



Modern Slavery Statement 2025



Our business structure, operations and supply chains

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

As subsidiaries of the SSP Group, present in 38 countries globally, we operate nationally in 12 Australian airports and one railway station.

Our purpose is to be the best part of the journey, and we are passionate about bringing great food and hospitality to travellers.

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.

SSP Australia Catering has operated in Australia since 2009 and has progressively expanded its presence across the country's major airports. Since that time, the business has continued to grow through a combination of strategic acquisitions and the organic development of new and existing outlets. This sustained growth reflects our long-term commitment to the Australian market, enabling us to broaden our portfolio of brands, enhance our operational capabilities and strengthen our national footprint. As the organisation evolves, we remain focused on maintaining strong oversight of our operations and supply chains.

See the [SSP Group plc Annual Report 2025](#) for further details of the SSP Group strategy and governance structure at: foodtravelexperts.com/investors/annualreport

Our Sustainability Strategy

Sustainability remains a core strategic priority for SSP, underpinning both our long-term success and our commitment to acting with purpose.

Our Sustainability Strategy is built around three focus areas of Product, Planet and People – which together guide how we manage our environmental social impacts. Across these pillars, sit ten key commitments that address the most material issues for our business and stakeholders, including sustainable sourcing and the protection of human rights. Each commitment is supported by defined targets to ensure transparency and measurable progress.



See the [SSP Group Sustainability Report 2025](#) for detailed information on our global Sustainability Strategy and performance at: foodtravelexperts.com/sustainability

Our 2025 business highlights

\$281 m
revenue

13
travel locations

106
food and drink outlets

c.2,330
employees

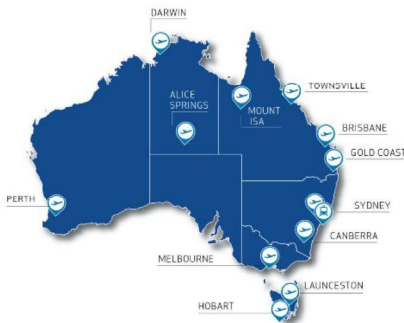
c.400
suppliers

Our business structure, operations and supply chains continued

Our value chain spans the full journey of our products and services, beginning with our upstream suppliers and extending through to the customers who rely on our outlets across Australia's major airports and transport hubs.

At the centre of this value chain are our own operations, where we hold the greatest ability to influence outcomes, manage risks and shape responsible practices. This central role enables us to set clear expectations for our stakeholders – from manufacturers through to distributors, brand partners and airport operators – and ensures alignment across the standards we seek to uphold.

By understanding how each part of the value chain connects, we can strengthen our sourcing practices, support ethical labour standards and deliver consistent, high-quality experiences for travellers across both capital city gateways and regional locations such as Alice Springs, Darwin, Townsville, Mt Isa, Launceston and the Gold Coast.



Upstream

We engage with a broad network of domestic and global suppliers to source the fresh produce, meat, dairy, functional bakery ingredients, snacks and beverages required to support our brands and operations. While we continue to prioritise domestic product sourcing for fresh ingredients wherever possible, we also draw on selected global suppliers to access specialised products necessary to meet our quality standards.

Farms and fisheries

The ingredients that go into our product offerings originate from a wide range of agricultural and marine environments globally. Most of these raw materials and finished goods are supplied to us through Australian-based manufacturers, wholesalers and distributors. Because we have limited direct involvement at the farm or fishery level, we place particular emphasis on sourcing key ingredients from suppliers that hold recognised independently sustainability certifications, such as Fairtrade – see [page 9](#) for details.

Manufacturers, wholesalers and distributors

Our upstream sourcing relies on established national distributors, local suppliers and integrated beverage partners that provide the core supply channels for our operations across Australia's travel hubs. These trusted suppliers play an essential role in ensuring the consistent flow of ingredients and products to our outlets, and we remain committed to fostering fair, transparent and constructive relationships with them. By partnering with reputable suppliers across the industry, we demonstrate strong oversight and a commitment to responsible sourcing.

Own operations

In 2025, we continued to operate 106 food, beverage and retail outlets within 13 travel locations.²

Clients

Our clients include 12 airport operators, and one railway station operator.

Brands and brand partners

We have a diverse portfolio of brands in our business, including our own and those we operate as franchises under licence from a brand partner.

Some of our own brands include Sydney Coffee Exports, Croissant Lab and Two Johns, which are featured in our travel hubs. We also hold several registered trademarks that apply to specific bespoke concepts such as York Street.

In addition to our own brands, we operate franchise outlets for a selection of well-known local and global brands including Roll'd, Hungry Jack's and KFC, drawing on our operational nous to integrate these concepts effectively into the travel environment.

Colleagues

Our people are central to our business, and we remain committed to creating a workplace where colleagues can build a rewarding career.

At the end of 2025, we employed 2,300+ workers, approximately 70% of which were in frontline roles. Our workforce is made up of both permanent and casual employees, with casuals comprising 67% of the team in 2025, helping support seasonal peaks.

Downstream

We serve quality food and beverages to customers travelling through Australia's airports and transport hubs.

Customers

Our customers may choose to enjoy our food and beverage offering in our hospitality outlets or choose to grab them and go, to consume during their journey.

Whether they are travelling for leisure or commuting for work, we remain committed to providing a food and drink experience that enhances their journey.

Communities

We are an integral part of the local areas where we operate, creating jobs and contributing to the economies of both major cities and regional centres such as Canberra, the Gold Coast, Mt Isa, Darwin, Alice Springs and Townsville.

SSP Group are members of the global social enterprise, the Slave-Free Alliance, which has a presence in Australia (see [page 7](#) for details).

2. The locations (and number of our outlets at each) are: Alice Springs Airport (1); Brisbane Airport (17); Canberra Airport (5); Central Railway Station Sydney (1); Darwin Airport (7); Gold Coast Airport (5); Hobart Airport (5); Launceston Airport (4); Melbourne Airport (21); Mt Isa Airport (1); Perth Airport (10); Sydney Airports (26); and Townsville Airport (3).

Our business structure, operations and supply chains continued

Our governance structure

We operate under the governance structure, global policies and standards set by the SSP Group. These form the foundation of our commitment to business ethics and good governance.

The SSP Group plc Board has general oversight of the management of human rights and modern slavery risks across Group businesses.

SSP Australia businesses are each governed by a Board of Directors which oversees strategic direction and governance. The boards are supported by the Managing Director, who reports directly to the Board and is responsible for overall leadership, including for human rights. Reporting to the Managing Director are the National Chief Operations Officer and the Head of Central Operations.

Complementing the broader governance framework, a Senior Leadership Team reports directly to the Managing Director, providing strategic direction and integrating operational insights into decision making. At the Operational level, General Managers oversee individual units with the support of Duty Managers/Supervisors. These General Managers report to the National Chief Operations Officer, ensuring cohesion across the Australian business.

The following SSP Group policies form the foundation of our approach and have been adopted by SSP Australia, where they are integrated into our local policies and procedures.

Human Rights Policy

Our Human Rights Policy provides a clear framework for identifying, preventing and addressing human rights risks, while outlining our expectations for ethical behaviour by our colleagues, suppliers and business partners.

The policy is guided by internationally recognised standards, including the UN Guiding Principles on Business and Human Rights, Ethical Trading Initiative Base Code, and the International Labour Organization (ILO) core conventions. This policy is also supported by our Supplier Code of Conduct.

In 2025, SSP Group updated the Human Rights Policy, with support from our partners at the Slave-Free Alliance, and in close consultation with regional People Directors (including our APAC People Director, representing SSP Australia), senior leadership and the SSP Group plc Board of Directors.

The updated policy addressed key recommendations identified in the Slave-Free Alliance gap analysis conducted in 2024, including more details on specific requirements for each of our salient human rights issues. In addition, we formally adopted the Employer Pays Principle in the updated policy, committing to the prohibition of all forms of recruitment fees.

Supplier Code of Conduct

Our Supplier Code of Conduct (the *Supplier Code*) sets out the standards we expect of our contracted suppliers, covering human rights, product quality and food safety, environmental sustainability, animal welfare, anti-bribery and corruption, cyber security and data privacy.

We expect all our contracted suppliers to sign-up to our Supplier Code or demonstrate their own equal or better standard. Contracted suppliers include suppliers for our own brands, and can include those for our franchise brands, where we have control over the selection and contracting.

By the end of 2025, 100% of our contracted suppliers had signed our Supplier Code or demonstrated they have equal standards. This included signing-up 160 additional suppliers in 2025, as part of the integration of our ARE business.

At the end of 2025, SSP Group updated the Supplier Code to align with recent revisions to Group Policies, including the Human Rights Policy. It also expands and clarifies the scope of the Supplier Code to include brand partners and their suppliers.

 Download [SSP Group policies](https://www.foodtravelexperts.com/who-we-are/policies-and-statements/) from our website at: [foodtravelexperts.com/who-we-are/policies-and-statements/](https://www.foodtravelexperts.com/who-we-are/policies-and-statements/)

Our human rights policy commitments

- Identifying, assessing and remedying human rights and modern slavery risks and across our business operations and supply chains;
- Preventing all forms of modern slavery and exploitation, including slavery, servitude, forced or compulsory labour and human trafficking;
- Adopting the Employer Pays Principle, where no worker should be charged recruitment fees or related costs to secure employment;
- Ensuring employment is freely chosen and freedom of movement is respected;
- Preventing child labour and applying a minimum age policy in accordance with ILO Convention No.138 on Minimum Age;
- Respecting workers' rights for freedom of association and collective bargaining without fear of retaliation or discrimination for exercising those rights;
- Providing a safe and healthy working environment;
- Complying with all applicable laws regarding working hours, overtime and fair compensation, and aligning with ILO standards on maximum working hours;
- Promoting diversity, equity and inclusion and striving to eliminate all forms of discrimination, harassment and bullying, ensuring all workers are treated with dignity and respect;
- Protecting vulnerable groups who may face increased risks of discrimination, exploitation and abuse;
- Respecting land, natural resources, and indigenous peoples' rights.

Our business structure, operations and supply chains continued

Colleague Code of Conduct

Our Colleague Code of Conduct (the *Colleague Code*) sets out the principles and standards expected of all employees, officers, and directors of SSP Group and its subsidiaries, regardless of where they work.

The Colleague Code provides guidance on identifying and managing key ethical issues, along with direction on where to find more detailed information and who to approach for advice.

It also includes a dedicated section on modern slavery and forced labour, outlining our commitment to respecting and protecting the human rights of anyone working for us in any capacity.

The full internal Colleague Code is available to employees via our intranet and SharePoint sites.

Speak Up Policy

Our Speak Up Policy reinforces our commitment to conducting business with honesty, integrity, and accountability, while fostering a culture where people feel safe to speak up.

The policy provides a clear framework for reporting, investigating, and addressing concerns about suspected wrongdoing, including matters related to modern slavery.

Individuals are encouraged to raise concerns with designated contacts, their Country Whistleblowing Officer, or through the confidential Group Helpline.

The helpline is independently operated, and all reports are handled in strict confidence by specially trained operators. Reports can be made anonymously, and SSP maintains a strict non-retaliation policy for anyone who raises a concern in good faith.

The SSP Group plc Board, in conjunction with the Audit Committee, oversees compliance with this policy and receives regular updates on the number and nature of reported cases. Serious matters are escalated to the General Counsel and the SSP Group plc Audit Committee for exceptional monitoring.

The Speak Up policy and reporting process were officially launched in New Zealand in early 2026.

Grievance Mechanisms

We also operate local grievance mechanisms that are available to all employees to raise issues or concerns, including those related to human rights and modern slavery.

Local Workplace Behaviour Guidelines

In alignment with the SSP Group Colleague Code and Speak Up Policy, we have developed local Workplace Behaviour Guidelines that incorporate all relevant Australian and New Zealand workplace conduct legislation.

Training aligned to these Guidelines has been implemented to support compliance and promote ethical and lawful workplace practices across our operations.

100% of our senior managers have completed the workplace behaviour training

100% of contracted suppliers have signed-up to our Supplier Code or demonstrated their own equal standards





Modern slavery risks

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.

SSP Group conducts annual risk assessments to identify and prioritise human rights risks, drawing on external sources, including reports by ILO and the Global Slavery Index³. These assessments consider both inherent risks – based on country and sector. Insights from internal audits, the gap analysis conducted by the Slave-free Alliance (see opposite), supplier due diligence and engagement with workers and business partners are reviewed by SSP Group senior leadership and used to refine global policies, standards and training. This feedback loop enables SSP Group to continuously strengthen our approach and respond to emerging risks.

Key risks in our operations

Our risk assessments indicate that the highest modern slavery risk exposure in our own operations relates to migrant workers in frontline team member roles.

For example, the latest report on global estimates of modern slavery found that “the forced labour prevalence of adult migrant workers is more than three times higher than that of adult non-migrant workers”.⁴

With over 40 different nationalities represented, we employ a diverse mix of Australian citizens and visa holders. While this diversity enriches our operations, it may also present vulnerabilities particularly for younger workers, casual employees and visa holders.

3. Walk Free (2023), *The Global Slavery Index*, Minderoo Foundation.

4. *Global Estimates of Modern Slavery* (Sept 2022), page 4. ILO, Walk Free, and the International Organization for Migration (IOM).

5. *Ibid*, page 30-33.

Key risks in our supply chains

Our risk assessments indicate greater potential exposure in parts of the supply chain where suppliers operate in countries classified by the Global Slavery Index as having elevated rates of modern slavery.

Consistent with the ILO’s Global Estimates of Modern Slavery, we also recognise that certain sectors particularly manufacturing, construction, agriculture and fishing present higher inherent risks due to labour intensity, complex subcontracting structures and the use of vulnerable worker populations.

We utilise Supplier Ethical Data Exchange (Sedex) as our primary platform for assessing and monitoring our top contracted suppliers. Sedex is an independent system designed to support companies in evaluating, tracking and reporting on ethical supply chain practices.

We require our tier one contracted suppliers to become members of Sedex and, through the platform, we conduct risk assessments and ongoing due diligence activities. The Sedex risk assessment tool enables us to evaluate inherent country and sector risks relating to human rights, labour standards and health and safety, alongside supplier-specific data, as illustrated in the graphic on [page 10](#).

In addition, all suppliers engaged by SSP Australia are required to formally acknowledge and comply with our Modern Slavery Policy as part of the onboarding process, reinforcing our expectations regarding ethical conduct and labour standards.

Membership of the Slave-Free Alliance

Since 2024, SSP Group have been members of the Slave-Free Alliance (SFA), a global social enterprise dedicated to eradicating modern slavery.

SFA conducted a Group-wide gap analysis in 2024 on SSP’s global approach to human rights and modern slavery. The findings from this analysis have informed Group risk assessments and action plans.

In Australia, we continue to benefit from SSP Group’s membership with access to SFA’s specialist resources, support and growing network of like-minded companies.

“As our partnership with SSP continues to grow, we’re proud to support their efforts to strengthen risk management practices and documentation.

This year, we collaborated on the review and launch of their Human Rights Policy and helped shape their new Migrant Worker Standard.

Looking ahead to 2026, we’re excited to continue working together to implement key priorities from their action plan, helping SSP uphold human rights across their value chain.”

Rachel Hartley,
Consultancy Director, Slave-Free Alliance



Actions taken to address risks

We are committed to taking action to manage and mitigate modern slavery risks across our business operations and supply chains.

Addressing risks in our operations

To mitigate the risk of worker exploitation by unethical labour agencies, we manage recruitment directly for all employees through a structured, centralised, and transparent process overseen by our People Services team.

A new Recruitment Guideline has been implemented across the SSP Asia Pacific Region, of which Australia is part of. These Guidelines outline appropriate processes for managing recruitment and onboarding activities in Australia and New Zealand, ensuring alignment with local standards and legislation.

Job advertisements are published only after approval by People Services, and interviews for each role are conducted by the responsible hiring managers. The recruitment process follows a defined approval workflow, beginning with advertisement approval and concluding with the successful appointment of a candidate.

Once an appointment is confirmed, the People Services team, supported by the Human Resources (HR) team, conducts onboarding due diligence and contracting processes. This includes:

- Reviewing visa requirements and work rights status.
- Verifying compliance with relevant industrial awards, certifications, and qualifications.
- Conducting employment reference checks and, where applicable, police background checks.

Copies of relevant visas, certifications, and qualifications are securely recorded and stored within our HR systems to ensure compliance and traceability. We do not retain original passports, identity documents, or visas; these are promptly returned to employees once verification checks are completed.

Employee training and communications further support the mitigation of modern slavery risks by raising awareness and understanding.

All senior managers globally are required to complete mandatory modern slavery training as part of their induction. In 2025, we maintained 100% compliance with this requirement.

To strengthen our approach, SSP Group introduced an updated human rights e-learning course in 2025. This training targets a broader group of colleagues, incorporates real-life business scenarios, and was initially rolled out to Senior Leadership. It is being progressively implemented across SSP Australia and New Zealand throughout 2026.

In addition, the SSP Group Human Rights SharePoint Hub provides colleagues with access to a wide range of resources and learning materials, including SSP policies and procedures, as well as SFA best-practice toolkits, guidance documents, and webinar recordings. The Hub was updated at the end of 2025 to reflect the new Human Rights Policy.

To support the rollout of the updated Supplier Code of Conduct at the end of 2025, SSP Group also launched a dedicated Supplier Code SharePoint Hub. This provides resources to support effective implementation, including detailed guidance, supplier engagement materials, a compliance tracker, and a risk assessment tool.

100% of our senior managers have completed modern slavery training

Actions taken to address risks continued

Addressing risks in our supply chains

We utilise Sedex as our primary tool for assessing modern slavery and broader human rights risks within our tier one contracted supplier base. Sedex is an independent platform designed to support companies in evaluating, tracking and reporting on ethical supply chain practices. This includes the use of the Sedex Self-Assessment Questionnaire (SAQ) and the Sedex risk assessment methodology, as illustrated on [page 10](#) of this Statement.

Consistent with the ILO's Global Estimates of Modern Slavery, we also recognise that certain sectors particularly manufacturing, agriculture and fishing present higher inherent risks due to labour intensity, complex subcontracting structures and the use of vulnerable worker populations.

We require our top contracted suppliers to become members of Sedex and, through the platform, we conduct risk assessments and ongoing due diligence activities. The Sedex risk assessment tool enables us to evaluate inherent country and sector risks relating to human rights, labour standards and health and safety, alongside supplier-specific data.

In addition, all suppliers engaged by SSP Australia are required to formally acknowledge and comply with our Modern Slavery Policy as part of the onboarding process, reinforcing our expectations regarding ethical conduct and labour standards.

Due diligence findings

Following an on-site SMETA audit conducted on a high-risk seafood supplier in 2024, that we reported on in last year's statement, we were pleased to see an improvement in a new audit conducted at the end of 2025.

While issues relating to issues missing payroll records and late wage payments were identified, there were no findings relating to modern slavery, child labour or other severe human rights violations.

The supplier's corrective actions are in progress, and their risk profile has been reclassified to medium risk having now demonstrated a good level of management competency.

In 2026, we will conduct new supplier risk assessments, ensuring due diligence reviews are conducted for all suppliers identified as high-risk within a three-year cycle.

Mitigating risks at source

We recognise that modern slavery risks often arise in upstream agricultural and fisheries production, where we have limited ability to conduct direct oversight. To mitigate these risks, we rely on independent third-party certifications for key ingredients.

Certifications such as Fairtrade, the Roundtable on Sustainable Palm Oil (RSPO), and the Marine Stewardship Council (MSC) provide assurance that commodities are produced in accordance with environmental, social and labour standards that include modern slavery safeguards.

These certifications also provide assurance to our procurement team, clients and customers that the products we source meet established and credible environmental, social and labour benchmarks.

For example, Fairtrade-certified farms must prohibit all forms of forced, bonded, and child labour, implement measures to prevent these practices, and provide accessible grievance mechanisms. Any farm found to use forced or child labour is immediately decertified.

Given our operating footprint across quick-service restaurants, coffee and bakery formats, and grab-and-go outlets, we consider palm oil and palm derived ingredients to present an inherent modern slavery risk in our supply chains. This risk sits predominantly in upstream agricultural production and processing, where traceability beyond our direct suppliers is often limited.

By the end of 2025, we achieved 100% Fairtrade certification across all own-brand coffee sourcing. We also remain focused on ensuring that the top 50 own-brand products in each market are either free from palm oil or utilise only RSPO-certified sustainable palm oil.

For MSC-certified fisheries, they are required to report publicly on the measures they are taking to address forced and child labour. An entity convicted of forced or child labour is removed from any MSC-certified fishery.

Given the dynamic nature of our operations, including new brands and partners and evolving supply contracts our procurement team maintain ongoing oversight to ensure continued progress against our certification-based risk-mitigation strategy.

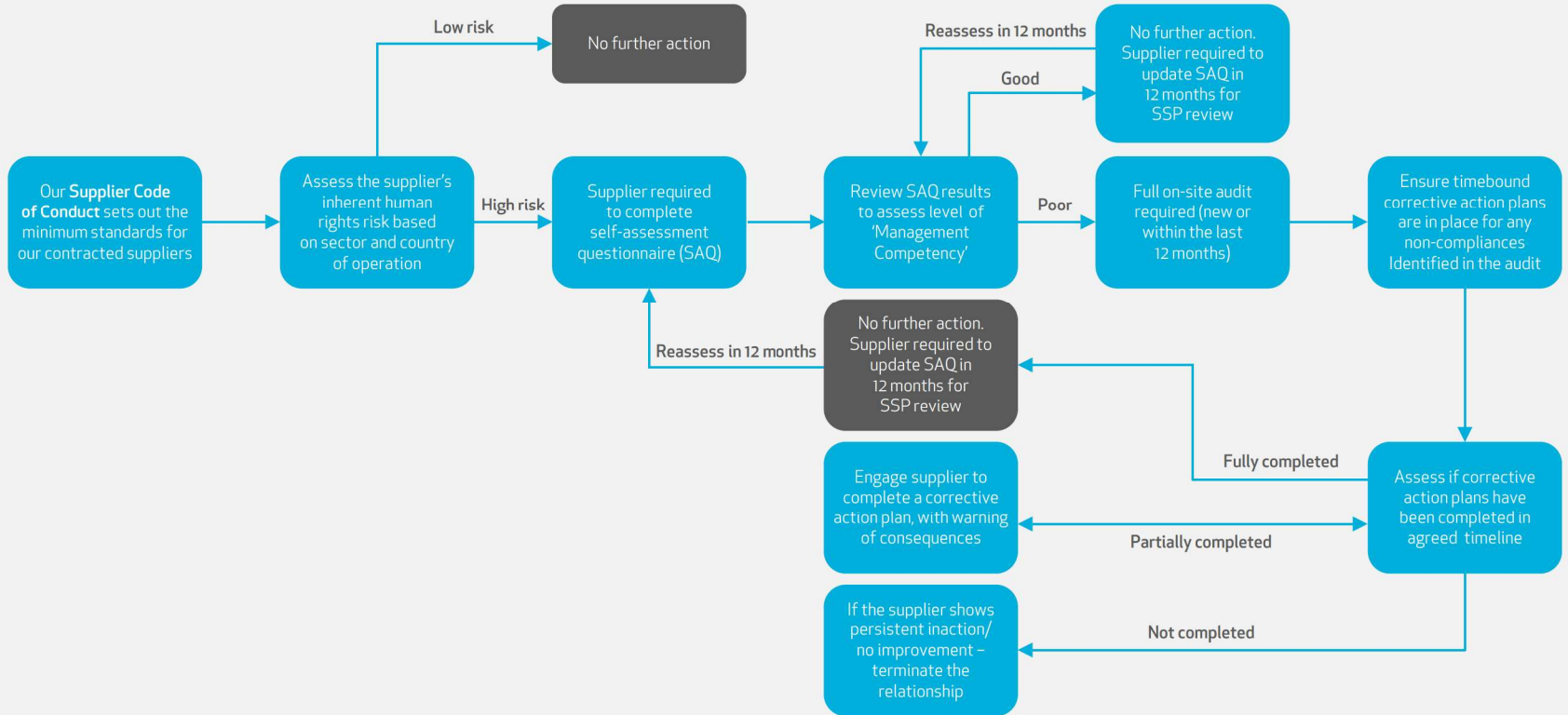
As can be seen in the charts on [page 11](#) we are pleased to have fully delivered all the targets in SSP Australia.

For 2026, we remain committed to strengthening our due diligence, maintaining our certification achievements, and continuing to improve the transparency and robustness of our supply chain oversight in accordance with the expectations of the Australian Modern Slavery Act.

100% of hot beverages and seafood for our own brands are from sources certified against independent standards, such as Fairtrade

Actions taken to address risks continued

Our tier 1 supply chain human rights due diligence process





Effectiveness of our actions

We are committed to measuring the effectiveness of our approach to help strengthen and enhance human rights management and risk mitigation.

We measure our actions against the targets in the charts opposite, which form part of the SSP Group Sustainability Strategy targets.

The performance against our targets shown in the charts opposite relates to SSP Australia Catering and ARE for 2025. Data for previous years is for SSP Catering only, as this was prior to our acquisition of ARE.

For 2026, we are fully committed to maintaining performance and driving continued progress.

See the [SSP Group Sustainability Data Book 2025](https://www.foodtravelexperts.com/sustainability) for details of global performance data, including data scope, definitions and methodologies at: [foodtravelexperts.com/sustainability](https://www.foodtravelexperts.com/sustainability)

Performance against our targets

% contracted suppliers signed up to our Supplier Code or demonstrated their own equal standards

	Target
2025	100%
2024	100%
2023	100%

% of high-risk contracted suppliers undergone our human rights due diligence reviews

	Target
2025	100%
2024	100%
2023	100%

% of hot beverages for our own brands from sources certified against independent standards

	Target
2025	100%
2024	100%
2023	100%

% of fish/seafood for our own brands from sources certified against independent standards

	Target
2025	100%
2024	98%
2023	100%

% of top 50 own brand products palm oil-free or only use RSPO Certified Sustainable Palm Oil

	Target
2025	100%
2024	100%
2023	100%

% of senior managers that have completed modern slavery training

	Target
2025	100%
2024	100%
2023	100%

Process of consultation and other relevant information



We actively engaged and consulted with the relevant entities within the scope of this joint statement to ensure a collaborative and comprehensive approach to addressing modern slavery risks.

The consultation process involved regular discussions to clarify and align on the specific reporting requirements under the Act, as well as the roles and responsibilities of each entity in meeting these obligations.

We collected and reviewed data on actions taken to date, identified areas for improvement and developed forward-looking strategies to enhance our compliance and risk mitigation efforts.

Throughout the process, we facilitated the exchange of relevant information with relevant stakeholders. This included providing detailed guidance and updates on key developments and sharing resources to support a consistent and informed approach across the Reporting Entities.

This ongoing engagement has been critical in helping to ensure this statement reflects a unified commitment to addressing modern slavery risks across our operations and our supply chains.

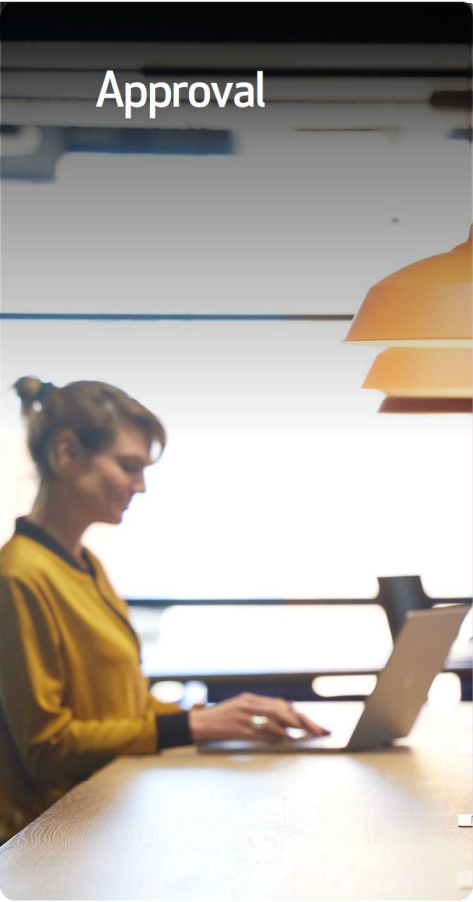
Next steps

We plan to undertake the following actions in 2026 to further strengthen our approach:

- Continue to roll-out a strengthened human rights training programme (developed by SSP Group) that will reach a larger proportion of colleagues and has been tailored to be more specific to real life business scenarios.
- Continue to review and streamline our supplier base to focus on a smaller number of selected supplier partnerships, helping to enhance supply chain security and controls.
- Continue to conduct new supplier risk assessments and integrate ARE contracted suppliers into the process, ensuring due diligence reviews are conducted for all those identified as high-risk within a three-year cycle.
- Roll out the new SSP Group core values nationally.
- Continue to engage and collaborate with the Slave-Free Alliance by working together to implement key priorities from the current action plan, helping SSP uphold human rights across our global value chain.



Approval



Pursuant to s14(1) of the Act this Statement has been approved by the Board of Directors of each of the Reporting Entities and represents the reporting period for the financial year ending 30 September 2025.

SSP Australia Catering Pty Ltd

Signed by the below named director on behalf of SSP Australia Catering Pty Ltd

Name	Job title	Signature	Date
Dominic Cain	Director		19 March 2026

Airport Retail Enterprises Pty Ltd

Signed by the below named director on behalf of Airport Retail Enterprises Pty Ltd

Name	Job title	Signature	Date
Dominic Cain	Director		19 March 2026



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