

**THOMAS TUNNOCK LIMITED**  
**MODERN SLAVERY STATEMENT**  
**AUGUST 2025**

This is the Modern Slavery Statement of Thomas Tunnock Limited ("Tunnock's") for the financial year ending 22 February 2025. It is made pursuant to s.54 of the Modern Slavery Act 2015 (the "Act") and sets out the steps taken by Tunnock's to prevent modern slavery and human trafficking within its business and supply chains.

Tunnock's is committed to combating all forms of Modern Slavery as set out in the Act which created offences in respect of slavery, servitude, forced or compulsory labour and human trafficking ("**Modern Slavery**").

### **ABOUT TUNNOCKS**

Tunnock's is a family-owned baking and confectionery company founded in 1890, based in Uddingston, Scotland. All manufacturing takes place on the site in Uddingston and our products are distributed to the retail sector throughout the United Kingdom, and internationally including to markets in the Americas, Africa, Asia and Europe.

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 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.

We work with a diverse range of suppliers to support our operations, 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
- Utilities and maintenance service providers to ensure our facilities and equipment are fit for purpose
- Laundry services to ensure our food handlers and auxiliary staff are compliant with food standards
- Labour providers including agency staff to supplement our staffing levels during peak production
- Software and IT equipment to ensure we keep records of our business transactions
- Legal and professional advisors to help us meet our legal duties.

We acknowledge that some parts of our supply chain may present higher risks than others and we monitor these risks accordingly.

### **POLICIES AND PROCEDURES**

#### ***Modern Slavery Policy***

Tunnock's maintains a dedicated Modern Slavery Policy, which outlines our zero-tolerance approach. This policy is accessible to all staff via Shared Drives and Policy Folders. This policy is reviewed regularly to ensure it remains current and effective.

### **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 contained in the product contributes to the production of sustainable palm oil as classified by Roundtable on Sustainable Palm Oil (RSPO).

The Company work closely with their suppliers and our key partners have demonstrated their own commitment to eradicating Modern Slavery and 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 will continue to monitor and assess these areas.

**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. We have 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.

Our HR Department take robust steps during recruitment to ensure:

- All new employees must prove their legal right to work in the UK
- Staff are paid directly into individual bank accounts
- Modern Slavery awareness is part of the Induction process
- Audits are carried out to detect warning signs such as shared bank accounts, changes of address and telephone numbers to ensure no red flags detected.

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 to Managers and key staff 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 620 staff, with peak workforce levels reaching 700. The vast majority of employees work directly for Tunnock's with a small number supplied through well-established recruitment agencies, who are licenced labour agencies holding a Gangmasters and Labour Abuse Authority (GLAA) Licence. These agencies ensure all Agency staff are briefed on our Modern Slavery risks, Tunnock's Code of Conduct and Whistleblowing Helpline.

**Transport and Distribution**

We contract a UK-based logistics provider for haulage and distribution. All drivers are directly employed, and no agency labour is used. The provider maintains clear internal controls and training to prevent modern slavery. Tunnock's assesses the risk in this area as low.

**Packaging**

Tunnock's engage a small number of UK and international suppliers to provide materials used in the packaging of products. These suppliers have confirmed their internal due diligence process and have provided staff training on Modern Slavery awareness.

Tunnock's will continue to monitor Modern Slavery risk across all areas of our supply chain and take corrective action where necessary.

**APPROVAL**

This statement is made pursuant to section 54(1) of the Act for the financial year ending 22 February 2025 and has been approved by the board of Directors of Tunnock's at a meeting on 7 August 2025.

  
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Director for and on behalf of Thomas Tunnock Limited

  
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Date