

## SSP<sup>1</sup> - Modern Slavery Statement 2018/19

SSP is committed to respecting the human rights of anyone working for us in any capacity and we will not tolerate modern slavery in our business operations and supply chains. This statement, which is published in accordance with the Modern Slavery Act 2015, outlines the work undertaken by SSP during the financial year ending 30 September 2019 to seek to identify and manage the risk of modern slavery and human trafficking in its business and supply chains.

### Our business and supply chains

SSP is a leading operator of food and beverage outlets in travel locations in 35 countries across the world. We, together with our group companies and affiliates (the "**Group**") operate a broad range of outlets from quick service to fine dining and serve, on average, 1.5 million customers each day.

These operations include more than 550 brands globally through an extensive portfolio of around 2,800 outlets, including coffee shops, sandwich bars, bakeries, casual and fine-dining restaurants, as well as convenience and retail outlets. The Group operates units under its own proprietary brands as well as international and local high street franchised brands and bespoke concepts. SSP and the wider Group employs approximately 39,000 colleagues. The majority are permanent employees, however the Group also employs some colleagues on a temporary basis responding to the seasonal peaks in our business.

SSP and the wider Group works with a large volume of suppliers. The SSP supplier relationships are managed centrally through the group head office or, for the wider Group operations, locally by country-based business teams in the relevant operating entities around the world.

### Policies

SSP is committed to respecting human rights in our business operations and supply chain as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We will not accept abuse of human rights anywhere in our business, supply chains or partnerships.

Our Ethical Trade Code of Conduct ("**Code of Conduct**"), which is aligned to the Ethical Trading Initiative's Base Code, outlines the standards we expect our suppliers to work to. Our over-arching objective is that the people who work within our supply chain are treated fairly and with respect.

Specific requirements within our Code of Conduct related to modern slavery include:

- There should be no forced, bonded or involuntary prison labour;
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice;
- Wages and benefits paid for a standard working week should meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to

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<sup>1</sup> This statement is published jointly on behalf of SSP Group plc, Select Service Partner UK Limited and Rail Gourmet UK Limited (together "SSP"), and references to "we", "us" or "our" are to all of these entities taken together.

meet basic needs and to provide some discretionary income;

- All workers shall be provided with written and understandable information about their employment conditions with respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid;
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded.

New suppliers of stock for SSP's proprietary branded outlets including food and beverages, packaging and disposables, as well as cleaning services and refuse collection ("**Vendors**") are asked to sign our Code of Conduct. This process is being adopted by both SSP as well as the Group's global business and international supply chain.

Our Code of Conduct is available at [www.foodtravelexperts.com](http://www.foodtravelexperts.com).

We have additional policies covering equality and whistleblowing. The Group's Whistleblowing Policy provides a framework to encourage and give all employees confidence to 'blow the whistle' and report irregularities. Employees are encouraged to raise concerns with designated individuals, including the Executive Directors or the Chairman of the Audit Committee.

### **Identification and Assessment of modern slavery risk within our supply chain**

We conduct or support annual internal reviews of modern slavery risks across SSP as well as the Group's international operations looking specifically at the different territories in which the Group operates and from which it sources, and the relative risk of slavery (based on operating country, sourcing country and product category). These risk assessments help us to identify where to focus our efforts.

The information sources we use for our risk assessments include:

- The Global Slavery Index to help us understand country risks
- Third party Vendor audits shared via the SEDEX system
- Analysis of calls to our whistleblowing lines, although to date no incidences of modern slavery or human trafficking have been reported
- Supply chain risk assessment conducted by the Group's country purchasing teams

Our internal risk assessments suggest that the majority of SSP's operations and supply chains are in countries with relatively low perceived levels of modern slavery risk, although the Group does have operations in some countries identified in the Global Slavery Index as having a higher relative risk of modern slavery. These include India, Thailand, Egypt, Russia, Greece and the Philippines.

These risk assessments further identified that the greatest area of possible risk exposure for SSP and the Group relate to migrant workers in the various business operations. These include migrant workers employed to provide cleaning or maintenance services, also seasonal workers, especially those involved with food processing, picking fruit and vegetables, or working in the seafood industry. We and the wider Group pay particular attention to those areas of our business where migrant workers are employed, as it is understood that these workers are often at greater risk of being a source of bonded labour.

Each Group operating company has ultimate responsibility for these areas in their appropriate jurisdiction and we are working with local management teams in higher risk countries to support them in putting in place appropriate controls, both for the relevant Group employees and for the products and services they procure.



We also work with external providers to review our modern slavery control measures and take appropriate steps where necessary to improve our systems, as further detailed below.

### **Due diligence: supply chain**

SSP's central and the wider Group's country purchasing teams are responsible for the on-going review of modern slavery risks within the various supply chains.

All countries are required to include the Code of Conduct within their key Vendor contracts and we continue to use SEDEX (Supplier Ethical Data Exchange) to access Vendors' ethical audit data and support our assessment of modern slavery risks in key suppliers. Vendor self-certification against the Code of Conduct is one of SSP's core sustainability KPIs, with all countries required to report progress against this KPI on a quarterly basis to our Group Executive Committee. As at October 2019, 87% of global Vendors surveyed (controllable spend, by value) have signed the Code of Conduct. The number of Vendors linked to SSP on SEDEX has also increased in comparison to last year.

In order to strengthen the ethical trade risk assessment process, we are increasing our internal ethical trade resource to provide the Group companies' country teams with additional support on how these operations should conduct reviews, ethical trade audit reports, risk assessments and determine the appropriate actions to be taken as follow up on any areas of concern.

If a supplier is found to be in breach of the Code of Conduct, we will investigate and take appropriate action and we reserve the right to cease trading with the relevant supplier if they are unable or unwilling to comply. We expect the Group companies to take similar action.

The Group companies' purchasing teams in higher risk countries and larger markets (for example, Russia, Greece, Germany and France) have held several meetings with key suppliers to discuss their modern slavery controls. In the year ahead, we will work with these Group companies to enable them to better engage with suppliers on these issues.

Many of our suppliers have their own complex supply chains, which reduces the ability for us and/or the Group to directly monitor the working conditions of each individual supplier. We and the Group companies are, however, committed to on-going dialogue with key suppliers, especially those operating in higher risk sectors, to understand the systems they have in place to manage modern slavery risks within their own supply chains.

### **Due diligence: SSP's business operations**

SSP employees and Group employees in each country have access to a confidential hotline they can use to raise any concerns they have about any aspect of their employment conditions. These hotlines are open to both permanent and temporary employees and afford such employees the opportunity to report any concerns they may have about issues related to modern slavery or wider welfare issues. Calls to the confidential hotline are monitored and escalated as appropriate if further action is required. During the year no calls were received related to modern slavery issues.

In territories where there is a higher risk of modern slavery overseas Group companies' local management teams receive guidance on the possible indicators of modern slavery and the specific issues they should be monitoring. These include duplicate bank account checks, monitoring any recruitment fees or other fees which may have been paid by employees, confirming that employees understand the terms of their contracts and that they have free access to their ID documents.

During the year, employee interviews were conducted in many of the Group's operations within the Middle East and Asia to monitor performance on the specific issues mentioned above. A more detailed review of recruitment and employment practices in India and the EEME region is being carried out, and the relevant Group companies are currently in the process of updating their processes.

### **Training and capacity building**

Modern slavery training has now been rolled out via our SSP Academy online training platform to all countries and translated into local language in high risk countries like Thailand. The level of training compliance is monitored to promote uptake.

Our Purchasing Director continues to champion modern slavery issues within the Purchasing Leadership Group (PLG). The September 2019 PLG conference had a session looking specifically at SSP's modern slavery and ethical trade and provided further training to the PLG on SSP's modern slavery policies and the actions which they and their teams need to take in terms of identifying and escalating risks.

### **Assessment of effectiveness in preventing modern slavery**

During the year, we instructed Deloitte to carry out a review of SSP's modern slavery controls and wider Group company procedures. Deloitte identified a number of areas where we could further strengthen our approach, which we have or are in the process of implementing.

We recognise that modern slavery risk continues to grow. We and the Group companies will continue to focus our efforts on suppliers and operations in those territories and industry sectors where it is believed that the risk of slavery is greatest.

We will work with our Group company country teams to promote a dialogue with our largest suppliers operating in sectors with a higher risk of modern slavery, and aim to encourage those suppliers to build their own capacity to manage this complex issue.

Our actions are measured against a number of Key Performance Indicators to enable us to better monitor progress in managing modern slavery risks within our business and supply chains. These KPIs include:

<b>KPI</b>	<b>Progress during 2018/19</b>
Provision of appropriate training on modern slavery risks to relevant employees and promoting such training within Group companies	<ul style="list-style-type: none"> <li>• Modern slavery training module launched on SSP Academy online training platform which managers complete and then cascade the information to their teams.</li> <li>• Refresher training provided to Group company Country Heads of Purchasing, and to purchasing teams in those countries deemed high risk for modern slavery.</li> </ul>
Vendor compliance with the Code of Conduct	<ul style="list-style-type: none"> <li>• SSP and Group companies are monitoring Vendor acceptance of the Code of Conduct</li> </ul>
Reviewing and strengthening supply chain due diligence and audit	<ul style="list-style-type: none"> <li>• Modern slavery issues were the subject of a review by our audit advisors, Deloitte. Further improvements have been (and will continue) to be made within SSP and across the Group.</li> <li>• Employee interviews conducted by Group companies in higher</li> </ul>

KPI	Progress during 2018/19
	<p>risk countries to assess modern slavery risk.</p> <ul style="list-style-type: none"> <li>• Number of Vendors linked to SSP on SEDEX has increased in comparison to last year.</li> <li>• Modern slavery has been added as a regular item for SSP's Group Risk Committee and Group Executive Committee.</li> </ul>

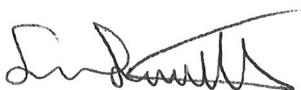
### Responsibility for this Statement

Within SSP, the SSP company directors and senior management take responsibility for implementing our policies and the objectives considered in this statement as well as monitoring modern slavery issues (should they arise).

We have engaged a specialist consultant to further support SSP on modern slavery and other supply chain issues.

This statement will be reviewed and published annually. This statement was approved by the Board(s) of SSP Group plc, Select Service Partner UK Limited and Rail Gourmet UK Limited respectively on the dates below.

Signed



**Simon Smith**

**CEO**

**SSP Group plc**

Date: 22/01/2020



**Richard Lewis**

**Director**

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Date: 24/01/2020



**Beat Ehlers**

**Director**

**Rail Gourmet UK Limited**

Date: 27/01/20