



SSP Group plc Modern Slavery Statement 2016/17

This statement has been published in accordance with the Modern Slavery Act 2015 and outlines the work undertaken by SSP Group plc during the financial year ending 30 September 2017 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 over 30 countries in the United Kingdom, Europe, North America, Asia Pacific and the Middle East. We operate a broad range of outlets from quick service to fine dining and serve, on average, one million customers each day.

We operate more than 450 brands globally through an extensive portfolio of over 2,500 outlets, including coffee shops, sandwich bars, bakeries, casual and fine-dining restaurants, as well as convenience and retail outlets. We operate units under our own propriety brands as well as international and local high street franchised brands and bespoke concepts. SSP employs approximately 35,000 colleagues. The majority of our colleagues are permanent employees, however we do also employ some colleagues on a temporary basis responding to the seasonal peaks in our business.

SSP has approximately 10,500 product suppliers and suppliers of non-merchandise goods and services. These supplier relationships are managed either centrally through the group head office or locally by purchasing teams based in our country based offices around the world.

Policies

At SSP, we are committed to improving our practices to identify and manage the risk of modern slavery and human trafficking in our supply chains and within our business.

Our Supplier 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 towards. Our overarching 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 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.

Suppliers are required to sign SSP's Code of Conduct as a condition of doing business. This requirement applies to SSP's global business and international supply chain. SSP's Code of Conduct is available at www.foodtravelexperts.com.

Company directors and senior management (led by the Group Commercial Director) take responsibility for implementing our policy and the objectives considered in this statement as well as monitoring modern slavery issues (should they arise).

Assessment of modern slavery risk within our supply chain

We conduct annual reviews of modern slavery risks across SSP's international operations looking specifically at the different territories in which we operate and from which we source, and their relative risk of slavery (based on operating country, sourcing country and product category, and referring to external resources such as the Global Slavery Index). Our risk assessment suggests that the majority of SSP's operations and supply chain are in countries with relatively low perceived levels of modern slavery risk.

Through our risk assessment we have identified countries with higher relative risks of modern slavery. We are working with our management teams in these countries to ensure that appropriate controls are in place, both for our own employees and for the products and services we procure.

We also pay particular attention to ensuring that we have a strong due diligence process in place in those countries where we have the larger scale operations, including the UK, France and Germany, although these countries have low risk ratings for modern slavery

We recognise that certain sectors have a higher potential risk of slavery. Our assessments of our supply chain have focused on sectors where there have been well-publicised cases of forced or trafficked labour. This has led us to give particular attention to suppliers of fresh produce and seafood. Details of the steps taken in relation to such suppliers are set out in the following section.

SSP's central and country purchasing teams use the Supplier Ethical Data Exchange system (SEDEX) to access ethical audit data on key suppliers, supporting our understanding of modern slavery risk within our supply chain.

Due diligence: supply chain

SSP's central and country purchasing teams are responsible for the on-going review of modern slavery risks within our supply chain. These purchasing teams have received training on the issues associated with modern slavery, SSP's policies and the role they should play in identifying and escalating risks.

Over the last year we have started using the 'SEDEX' system to access ethical audit data and support our assessment of modern slavery risks in key suppliers. During the year ahead, we will

provide further training for our central and country purchasing teams on the SEDEX risk assessment tool to enable suppliers to be classified as high, medium or low risk. Any suppliers classified as high risk to be subject to further investigation.

During 2016/17, our central and country purchasing teams have continued to contact our key suppliers to confirm that they have appropriate policies in place to manage any modern slavery risks. Each country purchasing team has written to its key suppliers to outline SSP's policies regarding labour standards and specifically modern slavery. Such suppliers have been asked to confirm that they have processes in place to manage modern slavery risks within their own businesses, or that they have plans in place to develop such processes. We are working to build a comprehensive set of records showing which suppliers have confirmed compliance with our policies and identifying any high risk suppliers where further follow up is required. In the year ahead, supplier compliance with our Code of Conduct will be monitored as part of regular Internal Audit checks across our global business.

Further, during the year, we have been holding meetings with suppliers that we believe to be operating in higher risk categories, to gain a detailed understanding of supplier approaches to managing modern slavery risks within their business. Our initial focus is on suppliers involved in supplying the largest quantity or biggest supplies of fresh fruit and vegetables or fish. To date, all suppliers forming part of this review have demonstrated their commitment to addressing modern slavery risks and have provided details of their associated controls.

These supplier meetings (both in the UK and in our international businesses) will continue in the year ahead as part of our on-going dialogue with higher risk suppliers.

Despite the requirements we place on our suppliers to comply with our policies, we are aware that many of them have their own complex supply chains, which means that it is less easy for us to directly monitor or control the working conditions of each individual supplier. We are, however, committed to on-going dialogue with our 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.

If a supplier is found to be in breach of SSP's Code of Conduct, we will investigate and take the appropriate action. If we identify any modern slavery issues which cannot be remedied, we reserve the right to cease trading with the relevant supplier with immediate effect.

Due diligence: SSP's employees

Each senior SSP HR manager/director throughout the SSP group has received training on the issues associated with modern slavery, SSP's policies and the role they should play in identifying and escalating risks. They are responsible for cascading such training to their regional teams.

The employee handbook and employee code of conduct include sections on modern slavery, providing information on what employees should do if they have any concerns themselves or identify possible cases of slavery within SSP's business. Our HR teams around the Group contact key employment agencies to confirm that they comply with SSP's Code of Conduct, and that they have appropriate processes in place to manage modern slavery risks.

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. We have not received any calls related to modern slavery issues.

In territories where there is a higher risk of modern slavery countries our local management teams conduct worker interviews to help identify any modern slavery risks or concerns.

In the year ahead, we will provide further training to our HR teams on modern slavery risks, especially for our HR teams in territories with higher modern slavery risks. We will also continue to work directly with our management teams in our higher risk countries to ensure that recruitment policies and procedures are carefully monitored and regular employee interviews conducted. Calls to confidential employee hotlines continue to be monitored and any issues will be escalated as appropriate.

Assessment of effectiveness in preventing modern slavery

We recognise that modern slavery risk continues to grow and we will go on developing our risk assessment tools and controls in the coming year to strengthen our approach. We will focus our efforts on suppliers and SSP operations in those territories and industry sectors where we believe the risk of slavery to be the greatest. We will maintain a regular 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.

In the year ahead, our actions will be measured against a number of Key Performance Indicators to enable us to better monitor our progress in managing modern slavery risks within our business and supply chains. These KPIs will include:

- (a) Provision of appropriate training on modern slavery risks to relevant employees.
- (b) Supplier compliance with SSP's Code of Conduct
- (c) Actions taken to strengthen supply chain due diligence and audit

We will report progress against these KPIs in the future.

This statement will be reviewed and published annually.

This statement was approved by the Board of SSP Group plc. on 16 January 2018

Signed



Ian Dyson

Non-Executive Director, SSP Group plc

25 January 2018