have the correct policies and procedures in place to comply with legal requirements for our workforce. New employees are required to provide proof that they have a right to work in the UK and these documents are rigorously checked. All employees are paid directly into their bank account and audits are conducted throughout the year to check on shared accounts, changes of address, and telephone numbers which are potential red flags in respect of unethical behaviour. No issues have been reported during the financial year.

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. Tunnock's has a Whistleblowing Policy in place 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.

Tunnock's employ approximately 650 staff that can fluctuate up to 700 at peak times. Most employees work directly for Tunnock's with a small number supplied through a well-established recruitment agency who they have worked with for many years. This agency holds a Gangmasters Licence and ensures all Agency staff are made aware of Modern Slavery, Tunnock's Code of Conduct and Whistleblowing Helpline.

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 24 February 2024 and has been approved by the board of Directors of Tunnock's at a meeting on 15 August 2024.



Director for and on behalf of Thomas Tunnock Limited

Date 19 August 2024