



## Human Rights and Modern Slavery Statement

June 2018

KP Snacks is the UK's number one manufacturer of nuts and number two manufacturer of bagged snacks. We make some of Britain's most iconic snack brands including McCoy's, Hula Hoops, KP Nuts, Butterkist 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.

Under KP's overall sustainability programme, which we call 'Our Taste for Good,' people are our number one priority. KP prides itself on being a great place to work and connecting positively with communities and our Modern Slavery policy is an important element of this. Our aim is to operate transparently and ethically, supporting all our KP colleagues to stay safe, be happy and healthy, and develop their careers the way they want to.

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

### To help ensure this, KP Snacks has taken the following actions:

- In 2016 the KP Board initiated a senior group of leaders of the business to form a steering committee so as to advance our MSA Commitment. The committee is attended by representatives from HR, Legal, Commercial, Supply Chain, Procurement and Public Affairs. The committee meets quarterly to review and monitor progress in preventing labour exploitation in KP's sites and within our supply chain. This committee has met formally four times in the period July 2017 to June 2018.
- We have developed a policy on Preventing Modern Slavery, which has been shared with all KP colleagues and is available on our intranet site (our "**Policy**").
- We are using the Stronger Together tools and have completed the Employer Progress Questionnaire for all our sites in 2017 and again in 2018. Completing the survey helped us identify our key next steps (see below).
- We have trained key people within KP Snacks, including recruiters, who have completed the Stronger Together MSA training to help them identify signs of modern slavery and human trafficking as they source candidates. Training has included key people at our new site in Pontefract.
- We have continued to raise awareness across all KP sites, especially at our new Pontefract site, 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 calling the confidential KP Whistleblowing hotline.
- We have engaged on modern slavery prevention with our new agency labour provider Single Resource, which has demonstrated good policies and practices in this area.
- The products we sell are sourced from a broad range of suppliers and supply chains – both national and international. As part of the Intersnack Group, KP works with Intersnack Procurement to continually improve the transparency and traceability of the supply chain for all our products.



- As expressed in our sustainability strategy ('Our Taste for Good', which can be found on kpsnacks.com), social responsibility involves focussing 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 NGO's and government bodies.
- As part of our social policy, we request our suppliers to be assessed against the Ethical Trading Initiative (ETI) code of conduct or equivalent social standards. Based on the ETI code of conduct we engage in dialogue with our suppliers to identify and mitigate risk related to human rights, including Modern Slavery. This enables us to identify and focus on the risk areas and risk categories in our supply chain.
- Through the Supplier Ethical Data Exchange (SEDEX) we monitor the progress on social compliance of our supplier base. Within this framework we use the SEDEX Forced Labour indicators to review the registered suppliers. Any supplier identified as high risk is reviewed in more detail. This process will be further tested during the coming year. Further guidance from SMETA and Stronger Together will be sought and learnings shared.

#### **Next steps:**

- We will continue with targeted risk assessments of our suppliers during 2018/19 to identify suppliers that we perceive potentially to 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.
- Training will be organised for any new managers and key colleagues. Sites will take training to front line team leaders during the next 12 months: 1 July 2018 - 30 June 2019.
- We will continue to include modern slavery as an agenda item at meetings with unions at all our sites.
- This Statement will be updated and published on KP's 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 2017.

A handwritten signature in black ink, appearing to read 'Mark Thorpe', with a large, sweeping underline.

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.*