

## SSP<sup>1</sup> - Modern Slavery Statement 2020/21

SSP is committed to respecting the human rights of anyone working for us in any capacity. 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 2021 (the “**Reporting Period**”) to seek to identify and manage the risk of modern slavery and human trafficking in its business and supply chains<sup>2</sup>.

### Our business and supply chains

SSP is a leading operator of food and beverage outlets in travel locations in 36 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.

These operations include more than 550 brands globally through an extensive portfolio of around 2,700<sup>3</sup> 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. The Group currently employs approximately 23,000 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.

The 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.

This has been a challenging year for the business as Covid-related travel restrictions continued to impact passenger numbers at airports and railway stations. This led to disruption due to units not being open, colleagues being unavailable and a need to prioritise workload when reopening units. By the end of the Reporting Period, we had opened c.1,850 units, which represents around 70% of our total units. However, though trading has been difficult, we have taken the opportunity to strengthen our foundations and ensure we are in the strongest possible position to capitalise on the recovery.

### Governance

The SSP Group plc Board has oversight of the management of modern slavery risks within our business. The Group Risk Committee<sup>4</sup> reviews internal controls for modern slavery risks on a regular basis.

The Chief People Officer and Chief Procurement Officer, who are members of the Group Executive Committee<sup>5</sup>, act as the global functional leads for the Group with respect to human rights within our operations and supply chain. The operational responsibility for execution of our policies and programmes sits with the regional and country managing directors who are responsible for upholding our standards and requirements in their own businesses including within the supply chain.

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.

### Code of Conduct and Related Policies

Our Ethical Trade Code of Conduct and Human Rights Policy (“**Code of Conduct**”), which incorporates the Ethical Trading Initiative’s Base Code, outlines the standards we follow and 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.

<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.

<sup>2</sup> 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, pages 17–19, UK Home Office.

<sup>3</sup> Units trading or temporarily closed at the end of the Reporting Period

<sup>4</sup> The Risk Committee comprises various senior management and our internal auditors, Deloitte. It is chaired by the CFO and operates under the oversight of the Audit Committee.

<sup>5</sup> See page 12 of our Annual Report for an overview of the Group Executive Committee

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

- There must 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 of stock for SSP's proprietary branded outlets as well as cleaning services and refuse collection (“**Vendors**”) are required to sign our Code of Conduct as part of our onboarding process. This process has been adopted by both SSP as well as the Group’s global business and international supply chain. In the year ahead, our country management teams plan to expand the Code of Conduct to other key suppliers.

Our Code of Conduct is available at [Policies - SSP Group plc \(foodtravelexperts.com\)](https://www.foodtravelexperts.com/policies)

We have additional policies covering equality, anti-bribery and corruption 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 and can do so in a safe and confidential manner with designated individuals and/or through the appointed country whistleblowing officer or helpline established by the Group<sup>6</sup>. The Board (in conjunction with the Audit Committee) monitors this policy and reviews the matters reported and the outcome of any investigations.

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

We recognise the pervasive nature of modern slavery across the globe. We conduct or support internal 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). These internal risk assessments help us to identify where to apply increased controls.

The information sources we use for our internal risk assessments include:

- The [Global Slavery Index](#)<sup>7</sup> to help us understand country risks
- Third party Vendor audits shared via the SEDEX (Supplier Ethical Data Exchange) 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

Whilst no new Group-wide risk assessment was undertaken during the Reporting Period, we continue to manage our response to these risks based on our risk assessment from the financial year ending 30<sup>th</sup> September 2020 and through our business as usual controls.

Our risk assessments to date suggest that the Group has operations in a number of countries identified in the [Global Slavery Index](#) as having a high prevalence of modern slavery. These countries fall within three of our operating regions; Asia Pacific, India and Eastern Europe/Middle East, and we therefore ask our management teams in these regions to operate increased

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<sup>6</sup> See p.34 of our Annual Report for further details of our Whistleblowing helpline.

<sup>7</sup> The 2018 Global Slavery Index 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.

modern slavery controls. This includes engaging with a greater number of suppliers to assess supply chain risk and implementing systems to more closely monitor human rights risk within our workforce, for example through anonymous worker interviews.

Our risk assessments indicate that the greatest area of possible risk exposure for the Group relate to migrant workers in the various business operations. These include migrant workers employed to provide cleaning or maintenance services. They also include seasonal workers, especially those involved with food processing, picking fruit and vegetables, or working in the seafood industry. We pay particular attention to those areas of our business where migrant workers are employed, and encourage our key Vendors to do so, as it is understood that these workers are often at greater risk of being victims of modern slavery.

Each Group operating company has ultimate responsibility for responding to these risk assessments in their appropriate jurisdiction and we work with local management teams to support them in putting in place the appropriate level of controls, both for the relevant Group employees and for the products and services they procure.

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

SSP's central team 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 to access Vendors' Ethical Trade Audit<sup>8</sup> 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. During the Reporting Period, Vendors who had signed our Code of Conduct accounted for 96% of our total spend with Vendors. We also encourage Vendors to share audit reports with us via SEDEX.

As part of our new Sustainability Framework, we are committed to reviewing the Ethical Trade Audits of suppliers identified as high-risk by our internal risk assessment and putting a timebound plan in place to address any high-risk issues identified. We have reviewed 57 ethical trade audit reports across 15 Vendors globally in the Reporting Period.

We continue to focus on initiatives to strengthen the ethical trade risk assessment process. During the Reporting Period, country purchasing teams were provided with additional training tools to help them review supplier ethical audit reports, conduct 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, this will be investigated immediately and we will take the appropriate action up to and including ceasing to trade with the relevant supplier. We expect the Group companies to take similar action.

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 are, however, committed to 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 Whistleblowing Helpline they can use to raise any concerns they have about any aspect of their employment conditions. This helpline is open to both permanent and temporary employees and affords such employees the opportunity to report any concerns they may have about issues related to modern slavery or wider welfare issues. Calls to the helpline are escalated as appropriate if further action is required.

Our local country management teams receive guidance on the possible indicators of modern slavery and the specific issues they should be monitoring. In the Reporting Period, we ran a number of training workshops on modern slavery risks within our supply chains which all of our local procurement teams were invited to attend.

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<sup>8</sup> "Ethical Trade Audits" are those carried out at the manufacturing facilities where goods are produced, by an independent third party, against a recognised standard including (but not limited to) a Sedex Members Ethical Trade Audit (SMETA) or against BSCI social auditing methodology.

In April 2021 we issued updated guidance to our country HR teams which included information to help them identify any risks within SSP's global business, how we manage risk in our business and information on our Ethical Trade Code of Conduct. It also included useful templates for employee questionnaires and a process to check for duplicate accounts.

In regions that have a higher prevalence of modern slavery, Asia Pacific, India and Eastern Europe/Middle East, we also ask country management teams to conduct employee interviews to monitor performance on the specific issues mentioned above. This work has progressed in Asia Pacific and is planned for India and Eastern Europe/Middle East.

### Training and capacity building

In 2019, we started to roll out anti-modern slavery training via our SSP Academy online training platform to all countries, with the training translated into local language in some countries, notably within our Asia Pacific region. As part of our new Sustainability Framework, we have focussed attention on ensuring that, by the end of 2022, 100% of senior managers (excluding those that have not yet completed their induction) complete the training and cascade this to their teams. This strengthens our previous target (95% of senior managers) and puts responsibility onto those senior managers for ensuring their teams are informed on the issues associated with modern slavery. As of January 2022, 91% of senior managers across the Group had completed the anti-modern slavery training module.

The level of training compliance continues to be monitored and each regional/country executive team will put in place action plans to achieve 100% compliance by financial year end<sup>9</sup>. Progress against this target will be reviewed by the Group Risk Committee.

### Assessment of effectiveness in preventing modern slavery

In 2019 we undertook a review of our approach to modern slavery alongside our internal auditors, and we continue to work in line with the findings of this report within SSP and across the Group.

During the Reporting Period, the Covid-19 pandemic and ensuing disruption to travel and commuting continued to cause a reduction in passenger volumes, which resulted in declining sales. To manage its cost base, SSP needed to take decisive action which has caused some of our modern slavery initiatives to be put on hold, due to the fact that units were either closed or operating under very different conditions to normal, with many of our colleagues furloughed.

Notwithstanding these unprecedented challenges, during the Reporting Period, we reviewed our approach to modern slavery, revised our KPIs and agreed new objectives, aimed at ensuring renewed progress in implementing and improving the way we monitor and manage human rights risks within our business. This work will continue to be led by the Group Executive Committee, with regular reporting to the Group Board.

This formed part of a broader review of our Sustainability strategy and stakeholder expectations, resulting in SSP's Board agreeing a new Sustainability Framework:



<sup>9</sup> Accepting ongoing turnover and business growth headcount variances.

As part of this new framework, human rights matters, including ethical trade and modern slavery and human trafficking issues now come under two of the new Core Commitments within the Sustainability strategy, with a focus on protecting human rights and sourcing our ingredients responsibly. Accountability for these commitments sits with our Chief People Officer and Chief Procurement Officer, respectively.

Within our new Sustainability Framework, we and the Group will continue improving our understanding of human rights risks and training our teams on how to identify and manage these risks. We 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 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.

Find out more about our new Sustainability Framework on pages 28-41 of our 2021 Annual Report [here](#).

### KPIs and Effectiveness

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

KPI	Progress during the Reporting Period
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>• Further rollout of modern slavery training module on SSP Academy online training platform, which senior managers complete and then cascade the information to their teams. By January 2022, 91% of all senior managers had completed the training. By the end of this Financial Year our target is 100%.</li> <li>• We previously targeted 100% of colleagues in countries with a higher prevalence of modern slavery would receive formal training. As we strengthened the requirement for senior managers to undertake the training and cascade this to their teams we have removed this requirement.</li> </ul>
Vendor compliance with the Code of Conduct	<ul style="list-style-type: none"> <li>• SSP and Group companies continue to monitor Vendor acceptance of the Code of Conduct. During the Reporting Period, Vendors who had signed our Code of Conduct accounted for 96% of our total spend with Vendors; an increase from 80% in 2020.</li> </ul>
Reviewing and strengthening supply chain due diligence and audit	<ul style="list-style-type: none"> <li>• As part of our new Sustainability framework, we will continue to strengthen our management approach to human rights and sourcing products responsibly through improved governance.</li> <li>• We continue to encourage Vendors to share ethical audit data with SSP via SEDEX, we have reviewed 57 ethical trade audit reports across 15 vendors globally.</li> <li>• Each year, 10 Vendors in higher risk categories in Europe, Americas and Australia, and 15 Vendors in the Middle East and Far East, will have their ethical trade audits risk assessed and a timebound plan agreed to address any issues identified.</li> </ul>

### Responsibility for this Statement

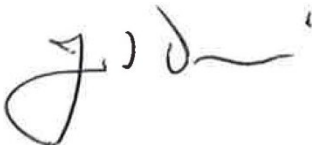
Within SSP, the Board and Group Executive Committee have oversight of key strategic risks and our sustainability strategy, which includes Modern Slavery, as well as monitoring modern slavery issues (should they arise). SSP company directors and senior management take responsibility for implementing our policies and the objectives considered in this statement.

We have engaged a specialist consultant to further support SSP on modern slavery and other supply chain issues, and in 2022 will appoint a permanent Head of Sustainability to ensure this process is delivered effectively.

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

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Jonathan Davies

Deputy CEO, SSP Group plc

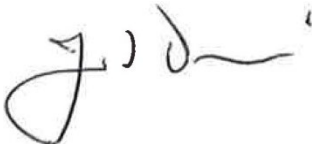
Approved on 4 February 2022

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Richard Lewis

CEO, Select Service Partner UK

Limited Approved on 29 March 2022

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Jonathan Davies

Director, Rail Gourmet UK Limited

Approved on 29 March 2022