

# RESPONSIBLE MARKETING PRINCIPLES



June 2024

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## 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. Delivering a leading customer proposition is a key priority of our Group strategy and, as part of our sustainability commitments, we are focused on serving our customers responsibly.

**Angela Morrison**  
Chief Customer Officer



*Marketing is an important way to communicate to customers. It helps them make informed choices and allows us to show our customers the diverse range of dietary, healthy and sustainable products that we sell.*

*Our communications must always be truthful, transparent, ethical and legal. It's critical for the protection of our customers and our reputation. For this reason we've taken the step to launch SSP Responsible Marketing Principles.*

*These Responsible Marketing Principles set out our commitments to market our products and brands responsibly and provides a global framework for our businesses to follow."*

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## OUR COMMITMENT

We are committed to market our products and brands with integrity, honesty and transparency.

These Responsible Marketing Principles are guided by the International Chamber of Commerce (ICC) [Framework for Responsible Food and Beverage Marketing Communications](#). We support the ICC's view that responsible marketing communications can assist consumers in making appropriate choices about food and beverage products, and in understanding the role of nutrition, diet and physical activity in healthy lifestyles.

## PURPOSE, SCOPE AND APPLICATION

These Responsible Marketing Principles set out our minimum global standards for all marketing communications generated by, or on behalf of, SSP Group proprietary brands and products.

Marketing communications refers to all types of activity designed to market, or communicate to customers, our products or brands. This includes, but is not limited to:

- Point-of-sale communications, materials and displays;
- Digital, mobile and social media;
- Advertising and brand or product-related media;
- Brand or product placement and sponsorship.

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These Responsible Marketing Principles are a mandatory requirement for all Group subsidiaries and joint ventures where SSP has a controlling interest. They also apply to third-party agencies, contractors or consultants engaged by SSP to help market our products or brands.

We are committed to applying these principles and upholding the same high standards in every market we operate, even when they are stricter than applicable local laws.

We encourage our brand partners to follow these standards or their own equal or better standards.

## CORE PRINCIPLES

Our marketing communications will be guided by the following core principles, to be:

- Clear, transparent and unambiguous to enable informed customer choice;
- Truthful, accurate, not misleading and can be substantiated with up-to-date, credible evidence;
- Ethical and conform to accepted principles of decency, fair competition and good business practice;
- Compliant with all applicable laws.

## KEY REQUIREMENTS

Our core principles are underpinned by the following key requirements:

- Ensure special care is taken relating to products or brands directed to or featuring children (aged 12 or below) or teens (aged 13-17), including relevant standards, information and options for promoting healthier eating and a balanced diet;
- Ensure marketing communications are framed as not to abuse the trust of customers or exploit their lack of experience or knowledge, particularly for children and teens;
- For age-restricted products, including (but not limited to) alcohol and tobacco, ensure marketing and communications are targeted at adults only, not designed to appeal to underage customers and subject to appropriate age-verification checks at point-of-sale;
- For health, environmental or sustainability claims, ensure the claim considers the full life cycle of the product or brand and can be substantiated with up-to-date, credible evidence;
- Ensure marketing communications are considerate of, and reflect, good safety practice;
- Ensure marketing communications respect the standards of our brand and business partners;
- Ensure our marketing activities follow all applicable laws and regulations. If the law conflicts with these Responsible Marketing Principles, we will apply the higher standard.

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## REVIEW AND COMPLIANCE MONITORING

These Responsible Marketing Principles have been noted by the Board of Directors of SSP Group plc. We are committed to review them every two years to ensure they remain effective.

Our Chief Customer Officer has overall responsibility for overseeing the implementation and management of these Responsible Marketing Principles and keeping the Board advised on compliance.

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

These Responsible Marketing Principles are supported by internal guidance and compliance procedures, which SSP subsidiaries are responsible for implementing in their business operations.

