

SSP¹ - Modern Slavery Statement 2019/20

SSP is committed to respecting the human rights of anyone working for us in any capacity and we will not tolerate modern slavery in our business operations and supply chains. This statement, which is published in accordance with the Modern Slavery Act 2015, outlines the work undertaken by SSP during the financial year ending 30 September 2020 to seek to identify and manage the risk of modern slavery and human trafficking in its business and supply chains.

Our business and supply chains

SSP is a leading operator of food and beverage outlets in travel locations in 35 countries across the world. We, together with our group companies and affiliates (the "**Group**") operate a broad range of outlets from quick service to fine dining and serve, on average, 1.5 million customers each day.

These operations include more than 550 brands globally through an extensive portfolio of around 2,700* ²outlets, including coffee shops, sandwich bars, bakeries, casual and fine-dining restaurants, as well as convenience and retail outlets. The Group operates units under its own proprietary brands as well as international and local high street franchised brands and bespoke concepts. SSP and the wider Group currently employs approximately 21,000 colleagues. The majority are permanent employees, however the Group also employs some colleagues on a temporary basis responding to the seasonal peaks in our business.

SSP and the wider Group works with a large volume of suppliers. The SSP supplier relationships are managed centrally through the group head office or, for the wider Group operations, locally by country-based business teams in the relevant operating entities around the world.

The 2020 Covid-19 outbreak and the strict restrictions put in place to limit the spread of the virus, led to an almost total shutdown of the travel market worldwide. As a result, by April 2020, SSP had been forced to close the majority of its units in response to the dramatic fall in passenger numbers, with only around 10% open during this time. Throughout the Summer, restrictions eased somewhat, and at the end of September 2020, the Group was operating around 1200 units.

Governance

The SSP Group plc Board has oversight of the management of modern slavery risks within our business. The Group Risk Committee reviews our internal controls for modern slavery on a quarterly basis.

The Group Human Resources Director and Group Chief Procurement Officer, who report to the Group CEO and CFO respectively, act as the global functional leads for the Group with respect to human rights within our operations and supply chain. The operational responsibility for execution of our policies and programmes sits with the regional and country managing directors who are responsible for upholding our standards and requirements in their own businesses including within the supply chain.

SSP is committed to respecting human rights in our business operations and supply chain as set out in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We will not accept abuse of human rights anywhere in our business, supply chains

¹ This statement is published jointly on behalf of SSP Group plc, Select Service Partner UK Limited and Rail Gourmet UK Limited (together "**SSP**"), and references to "we", "us" or "our" are to all of these entities taken together.

² trading or temporarily closed at year end

or partnerships.

Code of Conduct and Related Policies

Our Ethical Trade Code of Conduct (“**Code of Conduct**”), which is aligned to the Ethical Trading Initiative’s Base Code, outlines the standards we expect our suppliers to work towards. Our over-arching objective is that the people who work within our supply chain are treated fairly and with respect.

Specific requirements within our Code of Conduct related to modern slavery include:

- 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.

New suppliers of stock for SSP’s proprietary branded outlets including food and beverages, packaging and disposables, as well as cleaning services and refuse collection (“**Vendors**”) are asked to sign our Code of Conduct. This process is being adopted by both SSP as well as the Group’s global business and international supply chain. In the year ahead, our country management teams plan on expanding the Code of Conduct to other key suppliers.

Our Code of Conduct is available at www.foodtravelexperts.com.

We have additional policies covering equality, anti-bribery and corruption and whistleblowing. The Group’s Whistleblowing Policy provides a framework to encourage and give all employees confidence to ‘blow the whistle’ and report irregularities. Employees are encouraged to raise concerns with designated individuals, including the Executive Directors or the Chairman of the Audit Committee.

Identification and Assessment of modern slavery risk within our supply chain

Each year, we conduct or support internal reviews of modern slavery risks across SSP as well as the Group’s international operations. These reviews look specifically at the different territories in which the Group operates and from which it sources, and the relative risk of slavery (based on operating country, sourcing country and product category). These risk assessments help us to identify where to focus our efforts.

The information sources we use for our risk assessments include:

- The [Global Slavery Index](#) to help us understand country risks
- Third party Vendor audits shared via the SEDEX system
- Analysis of calls to our whistleblowing lines, although to date no incidences of modern slavery or human trafficking have been reported

- Supply chain risk assessment conducted by the Group's country purchasing teams

Our internal risk assessments suggest that the majority of SSP's operations and supply chains are in countries with relatively low perceived levels of modern slavery risk, although the Group does have operations in some countries identified in the Global Slavery Index as having a higher relative risk of modern slavery. These higher risk countries fall within two of our operating regions; Asia Pacific and Eastern Europe/Middle East, and we therefore ask our management teams in these regions to operate a higher level of modern slavery controls in recognition of the greater risk. This includes engaging with a larger group of suppliers to assess supply chain risk and implementing systems to more closely monitor human rights risk within our workforce, for example, through anonymous worker interviews.

Our risk assessments continue to indicate that the greatest area of possible risk exposure for SSP and the Group relate to migrant workers in the various business operations. These include migrant workers employed to provide cleaning or maintenance services, also seasonal workers, especially those involved with food processing, picking fruit and vegetables, or working in the seafood industry. We and the wider Group pay particular attention to those areas of our business where migrant workers are employed, as it is understood that these workers are often at greater risk of being a source of bonded labour.

Each Group operating company has ultimate responsibility for these areas in their appropriate jurisdiction and we are working with local management teams in higher risk countries to support them in putting in place appropriate controls, both for the relevant Group employees and for the products and services they procure.

We also work with external providers to review our modern slavery control measures and take appropriate steps where necessary to improve our systems, as further detailed below.

Due diligence: supply chain

SSP's central and the wider Group's country purchasing teams are responsible for the on-going review of modern slavery risks within the various supply chains.

All countries are required to include the Code of Conduct within their key Vendor contracts and we continue to use SEDEX (Supplier Ethical Data Exchange) to access Vendors' ethical audit data and support our assessment of modern slavery risks in key suppliers. Vendor self-certification against the Code of Conduct is one of SSP's core sustainability KPIs, with all countries are required to report progress against this KPI on a quarterly basis to our Group Executive Committee. Reporting on this issue was interrupted by the Covid-19 crisis, but, up to February 2020, Vendors accounting for 80% of global controllable spend had signed the Code of Conduct. We encourage Vendors to share audit reports with us via SEDEX and will look to increase the number of Vendors linked to SSP in the year ahead.

We continue to focus on initiatives to strengthen the ethical trade risk assessment process. During 2021, country purchasing teams will be provided with additional training tools to help them review supplier ethical audit reports, conduct risk assessments and determine the appropriate actions to be taken as follow up on any areas of concern.

If a supplier is found to be in breach of the Code of Conduct, we will investigate and take appropriate action and we reserve the right to cease trading with the relevant supplier if they are unable or unwilling to comply. We expect the Group companies to take similar action.

Many of our suppliers have their own complex supply chains, which reduces the ability for us and/or the Group to directly monitor the working conditions of each individual supplier. We and the Group companies are, however, committed to on-going dialogue with key suppliers, especially those operating in higher risk sectors, to understand the systems they have in place to manage modern slavery risks within their own supply chains.

Due diligence: SSP's business operations

SSP employees and Group employees in each country have access to a whistleblowing hotline they can use to raise any concerns they have about any aspect of their employment conditions. This hotline is open to both permanent and temporary employees and afford such employees the opportunity to report any concerns they may have about issues related to modern slavery or wider welfare issues. Calls to the confidential hotline are monitored and escalated as appropriate if further action is required. During the year no calls were received related to modern slavery issues.

In territories where there is a higher risk of modern slavery overseas Group companies' local management teams receive guidance on the possible indicators of modern slavery and the specific issues they should be monitoring. These include duplicate bank account checks, monitoring any recruitment fees or other fees which may have been paid by employees, confirming that employees understand the terms of their contracts and that they have free access to their ID documents. In the year ahead, we will extend this requirement so that all operating countries have these core modern slavery controls as part of their standard procedures.

In our higher risk regions, Asia Pacific and Eastern Europe/Middle East, we also ask country management teams to conduct employee interviews to monitor performance on the specific issues mentioned above. While this work was on hold for much of 2020 due to the Covid-19 pandemic, we will work with our regional management teams to ensure that these interviews resume during 2021.

Training and capacity building

In 2019, we started to roll out modern slavery training via our SSP Academy online training platform to all countries, with the training translated into local language in some countries, notably within our Asia Pacific region. In high risk countries, all colleagues are required to complete the training, and in all other markets, managers complete the training and cascade this to their teams. The training rollout was interrupted by the Covid-19 pandemic, but, as of February 2020, 77% of Hay Grade A-C managers globally had completed the modern slavery training module. The level of training compliance continues to be monitored to promote uptake.

Assessment of effectiveness in preventing modern slavery

During 2020, the Covid-19 pandemic and ensuing disruption to travel and commuting caused an unprecedented reduction in passenger volumes, resulting in declining sales. To manage its cost base, SSP needed to take decisive action which has caused some of our modern slavery initiatives to be put on hold, due to the fact that units were either closed or operating under very different conditions to normal with many of our colleagues furloughed.

Notwithstanding these unprecedented challenges, revised KPIs and objectives will be reviewed and agreed on over the course of 2021, aimed at ensuring renewed progress in implementing and improving the way we monitor and manage human rights risks within our business. This work will continue to be led by the Group Executive Committee, with regular reports to the Group Board.

Towards the end of 2019/20, we also undertook a review of our Corporate Responsibility (CR) strategy and stakeholder expectations. This resulted in SSP's Board agreeing a revised Corporate Responsibility framework. As part of this revised framework, human rights matters, including ethical trade and modern slavery and human trafficking issues now come under one of the new Core Commitments under the People pillar of our Corporate Responsibility strategy.

Within our new CR framework, we and the Group companies will continue improving our understanding of the human rights risks and training our teams on how to identify and manage these risks. We will continue to focus

our efforts on suppliers and operations in those territories and industry sectors where it is believed that the risk of slavery is greatest.

We will work with our Group company country teams to promote a dialogue with our largest suppliers operating in sectors with a higher risk of modern slavery, and aim to encourage those suppliers to build their own capacity to manage this complex issue.

Our actions are measured against a number of Key Performance Indicators to enable us to better monitor progress in managing modern slavery risks within our business and supply chains. These KPIs include:

KPI	Progress during 2019/20
Provision of appropriate training on modern slavery risks to relevant employees and promoting such training within Group companies	<ul style="list-style-type: none"> Further rollout of modern slavery training module on SSP Academy online training platform, which managers complete and then cascade the information to their teams. As of February 2020, 77% of all Hay Grade A-C managers had completed this training.
Vendor compliance with the Code of Conduct	<ul style="list-style-type: none"> SSP and Group companies continue to monitor Vendor acceptance of the Code of Conduct. As of February 2020, Vendors accounting for 80% of our controllable spend, had signed the Code of Conduct.
Reviewing and strengthening supply chain due diligence and audit	<ul style="list-style-type: none"> Following a 2019 review of modern slavery issues by our audit advisors, Deloitte, further improvements have been (and will continue) to be made within SSP and across the Group. We continue to encourage Vendors to share ethical audit data with SSP via SEDEX.

Responsibility for this Statement

Within SSP, the SSP company directors and senior management take responsibility for implementing our policies and the objectives considered in this statement as well as monitoring modern slavery issues (should they arise).

We have engaged a specialist consultant to further support SSP on modern slavery and other supply chain issues.

This statement will be reviewed and published annually. This statement was approved by the Board(s) of SSP Group plc, Select Service Partner UK Limited and Rail Gourmet UK Limited respectively on the dates below.

Signed



Simon Smith

CEO

SSP Group plc

Date of Board Approval: 26 February 2021



Richard Lewis

Director

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Date of Board Approval: 1 March 2021



Beat Ehlers

Director

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Date of Board Approval: 1 March 2021

1 March 2021