

Modern Slavery Statement 2024

Welcome

to our 2024 Modern Slavery Statement

About this statement

This statement is published in accordance with the UK Modern Slavery Act 2015.

It outlines the steps taken by SSP Group plc and relevant Group companies¹ to prevent modern slavery and human trafficking² in our business and supply chains.

The reporting period relates to our 2024 financial year, from 1 October 2023 to 30 September 2024. All references in this statement to performance and target dates relate to our financial year-end, unless otherwise stated.

1. Covering SSP Group plc, Select Service Partner UK Limited, SSP Financing UK Limited and Rail Gourmet UK Limited. References to "SSP", "we", "us" or "our" relate to all these entities taken together.
2. 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.

Further information

- Our **Sustainability Report 2024** provides detailed information on our global Sustainability Strategy and performance at: foodtravelexperts.com/sustainability
- Our **Annual Report 2024** provides details of the SSP Group Strategy and performance at: foodtravelexperts.com/investors/annualreport
- Our **Group policies** and previous Modern Slavery Statements at: foodtravelexperts.com/who-we-are/policies-and-statements/
- Our **Sustainability Data Book 2024** provides comprehensive global data disclosures at: foodtravelexperts.com/sustainability

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About SSP



We are the food travel experts. Present in 37 countries, we design, create and operate restaurants, bars, cafés, lounges and convenience retail outlets in locations where people are on the move.

Whether our customers are flying abroad on holiday or commuting to work by train, we are committed to making their food and drink experience the best part of the journey.

It is this purpose that drives our strategy, culture and aspiration to be the world's best travel food and beverage company.

We have a wide portfolio of brands, including our own and those we franchise. These cater to a variety of customer needs – from well-known grab 'n' go sandwich shops and cafés to casual dining restaurants and bespoke high-end concepts.

We operate in 37 countries across four operating regions (or reportable segments):

- North America
- Continental Europe
- UK & Ireland (UK&I)
- Asia Pacific and Eastern Europe & Middle East (APAC & EEME)

See our **Sustainability Data Book 2024** for the full list of SSP's countries of operation and reporting boundaries at: foodtravelexperts.com/sustainability

Our Sustainability Strategy

Sustainability is a key strategic priority at SSP. We see it as essential for our long-term success and to fulfilling our purpose.

Our Sustainability Strategy focuses on the three key strategic areas of Product, Planet and People.

Within these sit our 10 key commitments focused on the most material issues for our business and stakeholders, including commitments to sourcing sustainably and respecting human rights. These commitments are supported by clear and measurable targets.



See our **Sustainability Report 2024** for detailed information on our global Sustainability Strategy and performance at: foodtravelexperts.com/sustainability

Our 2024 Group highlights

£3.4bn
revenue

37
countries

c.625
locations

c.3,000
units

c.49,000
colleagues

c.15%
increase in colleague numbers

About SSP continued

Our value chain starts with upstream suppliers and ends with our downstream customers and communities.

Our own operations are at the centre of our value chain, where we have the greatest control over our own impacts and the most influence regarding the impacts of our clients and partners.



Upstream

Operating across 37 countries, our supply chains are highly diversified with a large supplier base managed by our local purchasing teams in each market.

Farms and fisheries

The raw ingredients and materials for our products are grown, gathered, reared or fished by farmers and producers around the world.

We primarily source these ingredients and finished products through manufacturers and distributors within the regions where we operate.

As we have limited direct farm or fishery-level sourcing, we focus on ensuring that our highest-risk ingredients are from sources that have been certified against a recognised independent sustainability standard, such as Fairtrade.

Manufacturers, wholesalers and distributors

Our direct supplier relationships are primarily with manufacturers, wholesalers and distributors based in the local market.

They are valued business partners, and we are committed to treating them fairly and with respect while building long-lasting, mutually beneficial relationships. By working together, we believe we can raise standards and drive sustainable practices across our supply chains.

Own operations

We operate over 3,000 food, beverage and retail units within our clients' travel locations, working collaboratively with our clients, brand and joint venture (JV) partners, and colleagues.

Clients

Primarily, our clients are railway station and airport operators. In 2024, we operated in over 630 client locations, with 70% in the air sector and 25% in the rail sector. The remainder include motorway service areas and in-flight and on-board rail catering.

JV partners

In our Americas, APAC & EEME markets, we often operate with JV partners. These partnerships help to enhance our local knowledge, provide access to brands and concepts and strengthen our relationships with clients and governments.

Brand partners

In addition to our own brands, we operate franchises for a wide range of local and international brands, leveraging our expertise to seamlessly introduce them into the travel environment.

Colleagues

We employ over 49,000 people worldwide, of whom around 88% are frontline team members. Our people are at the core of our business and we are committed to ensuring that SSP is the best part of their career journey.

Downstream

We serve quality food and drink to travelling customers around the world and play an important role in supporting our local communities.

Customers

Our customers enjoy our products either in our units or take them away to consume during their journey.

Whether they are flying abroad on holiday or commuting to work by train, we are committed to making our customers' food and drink experience the best part of their journey.

Communities

We play an important role in the communities where we live and work, creating jobs and contributing to local economies. We also have a long-standing approach to supporting and giving back to these communities through our community programmes and partnerships.

In 2024, we invested £1.15 million in community programmes, including partnerships with Action Against Hunger in France and FareShare in the UK to help alleviate food poverty.

We are also members of not-for-profit organisations, such as Slave-Free Alliance and the climate and health upskilling network Future Food Movement.

Governance and policies

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

Our governance and management structure is designed to ensure accountability from the Board right down to our operating markets.

Our Board has general oversight of the management of human rights and modern slavery risks within our business. The Board oversees our Group Sustainability Strategy, including receiving a detailed human rights review each year. In addition, the Board monitors progress against our commitments and targets as part of its oversight of the Group Sustainability Strategy twice a year.

The Chief People Officer (who reports to the Group CEO) and Chief Procurement Officer (who reports to the Group Chief Operating Officer), act as the global functional leads for the Group with respect to human rights within our operations and supply chains.

🔗 See our **Sustainability Report 2024** pages 54-55 for details of our governance structure: foodtravelexperts.com/sustainability

Group policies

Our global policies play a crucial role in forming the backbone of our approach. Group companies are expected to adhere to these policies within the context of local regulation and market practice.

The Board reviews and endorses each policy, with a member of the Group Executive Committee assigned responsibility for overseeing their implementation and ensuring compliance.

These policies are supported by clear guidance, standards, commitments and expectations for all our business operations, colleagues and suppliers to adhere to and work towards.

Human Rights Policy

Our Human Rights Policy sets out our global standards, commitments and expectations for all our business operations, colleagues and suppliers to adhere to and work towards.

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.

Our policy commitments cover, but are 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 workers are treated with dignity and respect.

We are working to ensure we have appropriate controls in place for managing, mitigating and remedying human rights risks and impacts. And we strive to comply with the internationally recognised code of labour practice, the Ethical Trading Initiative (ETI) Base Code.

🔗 Download our **Group policies** from our website at: foodtravelexperts.com/who-we-are/policies-and-statements/

Spotlight

Our modern slavery policy criteria

Our Human Rights Policy and Supplier Code of Conduct are aligned to the ETI Base Code and include specific criteria relating to modern slavery, including:

- 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.

Governance and policies continued

Supplier Code of Conduct

Our Supplier Code of Conduct (Supplier Code) sets out the minimum standards we expect our contracted suppliers to adhere to, including for human rights. As with our Human Rights Policy, this includes our expectation for our suppliers to strive to comply with the ETI Base Code.

We expect all our contracted suppliers to sign-up to our Supplier Code or demonstrate their own equal or better standard.

Contracted suppliers include suppliers for our own brands, and can include those for our franchise brands, where we have control over the selection and contracting. In most cases, our brand partners stipulate we use their contracted suppliers, in which case they are subject to our brand partners' own policies and due diligence procedures.

In 2024, we expanded the scope of suppliers expected to sign-up to our Supplier Code to include property and construction suppliers. While this expanded scope led to a decline in overall proportion of contracted suppliers signed-up (from 87% in 2023 to 76% in 2024), in absolute terms an additional c.500 suppliers signed-up to our Supplier Code in 2024, compared to 2023.

Colleague Code of Conduct

Our Colleague Code of Conduct (Colleague Code) sets out the principles and standards that are expected of all employees, officers and directors of SSP Group plc and its subsidiaries, regardless of where they work.

This Colleague Code provides guidance on how to identify and deal with important ethical issues, together with instructions about where to find more detailed information or who to approach to ask for advice.

It includes a section on modern slavery and forced labour detailing our commitment to ensuring full respect for the human rights of anyone working for us in any capacity.

Speak Up Policy

Our Speak Up Policy supports our commitment to conducting our business with honesty and integrity, and encouraging a culture of openness and accountability.

The policy provides a framework for how concerns about suspected wrongdoing, including for modern slavery, can be reported, investigated and remediated. Individuals are encouraged to raise concerns with designated persons and/or through the Country Whistleblowing Officer or confidential Group helpline and ethics point website.

The helpline and website is independently operated, with all reports dealt with in strictest confidence by specially trained operators. Reports can be made anonymously, and SSP operates a strict policy against any retaliation aimed at an individual who raises a concern in good faith.

The Board (in conjunction with the Audit Committee) monitors compliance with this policy and receives regular updates throughout the year on the number and subjects of cases. Serious cases are raised to the General Counsel and our Audit Committee to be monitored on an exceptional basis.

c.500 additional contracted suppliers signed-up to our Supplier Code in 2024, or demonstrated their own equal or better standards



Risk management and due diligence



We are committed to assessing the nature and extent of exposure to modern slavery risks in our business and supply chains and to conducting appropriate due diligence.

We conduct risk assessments to help us identify the nature and extent of exposure to human rights risks and help ensure we prioritise our efforts in the right areas. These assessments draw on external sources, such as reports by the International Labour Organization (ILO) and the Global Slavery Index³, and consider inherent risks based on the country and sector, as well as actual risks identified through due diligence procedures.

Due diligence in our operations

Our analysis against the Global Slavery Index shows that SSP operations are primarily located in countries with a lower prevalence of modern slavery. However, we did operate in 2024 in two countries, Saudi Arabia and United Arab Emirates, ranked in the top 10 of highest prevalence (13.4 and 21.3 victims per 1,000 capita respectively). We also operated in a further eight countries with an estimated prevalence between 6-9 victims per 1,000 capita⁴.

Our risk assessments also indicate that the highest modern slavery risk exposure in our own operations relates to migrant workers in frontline team member roles. For example, the latest report on global estimates of modern slavery found that "the forced labour prevalence of adult migrant workers is more than three times higher than that of adult non-migrant workers".⁵

While recruitment agencies may be used for sourcing candidates, for the vast majority of our c.49,000 employees SSP manages all aspects of the hiring and employment, including interviews, right-to-work checks, contracting and wages.

In the UK and Ireland, we have a well-established procedure for checking payroll records for duplicate accounts for different employees, or accounts that are not in the employee's own name. In 2024, no issues relating to modern slavery were identified through these checks.

In some cases, we recruit migrant workers through labour agencies, primarily in our Eastern Europe & Middle East (EEME) region. Our markets are required to follow due diligence procedures on these agencies and ensure they have signed-up to our Supplier Code. This was the case for our new market entry into Saudi Arabia in 2024 which included the recruitment of c.500 migrant workers.

For our existing markets, we commenced a series of reviews into migrant worker recruitment practices in 2024. This included reviewing labour agency due diligence procedures, conducting interviews with a sample of migrant workers and inspections of workers' accommodation. Experts from the Slave-Free Alliance (SFA) were also engaged for support and advice. These reviews are continuing into 2025 and we are committed to addressing any issues identified alongside the actions we will take in response to the SFA gap analysis. We will report on details of the findings and actions in our 2025 statement.

Case study

Joining forces with the Slave-Free Alliance

Human rights issues are complex and cannot be addressed in isolation. In 2024, we joined Slave-Free Alliance (SFA), a global social enterprise dedicated to eradicating modern slavery.

As members, we benefit from SFA's specialist resources, support and growing network of like-minded companies. As a key first step, SFA conducted a Group-wide gap analysis of our approach to human rights and labour exploitation. Through document reviews and interviews with senior leaders and managers, SFA experts explored our strengths and potential risks, tested and challenged our assumptions and provided a clear set of practical recommendations.

We are now developing an action plan for implementation in 2025 with the support of SFA.

"We are proud to be partnering with SSP. Throughout the gap analysis, we were struck by their openness and genuine commitment to learning and improving. In 2025, we will be supporting SSP on the implementation of their action plan and ongoing efforts to protect human rights across their value chain."

Rachel Hartley,
Consultancy Director, Slave-Free Alliance

3. Walk Free (2023), The Global Slavery Index, Minderoo Foundation.

4. Cyprus, India, Philippines, Qatar, Bahrain, Hungary, Greece and Malaysia.

5. Global Estimates of Modern Slavery (Sept 2022), page 4. The International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM).

Risk management and due diligence continued

Due diligence for our supply chains

Our risk assessments indicate the highest modern slavery risk exposure in our supply chains relates to suppliers operating in countries identified in the Global Slavery Index as having a high level of modern slavery prevalence.

In addition, based on the Global Estimates of Modern Slavery report, suppliers in manufacturing, agriculture and fishing are recognised as having higher inherent modern slavery risks.⁶

We use the Supplier Ethical Data Exchange, known as Sedex, as the primary means to conduct human rights due diligence on our contracted suppliers. Sedex is an independent platform that helps companies assess, monitor and report on ethical supply chain practices.

We expect our contracted suppliers to become members of Sedex and, through the platform, we carry out our key due diligence steps as follows and illustrated in the graphic on [page 9](#).

Step 1: Assessing inherent risk

We conduct risk assessments on all our contracted suppliers globally using the 'radar' risk assessment tool in the Sedex platform. This considers inherent country and sector risks for human rights, health and safety, and labour standards, alongside supplier-specific information.

Step 2: Assessing management competency

Suppliers identified as 'high risk' in step 1 are asked to complete the Sedex self-assessment questionnaire.

This assesses their level of 'management competency' for managing and mitigating the inherent risks identified, considering factors such as their policies, risk management and due diligence procedures.

Step 3: Conducting an on-site audit

Suppliers that demonstrate a 'poor' level of management competency are expected to undergo an independent on-site audit, such as a SMETA (Sedex Members Ethical Trade Audit), a Business Social Compliance Initiative (BSCI) audit or an Intertek Workplace Conditions Assessment audit.

Due diligence findings

Our risk assessments have identified 218 high-risk contracted suppliers and we have completed due diligence reviews on 66%, including 71 in 2024.

In 2024, we found no major non-conformance issues relating to child labour or modern slavery. The audits did, however, identify some non-conformances, primarily relating to emergency evacuation measures, systems and processes, record-keeping, and maintenance and inspection of machinery.

For all issues identified, we reviewed the suppliers' corrective actions to ensure they were addressed in the agreed timescale.

In 2025, we will continue reviewing all high-risk contracted suppliers, with the aim to ensure 100% are reviewed by year-end.

Mitigating risks at source

Many of the human rights risks in our supply chain relate to the upstream farms and fisheries where the commodities are produced.

As we have limited direct farm or fishery-level sourcing, we rely on independent certifications for key ingredients, such as Fairtrade, Roundtable on Sustainable Palm Oil (RSPO) and Marine Stewardship Council (MSC). These certifications provide assurance to our procurement teams, clients and customers that the ingredients have been produced in line with environmental, social and labour criteria, including for human rights and forced labour.

For example, RSPO-certification includes criteria regarding the protection of workers' rights (and their families) on plantations, aligned to the ILO Conventions on Forced Labour, Abolition of Forced Labour, Minimum Age, Worst Forms of Child Labour and more.

For MSC-certified fisheries, they are required to report publicly on the measures they are taking to address forced and child labour. An entity convicted of forced or child labour is removed from any MSC-certified fishery.

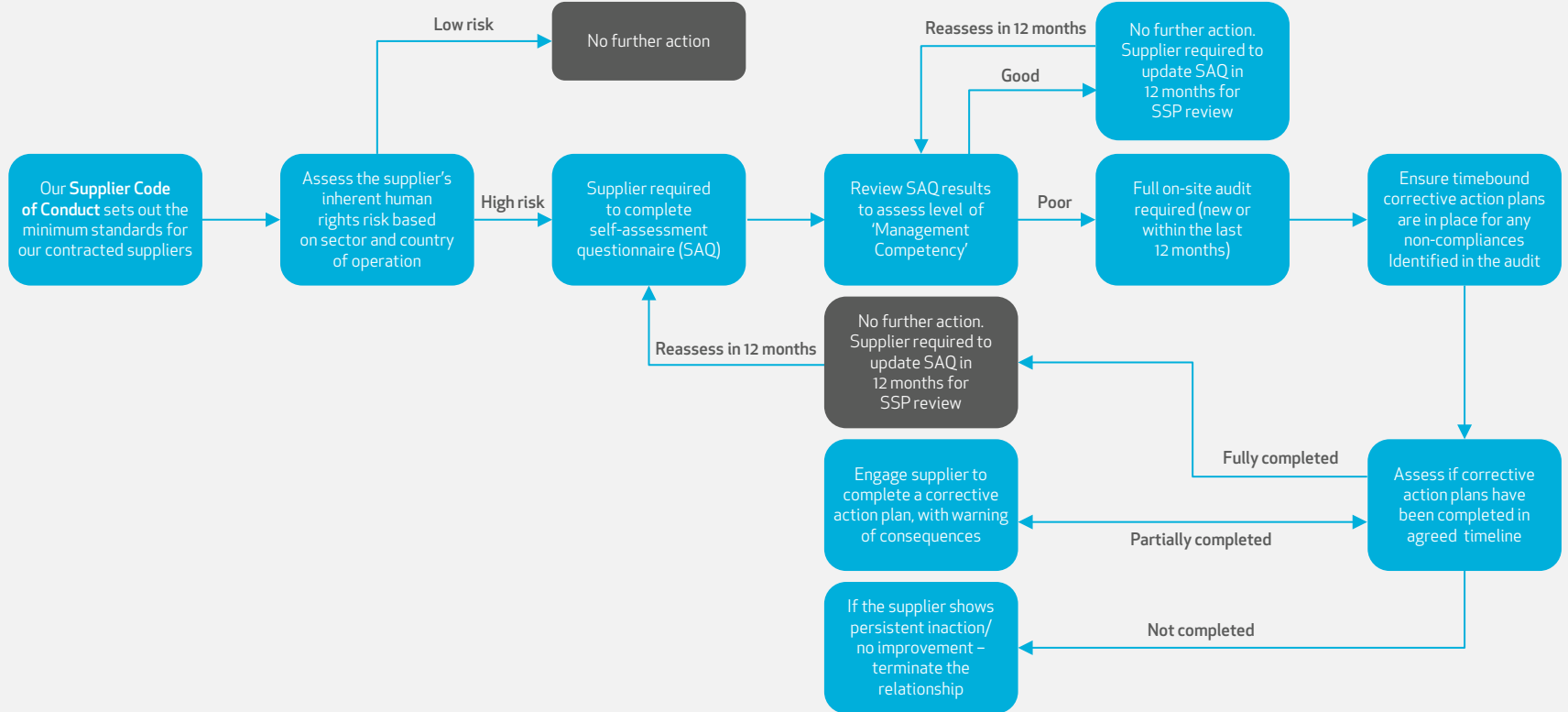
The dynamic nature of our business, with new brands, market entries and evolving supply agreements, means that driving progress against our certification targets is an ongoing effort for our purchasing teams. So, as can be seen in the charts on [page 11](#), we are pleased to have made good progress in 2024, particularly on coffee which accounts for over 80% of our global hot beverage volumes.



6. Global Estimates of Modern Slavery (Sept 2022), page 30-33. The International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM).

Risk management and due diligence continued

Our supply chain human rights due diligence process



Training and effectiveness



We are committed to providing appropriate training and to measuring the effectiveness of our approach to help strengthen and enhance human rights management across our business operations and supply chains.

We provide our colleagues with training and resources to help deliver our human rights commitments through a learning programme that includes in-person and online training, guidance materials and ongoing support.

All senior managers globally are required to complete mandatory modern slavery training as part of their induction. In 2024, we maintained 100% compliance with this requirement.

In 2025, we will launch a strengthened human rights training programme, reaching a larger proportion of colleagues and tailored to be more specific to real life business scenarios.

In 2024, we launched a dedicated 'Speak Up!' campaign aimed at increasing awareness of our channels for raising concerns and to address underreporting. While no incidences of modern slavery or human trafficking have been reported, the campaign has successfully resulted in an increase in reports through our Speak Up channels.

We plan to use these insights to better understand colleague concerns and drive continuous improvement in our management of human rights.

We have also established a new Human Rights SharePoint Hub, launched in October 2024, to coincide with Anti-Slavery Day. This provides our colleagues with access to a range of resources and learning materials, including SSP policies and procedures, as well as SFA's best practice toolkits, guidance documents and webinar recordings.

100% of senior managers have completed modern slavery training

Next steps

As well as continuing to progress towards our targets detailed on [page 11](#), we plan to undertake the following actions in 2025 to further strengthen our approach and in response to recommendations identified in the SFA gap analysis:

- Launch a strengthened human rights and modern slavery training programme, reaching a larger proportion of colleagues and tailored to be more specific to real life business scenarios.
- Review and update relevant Group policies and associated standards and procedures.
- Continue our reviews into migrant worker recruitment practices, where we use labour agencies, and put actions in place to address any issues identified.

Case study

Engaging our global purchasing leaders

Operating across 37 countries, our supply chains are highly diversified and managed by local purchasing teams in each market.

The central Group Procurement team works closely with our purchasing leaders around the world to ensure our policies and due diligence procedures are implemented effectively. This includes providing guidance and training on how to engage suppliers on our standards and expectations, use the Sedex platform, and review supplier risk assessments, audit reports and corrective action plans.

Monthly meetings between Group Procurement and local purchasing leaders also provide an opportunity to review plans and progress, and discuss any challenges or opportunities for improvement.

In 2024, our purchasing leaders got together in person for an intensive three-day conference to learn, engage and review strategic priorities. The conference included an expert-led session on emerging regulations, including the EU's Corporate Sustainability Due Diligence Directive which will impact our global business at a Group-level.

This event was invaluable in enhancing our purchasing teams' knowledge and capabilities, staying ahead of regulations, and setting the strategic direction for 2025 and beyond.

Training and effectiveness continued

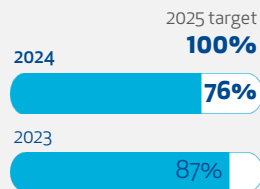
Measuring effectiveness

Our actions are measured against our targets and key performance indicators (KPIs). These enable us to measure effectiveness and monitor our progress in managing modern slavery risks within our business and supply chains:

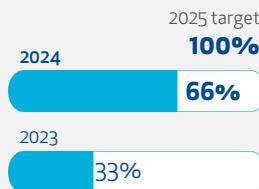
- By 2025, 100% of contracted suppliers with higher human rights risks to undergo our human rights due diligence.
 - By 2025, 100% of hot beverages (tea, coffee and hot chocolate) for our own brands to come from sources certified against independent standards, such as Fairtrade or Rainforest Alliance.
 - By 2025, 100% of fish for our own brands to come from sources certified against recognised sustainability standards, such as MSC.
 - Each year, work to ensure our top 50 own brand products in each market that are palm oil free, or using RSPO Certified Sustainable Palm Oil.
 - Each year, maintain 100% compliance of senior managers to have received modern slavery training.
- See our [Sustainability Data Book 2024](#) for details of all our performance data, including data scope, definitions and methodologies at: foodtravelxperts.com/sustainability

Progress against our targets

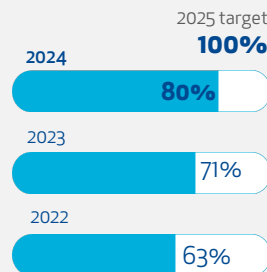
% of contracted suppliers have signed up to our Supplier Code or demonstrated their own standard



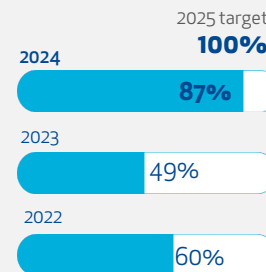
% of high-risk contracted suppliers undergone our human rights due diligence reviews



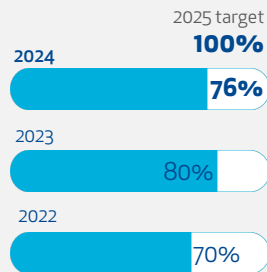
% of coffee for our own brands from sources certified against independent standards



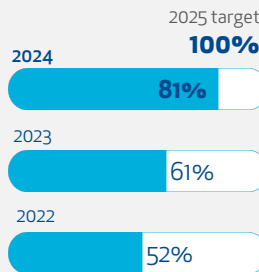
% of tea for our own brands from sources certified against independent standards



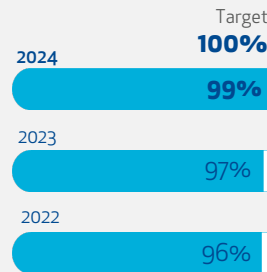
% of hot chocolate for our own brands from sources certified against independent standards



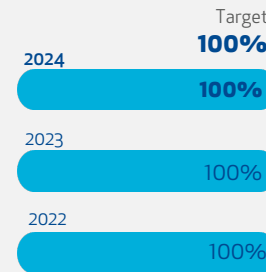
% of fish for our own brands from sources certified against independent standards



% of top 50 own brand products that are palm oil-free or only use RSPO Certified Sustainable Palm Oil




% of senior managers that have completed modern slavery training




Approval

This statement has been approved, in accordance with the UK Modern Slavery Act, by the Board of Directors of the companies listed below. The company directors and senior management take responsibility for implementing the policies, procedures and the objectives set out in this statement.

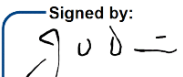
SSP Group plc

Name	Job title	Signature	Date
Patrick Coveney	Group Chief Executive Officer (CEO)	Signed by:  A64112515C3B4BA...	19 March 2025


Select Service Partner UK Limited

Name	Job title	Signature	Date
Kari Daniels	CEO, SSP UK & Ireland	Signed by:  0DFC1337CEF2467...	19 March 2025

SSP Financing UK Limited

Name	Job title	Signature	Date
Jonathan Davies	Deputy Group CEO & Chief Financial Officer	Signed by:  56DB50527FBF470...	19 March 2025

Rail Gourmet UK Limited

Name	Job title	Signature	Date
Andy Webb	Managing Director, Rail Gourmet UK Limited	DocuSigned by:  93F64952AB244C7...	19 March 2025



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