

Modern Slavery Statement

FOR KETTLE FOODS LTD, FINANCIAL YEAR 1 JAN 2018 TO 29 JUL 2018

1.0 Purpose of Statement

Kettle Foods Ltd is opposed to modern slavery at any level and recognises the responsibility that we share with our suppliers to tackle hidden labour exploitation.

We are committed to understanding modern slavery and human trafficking risks and ensuring that such activities are not taking place in our supply chain or any part of our business.

Modern slavery encompasses slavery, forced /compulsory labour and human trafficking whereby individuals are deprived of their freedom and exploited for commercial or personal gain as enacted in the Modern Slavery Act 2015.

We are committed to a zero tolerance approach to modern slavery and have taken steps to ensure a high degree of ethics is incorporated into our commercial dealings including all business relationships and supply chain.

As a result, we expect and maintain high standards from our entire staff, suppliers, contractors and anyone with whom we conduct business.

2.0 About Us

Kettle Foods Ltd, a subsidiary of Campbell Soup Company, is a UK snack food manufacturer supplying snack food to a number of countries and employing over 450 people in the UK.

Founded in 1988 and with potatoes being one of our key raw materials we chose Norfolk as our home in order to be as close as possible to many of our potato growers.

Having expanded our snack portfolio to include Vegetable Chips, Popcorn and rice cakes, we now have in excess of 400 direct product suppliers.

3.0 Our Business and Supply Chains

We are an active member of SEDEX (Supplier Ethical Data Exchange), a not for profit membership organisation that offers members a simple and effective way of managing ethical and responsible practices in supply chains.

As part of our membership and our conditions of supply with a number of our key customers, we are required to undertake regular semi-annual SEDEX Members Ethical Trade Audits (SMETA). These audits are based upon the ETI (Ethical Trade Initiative) Base Code which is founded on the conventions of the International Labour Organisation (ILO) and

is an internationally recognised code of labour practice covering 9 provisions:

- Employment is freely chosen
- Freedom of Association
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

We currently use direct labour suppliers for less than 20% of our workforce and every provider is required to have a comprehensive audit based upon the ETI Base code, carried out by a trained ethical auditor, every 6 months.

We had a SEDEX audit in 2016 and have zero non-conformances on the system.

Where our suppliers are not currently linked to our business on SEDEX or registered on SEDEX, then they are required to complete our Ethical Supply Questionnaire and are encouraged to register.

Our direct supply chains include the sourcing of raw materials related to the manufacture of our products, as well as finished goods from our co-manufacturing partners. These supply chains stretch across Europe including, Italy, Spain, Germany, France, The Netherlands and UK.

To ensure that Modern Slavery is not present in these supply chains we have communicated our commitment to the Modern Slavery Act 2015 and expressed a requirement that our suppliers and any new supplier that we contract

with make the same commitment.

To this end we have investigated how these direct suppliers are tackling the challenge and have carried out risk assessments to satisfy ourselves that their actions are sufficient; should we identify a risk then we will carry out follow up audits and education for the supplier. This will be an ongoing programme throughout 2018 and beyond, as we expand our reach into our extended supply chains.

During 2017 we conducted an audit of the agency who supplies temporary workers to us which included verification that the provider has developed and implemented a "tracking modern slavery policy" detailing the processes it will take to prevent forced labour.

Ethical risk is currently managed via an annual questionnaire to suppliers with a thorough investigation of responses or procedures conducted where necessary. All Kettle Foods suppliers are located within the European Union.

Kettle Foods intends to amend its Potato Contracts to include a comprehensive Modern Slavery clause to ensure that its farmers/suppliers are aligned and eradicate Modern Slavery in this aspect of its

business. Presently, all farmers who supply Kettle Foods are RED Tractor certified and part of this audit covers Modern Slavery.

All of Kettle Foods seasoning houses are Sedex approved.

4.0 Communication and Training

All employees are made aware of the company's policies on employment. Training and assessment is given as part of the induction in the organisation to all employees via ELearning with a test to demonstrate understanding of the concepts taken at the conclusion of the session with employees expected to gain 80% and above. We will continue to develop our commitment to combat modern slavery and will update our policies, contracts and staff training as appropriate.

Kettle Foods employees also have access to an "alert line" details of which are posted throughout the sites, enabling them to report any workplace issues, including modern slavery concerns, via a telephone number or online.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and was approved by the Board of Directors.

Ashley Hicks

Managing Director, Kettle Foods Limited

Signature: 

Date: 24 January 2019

