

## SSP Group plc

### Modern Slavery Statement 2017/18

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 2018 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 33 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, 1.5 million customers each day.

We operate more than 500 brands globally through an extensive portfolio of around 2,600 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 proprietary brands as well as international and local high street franchised brands and bespoke concepts. SSP employs approximately 37,000 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 and Human Rights Policy ("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.

All new suppliers are asked to sign our Code of Conduct. This process applies to SSP's global business and international supply chain. Our Code of Conduct is available at [www.foodtravelexperts.com](http://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).

Our local employee handbooks include a section 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.

### **Identification and 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, [www.globalslaveryindex.org](http://www.globalslaveryindex.org)).

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 although we do have operations in some countries identified in the Global Slavery Index as having a higher relative risk of modern slavery, including India, Thailand, Egypt, Russia, Greece and the Philippines. 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 and these controls are detailed below. 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.

We continue to use SEDEX to access suppliers' ethical audit data and support our assessment of modern slavery risks in key suppliers. We monitor the number of suppliers with whom we have connections on SEDEX, and we have seen this number more than double over the last year. In the year ahead, country

purchasing teams will continue to connect suppliers via the SEDEX platform. We will also provide refresher training for our central and country purchasing teams on ways to use the SEDEX risk assessment tool to enable suppliers to be classified as high, medium or low risk. Any suppliers classified as high risk will be subject to further investigation.

During the year, our focus has been on working with our purchasing teams in those countries identified as higher risk for modern slavery to give these teams the knowledge and tools they need to assess the risks in their supply chain and to engage with suppliers on these issues. Our Country Purchasing teams have made contact with those suppliers that we believe to be operating in higher risk categories, to gain a more detailed understanding of supplier approaches to managing modern slavery risks within their business. Our focus has been on suppliers involved in supplying the largest quantity or biggest supplies of fresh fruit and vegetables or fish. These supplier meetings will continue in the year ahead as part of our on-going dialogue with higher risk suppliers.

We have worked with our global construction teams to update each country's key construction contract documentation to include modern slavery requirements. Country teams have issued the Code of Conduct to existing construction contractors and suppliers and embedded the Code of Conduct within the standard tender process for all future construction projects.

Suppliers signing up to our Code of Conduct are monitored as part of the regular Internal Audit checks that are carried out across our global business.

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 appropriate action and we reserve the right to cease trading with the relevant supplier if they are unable or unwilling to comply with our Code of Conduct.

### **Due diligence: SSP's employees**

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 we did not receive any calls related to modern slavery issues.

In territories where there is a higher risk of modern slavery our local management teams conduct employee interviews to help identify any modern slavery risks or concerns. During the year, we conducted employee interviews in many of our operations within the Middle East and Asia. The objective was to assess modern slavery risk, looking at issues such as payment of recruitment fees and accommodation provision. Our assessment did not highlight any areas of concern from a modern slavery perspective.

In the year ahead, we will continue to work with our HR teams to build their understanding of modern slavery risks and the controls which need to be in place. We will focus on providing ongoing training and capacity building for our HR teams in territories with higher modern slavery risks, specifically to ensure

that recruitment policies and procedures are carefully monitored. We will continue to use regular employee interviews to monitor modern slavery risks within our permanent and temporary workforce. Calls to confidential employee hotlines continue to be monitored and any issues will be escalated as appropriate.

### **Training and capacity building**

This year, we included a training session on modern slavery within our Purchasing Leadership Group conference, providing guidance for country Heads of Purchasing on the issues associated with modern slavery, SSP’s policies and the role they and their teams should play in identifying and escalating risks. In addition, we work with our purchasing teams in those countries identified as higher risk for modern slavery to build their understanding of ways assess the risks in their supply chain and to engage with suppliers on these issues.

We have created a modern slavery training module on our global online training platform, the SSP Academy. The training is scheduled for launch in early 2019 and covers modern slavery risks, identifying the signs of modern slavery and forced labour and the steps to take in the case of any concern being identified. It will be compulsory for all managers to complete this training and to cascade the content to their teams.

### **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 further 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.

Our actions are 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 include:

<b>KPI</b>	<b>Progress during 2017/18</b>
Provision of appropriate training on modern slavery risks to relevant employees	<ul style="list-style-type: none"> <li>• Training provided to Country Heads of Purchasing, and to purchasing teams in those countries deemed high risk for modern slavery</li> <li>• Compulsory Modern slavery training module prepared for launch in early 2019</li> <li>• Modern slavery training provided to country Heads of Construction</li> </ul>
Supplier compliance with SSP’s Code of Conduct	<ul style="list-style-type: none"> <li>• All countries are monitoring supplier acceptance of SSP Supplier Code of Conduct and Human Rights Policy</li> <li>• Code of Conduct re-issued so that it can be included in supplier</li> </ul>

KPI	Progress during 2017/18
	<p>contracts</p> <ul style="list-style-type: none"> <li>In 11 operating countries, including many of our largest markets and those countries identified as higher risk for modern slavery, over 85% of existing suppliers (by value) have signed the Code of Conduct.</li> </ul>
Strengthen supply chain due diligence and audit	<ul style="list-style-type: none"> <li>Modern slavery issues now assessed as part of rolling programme of Internal Audit Country Healthchecks.</li> <li>Employee interviews conducted in higher risk countries to assess modern slavery risk.</li> <li>Number of supplier connections on the SEDEX platform has more than doubled year on year.</li> </ul>

In addition to the above activities we have included modern slavery risk management in our 2018/2019 Internal Audit programme.

This statement will be reviewed and published annually. This statement was approved by the Board of SSP Group plc on 18 January 2019.

Signed



Ian Dyson

Non-Executive Director, SSP Group plc

22 January 2019