

SSP GROUP PLC SPEAK UP POLICY



July 2022

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1. POLICY STATEMENT

1.1 SSP Group plc, its subsidiaries and joint venture companies (together, the "Group" or "SSP" and individually a "Group Company") are committed to conducting our business with honesty and integrity, and the Group expect all colleagues to maintain high standards. A culture of openness and accountability is essential to prevent wrongdoing occurring and to address it if it does occur.

2. PURPOSE

2.1 The aims of this policy are:

- 2.1.1 to encourage colleagues to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- 2.1.2 to provide colleagues with guidance as to how to raise those concerns;
- 2.1.3 to reassure colleagues that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

2.2 This policy takes account of the Whistleblowing Arrangements Code of Practice issued by the British Standards Institute and Public Concern at Work.

2.3 This policy does not form part of any colleague's contract of employment and it may be amended at any time.

2.4 This policy should be read in conjunction with the Group's other policies including the Code of Conduct and the Authorisation Policy.

3. WHO IS COVERED BY THIS POLICY?

3.1 This policy applies to all individuals working at all levels of the Group, including senior managers, officers, directors, employees, consultants, contractors, homeworkers, part-time and fixed-term workers, casual and agency staff (collectively referred to as "colleagues" or "you" in this policy) in all divisions and subsidiaries within the Group, all joint ventures (usually those in which a Group Company has a 50% or more interest and/or management control) and their subsidiaries.

3.2 Depending on circumstances, this policy may also apply to joint ventures in which a Group Company has a minority interest. This will be determined by SSP Group in discussion with your Country Speak Up Officer. If you are unsure whether a joint venture is subject to this policy please consult your manager, HR Manager or Country Speak Up Officer (see 11.2 for details of the role and their responsibilities).

4. WHAT IS SPEAK UP (WHISTLEBLOWING)?

4.1 Speak Up is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include criminal activity; miscarriages of justice; danger to health and safety; damage to the environment; failure to comply with any legal obligation; bribery; negligence; breach of our internal policies and procedures; or the deliberate concealment of any of these matters.

4.2 You should raise a concern under this policy if you have a genuine belief that an actual or suspected wrongdoing or negligence may have affected, is affecting or will affect any of SSP's activities.

4.3 This policy should not be used for complaints relating to your personal circumstances, for example, the way you have been treated at work, or for bullying and harassment complaints. In those cases, you should refer to and use the Grievance Procedure.

4.4 If you are uncertain whether something is within the scope of this policy, you should seek advice from your Country Speak Up Officer.

5. RAISING A (WHISTLEBLOWING) CONCERN

5.1 We hope that in many cases you will be able to raise any concerns with the Human Resources department. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to your Country Speak Up Officer.

5.2 However, where the matter is more serious, or you feel that your line manager or the Human Resources department has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

5.2.1 Your Country Speak Up Officer; or

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- 5.2.2 Our confidential SSP Group Helpline (where concerns can be reported anonymously if necessary). Country telephone numbers for this are set out at the end of this policy.

6. CONFIDENTIALITY

- 6.1 We hope that colleagues will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, the Group will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, the Group will discuss this with you. No colleague will suffer demotion, penalty or other adverse consequences for voicing concerns under this policy unless they are false allegations (as per paragraph 10 of this policy).
- 6.2 We do not encourage colleagues to make disclosures anonymously. Proper investigation may be more difficult or impossible if the Group cannot obtain further information from you. If you are concerned about possible reprisals if your identity is revealed then you should speak to your Country Speak Up Officer or one of the other contact points listed in paragraph 5 and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from our SSP Group Helpline or Public Concern at Work, the UK based independent whistleblowing charity, who offer a confidential helpline (Helpline: (0)20 7404 6609, E-mail: whistle@pcaw.co.uk, Website: www.pcaw.co.uk)

7. EXTERNAL DISCLOSURES

- 7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases, you should not find it necessary to alert anyone externally.
- 7.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external to the Group. As noted above, the independent UK based whistleblowing charity, Protect, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concerns.

7.3 Speak Up concerns usually relate to the conduct of our colleagues, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, the Group encourage you to report such concerns internally first. You should contact your line manager or the Human Resources department or one of the other individuals set out in paragraph 5 for guidance.

8. INVESTIGATION AND OUTCOME

8.1 We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

8.2 Following this meeting, the Group will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings to provide further information.

8.3 In some cases, the Group may appoint an investigator or team of investigators including colleagues with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

8.4 We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us from giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

8.5 If the Group concludes that you have deliberately made false allegations, you will be subject to disciplinary action.

9. IF YOU ARE NOT SATISFIED

9.1 While the Group cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.

9.2 If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts in paragraph 5

10. PROTECTION AND SUPPORT FOR WHISTLEBLOWERS

10.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support colleagues who raise genuine concerns under this policy, even if they turn out to be mistaken.

10.2 Colleagues must not suffer any detrimental treatment as a result of raising concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your Country Speak Up Officer immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure

10.3 Colleagues must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.

11. RESPONSIBILITY FOR THE SUCCESS OF THIS POLICY

11.1 The Board has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

11.2 Each country has a Country Speak Up Officer which is your Country Managing Director, Country CEO, Country General Manager, Area Manager or other relevant person (as appropriate). A list of Country Speak Up Officers is available from Global.HR@ssp.uk.com. Your Country Speak Up Officer has ultimate responsibility for (i) ensuring that their respective business areas establish systems and controls to comply with this policy and (ii) periodically monitoring it. This includes:

- day-to-day operational responsibility for this policy;
- implementing communication mechanisms to ensure that this policy is embedded and understood throughout the organisation;
- ensuring adequate staffing levels to meet the requirements of this policy;
- ensuring all relevant employees receive appropriate training;
- ensuring conformance of controls implementing this policy;
- ensuring smooth and prompt onward reporting under this policy.

11.3 The designated person with overall responsibility for this Policy is Jonathan Davies, Chief Financial Officer of SSP Group plc who will discuss the results of the monitoring and review activity with the SSP Risk Committee. The Committee will report periodically to the Group Audit Committee and the Board of Directors of SSP Group plc. The relevant people who are obliged to comply with this policy will be notified of any resultant changes.

11.4 SSP will maintain a record of all reports made under this policy including details of the investigation and the outcome of those investigations. These records will be retained for at least five years from the date of recording.

11.5 All colleagues are responsible for the success of this policy and should ensure that they use it to disclose any suspected wrongdoing. Queries on the policy should be addressed to your Country Speak Up Officer.

12. MONITORING AND REVIEW

12.1 SSP will periodically review the implementation of this policy in respect of its suitability, adequacy and effectiveness and is committed to making improvements as appropriate.