

HUMAN RIGHTS POLICY



SSP *The Food
Travel Experts*

April 2023

INTRODUCTION

At SSP, our purpose is to be the best part of the journey. This drives our culture as an organisation as we aspire to our vision to be the world's best travel food and beverage company.

To deliver our purpose and vision, we are focused on growing our market-leading positions in the food travel sector in international markets. Ensuring we have skilled and engaged colleagues is a key priority of our Group strategy and, as part of our sustainability commitments, we are focused on protecting human rights of people across our business and supply chains.

Nathan Clements
Chief People Officer



“ We are a people business, and our diverse teams are at the heart of everything we do, serving our customers across our global business.

The talent and dedication of our colleagues are crucial to our success. We are focused on ensuring SSP is a great place to work where everyone can fulfil their potential. This includes respecting our colleagues' human rights and ensuring they are treated with dignity and respect.

In this way, we truly believe we can deliver our purpose and be the best part of our colleagues' career journeys.”

PURPOSE, SCOPE AND APPLICATION

This policy set out our minimum global standards for protecting human rights.

It applies to all individuals working at all levels of the SSP 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') 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. Where we have a minority or non-controlling interest, we encourage those businesses to follow these or their own equal or better standards. We also encourage our brand partners to follow these or their own equal or better standards.

This policy should also be read in conjunction with the following, available at: [Policies and statements | SSP \(foodtravelexperts.com\)](https://www.foodtravelexperts.com/policies-and-statements):

- Our Supplier Code of Conduct, which outlines the minimum standards we expect of our suppliers, including for human rights;
- Our Colleague Code of Conduct, which sets out the principles and standards that are expected of all employees regardless of where they work;
- Our Speak Up Policy, which sets out how concerns about suspected wrongdoing at work can be raised, how they will be investigated and protection and support for whistleblowers;
- Our Diversity, Equity and Inclusion Policy, which sets out our commitment to encouraging diversity, equity and inclusion, and eliminating unlawful discrimination.

OUR COMMITMENT

We are committed to respecting the human rights of people across our business operations and supply chains.

We believe that fundamental human rights should be respected, as set out in the International Bill of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nation's Guiding Principles on Business and Human Rights.

This includes, but is not limited to, the prohibition of modern slavery, forced labour, child labour and discrimination, as well as respect for freedom of association, providing a safe and healthy working environment and ensuring all colleagues are treated with dignity and respect.

We are committed to have appropriate controls for managing, mitigating and remedying human rights risks and impacts in our business operations and supply chains. We strive to comply with the Ethical Trading Initiative Base Code (detailed in the [Appendix](#)), which is founded on ILO conventions and is an internationally recognised code of labour practice that SSP has adopted as our international standard.

REVIEW AND COMPLIANCE MONITORING

This policy has been approved by the Board of Directors of SSP Group plc. We are committed to review the policy every two years and reserve the right to reasonably change the requirements of this policy as necessary to keep up with relevant legislation and to reflect our sustainability targets and ambitions.

Our Chief People Officer has overall responsibility for overseeing the implementation and management of this policy and keeping the Board advised on compliance.

The operational responsibility for the execution of day-to-day implementation of this policy sits with SSP regional and country managing directors. They are responsible for upholding our human rights standards and requirements in their own businesses and ensuring compliance at a local level.

This policy is supported by internal guidance, training and compliance procedures, which SSP subsidiaries are responsible for implementing in their business operations.

APPENDIX

Definitions

- **Child:** any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply.
- **Child labour:** any work by a child or young person younger than the age(s) specified in the above definition, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.
- **Group policies:** all the latest SSP Group policies are available at: [Policies and statements | SSP \(foodtravelexperts.com\)](https://www.foodtravelexperts.com/policies-and-statements-ssp).
- **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, UK Home Office.
- **Worker:** SSP employees and contractors, including senior managers, officers, directors, employees, consultants, contractors, homeworkers, part-time and fixed-term workers, casual and agency staff.
- **Young person:** any worker over the age of a child as defined above and under the age of 18.

Ethical Trading Initiative (ETI) Base Code

At SSP, we strive to comply with the Ethical Trading Initiative Base Code (copied below), which is founded on ILO conventions and is an internationally recognised code of labour practice that SSP has adopted as our international standard.



Download the ETI Base Code and access additional guidance and resources at www.ethicaltrade.org/eti-base-code

Employment is freely chosen

- There is 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.

Freedom of association and the right to collective bargaining are respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively;
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities;
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace;

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- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Working conditions are safe and hygienic

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards;
- Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment;
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers;
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided;
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers;
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

Child labour shall not be used

- There shall be no new recruitment of child labour;
- Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child;
- Children and young persons under 18 shall not be employed at night or in hazardous conditions;
- These policies and procedures shall conform to the provisions of the relevant ILO standards.

Living wages are paid

- Wages and benefits paid for a standard working week 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 in 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 expressed permission of the worker concerned. All disciplinary measures should be recorded.

Working hours are not excessive

- Working hours comply with national laws and benchmark industry standards, whichever affords greater protection;
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

No discrimination is practiced

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Regular employment is provided

- To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice;
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

No harsh or inhumane treatment is allowed

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.