

## **Kettle Foods Limited trading as Metcalfe's skinny® Modern Slavery Statement for Financial Year 2017**

### **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 Snyder's Lance, Inc, 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 our better for you range of products; 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-announced 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.

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.



(Size of star depicts relative scale of supply chains to Kettle Foods Ltd)

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 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 2017 and beyond, as we expand our reach into our extended supply chains.

#### **4.0 Communication and Training**

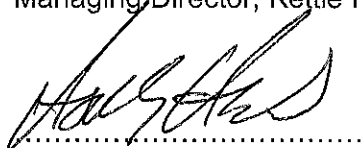
All employees are made aware of the company's policies on employment. Training will be given as part of general management development and to all recruiting managers and supply chain employees. We will continue to develop our commitment to combat modern slavery and will update our policies, contracts and staff training as appropriate.

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

Name: Ashley Hicks

Position Managing Director, Kettle Foods Limited

Signature:

A handwritten signature in black ink, appearing to read 'Ashley Hicks', written over a horizontal dotted line.

Date: 22 June 2017 .