

MODERN SLAVERY STATEMENT 2022



Reporting period:
1 October 2021 – 30 September 2022

INTRODUCTION

At SSP, we are committed to respecting human rights in our business operations and supply chains.

We believe that fundamental human rights should be respected, as set out in the International Bill of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nation's Guiding Principles on Business and Human Rights.

We recognise that, like all businesses, we run the risk of being exposed to modern slavery either within our own operations or those of our extended supply chain¹. This statement is published in accordance with the UK Modern Slavery Act 2015. It outlines the steps taken by SSP² to prevent modern slavery and human trafficking in our business and supply chains during the financial year ending 30 September 2022 ('2022' or the 'reporting period').

ABOUT SSP

We are the food travel experts. Operating in 35 countries globally, we are experts in creating and running food and drink outlets in locations where people are on the move.

Our core market is food and beverage provision in travel-related locations worldwide, principally within the air and rail channels. Whether they're flying abroad on holiday or commuting to work by train, we make sure the food and drink experience we offer meets the needs of our many different customers.

Our 2022 business highlights		
£2.2bn revenue	c.550 brands and bespoke concepts	c.2,600 units
35 countries in which we operate	c.600 locations	c.35,000 colleagues at year-end
66% of our business is in the air sector	28% of our business is in the rail sector	6% of our business is in other areas ³



Find out more in our 2022 Annual Report at
foodtravelexperts.com/reports

¹ Modern slavery encompasses slavery, servitude and forced or compulsory labour and human trafficking, as defined in '[Transparency in supply chains: a practical guide](#)', Annex A, UK Home Office.

² Covering 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.

³ Including motorway service areas, in-flight catering, retail, lounges and on-board rail catering.

Our purpose, vision and strategy

Our purpose is to be the best part of the journey. This drives our culture as an organisation as we aspire to be the world's best travel food and beverage company.

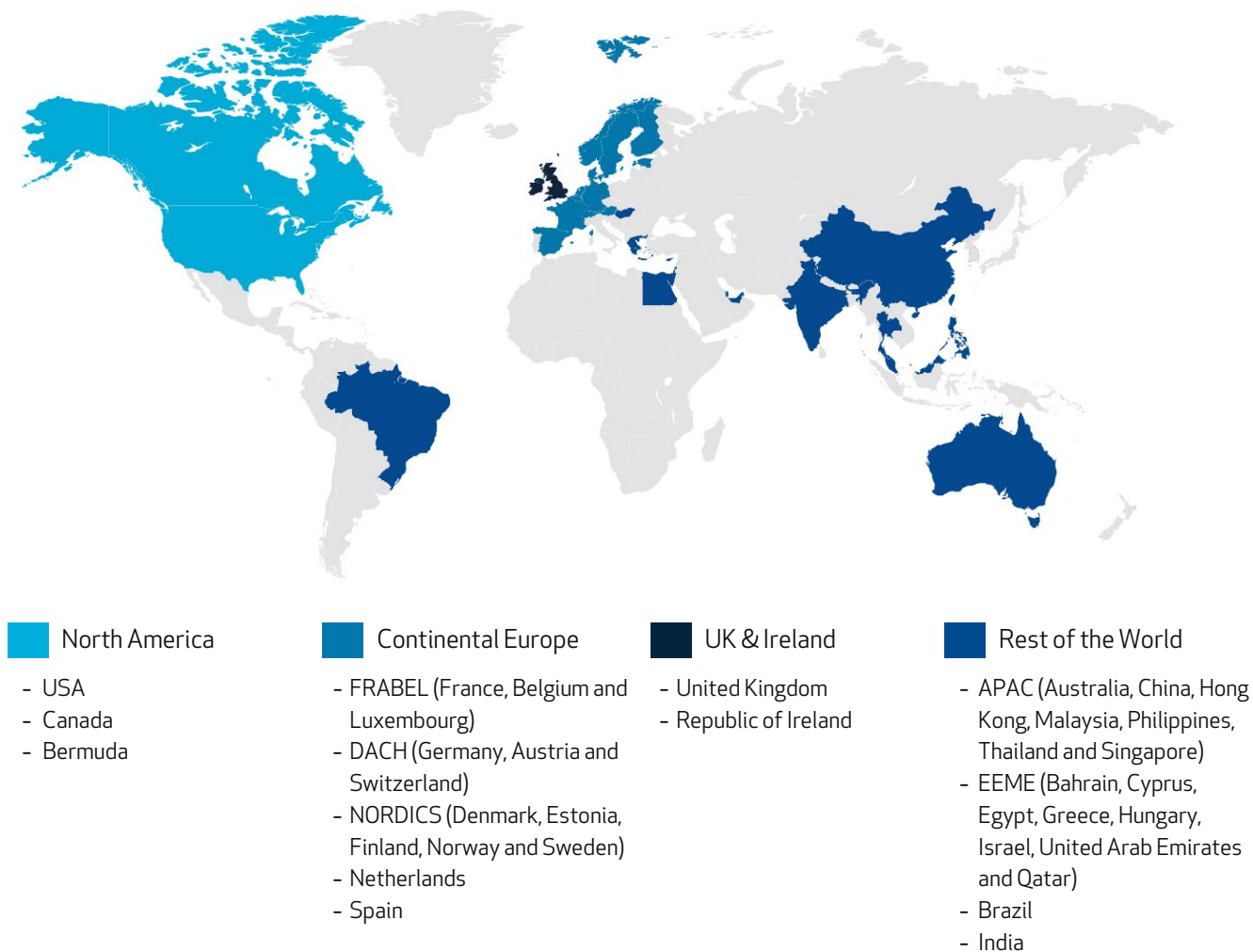
Our strategy remains to grow our market-leading positions in the food travel sector globally. To this aim, our strategic priorities reflect our focus on delivering a leading customer proposition aligned to our clients' needs and goals and on ensuring we have skilled and engaged colleagues.

At the same time, we continue to drive performance through our proven economic model to deliver long-term sustainable growth.

Embedding sustainability into our business forms a critical part of our strategy, encompassing our core strategic priorities. Our commitment to protecting human rights is one of the key material issues we focus on as part of our Sustainability Strategy.

The structure of our business and supply chains

In 2022, we operated in 35 countries and territories, across four key operating regions:



Our clients are primarily airports and railway stations seeking to develop the right range of food, beverage and retail brands and services at their locations to satisfy the needs of the travelling customer. We have a wide portfolio of brands, which include those we have created ourselves as well as those we franchise, to cater to our clients' and customers' needs. These brands range from well-known grab 'n' go sandwich shops and cafés, to bespoke high-end bars and restaurants.

At the end of the reporting period, we employed c.35,000 colleagues globally. The majority (87%) were team members or supervisors, 8% were operations management and 5% were support function colleagues. Our colleagues are primarily permanent employees, however, we do also employ some colleagues on a temporary basis responding to the seasonal peaks in our business.

With c.550 brands in our portfolio and operating in 35 countries, our ingredients and raw materials come from highly diversified supply chains, with a large volume of suppliers globally. These supplier relationships are predominantly managed by locally-based purchasing teams in the relevant operating entities around the world, with some larger agreements managed centrally by our Group Procurement function.

Our value chain



Find out more on page 4 of our 2022 Sustainability Report
foodtravelexperts.com/reports

GOVERNANCE AND POLICY COMMITMENTS

We are committed to upholding high standards of governance, and keeping our business accountable through clearly defined policy commitments.

The SSP Group plc Board has general oversight of the management of modern slavery risks within our business. The Group Risk Committee reviews our internal controls for modern slavery on a regular basis. The Chief People Officer and Group Chief Procurement Officer, who report to the Group Chief Executive Officer (CEO) and Deputy Chief Executive Officer and CFO respectively, act as the global functional leads for the Group with respect to human rights within our operations and supply chains.

Our Group policies outlined below provide a clear set of global frameworks that our businesses globally are expected to adhere to within the context of local regulation and market practice, where applicable. Each policy has been endorsed at Board-level and a member of the Group Executive Committee is assigned responsibility for overseeing its general implementation.

The operational responsibility for the execution of day-to-day implementation of our policies and procedures sits with the regional and country managing directors. They are responsible for upholding our standards and requirements in their own businesses including within the supply chain, and ensuring compliance at a local level.



Find out more on page 56 of our 2022 Sustainability Report
foodtravelexperts.com/reports

Colleague Code of Conduct

Our Colleague Code of Conduct (the 'Colleague Code') sets out the principles and standards that are expected of all employees, officers and directors of Group subsidiaries, regardless of where they work. This includes guidance on how to identify and deal with important ethical issues, together with instructions about where to find more detailed information or who to approach to ask for advice.

The Colleague Code applies to all employees, officers and directors of Group subsidiaries, and is compulsory regardless of where in the world they operate or are located. It includes a section on modern slavery and forced labour detailing our commitment to ensuring full respect for the human rights of anyone working for us in any capacity. We take a zero-tolerance approach to modern slavery or forced labour in our business operations and supply chains.

In the Colleague Code, we outline how we have a responsibility to look out for any signs of forced labour or modern slavery among our permanent and temporary colleagues, as well as for our suppliers workers and those of our service providers. Examples are given of some of the warning signs that could indicate that someone is a victim of modern slavery, as well as instructions for how to report concerns, such as via our independent and confidential Speak Up helpline.

A summary of the Colleague Code is publicly available on our website and the detailed internal Colleague Code is available for our colleagues.

Supplier Ethical Trade Code of Conduct

Our Ethical Trade Code of Conduct (the 'Supplier Code') outlines the standards we expect of our 'Contracted Suppliers'⁴. The Supplier Code is aligned to the best practice [Ethical Trading Initiative's Base Code](#) and includes specific requirements relating to modern slavery, including:

- 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 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.

Speak Up Policy

Our Speak Up Policy sets out our commitment to conducting our business with honesty and integrity, and encouraging a culture of openness and accountability.

The Policy provides a framework for how concerns about suspected wrongdoing, including for modern slavery, can be reported, investigated and remediated. Individuals are encouraged to raise concerns with designated persons and/or through the Country Whistleblowing Officer or confidential Group Helpline. The helpline is independently operated with all calls being dealt with in strictest confidence by specially trained operators. Calls can be made anonymously, and SSP operates a strict policy against any retaliation aimed at an individual who raises a concern in good faith.

The Board (in conjunction with the Audit Committee) monitors this policy and receives regular updates throughout the year on the number and subjects of cases. Serious cases are raised to the General Counsel and our Audit Committee to be monitored on an exceptional basis.



Download these and our other policies at
foodtravelexperts.com/policies

⁴ Contracted Suppliers relates to all vendors that are engaged via SSP purchasing teams, have contracts in place and SSP controls the spending for the provision of goods or services. This excludes non-contracted suppliers (e.g., wet markets and one-off purchases by invoice or purchase order), indirect suppliers (i.e. lower tier suppliers to a wholesaler or distributor) and non-controlled suppliers stipulated by our brand partners.

OUR RISK MANAGEMENT AND DUE DILIGENCE PROCEDURES

Our risk management and due diligence processes help us assess the nature and extent of exposure to modern slavery risks in our business and supply chains to inform our approach and ensure we prioritise our efforts in the right areas.

Assessing modern slavery risks

We conduct internal Group-level reviews of modern slavery risks across the Group's international operations. These reviews look specifically at the 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). In addition, local-level internal risk assessments help us to identify where to apply increased controls.

The information sources we and our local operational teams use for internal risk assessments include:

- The Global Slavery Index⁵ to help us understand inherent country and sector risks;
- Analysis of employee data, including number of colleagues in front-line team member roles;
- Analysis of reports received through our Speak Up channels – although, to date, no incidences of modern slavery or human trafficking have been reported;
- Supplier self-assessments shared via the Supplier Ethical Data Exchange (SEDEX) platform;
- Supply chain risk assessments conducted by our country purchasing teams;
- External human rights reports and insights, including the Global Estimates of Modern Slavery report produced each year by the ILO, Walk Free and the International Organization for Migration.

For our operations, our analysis against the Global Slavery Index shows that SSP operations are primarily located in countries with a lower prevalence of modern slavery. While we do not operate in any of the top 20 countries identified as having the highest prevalence (between 10-100 victims per 1,000 capita), five of our operations are in countries with an estimated prevalence between 6-9 victims per 1,000 capita.

Our risk assessments also indicate that the greatest area of possible risk exposure in our own operations relates to migrant workers in front-line team member roles. For example, the latest report on global estimates of modern slavery found that the forced labour prevalence of adult migrant workers is more than three times higher than that of adult non-migrant workers⁶.

For our supply chain, the greatest area of possible risk exposure relates to suppliers operating in countries identified in the Global Slavery Index as having a high level of modern slavery prevalence. In addition, based on the Global Estimates of Modern Slavery report, suppliers in manufacturing, agriculture and fishing are recognised as having higher inherent modern slavery risks⁷.

⁵ The [Global Slavery Index](#) (2018) provides a country by country ranking of the number of people in modern slavery, as well as an analysis of the actions governments are taking to respond, and the factors that make people vulnerable.

⁶ [Global Estimates of Modern Slavery](#) (Sept 2022), page 4. The International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM).

⁷ Ibid, pages 30-33.

Due diligence for our operations

Each Group operating company has ultimate responsibility for responding to our risk assessments in their appropriate jurisdiction. Our Modern Slavery Guidance, first implemented in 2020 and last updated in April 2021, provides detailed information for our local management teams to support them in putting in place the appropriate level of controls.

The guidance outlines the definition of modern slavery and provides examples of indicators or warning signs to watch out for. It also includes practical tools for mitigating and monitoring risks including a procedure for checking for duplicate accounts and an employee questionnaire. In operations located in countries with a higher prevalence of modern slavery, we also ask our teams to conduct interviews with a random sample of employees (including migrant workers).

Due diligence for our supply chains

We have a 2025 target for 100% of Contracted Suppliers to have signed-up to our Supplier Code (as described on page 5) or to have provided their own equivalent or higher standard. By the end of 2022, this was achieved for 64% of our contracted Suppliers globally.

We are also committed to assessing Contracted Suppliers in higher risk categories on ethical trade risks. Where possible, we do this via SEDEX, including reviewing the results of self-assessments and on-site SEDEX Members Ethical Trade Audits (SMETA). In 2022, we reviewed a total of 64 independent ethical trade audits for our Contracted Suppliers. This included 13 high-risk suppliers in the Middle East and Far East, and 14 suppliers in higher risk categories in Europe, Americas and Australia. As part of this, we also reviewed corrective actions to ensure any issues identified have been addressed.

In addition, we complement these due diligence efforts with a focus on key ingredients that can be associated with human rights issues. Our current focus is on the highest risk ingredients of palm oil, tea, coffee, cocoa for hot chocolate, and fish/seafood.

We are committed to sourcing ingredients that meet recognised sustainability standards and certifications, such as Rainforest Alliance, Fairtrade and UTZ certification for tea, coffee and cocoa, Roundtable on Sustainable Palm Oil (RSPO) for palm oil, or Marine Stewardship Council (MSC) for fish/seafood. These certifications help provide reassurance for our procurement teams, clients and customers that the ingredients have been produced in line with best practice criteria, including for human rights and forced labour.

For example, RSPO-certification includes criteria regarding the protection of workers' rights (and their families) on plantations, aligned to the ILO Conventions on Forced Labour, Abolition of Forced Labour, Minimum Age, Worst Forms of Child Labour and more⁸. For MSC-certified fisheries, they are required to report publicly on the measures they are taking to address forced and child labour, and any entity convicted of forced or child labour is removed from any MSC-certified fishery⁹.

Our 2025 target is for 100% of tea, coffee, hot chocolate and fish/seafood sourced for our own brands to be certified. By the end of 2022, 90% our global tea volumes, 63% of our global coffee volumes, 70% of our global

⁸ [Protecting Local Labour Rights in the Palm Oil Sector - Roundtable on Sustainable Palm Oil \(RSPO\)](#)

⁹ [Forced and child labour | Marine Stewardship Council \(msc.org\)](#)

hot chocolate volumes and 52% of our global fish/seafood volumes were certified.

For palm oil, this is used as a cooking oil in some markets and as an ingredient in a wide variety of different foods, often in very small amounts, such as pastries and sauces. Given the scale of its use, we have initially targeted the top 50 products for our own brands in each market to be palm oil free or to only use RSPO certified sustainable palm oil. By the end of 2022, we achieved this for 96% of our top 50 products in each market. The shortfall was due to global supply challenges, primarily driven by the Russia-Ukraine conflict leading to shortages of alternative oil supplies.

TRAINING AND CAPACITY BUILDING

We work to help ensure our colleagues around the business are aware of and understand how to manage human rights and modern slavery risks through focused training and engagement.

Having launched our new Sustainability Strategy and commitments in 2021, we recognise the importance of strengthening our capacity and capabilities across our business to drive progress and ensure effective delivery.

In 2022, we brought in specialist dedicated resources to strengthen our capability and processes in this area of the business. This included appointing our Group Head of Sustainability to lead a central Sustainability team and coordinate the strategy across our global business, including for human rights. They work closely with sustainability leads for our central functions and operating regions to support the development of action plans, programmes and initiatives to drive progress. This approach also helps to further embed sustainability into our ways of working.

We have mandatory compliance e-learning programmes on our SSP Academy training platform, that are a requirement for new management-level colleagues to complete as part of their induction. This includes mandatory modern slavery training for all our senior managers globally¹⁰.

By the end of 2022, we successfully achieved our target for this training to be completed by 100% of our senior management post-induction. In addition, the training has been completed by more than 2,600 colleagues located in countries identified as having a higher risk for modern slavery issues.

We also held two live training sessions for our purchasing teams in 2022, with our audit partner SEDEX. These were attended by 32 colleagues representing all our global businesses and focused on helping them navigate and utilise the SEDEX platform to assess modern slavery risks for our suppliers.

In 2023, we plan to develop new modern slavery training targeted at colleagues in specific roles, such as purchasing and human resources.

¹⁰ Senior managers relates to managers in Hay Grade A-C.

MONITORING EFFECTIVENESS

We are committed to measuring the effectiveness of, and working to further strengthen and enhance, our approach to tackling modern slavery.

Our actions are measured against our targets and key performance indicators (KPIs). These enable us to measure effectiveness and monitor our progress in managing modern slavery risks within our business and supply chains.

Key performance indicators

Target	KPI	2022 performance
By 2022, 100% of senior managers who have completed their induction to have received modern slavery training	% of senior managers who have completed the training (post-induction)	100%
In 2022, assess 10 contracted suppliers in higher risk categories in Europe, Americas and Australia and 15 in the Middle East and Far East on ethical trade risks, and agree a time-bound plan to address any issues identified	Total number of supplier ethical trade audits reviewed globally. Of these: <ul style="list-style-type: none"> Number of suppliers in higher risk categories in Europe, Americas and Australia Number of high-risk suppliers in the Middle East and Far East 	64, with corrective actions agreed to ensure any issues identified have been addressed 14 13
By 2022, SSP own brands to source 100% certified sustainable palm oil for the top 50 products in each market	% of top 50 own brand products that are palm oil free or using RSPO-certified palm oil	96%
By 2025, all Contracted Suppliers to sign SSP's Ethical Trade Code of Conduct or provide their own equivalent or higher standard	% of Contracted Suppliers that have signed the Supplier Code or demonstrated their own equivalent or higher standard	64%
By 2025, 100% of tea, coffee, hot chocolate and fish/seafood for our own brands to be certified to independent sustainability certifications	% of own brand volumes that are certified	90% tea 63% coffee 70% hot chocolate 52% fish/seafood



Find out more about the scope and definitions of our KPIs on page 71 of our 2022 Sustainability Report foodtravelexperts.com/reports

Next steps

As well as continuing to progress towards our 2025 targets, we plan to undertake the following actions in 2023 to further strengthen and enhance our approach:

- Conduct a detailed policy review and update where needed;
- Conduct a new Group-level modern slavery risk assessment and update our modern slavery guidance, procedures and controls to assist our businesses in conducting their own local risk assessments and implementing strengthened controls;
- Continue to review ethical trade audits for Contracted Suppliers with higher risks for human rights and modern slavery issues and ensure a timebound corrective plan is implemented to address any issues identified;
- Continue to maintain 100% compliance of senior managers (post induction) to have completed modern slavery training;
- Develop new modern slavery training targeted at colleagues in specific roles, such as purchasing and human resources.

APPROVAL

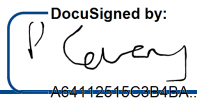
This statement has been approved, in accordance with the UK Modern Slavery Act, by the Board of Directors of the companies listed below.

The company directors and senior management take responsibility for implementing the policies, procedures and the objectives set out in this statement.

SSP Group plc

Name Patrick Coveney

Signature

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Date 29 March 2023

Select Service Partner UK Limited

Name Kari Daniels

Signature

DocuSigned by:

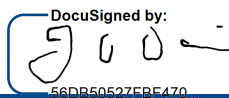
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Date 30 March 2023

SSP Financing UK Limited

Name Jonathan Davies

Signature

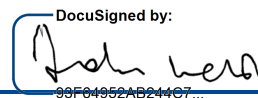
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Date 30 March 2023

Rail Gourmet UK Limited

Name Andy webb

Signature

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Date 29 March 2023

FURTHER INFORMATION

All data relates to the financial year 1 October 2021 – 30 September 2022, unless otherwise stated. Full details of the Group's Sustainability Strategy, targets and performance can be found in our 2022 Sustainability Report.



Find out more and download our 2022 Sustainability Report at foodtravelexperts.com/sustainability

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Select Service Partner UK Limited

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Company number: 5687183

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Company number: 05735959

Rail Gourmet UK Limited

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Company number: 3052537

