

# *Human Rights and Modern Slavery Statement*

June 2025

## **1 INTRODUCTION AND ORGANISATION STRUCTURE**

KP Snacks Limited (“we”, “our”) is the UK’s number one manufacturer of nuts and popcorn, and number two manufacturer of bagged snacks. We are part of the Intersnack group of companies, and our ultimate parent company is headquartered in Germany. We have over 2,300 employees in the UK.

We make some of Britain’s most iconic snack brands including McCoy’s, Hula Hoops, KP Nuts, Butterkist, Tyrrells, Whole Earth, popchips and POM-BEAR. We also produce many fantastic products for the UK’s leading retailers. We are proud that millions of people enjoy our snacks, every day. We take great care in operating our business and in selecting our business partners and suppliers.

We had an annual turnover of £654,272,000 in 2024.

## **2 OUR BUSINESS**

Our headquarters are in Slough and we operate seven manufacturing sites as set out at [www.kpsnacks.com/about-us/locations](http://www.kpsnacks.com/about-us/locations).

## **3 OUR SUPPLY CHAINS**

The products we sell are sourced from a broad range of suppliers and supply chains. However, as our operations are based in the UK, most of our suppliers (goods and services excluding raw materials) are also predominantly based in the UK. Suppliers of our raw materials are based nationally and internationally. For example, the potatoes for Tyrrells sold in the UK are grown exclusively in the UK, whereas our potato dehydrates are sourced from Europe. As part of Intersnack Group, we work with Intersnack Procurement to continually improve the transparency and traceability of the supply chain for all our products. These suppliers are subject to our audit and transparency requirements as set out in our Responsible Sourcing Policy

This international sourcing via a large, diverse system of local and international supply chains enables us to offer consumers a wide range of tasty products. We aim to source as directly as possible, wherever and whenever possible. This creates greater transparency and enables us to build long-term partnerships with our suppliers and stakeholders in the supply chain.

In general, our supply chain consists of the following stages:

- A. Agricultural /raw material production: our direct and indirect suppliers source from producers within the UK and internationally.
- B. Suppliers: we source raw materials, and services such as logistics and packaging.
- C. Our operations: we process raw materials into finished goods and packing materials at our sites.
- D. Distribution to business customers: finished goods are collected by our business customers, and/or we engage a third party to deliver finished goods to our business customers' locations.

## **4 OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, including slavery, forced labour and human trafficking. We adopt a zero-tolerance approach to modern slavery, and we continue to be committed to acting ethically and with integrity in all our business dealings and relationships. We continually implement and enforce effective systems and controls to ensure modern slavery is not taking place in our own business or in our supply chains (our "MSA Commitment").

### **4.1 Our Steering Committee**

Our steering committee is made up of representatives from each of our business and manufacturing sites, including HR, Legal, Commercial, Supply Chain, Procurement and Corporate Affairs. The committee meets to review and monitor progress in preventing labour exploitation in our sites and within our supply chain.

### **4.2 Our Policies**

We have continued to maintain our policies and processes throughout the year since our last statement. Our policy on Preventing Modern Slavery is continually reviewed and shared with all colleagues through our intranet and site briefings. We have also further publicised our Master Service Agreements (MSA) Commitment to colleagues through our internal digital screens at every site as well as Head Office. Compliance is a contractual requirement. We continue to operate in accordance with the Intersnack Code of Conduct (available at [www.intersnackgroup.com/about-us/code-of-conduct](http://www.intersnackgroup.com/about-us/code-of-conduct)) which defines basic principles of conduct for a wide range of topics, such as combatting bribery and corruption, fair treatment of people and ensuring food safety. In line with our core values, we are committed to meeting our responsibility to respect human rights as laid out in the Universal Declaration of Human Rights. This is put into effect through the Intersnack Labour & Human Rights Policy. We have continued to incorporate our Responsible Sourcing Policy into our arrangements with our raw material suppliers, ever mindful of the risk associated with modern slavery and human trafficking within similar national and international supply chains. Our Responsible Sourcing Policy codifies the processes and requirements we demand from our suppliers to increase the transparency in our supply chain and identify social compliance risks, including modern slavery and human trafficking. All suppliers of raw materials are required to sign and comply with this policy.

Our Supplier Code of Conduct is a mandatory policy that applies to all suppliers. The Code requires suppliers to adhere our high standards of business integrity



and ethics as well as maintaining a commitment to respecting all internationally recognised human rights. In accordance with the ETI Base Code for labour standards, suppliers are required to ensure that their employees are treated with dignity and respect and, among other requirements including the payment of living wages, child labour is strictly prohibited.

As part of our ongoing commitment to sustainability, we are continually evolving and monitoring our 'People & Planet' programme which includes ambitious, long-term goals across four pillars: Consumer, Environment, Social and Colleagues. This strategy can be found at [www.kpsnacks.com/people-planet](http://www.kpsnacks.com/people-planet). We pride ourselves on being a great place to work and connecting positively with communities, and our programme is an important element of this.

## **5 DUE DILIGENCE PROCESS FOR SLAVERY AND HUMAN TRAFFICKING**

### **5.1 Due Diligence in our Business**

We have continued to train our colleagues on our MSA Commitment so that they can recognise when they are involved in matters where there is a risk of modern slavery. We use training provided by Stronger Together; a multi-stakeholder business-led initiative which aims to reduce modern slavery. All colleagues are required to participate in training so they can identify signs of modern slavery and human trafficking. All line managers and colleagues within our corporate and commercial functions must complete an e-learning module on modern slavery. This has a test at the end to confirm they have understood the key messages. We maintain a register of all colleagues who complete the module. Key individuals are also required to undertake enhanced training in the form of a full-day course run by Stronger Together, in particular those involved in recruitment at our sites, where their role exposes them to situations where modern slavery may be more prevalent. This training is tracked and recorded by our in-house Learning and Development team. As also noted above, we also use digital screens throughout our sites to maintain awareness of our MSA Commitment and promote the Whistleblowing Portal, to all our colleagues,

We use the Stronger Together tools including the Employer Progress Questionnaire at each of our sites. Further detail on these tools can be found at [www.stronger2gether.org](http://www.stronger2gether.org). These aid our ongoing review of modern slavery and trafficking and help to identify areas of risk and improvement. Each of our sites must also complete the Supplier Ethical Data Exchange (SEDEX) Self-Assessment Questionnaire (SAQ) annually. The SAQ is a set of questions on Labour, Health & Safety, Environment and Business Ethics. Our work here has supported and driven an Ecovadis gold accreditation. We have continued to raise awareness across all sites, to encourage colleagues and agency workers to report any causes of concern regarding labour exploitation they may observe or experience by contacting their local human resources team or contacting us through our confidential whistleblowing online portal.

### **5.2 Whistleblowing Policy**

Our Whistleblowing Policy is available through our intranet and at all our sites, to all colleagues, contractors and other service providers who operate within our business. The policy provides a clear reporting structure for an individual to report any suspected wrongdoing. An anonymous portal provided by a third party (BKMS) is in place to ensure confidentiality to any reporting party.

### **5.3 Due Diligence with our Suppliers**

Intersnack has an integrated due diligence approach based on two widely accepted international frameworks: the UN Guiding Principles for Business and Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct. We aim to understand our risks and drive compliance in our supply chains through the Intersnack Responsible Sourcing Policy, Supplier Code of Conduct and the introduction of standards and certifications. This due diligence process including compliance checks is mandatory for all onboarded suppliers and we continue to manage our supplier base to comply with our high expectations. Our policies are the cornerstone of our approach. All raw food suppliers as well as significant non-food suppliers are subject to an annual risk assessment and our Group Procurement function maintains these assessments as well as producing an annual sustainability report to identify any action required.

Through SEDEX, we monitor the compliance progress of our supplier base. SEDEX has developed a series of specific questions that are designed to identify suppliers to us where their operations may give rise to the risk of modern slavery and/or human trafficking.

As expressed in our People & Planet programme, social responsibility involves focusing on sustainable sourcing, supplier development and improving conditions in our supplier regions. We promote sustainable sourcing by building awareness among suppliers, implementing social compliance standards, monitoring performance and undertaking pro-active partnerships with our suppliers as well as NGOs and government bodies.

We continue to engage on modern slavery prevention with our principal agency labour provider, Single Resource, which continues to demonstrate good policies and practices in this area.

We maintain links between all our manufacturing sites and their local Gang Masters Associations.

## **6 SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS**

Our supply chain compliance programme, as outlined above, ensures:

- our suppliers are required to assure decent working conditions, and that employment is freely chosen
- high-risk suppliers are subject to third party assessment in accordance with the Intersnack Responsible Sourcing Policy
- the tools we use and training we undertake is appropriate to highlight any areas of risk of modern slavery or human trafficking
- all issues can be brought to the attention of senior leaders of our business so that they can be addressed appropriately



## 7 TRAINING FOR COLLEAGUES AND SUPPLIERS

Using the tools and methods noted above, we will continue with targeted risk assessments of our suppliers during 2025/26 to identify suppliers that we perceive potentially have a higher risk of exposure to modern slavery and decide what, if any, action we need to take. Where issues are identified, we will work with our suppliers to remove risks as far as possible.

We continue to organise training for colleagues and contractors and enhanced training for any new managers and key colleagues which is reported to our committee. Sites have continued to take training to front line team leaders during the last 12 months and we have continued to see engagement from those team members.

## 8 MEASURING EFFECTIVENESS

Through the SEDEX tool, we continue to monitor supplier risk and compliance as well as our sites' risk and compliance. Through the continued implementation of our policies and processes and the actions of the committee, we consider our ongoing mitigation measures will reduce the likelihood of modern slavery arising in our supply chain and business. Our Responsible Sourcing Policy continues to be rolled out to suppliers. Modern Slavery remains an agenda item at meetings with unions at all our sites and we are also recirculating and refreshing communications on modern slavery at each of our sites to maximise awareness of our Modern Slavery Policy.

Our committee will continually monitor effectiveness through its meetings, including identifying and maintaining the areas of progress that are being carried out, to completion.

This Statement will be updated and published on our website each year, to highlight progress made and upcoming focus areas.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2025.



**Mark Thorpe**  
Chief Executive Officer and Managing Director, Operations  
KP Snacks Limited

Signed on behalf of the Board of Directors of KP Snacks Ltd, who have read and authorised publication of this statement.