

# SSP CODE OF CONDUCT – SUMMARY



June 2022

SSP enjoys an excellent reputation with customers, suppliers, brand partners and local governing bodies which has been built up by consistently delivering high standards of service and adhering to key SSP Group values. Below is a summary of the key principles of the SSP Code of Conduct governing the principles and standards that are expected of and must be followed by all employees. A full version of the Code can be accessed upon request and any issues or questions should be directed to your manager.

Principle	Summary of standards expected
<b>Health and safety</b>	SSP is committed to ensuring that all employees are able to work in a safe and secure environment and it is the responsibility of every employee to ensure that the work environment that we operate in is safe, secure and healthy and that all Health and Safety policies at your work are adhered to.
<b>Environment</b>	SSP is committed to minimising any negative effects that its business may have on the environment and wherever possible preventing environmental damage. Together with all employees it will seek to minimise the impact that its business operations have on the environment.
<b>Harassment Free Work Environment</b>	SSP will not tolerate abuse or harassment in the workplace. Every employee has the right to be fairly treated and receive courtesy from others in the workplace and no employee should have to suffer abuse or harassment of any nature.
<b>Personal Information</b>	SSP is committed to respecting the confidentiality of all employees' personal information and ensuring that when such data is handled it is done so in accordance with all applicable local data protection laws and regulations.
<b>Protection and Proper Use of SSP Property</b>	All employees are responsible for ensuring that SSP property they use or come into contact with at work is not damaged, misused or wasted. Any act by an employee that involves theft, fraud or misappropriation of any SSP company property is prohibited and will lead to disciplinary action being taken.
<b>Use of SSP IT</b>	IT equipment is intended to be used by employees for business functions only but may be used for occasional, limited personal use that does not interfere with such functions. SSP may monitor the use of its IT and communication facilities by employees to ensure compliance with company policies. Any prohibited material found on IT facilities may lead to disciplinary action.

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<b>SSP Company Information</b>	At SSP we create information that is valuable to the business on a daily basis. This information may be classed as confidential information and it is important that every employee ensures that this information is protected from use by others.
<b>Brand/Business Partner Information</b>	The unauthorised use of a brand or business partner's confidential information or intellectual property could be very damaging to the reputation of SSP and may result in legal action being taken against the company. Employees should never use or copy or disclose information that is owned by another party unless they have obtained the express permission of such party to do so.
<b>Accurate Reporting</b>	Every employee must ensure that all transactions, hours worked, expenses claimed, or any other aspect of the business is recorded promptly, accurately, honestly, and in accordance with local requirements and procedures.
<b>Corporate Hospitality and Gifts</b>	In some circumstances the exchange of entertainment or gifts could be disproportionate and be seen to create a level of improper influence, or in extreme cases as a bribe. Some entertainment and gifts are never acceptable while some may be acceptable with prior approval. Each employee should be familiar with their department's rules on this topic.
<b>Working with Suppliers</b>	SSP will only appoint and work with suppliers that operate to the same high standards of honesty and integrity that SSP strives to achieve, and care must be taken when appointing a supplier.
<b>Conflicts of Interest</b>	All conflicts or potential conflicts of SSP's interests and an employee's private interest must be avoided or carefully managed. Any conflict should be disclosed to your manager failure of which may lead to disciplinary action.
<b>Money Laundering</b>	SSP will not assist or support money laundering activity (the attempt to conceal the true origin and ownership of the proceeds of illicit funds).
<b>Bribery and Corruption</b>	SSP operates a strict, zero tolerance policy for all forms of bribery and corruption within its business and expects all officers, employees and, where appropriate, business partners to conduct themselves in accordance with this policy.
<b>Facilitation Payments</b>	Unless in extreme situations (involving an employee's personal safety), SSP has a strict policy not to accept or make facilitation payments (a payment or gift that is made to secure or speed up a procedure or governmental action).

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<b>Political Activity</b>	SSP does not participate in party political activity in any country that it does business but may engage in policy debate (by processes such as lawful lobbying) on subjects that concern the company and its employees. It is important for all employees to ensure that personal political activity is not mistaken for activities of SSP.
<b>Competition</b>	As with all other laws, SSP is committed to ensuring that competition laws (e.g., price fixing and market division) in each region in which SSP operates are complied with and fully adhered to. Any employee who is found to have engaged in any anticompetitive behaviour will face disciplinary action and may also face criminal investigation.
<b>Modern Slavery</b>	As a company, we are committed to ensuring full respect for the human rights of anyone working for us in any capacity and we take a zero-tolerance approach to modern slavery or forced labour in our business operations and supply chains. If you have any concerns about a colleague or someone employed by a contractor or supplier being subject to forced labour, or if you have any concerns about your personal situation, please speak to your line manager, or, if you prefer, call the confidential employee hotline.
<b>Tax Evasion and Facilitating Tax Evasion</b>	SSP operates a strict, zero tolerance policy for tax evasion and facilitating tax evasion within its business and expects all officers, employees and, where appropriate, business partners to conduct themselves in accordance with this policy.

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## **SPEAK UP HELPLINE (WHISTLEBLOWING)**

A code of conduct helpline is available if you feel unsure about where best to seek advice or if you are uncomfortable about speaking about a matter to one of the people identified in the Code. The helpline is independently operated with all calls being dealt with in the strictest of confidence by specially trained operators. Calls can be made anonymously, but if you are happy to give your name it may help to speed up the investigation of any concerns.

The freephone helpline operates 24 hours a day, 7 days a week (except 25 December) and is available to all employees, regardless of their location or role within SSP. The helpline contact telephone numbers are available on posters in units and on our Company SharePoint site. If you have any difficulties with contacting the helpline (or your country is not listed below) you should refer to your country's HR department for contact details.

SSP operates a strict policy against any retaliation aimed at an individual who raises a concern in good faith. All allegations of retaliation will be thoroughly investigated and may result in disciplinary action being taken.