



## **SSP Group plc Modern Slavery Statement 2015/16**

This statement has been published in accordance with the Modern Slavery Act 2015 and outlines the work undertaken by SSP Group plc during the year ending 30 September 2016 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 400 brands globally through an extensive portfolio of over 2,000 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 30,000 colleagues.

SSP has approximately 10,000 product suppliers and suppliers of non-merchandise goods and services.

### **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 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 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 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 all of SSP's global business and international supply chain. SSP's Code of Conduct is available at [www.foodtravelexperts.com](http://www.foodtravelexperts.com).

Company directors and senior management (led by the Group Commercial Director) shall 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**

During the year ending 30 September 2016, we have undertaken a review 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.

Our review has focused on those territories such as Qatar, UAE and Thailand where, despite our operations being of a limited scale, we know that there is a higher relative risk rating for slavery. In these territories, we ensure that any recruitment agencies used are approved by the government and we have additional checks and controls in place to help ensure that our standards and procedures are adhered to.

In addition, we have paid 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. Our assessment of such suppliers has been carried out through conversations with them as well as the use of the SEDEX system, a not for profit organisation dedicated to driving improvements in responsible and ethical business practices across global supply chains. It enables sharing of ethical supply chain data which allows members to access information about their suppliers in four key areas – labour standards, health and safety, the environment and business ethics.

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

Following our initial review set out above, we continue to conduct an assessment of modern slavery risks within our business, including due diligence of our supply chain to better assess such risks. All of SSP's global purchasing teams receive training on the issues associated with modern slavery, SSP's policies and the role they should play in identifying and escalating risks.

Over the year, we have required key suppliers to confirm their compliance with SSP's Code of Conduct and provide details of the approach they are taking to assess and manage modern slavery risks within their own business and supply chains. For any suppliers identified as high risk from a slavery perspective, we are holding meetings with the supplier management to review their modern slavery approach in detail. These meetings 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 ongoing 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.

In future, as a way of further enhancing our assessments of human rights and slavery risks within our supply chain our global purchasing teams will be using the SEDEX system to refer to independent 3rd party ethical audit reports. Any suppliers classified as high risk, will be contacted to discuss the issues and agree any remedial actions which should be taken. Persistent breaches of SSP's Code of Conduct, or issues which cannot be remedied, will result in the immediate termination of the relevant supplier.

### **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 has been updated and now includes a section on modern slavery. Our HR teams around the Group have contacted key employment agencies to confirm they comply with SSP's Code of Conduct, and also have appropriate processes in place to manage modern slavery risks.

We are also updating our employee code of conduct so that it will include a dedicated section on modern slavery, giving advice to employees on what they should do if they have any concerns themselves or identify possible cases of slavery within SSP's business.

Employees in each country currently all have access to a confidential hotline they can use to raise any concerns they have about any aspect of their employment conditions. These hotlines 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.

### **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. In our UK business, we will maintain a regular dialogue with suppliers operating in sectors with a higher risk of slavery, and aim to also encourage key UK suppliers to build their own capacity to manage this complex issue.

We are continuing to develop key performance indicators during the current year in order to assess and report on our progress in monitoring and managing slavery risks within our business and supply chains.

This statement will be reviewed and published annually.

This statement was approved by the Board of SSP Group plc.

Signed

A handwritten signature in black ink, appearing to read 'Ian Dyson', written in a cursive style.

Ian Dyson

Non-Executive Director, SSP Group plc

30<sup>th</sup> January 2017