



Modern Slavery Statement 2023

Welcome

to our Modern Slavery Statement

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.

We recognise that, like all businesses, we run the risk of being exposed to modern slavery either within our own operations or those of our extended supply chain.¹

This statement is published in accordance with the UK Modern Slavery Act 2015. It outlines the steps taken by SSP² to prevent modern slavery and human trafficking in our business and supply chains during the financial year ending 30 September 2023 ('2023' or the 'reporting period'). All data relates to the financial year 2023, unless otherwise stated.

→ Read our full **Sustainability Report 2023** for detailed information on our Sustainability Strategy and performance foodtravelexperts.com/sustainability




→ Download our **Sustainability Data Book** for comprehensive data disclosures foodtravelexperts.com/sustainability



→ Our **Annual Report 2023** provides details of our Group Strategy and performance foodtravelexperts.com/investors/annualreport



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1. 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.
 2. Covering SSP Group plc, Select Service Partner UK Limited, SSP Financing UK Limited and Rail Gourmet UK Limited (together 'SSP'), and references to 'we', 'us' or 'our' are to all of these entities taken together.

About SSP

We are the food travel experts. Operating in 37 countries globally, we design, create and operate food and drink 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 and culture as an organisation, and drives our 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, which cater to client and customer needs. Our brands range from well-known grab 'n' go sandwich shops and cafés, to casual dining restaurants and bespoke high-end concepts, so we can respond to our customers' specific needs as they travel around the world.

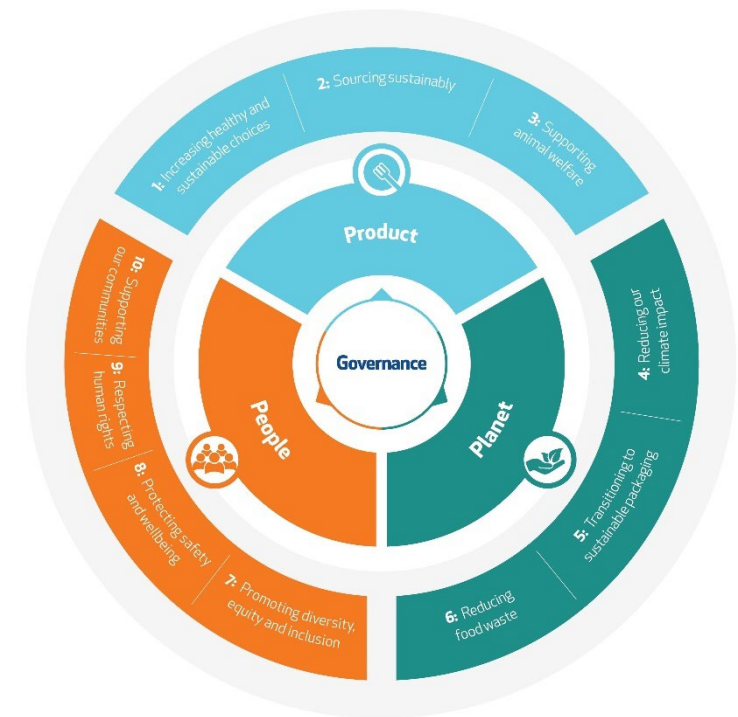
Sustainability is an important strategic priority and crucial for our long-term success. Our Sustainability Strategy focuses on the three key areas of Product, Planet and People, and is underpinned by high standards of governance.

Our 10 key sustainability commitments are focused on the most important social and environmental issues for our business and stakeholders. This includes our commitment to respecting human rights.

Our Group purpose



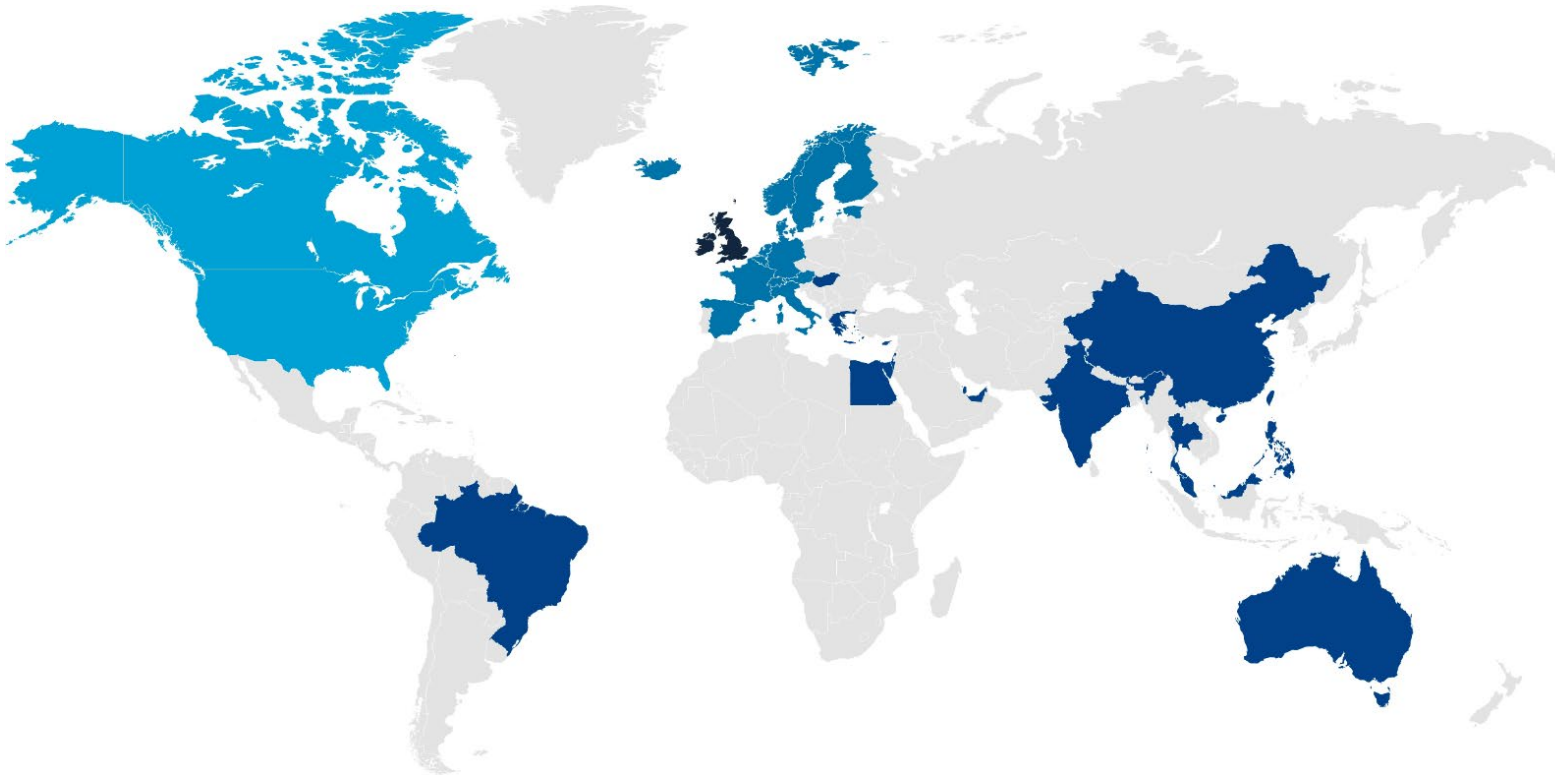
Our Sustainability Strategy



Find details of our **Group purpose, vision and strategy** on pages 18-29 of our [Annual Report 2023](#)

The structure of our business and supply chains

We operate in 37 countries and territories³, across four operating regions (or reportable segments):



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

Our 2023 Group highlights

c.3bn
revenue

c.42,000
colleagues

37
countries

c.550
brands

c.2,900
units in c.600 client locations

c.70%
of our business in the air sector

3. Our 37th market in Italy started trading after the end of our 2023 financial year in December 2023.

The structure of our business and supply chains *(continued)*

Our clients are primarily railway station and airport operators seeking to develop the right range of food, beverage and retail brands and services at their locations to satisfy the needs of the travelling customer.

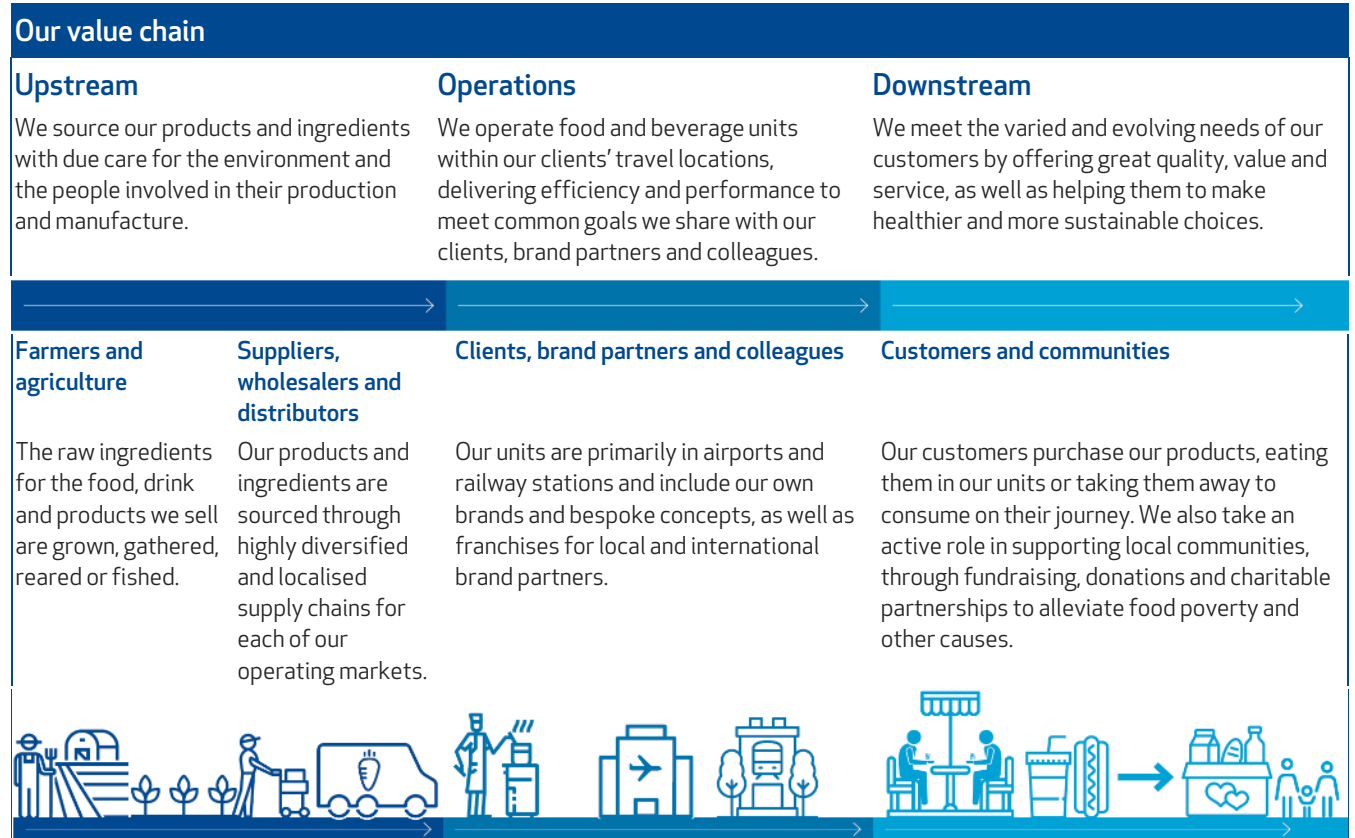
At the end of 2023, 70% of our business was in the air sector, 25% was in the rail sector, and the remainder was in other areas, including motorway service areas, hospitals and shopping centres, in-flight catering, non-travel convenience retail, lounges and on-board rail catering.

We employed c.42,000 colleagues globally at the end of 2023. The majority (87%) were team members or supervisors, 7% were operations and unit-level management and the remaining were support function colleagues.

Our colleagues are primarily permanent employees, however, we do also employ some colleagues on a temporary basis responding to the seasonal peaks in our business.

With c.550 brands in our portfolio and operating in 37 countries, our ingredients and raw materials come from highly diversified supply chains, with a large volume of suppliers globally.

These supplier relationships are predominantly managed by locally-based purchasing teams in the relevant operating entities around the world, with some larger agreements managed centrally by our Group Procurement function.



Our **Sustainability Data Book** provides comprehensive data disclosures on Group operations and employees available at: www.foodtravelexperts.com/sustainability

Governance and policy commitments

We are committed to upholding high standards of governance and to operating with honesty, integrity and transparency.

Our governance and management structure

Our governance and management structure is designed to ensure accountability from the Board right down to our operating markets, as shown in the adjacent graphic.

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 for human rights, reviewing the strategy, targets and performance at least twice a year. In 2023, this included three sustainability reviews covering strategic progress and performance against targets, human rights and modern slavery, and a detailed policy review and update.

Our Group CEO is responsible for delivery of our Sustainability Strategy, with our Corporate Affairs Director and Group Head of Sustainability responsible for leading and coordinating the management and delivery of the strategy.

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



Find further details of our [Governance](#) on pages 51-63 of our [Sustainability Report 2023](#) and pages 80-145 of our [Annual Report 2023](#)

Our policy commitments

Our global policies play a crucial role in forming the backbone of our approach to business ethics and good governance.

Our Group companies are expected to adhere to these policies within the context of local regulation and market practice, where applicable.

The Board reviewed and endorsed each policy and a member of the Group Executive Committee was assigned responsibility for overseeing their implementation and ensuring compliance.

Our policies are reviewed every two years to ensure they remain effective and to keep pace with internal and external developments. In 2023, we conducted a comprehensive review to ensure our policies are aligned with best practice and stakeholder expectations, and that they address existing and emerging issues and risks.

As a result, we amalgamated three distinct policies into a consolidated Environment, Sourcing and Animal Welfare Policy and updated our Human Rights Policy and Community Engagement Policy. We also introduced a unified Supplier Code of Conduct, articulating the minimum standards we expect from our contracted suppliers.



Our **Group policies** are available for download at: www.foodtravelexperts.com/who-we-are/policies-and-statements/

Human Rights Policy

Our Human Rights Policy sets out our commitment to respecting the human rights of people across our business operations and supply chains. It applies to all individuals working at all levels of the SSP Group, divisions and subsidiaries.

Our 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 committed to having 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 (ETI) Base Code, which is founded on ILO conventions and is an internationally recognised code of labour practice that we have adopted as our international standard.

Supplier Code of Conduct

Our new Supplier Code of Conduct, published in April 2023, consolidates the previous distinct policies we asked our suppliers to sign up to. It outlines the minimum standards we expect from our contracted suppliers, covering human rights, product quality, food safety, environmental sustainability, farm animal welfare, and business integrity.

As with our Human Rights Policy, we expect our suppliers to strive to comply with the ETI Base Code.

By the end of 2023, 87% of our contracted suppliers had signed up to our Supplier Code of Conduct or equivalent standard. We're aiming for 100% by 2025.

Modern slavery criteria

Our Human Rights Policy and Supplier Code of Conduct are aligned to the ETI Base Code and includes 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.



Find out more about the ETI Base Code at: www.ethicaltrade.org/eti-base-code

87%

of our contracted suppliers have signed-up to our Supplier Code of Conduct or an equivalent

Our policy commitments *(continued)*

Colleague Code of Conduct

Our Colleague Code of Conduct (the '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 includes 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.

The Colleague Code applies to all employees, officers and directors of Group subsidiaries, and is compulsory regardless of where in the world they operate or are located. 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.

In the Colleague Code, we outline how we have a responsibility to look out for any signs of forced labour or modern slavery among our permanent and temporary colleagues, as well as for our suppliers' workers and those of our service providers. Examples are given of some of the warning signs that could indicate that someone is a victim of modern slavery, as well as instructions for how to report concerns, such as via our independent and confidential Speak Up helpline.

A summary of the Colleague Code is publicly available on our website. The detailed internal Colleague Code is available for our colleagues in local languages on our intranet and SharePoint sites.

Speak Up Policy

Our Speak Up Policy sets out 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.

The helpline is independently operated, with all calls being dealt with in strictest confidence by specially trained operators. Calls 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.



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.

Assessing modern slavery risks

We conduct internal Group-level reviews of modern slavery risks across the Group's international operations. These reviews look specifically at the 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).

In addition, local-level internal risk assessments help us to identify where to apply increased controls.

The information sources we and our local operational teams use for internal risk assessments include:

- The Global Slavery Index to help us understand inherent country and sector risks⁴.
- Analysis of employee data, including number of colleagues in front-line team member roles.
- Analysis of reports received through our Speak Up channels – although, to date, no incidences of modern slavery or human trafficking have been reported.
- Supplier self-assessments shared via the Supplier Ethical Data Exchange (SEDEX) platform.
- Supply chain risk assessments conducted by our country purchasing teams.

- External human rights reports and insights, including the Global Estimates of Modern Slavery report produced each year by the ILO, Walk Free and the International Organization for Migration.

For our operations, our analysis against the 2023 Global Slavery Index shows that SSP operations are primarily located in countries with a lower prevalence of modern slavery. However, we did operate in 2023 in one country, United Arab Emirates, ranked in the top 10 of highest prevalence (13.4 victims per 1,000 capita). We also operated in a further eight countries with an estimated prevalence between 6-9 victims per 1,000 capita⁵.

Our risk assessments also indicate that the greatest area of possible risk exposure in our own operations relates to migrant workers in front-line team member roles. For example, the latest report on global estimates of modern slavery⁶ found that the forced labour prevalence of adult migrant workers is more than three times higher than that of adult non-migrant workers.

For our supply chain, the greatest area of possible risk exposure 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 risks⁷.

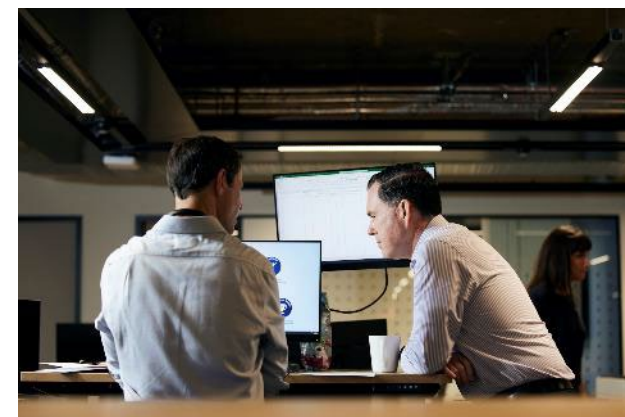
Due diligence for our operations

Each Group operating company has ultimate responsibility for responding to our risk assessments in their appropriate jurisdiction.

Our Modern Slavery Guidance, first implemented in 2020 and last updated in April 2021, provides detailed information for our local management teams to support them in putting in place the appropriate level of controls.

The guidance outlines the definition of modern slavery and provides examples of indicators or warning signs to watch out for. It also includes guidance on how to implement a procedure for checking for colleagues with duplicate accounts or how to conduct interviews with colleagues who may be at risk, such as migrant workers.

We plan to review and refresh this guidance in 2024.



4. Walk Free (2023), [The Global Slavery Index 2023](#), Minderoo Foundation, Cyprus, India, Philippines, Qatar, Bahrain, Hungary, Greece and Malaysia

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

7. *Ibid*, pages 30-33

Due diligence for our supply chains

Following the update to our Supplier Code of Conduct in 2023, we implemented a revised human rights due diligence process for suppliers, as detailed in the graphic opposite.

We use the Supplier Ethical Data Exchange (SEDEX) as the primary means for conducting human rights due diligence. SEDEX is a platform for storing, analysing, sharing and reporting on ethical supply chain practices.

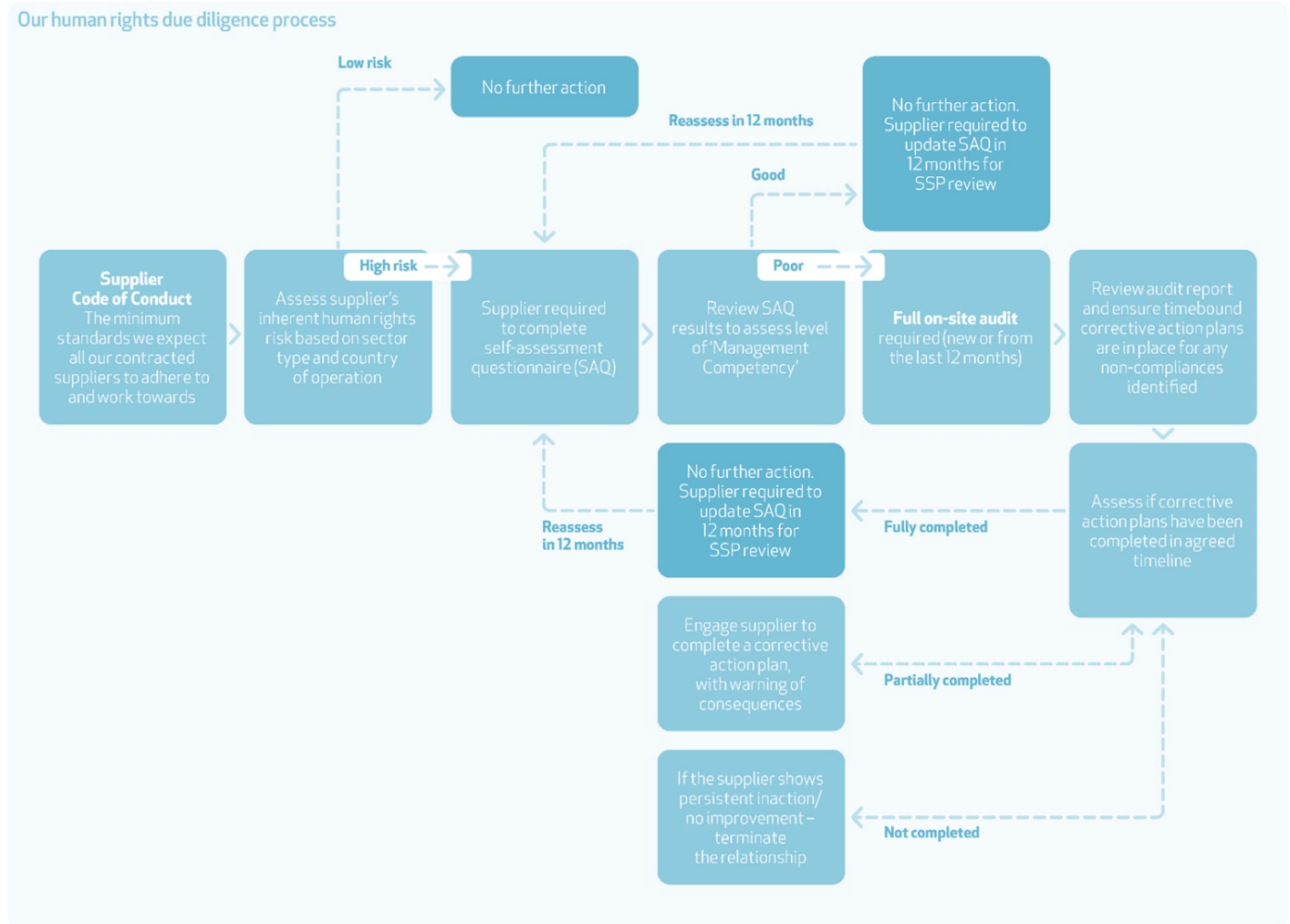
We expect our suppliers to become members of SEDEX and then, through the platform, we conduct risk assessments, self-assessment questionnaires and on-site audits.

In 2023, we conducted 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.

We identified 218 contracted suppliers as high risk, for which we conducted the due diligence reviews for 33% by year-end. This included 62 suppliers completing self-assessment questionnaires and reviews of nine independent on-site audit reports.

No issues or non-conformances relating to modern slavery or child labour were identified. The audits did, however, identify some non-conformances, primarily relating to emergency evacuation safety measures, record keeping and maintenance of facilities and equipment. For all issues identified, we reviewed the suppliers' corrective actions to ensure they were addressed in the agreed timescale.

In 2024, we will continue conducting due diligence reviews on the remaining high-risk suppliers, as well as conducting risk assessments on any new contracted suppliers. Our target is for 100% of high-risk suppliers to undergo the due diligence reviews within a three-year cycle.



Due diligence for our supply chains *(continued)*

In addition to our due diligence procedures for contracted suppliers, we are focused on sourcing high-quality ingredients that meet recognised sustainability standards and certifications.

Our immediate focus is on high-risk ingredients like palm oil, tea, coffee, cocoa (for hot chocolate) and fish, with plans to extend this approach to additional ingredients in the future. Examples of recognised standards include Rainforest Alliance, Fairtrade and UTZ certification for tea, coffee and cocoa, Roundtable on Sustainable Palm Oil (RSPO) for palm oil, or Marine Stewardship Council (MSC) and Aquaculture Stewardship Council (ASC) for fish.

These certifications provide assurance to our procurement teams, clients and customers that the ingredients have been produced in line with environmental, social and ethical 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, and any entity convicted of forced or child labour is removed from any MSC-certified fishery.

Our 2025 target is to source 100% of our tea, coffee, cocoa for hot chocolate and fish products for our own brands from certified farms and fisheries. We have made positive strides – by the close of 2023, 49% of tea, 71% of coffee, 80% of hot chocolate, and 61% of fish were certified globally.

For palm oil, we have a target for the top 50 products under our own brands in each market to be palm oil-free or to only use RSPO Certified Sustainable Palm Oil.

By the close of 2023, we achieved 100% in 23 markets and 97% of our top 50 products globally. The 3% shortfall was due supply challenges for a total of 40 products across the remaining markets.



Our **Sustainability Data Book** provides comprehensive data disclosures on our Group human rights and sourcing targets available at: www.foodtravelxperts.com/sustainability



61%

of fish for our own brands are from sources certified against standards, such as Marine Stewardship Council

71%

of hot beverages for our own brands are from sources certified against standards such as Fairtrade

Training and effectiveness

We are committed to providing appropriate training and measuring the effectiveness to help strengthen and enhance our approach to tackling modern slavery.

Training and capacity building

We need a workforce with the knowledge, skills and passion to help us drive forward our Sustainability Strategy and deliver on our commitments, including for respecting human rights.

We continue to strengthen our expertise across the business, led by our Group Head of Sustainability and Chief Procurement Officer, and supported by a dedicated Group Supply Chain Sustainability Manager.

The Group Sustainability team works closely with sustainability leads and purchasing teams in our operating regions and markets to support the development of action plans, programmes and initiatives. In 2023, we appointed two leadership sustainability roles for our UK & Ireland and APAC and EEME regions to coordinate the strategy across these diverse geographies.

This approach helps to ensure the right balance of specialist sustainability knowledge, alongside clear responsibilities in day-to-day business operations, to further embed sustainability and human rights into our ways of working and everyday decision-making.

All our senior management-level colleagues are required to complete mandatory e-learning compliance training as part of their induction, which includes modules on modern slavery and human trafficking.

In 2023, we maintained 100% compliance with the requirement. In total, over 500 senior managers globally have completed the mandatory modern slavery training.

For the roll-out of our new Supplier Code of Conduct and revised supplier human rights due diligence procedure, we provided focused training, guidance and support for our purchasing teams. This included details on how to engage suppliers, use the SEDEX platform and review supplier risk assessments, audit reports and corrective action plans.

We also launched an online sustainability learning hub in 2023, where colleagues can access guidance, resources and tools, which is updated on a regular basis.

Monitoring effectiveness

Our actions are measured against our targets and key performance indicators (KPIs), as detailed in the table opposite.

These enable us to measure effectiveness and monitor our progress in managing modern slavery risks within our business and supply chains.



Our **Sustainability Data Book** provides comprehensive data disclosures, definitions and methodologies for all our targets and KPIs: www.foodtravelxperts.com/sustainability

Our 2023 performance

Target/KPI	2023 status
Each year, continue to maintain 100% compliance of senior managers to have received modern slavery training.	Yearly target: 100% 100%
By 2025, 100% of contracted suppliers with higher human rights risks to undergo our human rights due diligence.	2025 target: 100% 33%
By 2025, 100% of hot beverages (tea, coffee and hot chocolate) for our own brands to come from sources certified against recognised sustainability standards.	Tea 2025 target: 100% 49%
	Coffee 2025 target: 100% 71%
	Hot chocolate 2025 target: 100% 80%
By 2025, 100% of fish for our own brands to come from sources certified against recognised sustainability standards.	2025 target: 100% 61%
Each year, continue to work to ensure our top 50 own brand products in each market are palm oil free, or using Roundtable for Sustainable Palm Oil (RSPO) Certified Sustainable Palm Oil.	Yearly target: 100% 97%

Next steps and approval

We recognise the importance of driving continuous improvement and taking responsibility for our approach to tackling modern slavery.

Next steps

As well as continuing to progress towards our targets detailed on the previous page, we plan to undertake the following actions in 2024 to further strengthen and enhance our approach:

- Review and update our Colleague Code of Conduct, including standards relating to human rights and modern slavery.
- Review and refresh our modern slavery risk assessments, controls and guidance for SSP operations.
- Continue due diligence reviews for our contracted suppliers identified as high risk and conduct risk assessments on any new contracted suppliers.
- Continue to maintain 100% compliance of senior managers (post induction) to have received 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.

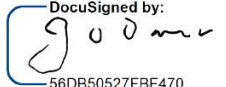
SSP Group plc

Name	Job title	Signature	Date
Patrick Coveney	Group Chief Executive	 A64112515C3B4BA...	22 March 2024

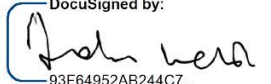
Select Service Partner UK Limited

Name	Job title	Signature	Date
Kari Daniels	Chief Executive Officer, SSP UK & Ireland	 0DFC1337CEF2467...	21 March 2024

SSP Financing UK Limited

Name	Job title	Signature	Date
Jonathan Davies	Group Chief Financial Officer	 56DB50527FBF470...	23 March 2024

Rail Gourmet UK Limited

Name	Job title	Signature	Date
Andy Webb	Managing Director	 93F64952AB244C7...	21 March 2024



The Food Travel Experts

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Select Service Partner UK Limited

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SSP Financing UK Limited

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Company number: 05735959

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