SSP The Food Travel Experts









Group Fraud Policy

Welcome

to our Fraud Policy

About SSP

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

We have a wide portfolio of brands, including our own and those we license or 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.

Our purpose

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.

About this policy & who it applies to

This is a mandatory global policy for SSP Group[1] effective from 1 November 2026.

This policy applies to:

- **All employees, directors and officers** of SSP Group.
- **Any direct or indirect subsidiary** of SSP Group.
- **Contractors or any other agents** working for or acting on behalf of any SSP Group company where they are under that Group company's direct supervision.

Where we have an interest in a joint venture, subsidiary or other entity and do not have the ability to mandate adoption of this policy, we will seek to use our influence to encourage the adoption of, or adherence to, this policy or an equivalent policy, and promote conduct that is consistent with its principles.

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1. References to "SSP Group", "SSP", "the Group", "we", "us" or "our" means SSP Group plc and all of its subsidiaries.

SSP has a zero-tolerance approach to fraud and is committed to conducting its business with integrity, transparency and accountability.

Fraud in any form undermines and erodes trust with customers, colleagues, business partners, and regulators, exposing SSP to legal, financial, operational and reputational risks, and is inconsistent with our values and Code of Conduct. This applies equally to all fraud, including fraud intended to benefit an individual, an external organisation or SSP itself.

Purpose of this policy

This policy sets out SSP's global commitment to preventing, detecting, and responding to fraud, including both financial and non-financial fraud. It establishes the principles that guide our approach and forms the foundation for supporting standards, procedures and guidance, and sets out the obligations of those who operate for or on our behalf, to refrain from engaging in, protect against and report fraud.

Policy applicability across jurisdictions

This policy shall be applied in accordance with **applicable local laws, regulations and contractual obligations.**

Where applicable laws differ from this policy, we will comply with whichever affords the greatest protection to SSP. In cases where there is a conflict between applicable laws and this policy, we will prioritise the protection of employees and SSP and work with relevant stakeholders to determine the appropriate course of action.

Accountability and implementation

The Group Chief Legal & Governance Officer and Company Secretary of SSP Group has Group level accountability for this policy, monitoring compliance and advising the Board on anti-fraud matters.

SSP regional CEOs and country managing directors are responsible for the implementation of this policy in their respective regions/countries, for integrating the commitments into their

"Integrity is at the heart of who we are. Fraud doesn't just break the law and erode value from our business; it breaks the culture of trust we rely on to conduct our operations. Each of us has to take ownership in protecting that culture. If we ever have concerns or believe something isn't right, we must speak up. Our actions help protect our people, our values and our future."

Fiona Scattergood
Group Chief Legal & Governance Officer and Company Secretary



operations and for ensuring its practical application at a local level.

Training

Training will be provided to employees, with a focus on high-risk roles and leadership positions. The approach will be outlined in supporting standards and procedures.

Consequences of a breach of this policy

This policy is a mandatory global policy. All instances of actual or suspected fraud will be investigated in line with SSP's investigations processes.

Failure to comply with this policy may result in disciplinary action, including, as applicable, termination of employment or business relationships and/or other available remedial actions. Certain breaches may also be reported to relevant authorities where required by law or otherwise deemed appropriate by SSP.

These consequences apply equally to all fraud, regardless of the actual or intended beneficiary (e.g., an individual, an external organisation, or SSP itself).



What Is Fraud?

Fraud is an act of engaging in deceptive or intentionally misleading activity to obtain an unfair or illegal financial or personal gain.

Fraud can take many forms, including:

- **Fraud by False Representation** - intentionally and dishonestly making a false statement.
- **Fraud by Failing to Disclose Information** - dishonestly failing to disclose information.
- **Fraud by Abuse of Position** - dishonestly using a position of trust or authority.

The following examples, among others, may constitute fraud under this policy:

- Deliberately destroying, manipulating, altering, forging or falsifying documents, records, signatures or approvals;
- deliberately recording, reporting, or classifying financial transactions incorrectly, or altering financial records to conceal the true nature of a payment, including manipulating revenues, costs, assets or liabilities, or falsifying financial or management accounts;
- misrepresenting, concealing or withholding material facts relevant to a decision or transaction;
- counterfeit products knowingly received from supplier(s) and sold to customers;
- fraudulent substitution of ingredients for lower value or counterfeit ingredients;
- theft by deception (e.g., recording cash transactions in the till but taking the money);
- dishonestly misusing or removing company assets for personal benefit, including falsifying inventory records, taking stock or waste items, unauthorised use of company equipment, or applying staff discounts without approval;
- intentionally submitting falsified or duplicative expense claims;
- knowingly fabricating or falsifying timekeeping records, including clocking in or out on behalf of another employee, altering recorded working hours, or claiming pay for time not worked;
- knowingly creating “sham” contracts or falsifying information in contracts;
- backdating contracts with the intent to deceive or mislead; and
- procurement fraud including knowingly creating “fake” suppliers for the purpose of bid rigging, colluding with suppliers to influence tender outcomes, or approving false or inflated invoices.

We do not tolerate any form of fraudulent behaviour and we do not knowingly assist or facilitate any third party to commit fraud.

Our anti-fraud commitments include, but are not restricted to:

Integrity and Transparency

- We will take all reasonable steps to ensure that material records, data, and communications – whether related to financial, operational, reporting, compliance, sustainability metrics, customer data, health and safety, or other non-financial information – are accurate, complete, and not misleading.
- We will act fairly, honestly, and openly in all dealings with customers, colleagues, partners, regulators, and other stakeholders.
- We will maintain transparency and accountability in decision-making, reporting, and all business interactions to safeguard trust in SSP's operations globally.

Prevention and Detection

- We will implement controls and processes in order to mitigate the risk of fraud and detect fraud. This includes providing appropriate training and awareness materials to our employees.
- We will conduct ongoing fraud risk assessments and maintain registers of key fraud risks impacting our regions and countries, assessing the adequacy and effectiveness of mitigating controls, and providing independent assurance over fraud controls through the Group's Assurance and Internal Audit frameworks.

Continuous Strengthening

- We will regularly review fraud risks and adapt our approach in response to new threats, legislation, and best practices.
- We will maintain ongoing training, awareness campaigns, and updates to procedures to reflect emerging risks.

Investigations

- We will take all reports of actual or suspected fraud seriously and investigate fairly and thoroughly.
- We will conduct objective investigations and prohibit retaliation against individuals who raise concerns in good faith.
- We will take appropriate action based on the findings.

Shared Responsibility

- We will require everyone who works for or represents SSP to uphold this policy and associated standards.
- This includes embedding fraud prevention into business processes, partnerships, and decision-making.



As an employee, contractor or agent acting for or on our behalf, you have a responsibility to:

- Conduct business honestly, ethically and in accordance with applicable laws, SSP policies and contractual obligations.
- Be aware of what is happening around you to help prevent and detect fraud and other financial misconduct.
- Report any suspected wrongdoing – whether involving employees, suppliers or other third parties.
- Complete all mandatory compliance training.
- Cooperate with any investigations or audits related to suspected fraud.

We expect our Business Partners to operate in accordance with the Supplier Code of Conduct.

Speaking up and investigations

SSP strives to promote a safe environment for reporting concerns about potential violations of our Code of Conduct, policies, or the law.

All individuals, including (but not limited to) employees, those working in our supply chain, and other internal and external stakeholders, are encouraged to speak up if they become aware of any potential violations.

Concerns can be reported through SSP Group's independently operated Speak-Up channel, which offers confidential reporting and an option for anonymous reporting. This channel is accessible in multiple languages. Concerns can also be raised with line managers or an appropriate staff member.

All reports will be taken seriously, carefully reviewed, treated confidentially and investigated where necessary. Appropriate actions will be taken based on the findings. SSP has zero tolerance for retaliation against anyone who raises a genuine concern and any such retaliatory behaviour may lead to disciplinary action for employees or termination of business relationships with third parties.



Related Group policies

- **Colleague Code of Conduct** which sets out the principles and standards that are expected of all employees regardless of where they work.
- **Supplier Code of Conduct** which outlines the minimum standards we expect of our suppliers, including for human rights and business integrity.
- **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.
- **Human Rights Policy** which provides a clear framework for identifying, preventing, and addressing human rights risks, while outlining our expectations for ethical behaviour by employees, suppliers and business partners.
- **Anti-Bribery & Anti-Corruption Policy** sets out the Group's policy against bribery and other corrupt practices and the standards and procedures required to ensure compliance.
- **Prevention of the Criminal Facilitation of Tax Evasion Policy** which sets out the Group's expectations in preventing criminal facilitation of tax evasion within the business.
- **Responsible Marketing Principles** set out our commitments to ensure our marketing communications are transparent, truthful, ethical and legal.

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



Glossary



Definitions of key terms used in this policy

- **Agent**: an individual or organisation performing services for or on behalf of SSP.
- **Business partners**: suppliers, consultants, contractors, business partners, and brands licensed or franchised to SSP and other agents of SSP.
- **Dishonest conduct**: acting without honesty, integrity or truthfulness.
- **Material facts**: information that, if omitted or misstated, could influence a decision.
- **Misrepresentation:** providing false or misleading information.
- **Retaliation**: taking adverse action against someone for raising concerns or reporting wrongdoing.
- **SSP employees**: individuals qualifying as “employees” under applicable law, including senior managers, officers, directors, contractors, homeworkers, and all other applicable employees and workers (including agency and temporary workers).
- **Suppliers**: all third-party vendors, business partners, agents, intermediaries, sub-agents, manufacturers, primary producers, sub-contractors, distributors and wholesalers, whether engaged directly or via our brand partners.









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