

KETTLE FOODS LIMITED's
MODERN SLAVERY STATEMENT
covering the period 1st April 2020 to 31st March 2021

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1 Introduction

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. We have 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 chains. As a result, we expect and maintain the highest standards from our entire staff, contractors, suppliers and anyone with whom we do business.

One of the key principles of our company ethics is to treat everyone fairly, with dignity and respect. We are committed to continuous improvement in our practices to combat slavery and human trafficking.

This statement is made pursuant to Modern Slavery Act 2015 by Kettle Foods Ltd ("Kettle Foods" "we" "our" "us"). It outlines the measures Kettle Foods has taken to access and reduce the risk of slavery and human trafficking occurring in our business or supply chains in the financial year 1st April 2020 to 31st March 2021. It also outlines our commitments to continue to reduce risk in the Kettle Foods financial year commencing 1st April 2021.

2 Kettle Foods Mission Statement

Kettle Foods is committed to continuously improving its practices to identify and eliminate any slavery and human trafficking in its business and supply chains whilst always acting ethically and with integrity in all its business relationships.

Each of Kettle Foods' departments adopt this mission statement when dealing with its suppliers in addition to the following departmental commitments:

HR

To support the company's Modern Slavery Statement and the eradication of modern slavery and human trafficking within its supply chains and ensuring that our employees, future employees and agency workers are treated fairly with dignity and respect.

Procurement & Operations

To support delivery of the company objectives by providing a supply chain that minimises risk and total cost to the business. To provide a supply base that will help the business maintain competitive advantage through technical competence, efficiency, agility and quality of goods or services.

Technical

To help protect the integrity of our business, our brands and our products via robust and detailed technical supply chain assurance. To maintain our business commitment to always act ethically and with integrity whilst also ensuring that everyone within our supply chains takes the same approach.

Agriculture

To ensure an aligned, invested and engaged supply chain with our agricultural supply partners which manages and maintains the highest standards within its supply base.

3 Organisation's structure

Kettle Foods is a private limited company registered in England and Wales; company number 2238320.

During the period covered by this statement Kettle Foods was owned by Valeo Foods. Kettle Foods is a UK snack manufacturer supplying snack food to several countries and employing on average 420 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.

4 Our Supply Chains

Kettle Foods undertakes the manufacture of various snacks foods as set out below:-

4.1 Potato Chips

All of our potatoes are sourced from farms in the UK and within an average of 30 miles of the Kettle Foods factory in Norwich where supply permits. Kettle Foods' Head of Agriculture is responsible for managing the supply chain and part of that role is to ensure that our potato suppliers maintain high ethical and environmentally sustainable practices. We only contract with potato suppliers who maintain high standards across all their practices. As testament to this, each supplier is contractually obliged to be a member of The Assured Produce Scheme and shall have passed its annual audit with 100% compliance. Our supply base and its suppliers are compelled to use seasonal labour each year to manage the seasonal nature of the industry. This labour force will be sourced from recognised and approved agencies. The agricultural suppliers are audited to the satisfaction of the Red Tractor or Global Gap Audits – this will be internally audited on an annual basis by Kettle Foods to ensure compliance. SEDEX Accreditation is the preferred status of Kettle Foods agricultural suppliers.

The Kettle Foods Potato Contract precedent has been amended to include a clause dedicated to modern slavery ensuring its suppliers comply with the law including but not limited to the Modern Slavery Act 2015 as well as other contractual obligations regarding combating modern slavery by requiring each potato supplier to:

- i. Adhere to Kettle Foods Anti-Slavery Policy;
- ii. Complete all questionnaires relating to modern slavery raised by Kettle Foods;
- iii. Confirm neither it nor any of its employees (or other individuals associated with it) have been convicted of an offence involving modern slavery or human trafficking or have been the subject of an investigation, inquiry or enforcement proceedings regarding any offence connected with modern slavery or human trafficking;
- iv. Implement due diligence procedures of its own suppliers and participants in its supply chains;
- v. Undertake not to purchase any resource, raw materials or products which have been sourced from producers/manufacturers using forced labour in their operations or practices;
- vi. Notify Kettle Foods as soon as it becomes aware of any breach (or potential breach) of Kettle Foods' Anti-Slavery Policy, actual or suspected slavery or human trafficking in a supply chain connected with the Potato Contract;
- vii. Maintain a complete set of records to trace the supply chain of all goods and services provided to Kettle Foods;
- viii. Implement annual supplier and subcontractor audits to monitor compliance with Kettle Foods' Anti-Slavery Policy, the first of which shall be completed by the first anniversary of the Potato Contract; and

- ix. Implement a system of training for its employees, suppliers and subcontractors to ensure compliance with Kettle Foods' Anti-Slavery Policy and maintain a record of all training offered and completed, made available to Kettle Foods on request.

All raw materials required to produce the potato chips including seasonings, film, cardboard and oil are sourced direct by our procurement team who ensure that due diligence is carried out before orders are placed. Kettle Foods has long standing relationships with the majority of our suppliers who maintain high standards and are as equally committed to ensuring that modern slavery is eradicated. As contracts between Kettle Foods and such suppliers are updated, renewed or new suppliers are engaged, Kettle Foods shall ensure that modern slavery is adequately addressed as part of the supplier's contractual obligations.

4.2 Vegetable Chips

Our Vegetable Chips are entirely sourced from our co-manufacturing partner within the EU, Yellow Chips B.V. (a company owned by the same parent company as Kettle Foods) and are supplied to either our Norfolk warehouse or direct to the customer. We maintain our high levels of ethical and environmental sustainability by working in close collaboration with our co-manufacturer.

As part of our responsible supply chain governance we ensure that raw materials such as root vegetables are sourced from reputable sources who undergo periodic audits by our co-manufacturer.

4.3 Popcorn

Our popcorn brands are all manufactured under Kettle Foods' control at our Wednesbury facility in the West Midlands of the UK. The Wednesbury facility is managed under the same high ethical and environmental sustainability practices as our Norwich facility.

The popcorn kernels are all sourced from a sole supplier within the EU who is SEDEX registered and audited, and who is working with selected farms to develop a more sustainable and ethically aware process of producing popcorn kernels.

4.4 Rice Cakes

Our Rice Cakes are entirely sourced from a co-manufacturing partner within the EU before being supplied to either our Norfolk warehouse or direct to the

customer. We maintain our high levels of ethical and environmental sustainability by working in close collaboration with this co-manufacturer.

As part of our responsible supply chain governance we ensure that raw materials such as rice and chocolate are sourced from reputable sources who undergo periodic audits by the co-manufacturer.

At the date of this statement, Kettle Foods has no issues with any of its suppliers or other bodies representing workers that should be disclosed in the context of the Modern Slavery Act 2015.

5 Our policies on slavery and human trafficking

Kettle Foods has several policies and/or procedures in place to help it combat modern slavery:

5.1 Kettle Foods' Anti-Slavery Policy

All suppliers are required to comply with our Anti-Slavery Policy as part of their contract. Our Anti-Slavery Policy sets out the minimum standards for working conditions that Kettle Foods expects its suppliers to adhere to in the production of raw materials required to make our products.

The Policy is subject to ongoing review and an updated version was made available during the period covered by this statement in September 2020. Some of the principles included in the Policy are:

- Suppliers shall comply with all applicable local legal and regulatory requirements of the country where the factory is located;
- Suppliers shall put in place appropriate due diligence procedures;
- Suppliers shall maintain records and implement audits;
- Suppliers shall not to purchase a resource or raw materials from producers using forced labour in their operations; and
- Suppliers shall notify Kettle Foods of any actual or suspected modern slavery or human trafficking in its supply chains.

Kettle Foods will not tolerate modern slavery, forced labour or human trafficking within our business dealings or supply chains. Where any non-compliance issue is identified, we expect and require our suppliers to address it. If this does not occur within a reasonable timeframe, we reserve the right to terminate our relationship with the supplier/third party in question.

5.2 Code of Conduct Policy (Employees)

This policy sets out Kettle Foods' internal standards, expectations and accountability.

It incorporates an understanding of the risks of modern slavery and human trafficking within our business and supply chains.

The Code of Conduct is available to employees via our intranet and any updates are communicated to employees as appropriate. Employees who breach our Code of Conduct and any related policies may be subject to disciplinary proceedings.

5.3 Whistleblowing Policy

The Whistleblowing Policy allows employees a route for anonymous reporting of any concerns that they have in relation to a number of issues and it can be used to report suspected incidents of modern slavery. The Policy is reviewed and updated as necessary and then communicated to employees. The main options for reporting are:

- Line management;
- Contact the external whistleblowing provider SeeHearSpeakUp via email, telephone or online, details of which are provided to employees through internal communications.

The Policy also includes our zero tolerance of retaliation.

5.4 Hidden Labour and Exploitation Policy

The Hidden Labour and Exploitation Policy confirms that Kettle Foods is an active member of SEDEX (Supplier Ethical Data Exchange). As part of its membership, Kettle Foods is required to undertake regular, semi-announced audits based on the ETI (Ethical Trade Initiative) Base Code which is founded on the conventions of the International Labour Organisation and its 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; and
- No harsh or inhumane treatment is allowed.

Kettle Foods has a trained ethical auditor who carries out such audits every 6 months. In addition, this Policy confirms that Kettle Foods is committed to investigating its tier 1 suppliers and has carried out risk assessments to satisfy itself that their actions are sufficient. Where Kettle Foods suppliers are not SEDEX registered, they are required to complete an "Ethical Supply Questionnaire" and are encouraged to gain SEDEX registration.

Any breaches of this Policy are reportable and appropriate action will be taken. The Policy was issued in January 2021 and will be reviewed and updated annually or sooner if necessary.

5.5 Governance

Responsibility for the preparation of our Modern Slavery Statement sits with our legal team and is approved by our board of directors. The following departments are responsible for carrying out the implementation of policies, codes and procedures: Legal, Procurement, Technical, Operations, Agriculture & HR.

6 Due diligence processes for slavery and human trafficking

As set out in section 5.4, Kettle Foods is an active member of SEDEX a not for profit membership organisation that offers members a simple and effective way of managing ethical and responsible practices in supply chains.

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 and the 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 as we expand our reach into our extended supply chains.

Ethical risk is currently managed via an annual questionnaire (as set out in section 6.4) to suppliers with a thorough investigation of responses or procedures conducted where necessary. All Kettle Foods' suppliers are located within the European Union.

As set out in section 4.1, all Kettle Foods' agricultural suppliers are required to adhere to contractual obligations regarding modern slavery. In this way, Kettle Foods ensures that its farmers/agricultural suppliers are aligned in their joint efforts to eradicate modern slavery in this aspect of the business.

All of Kettle Foods' seasoning houses who supply the blended seasonings that are used to give the flavours to our snack products are SEDEX approved.

Kettle Foods imposes contractual obligations regarding Modern Slavery on its Suppliers and operates an ongoing programme of ensuring that such provisions are incorporated into the wording of its contracts starting with those that pose the highest risk, including but not limited to the following:

- In performing its contractual obligations, each Supplier shall (and ensure that each of its subcontractors shall) comply with:
 - All applicable laws, regulations (& codes) from time to time in force including but not limited to the Modern Slavery Act 2015;
 - Kettle Foods' Anti-Slavery Policy.

6.1 Procurement Process

Our procurement team ensure, through the governance of the procurement process, that efficient, accountable, transparent and ethical practices are applied to acquire the materials and products that our business requires. Due diligence is completed before engaging with a supplier which may include a site visit and auditing of working conditions.

Governance of the procurement process includes:

- Initial supplier self-assessment of ethical and environmental aspects;
- SEDEX membership checks (see below);
- Risk assessment and follow up audits if necessary;
- Compliance with the Kettle Foods' policies on Bribery & Corruption and Modern Slavery;
- Financial review; and
- Annual cross-functional review of supply chain risk.

Our existing first tier suppliers are subject to an annual review of supply chain risk in terms of ethical, environmental, sustainability and supply. This enables us to monitor changes and highlight any areas of concern for further investigation and follow up with the individual supplier.

As our portfolio of raw materials and co-manufacturing changes, we endeavour to only source from countries that have a low ethical and sustainability risk, as such our current first tier supply chains stretch across Europe, and include Italy, France, Netherlands, Denmark, Germany, Slovenia and Czech Republic.

6.2 Risk Assessment and Management

The following groups of workers have been identified as vulnerable to the risks of modern slavery and Kettle Foods' Human Resources (HR) Team is trained to be mindful of this when dealing with workers who fall into one of these categories:-

- Migrant workers;
- Minority groups; and
- Contract, agency and temporary workers.

In addition to the above, the following have been identified as potential indicators of modern slavery and our HR team is trained to be aware of these and act as appropriate:-

- Someone who does not have their own passport, ID or travel documents;
- Someone who always allows others to speak for them or talks as though being instructed or coached by someone else;
- Someone who may be withdrawn or appear frightened and may have injuries;
- A person who has limited social interaction and may always be dropped off and collected from work (they may not be able to contact their friends and family easily);
- A person with very few possessions or who lives in a very poorly maintained, overcrowded place (and is often overcharged for this);
- A person who has little control over their finances or who has no access to a bank account
- Recruitment fees and labour agents;
- Cash in hand payments;
- No unions; and/or
- No access to grievance mechanisms.

This is not an exhaustive list and other factors may also be considered relevant, but the key consideration is awareness. The above are not conclusive evidence of modern slavery but should be taken as warning signs. If a concern is raised to our HR team, the matter would be immediately referred to Kettle Foods' HR Director. Depending on the severity of the issue and warning signs, the HR Director may contact the police in the first instance.

In consideration of the indicators above, Kettle Foods has several pre-emptive measures in place including:

- We do not accept any communication through a third party on behalf of an employee;
- We do not pay an employee's salary into a third-party bank account;
- We will not raise a cheque in another person's name even if requested by the employee;
- We will not process any application for employment or issue a contract of employment unless the employee has an address;
- We do not prevent membership of a union or representative body; and
- We have in place easily accessible grievance procedures available to all employee and workers.

6.3 Supplier relationships

Kettle Foods' Head of Procurement and its Head of Agriculture are responsible for supplier relationships. If there are concerns over performance, these individuals will decide whether to continue to do business with the relevant supplier and take any further appropriate action which may include (but is not limited to) the following:

- Reporting concerns to the appropriate authorities;
- More frequent audits; and
- Termination of the supplier relationship.

6.4 Audit Programme

Audits are conducted by Kettle Foods' Technical Team. Also, our HR team conducts regular audits of our recruitment agencies where temporary staff are supplied to our 3 sites in the UK which includes a verification that the agency provider has developed and implemented a "tracking modern slavery policy" detailing the processes it will take to prevent forced labour.

As part of our SEDEX membership, and our conditions of supply with a number of our key customers, we are required to undertake regular semi-announced SEDEX Members Ethical Trade Audits (SMETA).

All suppliers are required to complete the Kettle Foods Supplier Questionnaire and Risk Assessment every 12 or 18 months depending on risk. If a supplier is not SEDEX registered such supplier will automatically be considered high risk and must provide documentation to Kettle Foods to demonstrate it has conducted due diligence with its suppliers.

7 Key Performance Indicators

To monitor the effectiveness of the steps that we have taken to combat modern slavery and human trafficking in our business and its supply chains, we use the following key performance indicators ("KPI's") for each financial year:

- All employees are provided with appropriate training on induction to the business as detailed in section 8, below;
- Our Modern Slavery Policy and any updates are communicated to all employees via the intranet;
- We will ensure that we continue to revise our Modern Slavery clauses in our contracts with our suppliers;
- We will continue to ensure that our suppliers are provided with a copy of our current Modern Slavery Policy;
- We have established the Modern Slavery Steering Committee comprising key individuals from the business who meet quarterly to consider how best to assess risk, carry out due diligence and review KPI's;
- We will establish which suppliers are considered to be high risk and ensure that our zero-tolerance approach to modern slavery is communicated and require them to confirm adherence to our Modern Slavery Policy as a minimum; and
- We will continue to develop our risk assessment and due diligence processes and put in place further measures where areas of risk are identified;
- The Procurement, Agriculture, Technical and HR teams have each drafted a Mission Statement for their departments underpinning the company's Mission Statement set out in section 2 of this Statement ensuring that the issue of modern slavery is utmost in the thoughts of its employees when forming new business relationships and making sure that similar standards are maintained in its existing business connections; and
- The Procurement, Agriculture, Technical and HR teams have undertaken a review of their department policies/procedures and a central record of such documents has been created which is retained by the Legal Department. Its content will be kept under review (at least annually) and any updated or additional documents stored on such central register.

8 Training

Kettle Foods conducts training and assessment as part of the induction into the organisation for all new employees via e-learning with a test to demonstrate understanding of the concepts taken at the conclusion of the session with employees expected to gain 80% and above.

9 Finding Help

If you or someone you know is being or has been exploited or you are unsure if someone needs help, assistance and advice is available:

- for life-threatening emergencies, call 999, or for non-emergencies, call 101 for the police;
- [Modern Slavery Helpline](#) can be called on 08000 121 700 or contacted via an [online form](#);
- [Victim Support](#) can be called on 0808 16 89 111 or contacted via an [online form](#);
- [Crimestoppers](#) can be called on 0800 555 111 or contacted via an [online form](#);
- [Migrant Help](#) can be called on 0808 8010 503;
- [The Salvation Army](#) have a 24/7 confidential referral helpline, which can be called on 0800 808 3733.

10 Publication

Kettle Foods' Modern Slavery Statements (current and previous Statements) are published on:

- 1) all Kettle Foods' websites; and
- 2) TISC (Transparency In Supply Chains) – open platform reporting tool which meets the requirements of section 54 of the Modern Slavery Act 2015.

In addition, this Modern Slavery Statement will be published on the UK Government's Modern Slavery Statement Registry.


11 Conclusion

Kettle Foods is constantly striving for improvement to tackle modern slavery head on. During the period 1st April 2020 to 31st March 2021, Kettle Foods continued to work to increase awareness of risks and reporting channels. We will continue to develop our commitment to combat modern slavery and will update our company policies, contracts and employee training as appropriate.

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 31st March 2021. It was adopted by the board on 2021.

Ashley Hicks, Managing Director of Kettle Foods Ltd

Signature: 

Date: 25/8/2021