



Global Human Rights Policy

Welcome

to our Human Rights Policy

About SSP

We are the food travel experts. We design, create and operate restaurants, bars, cafes, lounges and convenience retail outlets in locations around the world 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.

1. Includes all references to "SSP Group", "SSP", "we", "us" or "our".

About this policy and who it applies to

This is a mandatory global policy for SSP Group¹ effective from 30th September 2025. This replaces all previous versions of this policy.

This policy applies to:

- **All SSP employees** across all levels, functions and geographies.
- **All SSP majority-owned businesses**, including subsidiaries, joint ventures and controlled entities.
- **All businesses where SSP has operational oversight or responsibilities**, including instances where SSP does not hold a majority ownership stake.
- **All associates**, including agents, intermediaries, sub-agents, suppliers, contractors, consultants, and anyone acting on or in conjunction with SSP (directly or indirectly). This includes, but is not limited to, recruitment agents and labour suppliers, as well as their sub-agents.

- **Minority or non-controlling interests.** While SSP may not control these businesses, we use our influence to encourage them to act in a manner consistent with the intent of this policy.

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Purpose

SSP Group is committed to respecting, protecting and promoting human rights in all areas of our business, including our operations, supply chains and business partnerships.

Protecting human rights is fundamental to our business integrity, the well-being of our people, and our long-term success.

This policy 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.

Our approach is guided by internationally recognised frameworks, including:

- The United Nations Guiding Principles on Business and Human Rights (UNGPs);
- The International Labour Organization (ILO) Core Conventions;
- The ILO Declaration on Fundamental Principles and Rights at Work;
- The Ethical Trading Initiative (ETI) Base Code;
- The OECD Due Diligence Guidance for Responsible Business Conduct;
- The Dhaka Principles for Migration with Dignity developed by the Institute for Human Rights and Business (IHRB).

Standards, procedures and guidance, including those related to recruiting migrant workers, further support the policy.

See **Additional Resources** for details of related policies, standards, procedures and guidance to support effective policy implementation.

“We are a people business, and our diverse teams are at the heart of everything we do. Respect for human rights is essential to our business and the customers and communities we serve. As such, this policy sets out our global standards, commitments and expectations for all our business operations, colleagues and suppliers to adhere to and work towards.”

Ann-marie Murphy
Chief People Officer



Our policy commitments



Our human rights commitments include, but are not restricted to:

Managing human rights and modern slavery risks

We are committed to identifying, assessing, and remedying human rights and modern slavery risks and impacts across our operations and supply chains.

This includes ensuring we have appropriate controls, training and due diligence procedures for managing and integrating human rights considerations into decision-making and risk management.

Preventing exploitation, forced labour, and human trafficking

We are committed to preventing all forms of modern slavery, encompassing slavery, servitude, forced or compulsory labour and human trafficking in our operations and supply chains.

This includes embedding responsible recruitment, procurement, and operational practices, and ensuring that workers are not subject to coercion or exploitation.

We work with our partners to identify potential risks and take appropriate actions, always with careful consideration of workers' rights, safety and wellbeing.

Adopting the Employer Pays Principle – no worker shall pay for a job

We do not charge workers recruitment fees or related costs.

We require our recruitment agencies and labour suppliers (including manpower companies) to comply with this principle and to impose similar requirements on, and appropriately monitor, the practices of any sub-contractors or other third parties engaged in providing or supporting recruitment services.

We also expect our suppliers to adopt this principle within their own operations.

Ensuring employment is freely chosen and freedom of movement is respected

We are committed to ensuring that all employment is freely chosen, and that workers' freedom of movement is respected.

We do not tolerate any form of forced, bonded, or involuntary labour. Workers should not face any restrictions on their movement, including withholding passports, identity documents, residency papers or work permits, or recruitment practices limiting their ability to leave employment after providing reasonable notice.

Preventing child labour and minimum age policy

We are committed to preventing child labour. The minimum age for employment shall be 15 years or the local legal minimum requirement under applicable law, whichever is higher (subject to the exception below).

No one under the age of 18 shall work at night or undertake any work that is considered hazardous, in accordance with ILO Convention on Minimum Age.

If local minimum age laws permit employment from 14 years of age, in line with exceptions for developing countries under ILO Convention No. 138, the lower age requirement may apply.

See the [Glossary](#) for ILO child labour and night work definitions.

Providing a safe and healthy environment

We are committed to providing a safe, healthy and supportive work environment.

Where workers are provided accommodation, it shall be safe, clean, and meet their basic needs. It shall also comply with all relevant legal standards and offer a respectful living environment.



Our policy commitments continued

Respecting workers' rights for freedom of association

We recognise and respect workers' rights to freely form or join trade unions and engage in collective bargaining without fear of retaliation or discrimination for exercising those rights.

Where the right to freedom of association and collective bargaining is restricted by law, we will facilitate, where requested, and not hinder, the development of parallel means for independent and free association and bargaining.

Fair pay and working hours

SSP is committed to complying with all applicable laws regarding working hours, overtime and fair compensation.

We align with ILO standards, including on maximum working hours, while recognising that operational needs in travel hubs and 24/7 environments may require flexible arrangements to ensure service continuity. In all cases:

- Working hours and compensation terms must be clearly defined in employment contracts;
- Wages must be paid on time, and without unlawful deductions.

We expect our business partners and suppliers to uphold the same standards.

Promoting diversity, equity and inclusion

We are committed to promoting workplace diversity, equity and inclusion.

We foster an inclusive environment where all workers, regardless of race, gender, sexual orientation, disability, or other characteristics, feel respected and supported.

We strive to eliminate all forms of discrimination, harassment, and bullying, ensuring all workers are treated with dignity and respect.

In addition, we ensure non-discriminatory recruitment and employment practices, offering equal opportunities regardless of race, gender, religion, sexual orientation, age, disability, or other status. We strive to ensure all workers have equal growth, development and advancement opportunities.

SSP's commitment to dignity and equal opportunity is implemented in compliance with all local laws. Where permitted by applicable law, we voluntarily adopt practices that foster inclusive workplaces and remove barriers to participation.

Our approach is regularly reviewed to align with evolving legal requirements and best practices.

Protecting vulnerable groups

We recognise that some workers belong to vulnerable groups, including minorities, migrant workers, young people, women, and people with disabilities.

These workers may face increased risks of discrimination, exploitation and abuse. We are committed to ensuring their rights are respected throughout their employment in accordance with national laws.

We expect our business partners to uphold similar principles of protection for vulnerable groups and take steps to promote respect for their rights within their operations.

Respecting land, natural resources, and indigenous peoples' rights

SSP acknowledges the importance of respecting the rights of indigenous peoples and local communities regarding land, natural resources, and cultural heritage.

We recognise the need to assess the potential risks and impacts of our operations and supply chains on these communities and their rights.

Should any issues arise, we will evaluate them in accordance with international human rights standards and take appropriate measures.

SSP will explore opportunities for collaboration with suppliers and partners to raise awareness and address concerns related to land and resource rights.



Policy application



Our Human Rights Policy is a mandatory global policy.

Local company policy adoption

All SSP majority-owned businesses and where SSP has operational oversight or responsibilities (as defined on page 2) are required to adopt this policy.

Should a local company wish to make any adaption of the policy, this must be done in accordance with Group Authorisation Procedures, with approval of the global policy owner.

Policy applicability across jurisdictions

SSP Group is committed to complying with all applicable national laws and regulations in the countries where we operate.

Where national laws differ from this policy, we will adhere to the standard that offers the greatest protection for human rights.

In cases where there is a conflict between national laws and this policy, we will prioritise the protection of human rights and work with relevant stakeholders to resolve the matter to uphold the highest standard of protection.

Consequences of a breach

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or business relationships.

Serious breaches may also be reported to relevant authorities where required by law.



Speaking up and raising concerns

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

All reports will be taken seriously, carefully reviewed, and investigated where necessary. Appropriate actions will be taken based on the findings.

Retaliation against anyone who raises a genuine concern is strictly prohibited and may lead to disciplinary action for employees or termination of business relationships with third parties.



See our **Group Speak Up Policy** at: foodtravelexperts.com/who-we-are/policies-and-statements/

Policy application continued

Implementation, compliance and governance

Policy communication and stakeholder engagement

We are dedicated to clearly communicating and integrating this policy throughout our business and value chain.

We will work towards making sure that all relevant stakeholders, including employees, suppliers and business partners, are aware of this policy and understand its expectations.

Implementation

As the Policy Owner, the Chief People Officer of SSP Group is responsible for overseeing the implementation and integration of this policy across our operations through a structured implementation plan.

We recognise that some aspects of this policy may require time to be fully integrated into our business processes.

Monitoring and compliance

We will regularly assess and monitor compliance with this policy, making adjustments as needed to promote continuous improvement.

We are dedicated to promptly addressing any issues and gaps that are identified. Our approach will be reviewed regularly to adapt to emerging human rights risks that may affect our business.

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.

Accountability and review

This policy has been approved by the Board of Directors of SSP Group plc, which provides strategic oversight of our human rights commitments.

The Chief People Officer of SSP Group is accountable for the implementation of this policy, monitoring compliance, and advising the Board on human rights matters.

SSP regional and country managing directors are accountable for integrating this policy into their operations and ensuring its practical application at a local level.

This policy will be periodically reviewed, with updates made as needed to reflect any material changes in legislation, business priorities, and stakeholder expectations.



Additional resources



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.
- **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.
- **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.
- **Diversity, Equity & Inclusion Policy** sets out our commitment to encouraging diversity, equity and inclusion, and eliminating discrimination.
- **Global Safety Policy** describes our commitment to managing safety across our global operations and sets out our Global Safety Standards and responsibilities.
- **Environment, Sourcing and Farm Animal Welfare Policy** sets out our approach to protecting our environment, sourcing our ingredients and products responsibly and sustainably, and supporting animal welfare.
- **Community Engagement Policy** sets out our approach to support the communities where we operate.
- **Responsible Marketing Principles** sets 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/

Internal standards and procedures

- **Migrant Worker Standard, Procedures and Guidance** which outlines our standards relating to migrant workers, including recruitment, contracting and onboarding, wages and working hours, accommodation, freedom of movement, termination and repatriation, and access to recourse and remediation.
- **Supply Chain Due Diligence Procedure** which outlines our procedures for conducting human rights due diligence on our contracted suppliers.
- See our **Human Rights Hub** on our internal SharePoint for details of all our human rights policies, standards, procedures and other resources (accessible to SSP employees only).



Links to external standards

- Ethical Trading Initiative (ETI) Base Code.
- IHRB Employer Pays Principle.
- International Bill of Human Rights.
- ILO Declaration on Fundamental Principles and Rights at Work.
- OECD Due Diligence Guidance for Responsible Business Conduct.
- UN Guiding Principles on Business and Human Rights.
- UN Declaration on the Rights of Indigenous Peoples (UNDRIP).



Glossary



Definitions of key terms used in this policy

- **Associates:** third parties engaged by SSP or its partners to provide goods, services, or labour – directly or indirectly – including subcontractors, intermediaries, and labour suppliers.
- **Child:** a person under the age of 15 years, or the local minimum legal working age, whichever is higher. If compulsory schooling extends beyond age 15, the higher age applies.
- **Child labour:** all work performed by a child (as defined above) that:
 - a. Violates relevant ILO standards;
 - b. Is hazardous,
 - c. Interferes with education or harms physical, mental, or social development.
- **Labour supplier:** Any third-party providing temporary, seasonal, or outsourced workers, including:
 - a. Staffing agencies and manpower providers;
 - b. Subcontracted labour providers;
 - c. Worker housing/transportation providers.
- **Migrant worker:** a person who migrates, or has migrated, from one country to another, with a view to being employed by someone other than him/herself, including any person regularly admitted, as a migrant, for employment.
- **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.
- **Night work:** as defined by ILO Convention No. 79 for non-industrial work, typically covering retail, hospitality, and office work: 7+ consecutive hours between 10 pm and 7 am. National definitions may apply where stricter.
- **Recruitment agents:** any entity or individual engaged directly or indirectly to source, refer, or hire workers, including but not limited to:
 - a. Employment agencies, and labour brokers;
 - b. Sub-agents or third-party intermediaries in the hiring process.
- **Vulnerable groups:** people who may face increased risks of discrimination, exploitation and abuse, including minorities, migrant workers, young people, women and people with disabilities.
- **Workers and employees:** SSP employees and contractors, including senior managers, officers, directors, employees, consultants, contractors, homeworkers, full or part-time and fixed-term workers, casual and agency staff.
- **Young person:** any worker over the age of a child (as defined above) and under the age of 18.



