



# Human Rights and Modern Slavery Statement

June 2022

## 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 2,200 employees in the UK.

We make some of Britain’s most iconic snack brands including McCoy’s, Hula Hoops, KP Nuts, Butterkist, Tyrrells, 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 £524,751,000 in 2021

## 2. OUR BUSINESS

Our business has its headquarters at Slough and operates 7 manufacturing sites as set out at <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 the majority of our suppliers (goods and services excluding raw materials) are also predominantly based in the UK. The 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 dehydrated raw materials are sourced from Europe and the United States. As part of the 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 a wide range of tasty products to the consumer. 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: by producers both within the UK and internationally, from whom our direct and indirect suppliers source.
- B. Suppliers: we source raw materials, from as far upstream in the supply chain as possible.



- C. Our Operations: Processing 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 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 made up of representatives and senior team members from each of our business and manufacturing sites, from HR, Legal, Commercial, Supply Chain, Procurement and Corporate Affairs. The committee meets quarterly to review and monitor progress in preventing labour exploitation in our sites and within our supply chain. Most recently, the committee met to review the recent audits undertaken at the sites to ensure compliance with our MSA Commitment. The committee also discussed training at sites and across the business to ensure that the MSA Commitment is continually reinforced. This committee has met formally four times in the period July 2021 to May 2022.

##### 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 KP colleagues through our intranet site and site briefings. Compliance is a contractual requirement. We continue to operate in accordance with the Intersnack Code of Conduct (available at <https://www.intersnackgroup.com/about-us/code-of-conduct>). 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. The 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.

Under our overall sustainability programme, which we call 'Our Taste for Good,' people are our number one priority. This programme can be found at <https://www.kpsnacks.com/ourtasteforgood/>. 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 employees 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.



Employees are required to participate in training so they can identify signs of modern slavery and human trafficking. All line managers must complete an e-learning module from Stronger Together on modern slavery. This has a test at the end to confirm they have understood the key messages. We maintain a register of all employees who complete the module and require all employees have complied with this requirement. Key individuals are also required to undertake enhanced training in the form of a full-day course (currently online) 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.

We use the Stronger Together tools and annually complete the Employer Progress Questionnaire at each of our sites. Further detail on these tools can be found at <https://www.stronger2gether.org/prt/>. The results of the questionnaires aid in our ongoing review of modern slavery and trafficking and help to identify areas of risk and improvement. 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 phone number and online portal.

## 5.2. Whistleblowing Policy

Our Whistleblowing Policy is available through our intranet and at all our sites, to all employees, 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 hotline provided by a third party (Navex) as well as a web link reporting tool remain in place. This will continue to ensure confidentiality to any reporting party.

## 5.3. Due Diligence with our Suppliers

Intersnack has an integrated due diligence approach which is 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 and the introduction of standards and certifications.

Through the Supplier Ethical Data Exchange (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 Taste for Good programme, 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.

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

We continue to attend meetings with the Gang Masters Associations in the West Midlands to maintain diligence on modern slavery and trafficking in the employment sector in this area, which has been



identified as an area of risk. We are also maintaining 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; and
- all issues can be brought to the attention of senior members of our business so that they can be addressed appropriately.

#### 7. TRAINING FOR STAFF AND SUPPLIERS

Using the tools and methods noted above, we will continue with targeted risk assessments of our suppliers during 2022/23 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. We continue to train suppliers on our policies, particularly our Responsible Sourcing Policy.

We continue to organise training for employees 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. Through the continued implementation of our policies and through the actions of the committee we expect to see further reduction in areas of risk highlighted. Our Responsible Sourcing Policy continues to be rolled out to suppliers.

Modern slavery as an agenda item at meetings with unions at all our sites and we are also recirculating and refreshing the communications on Modern Slavery at each of our sites to maximise awareness of our policy on Modern Slavery.

Our committee will continually monitor effectiveness through its quarterly 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 2022.



A handwritten signature in black ink, appearing to read 'Mark Thorpe', written over a horizontal line.

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.