



# Modern Slavery Statement 2024

# Welcome

## to our 2024 Modern Slavery Statement

### About this statement

This statement is published in accordance with the statutory obligations legislated within the Modern Slavery Act (Cth) 2018 (the Act).

It is a joint statement between SSP Australia Catering Pty Ltd (SSP Australia Catering) and Airport Retail Enterprises Pty Ltd (ARE) together referred to as SSP Australia<sup>1</sup>, each of which is a Reporting Entity under the Act.

The Reporting Entities are proprietary companies registered in Australia under the Corporations Act 2001 (Cth) and are wholly owned subsidiaries of SSP Group plc (SSP Group), a UK public company listed on the London Stock Exchange.

SSP Group is subject to its own reporting obligations under the UK Modern Slavery Act 2015.

The reporting period relates to our 2024 financial year, ending 30 September 2024.

1. SSP Australia Catering Pty Ltd (ACN134 475 924) (SSP Australia Catering) and Airport Retail Enterprises Pty Ltd (ACN008 749 031) (ARE). References to 'SSP Australia', 'we', 'us' or 'our' include all the Reporting Entities taken together.

All data and references in this statement to performance and target dates relate to our financial year-end, unless otherwise stated.

This statement covers the seven reporting criteria required by the Act to be included in modern slavery statements.

### Further information

- 1. The **SSP Group plc Sustainability Report 2024** provides detailed information on our global Sustainability Strategy and performance at: [foodtravelexperts.com/sustainability](https://foodtravelexperts.com/sustainability)
- 2. The **SSP Group plc Annual Report 2024** provides details of the SSP Group Strategy, governance and performance at: [foodtravelexperts.com/investors/annualreport](https://foodtravelexperts.com/investors/annualreport)
- 3. The **SSP Group policies and UK Modern Slavery Statements** at: [foodtravelexperts.com/who-we-are/policies-and-statements/](https://foodtravelexperts.com/who-we-are/policies-and-statements/)

## Contents

Our business structure, operations and supply chains	3
Modern slavery risks	7
Actions taken to address risks	8
Effectiveness of our actions	11
Process of consultation and other relevant information	12
Approval	13



# 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 37 countries globally, we operate nationally in 12 Australian airports and one railway station.

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 the SSP Group 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.

SSP Australia Catering has operated in Australia since 2009. In May 2024, we grew our business with the acquisition of ARE, adding 62 outlets across seven airports to our portfolio and welcoming over 1,600 new colleagues.

See the [SSP Group plc Annual Report 2024](#) for further details of the SSP Group strategy and governance structure at: [foodtravelexperts.com/investors/annualreport](https://foodtravelexperts.com/investors/annualreport)

## Our Sustainability Strategy

Sustainability is a key strategic priority at SSP. We see it as essential for our long-term success and to fulfilling our purpose.

The SSP Group Sustainability Strategy focuses on the three key areas of Product, Planet and People.

Within these sit our 10 key commitments focused on the most material issues for our business and stakeholders, including commitments to sourcing sustainably and respecting human rights. These commitments are supported by clear and measurable targets.



See the [SSP Group Sustainability Report 2024](#) for detailed information on our global Sustainability Strategy and performance at: [foodtravelexperts.com/sustainability](https://foodtravelexperts.com/sustainability)

## Our 2024 business highlights

**\$172 m**  
revenue

**13**  
travel locations

**106**  
food and drink outlets

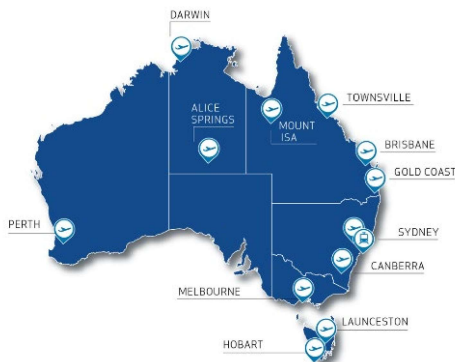
**c.2,300**  
employees

**c.400**  
suppliers

## Our business structure, operations and supply chains continued

Our value chain starts with upstream suppliers and ends with our downstream customers and communities.

Our own operations are at the centre of our value chain, where we have the greatest control over our own impacts and the most influence regarding the impacts of our clients and partners.



### Upstream

We collaborate with local and global suppliers to source fresh produce, meat, dairy, bakery items, snacks and beverages for our brands and operations. While we prioritise local sourcing for fresh ingredients, we also procure specialised products globally.

#### Farms and fisheries

The raw ingredients and materials for our products are grown, gathered, reared or fished by farmers and producers around the world.

We primarily source these ingredients and finished products through manufacturers, wholesalers and distributors within Australia.

As we have limited direct farm or fishery-level sourcing, we focus on ensuring that our highest-risk ingredients are from sources that have been certified against a recognised independent sustainability standard, such as Fairtrade.

#### Manufacturers, wholesalers and distributors

Our direct supplier relationships are with c.400 suppliers, including national and local distributors and sourcing our beverages through integrated business partnerships.

Our suppliers are valued business partners, and we are committed to treating them fairly and with respect while building long-lasting, mutually beneficial relationships. By working together, we believe we can raise standards and drive sustainable practices across our supply chains.

### Own operations

In 2024, we operated 106 food, beverage and retail outlets within 13 travel locations.<sup>2</sup>

#### Clients

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

#### Brands and brand partners

We have a wide portfolio of brands, including our own and those we franchise.

Our own brands include Two Johns, Local Bar & Eatery, The Independent and Quikshots Café Works. We also own three registered trademarks, “Pronto”, “Wok on Air” and “Ignite Grill”, that are used throughout operations.

In addition to our own brands, we operate franchises for a wide range of local and international brands, such as Roll’d and Hungry Jacks, leveraging our expertise to seamlessly introduce them into the travel environment.

#### Colleagues

Our people are at the core of our business and we are committed to ensuring that SSP is the best part of their career journey.

At the end of 2024, we employed over 2,300 people, of whom around 70% are frontline team members. Our colleagues are a combination of both permanent and casual employees; with 67% of our workforce employed as casuals responding to the seasonal peaks in our business.

### Downstream

We serve quality food and drink to travelling customers around the world.

#### Customers

Our customers enjoy our products either in our outlets or take them away to consume during their journey.

Whether they are flying for a holiday or commuting to work by train, we are committed to making our customers’ food and drink experience the best part of their journey.

#### Communities

We play an important role in the communities where we live and work, creating jobs and contributing to local economies.

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.

At the individual level, operational units are overseen by general managers, who are supported by duty managers/supervisors. These General Managers report to the National Chief Operations Officer, creating a structured and streamlined reporting hierarchy that ensures alignment across the Australian region.

The following SSP Group policies play a crucial role in forming the backbone of our approach. They have been adopted by SSP Australia and integrated into our local internal policies, standards and procedures.


### Human Rights Policy

Our Human Rights Policy sets out our standards, commitments and expectations for all our business operations, colleagues and suppliers to adhere to and work towards.

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.

Our policy 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 working to ensure we have appropriate controls in place for managing, mitigating and remedying human rights risks and impacts. And we strive to comply with the internationally recognised code of labour practice, the Ethical Trading Initiative (ETI) Base Code.

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

### Supplier Code of Conduct

Our Supplier Code of Conduct (Supplier Code) sets out the minimum standards we expect our contracted suppliers to adhere to, including for human rights. As with our Human Rights Policy, this includes our expectation for our suppliers to strive to comply with the ETI Base Code.

We expect all our contracted suppliers to sign-up to our Supplier Code or demonstrate their own equal or better standard. By the end of 2024, 100% of our contracted suppliers for SSP Australia Catering had met this requirement.

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. In most cases, our brand partners stipulate we use their contracted suppliers, in which case they are subject to our brand partners' own policies and due diligence procedures.

In 2025, as part of the integration of our newly acquired ARE business, we will engage ARE's contracted suppliers on our Supplier Code.

## Spotlight

### Our modern slavery policy criteria

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

## Our business structure, operations and supply chains continued

### Colleague Code of Conduct

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

This Colleague Code provides 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.

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.

The detailed internal Colleague Code is available for our employees on our intranet and SharePoint sites

### Speak Up Policy

Our Speak Up Policy supports 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 SSP Group plc 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 the SSP Group plc Audit Committee to be monitored on an exceptional basis.

In alignment with the SSP Group Colleague Code and Speak Up Policy, we have developed our own local Workplace Behaviour Guidelines, which incorporate and encapsulate all relevant Australian legislation on workplace conduct. This helps to ensure compliance and promotes ethical and lawful practices within our operations.

We also operate local Grievance Mechanisms that are available to all employees to report any issues or concerns, including in relation to human rights and modern slavery.

## 100% of contracted suppliers for SSP Australia Catering have signed-up to our Supplier Code or demonstrated their own equal or better standards



### Spotlight

#### Our values

Our values play a key role in delivering the SSP Group purpose, vision and strategy by guiding our culture, behaviours and decisions. They help ensure we act in the best interests of our stakeholders, the environment and our business.



#### We are one team

Working together and sharing our best ideas to fulfil our global potential.



#### We are results focused

Delivering great food and service for our customers and outstanding results for our colleagues, clients and shareholders.



#### We all make a difference

Respecting each other, acting responsibly and sustainably and being accountable for the contributions that we make.



#### We are bold

Seizing opportunities, innovating and quickly adapting every day.



#### We celebrate success

Recognising and valuing everyone's achievements.

## 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 risk assessments to help identify the nature and extent of exposure to modern slavery risks across the global businesses and help ensure we prioritise our efforts in the right areas.

These assessments draw on external sources, such as reports by the ILO and the Global Slavery Index<sup>3</sup>, and consider inherent risks based on the country and sector, as well as actual risks identified through due diligence procedures.

### 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”.<sup>4</sup>

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.

### Key risks in our supply chains

3. Walk Free (2023), [The Global Slavery Index](#), Minderoo Foundation.
4. Global Estimates of Modern Slavery (Sept 2022), page 4. The International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM).
5. Ibid, page 30-33.

Our risk assessments indicate the highest modern slavery risk exposure in our supply chains 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 ILO's Global Estimates of Modern Slavery report, suppliers in manufacturing, agriculture and fishing are recognised as having higher inherent modern slavery risks.<sup>5</sup>

We use the Supplier Ethical Data Exchange, known as Sedex, as the primary means to conduct human rights due diligence on our contracted suppliers. Sedex is an independent platform that helps companies assess, monitor and report on ethical supply chain practices.

We expect our contracted suppliers to become members of Sedex and, through the perform, we carry out risk assessments and due diligence, as illustrated in the graphic on [page 10](#).

We conduct risk assessments on our contracted suppliers 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.

### Case study

#### Joining forces with the Slave-Free Alliance

Human rights issues are complex and cannot be addressed in isolation. In 2024, SSP Group joined Slave-Free Alliance (SFA), a global social enterprise dedicated to eradicating modern slavery.

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

As a key first step, SFA conducted a Group-wide gap analysis of our approach to human rights and labour exploitation. Through document reviews and interviews with senior leaders and managers, SFA experts explored SSP Group's strengths and potential risks, tested and challenged assumptions and provided a clear set of practical recommendations.

SSP Group are now developing an action plan for implementation in 2025 with the support of SFA.

**“We are proud to be partnering with SSP. Throughout the gap analysis, we were struck by their openness and genuine commitment to learning and improving. In 2025, we will be supporting SSP on the implementation of their action plan and ongoing efforts to protect 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 risks of workers being exploited by unethical labour agencies, we manage recruitment directly for all our employees through a structured, centralised and transparent process, overseen by our People Services team.

Job advertisements are uploaded once approved by People Services and interviews for the individual positions, are conducted by the responsible managers. The recruitment process includes an approval workflow, beginning with the advertisements approval and concluding with the candidate's successful appointment to the position.

Once an appointment has been affected the People Services team conducts onboarding due diligence and contracting with support from the Human Resources (HR) team. This includes:

- Reviewing visa requirements and status;
- Verifying compliance with all industrial awards and certifications against qualifications;
- Employment references verification and conducting police background checks, if applicable.

Copies of all relevant visas, certifications and qualifications are recorded and securely stored in our HR system to ensure compliance and traceability. We do not retain original passports, identity papers

or visas – these are all promptly returned to the employee as soon as HR checks are completed.

Our employee training and communications help to further mitigate modern slavery risks by raising awareness and understanding.

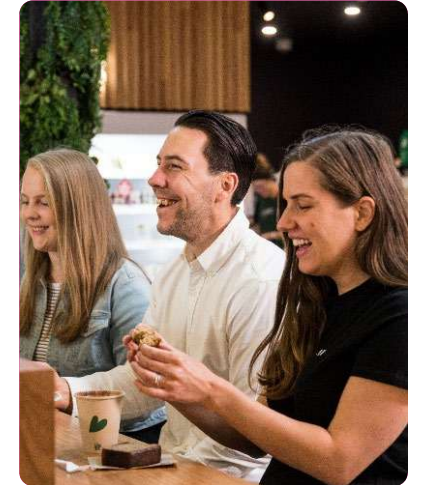
All senior managers globally are required to complete mandatory modern slavery training as part of their induction. In 2024, we maintained 100% compliance with this requirement for all senior managers in SSP Australia.

In 2024, we launched a dedicated 'Speak Up!' campaign aimed at increasing awareness of our channels for raising concerns and to address underreporting. While no incidences of modern slavery or human trafficking have been reported, the campaign has successfully resulted in an increase in reports through our Speak Up channels.

We plan to use these insights to better understand colleague concerns and drive continuous improvement in our management of human rights.

SSP Group also established a new Human Rights SharePoint Hub, launched in October 2024. This provides our managers with access to a range of resources and learning materials, including SSP policies and procedures, as well as SFA's best practice toolkits, guidance documents and webinar recordings.

**100% of our senior managers have completed modern slavery training**





## Actions taken to address risks continued

### Addressing risks in our supply chains

We use Sedex as the primary means to conduct human rights due diligence on our contracted suppliers. The key steps of the process are illustrated in the graphic on [page 10](#).

Suppliers identified as 'high risk' in our risk assessments are asked to complete the Sedex self-assessment questionnaire. This assesses their level of 'management competency' for managing and mitigating the inherent risks identified, considering factors such as their policies, risk management and due diligence procedures.

Suppliers that demonstrate a 'poor' level of management competency are expected to undergo an independent on-site audit, such as a SMETA (Sedex Members Ethical Trade Audit), a Business Social Compliance Initiative (BSCI) audit or an Intertek Workplace Conditions Assessment audit.

### Due diligence findings

In 2024, an on-site SMETA audit was completed on a seafood contracted supplier for SSP Australia Catering that had been identified as high-risk.

While no issues were found in relation to modern slavery or forced labour, the audit did identify non-conformances relating to age verification and payroll records not being consistently maintained. Isolated incidences of late payments of wages were also identified.

For all issues identified, we reviewed the supplier's corrective actions to ensure they were addressed in the agreed timescale.

In 2025, we will conduct new supplier risk assessments and integrate ARE contracted suppliers into the process, ensuring due diligence reviews are conducted for all suppliers identified as high-risk within a three-year cycle.

### Mitigating risks at source

Many of the human rights risks in our supply chain relate to the upstream farms and fisheries where the commodities are produced.

As we have limited direct farm or fishery-level sourcing, we rely on independent certifications for our highest risk ingredients (coffee, tea, cocoa, fish and palm oil).

These certifications, such as Fairtrade, Roundtable on Sustainable Palm Oil (RSPO) and Marine Stewardship Council (MSC), provide assurance to our procurement teams, clients and customers that the ingredients have been produced in line with environmental, social and labour criteria.

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. An entity convicted of forced or child labour is removed from any MSC-certified fishery.

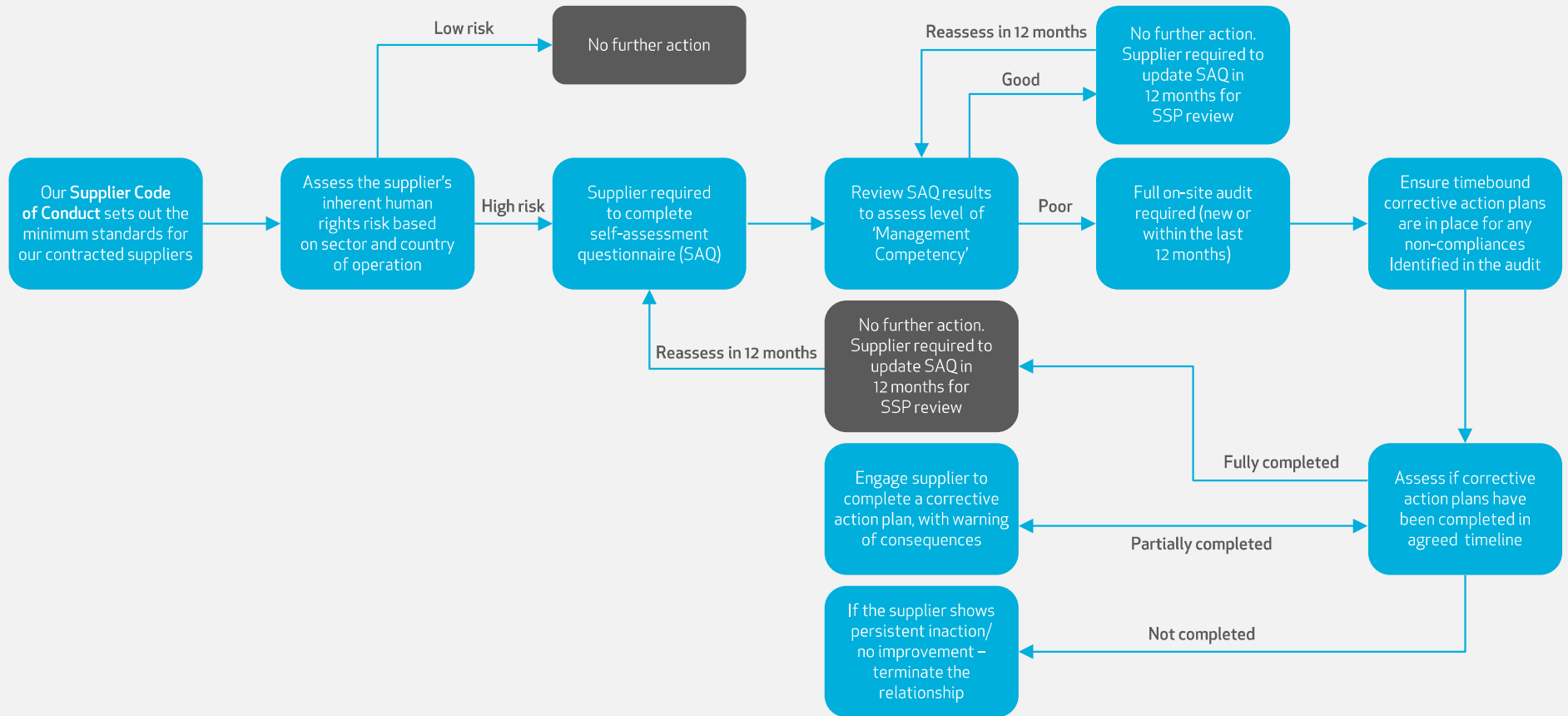
The dynamic nature of our business, with new brands, market entries and evolving supply agreements, means that driving progress against our certification targets an ongoing effort for our purchasing teams.

So, as can be seen in the charts on [page 11](#) we are pleased that SSP Australia Catering has maintained strong performance in 2024 (compared to 2023), with only a small decline on fish certification.



Actions taken to address risks continued

Our 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.

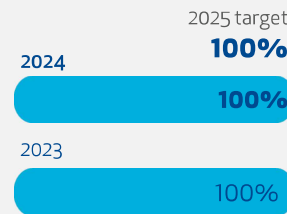
We measure our actions against the targets in the charts opposite, which form part of the SSP Group Sustainability Strategy targets.

The performance against our targets shown in the charts opposite relates to SSP Australia Catering only. In 2025, we will be integrating our ARE business into our sustainability targets and associated procedures.

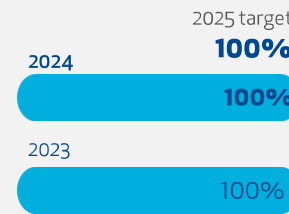
See the [SSP Group Sustainability Data Book 2024](https://www.foodtravelexperts.com/sustainability) for details of global performance data, including data scope, definitions and methodologies at: [foodtravelexperts.com/sustainability](https://www.foodtravelexperts.com/sustainability)

### SSP Australia Catering's progress against our targets

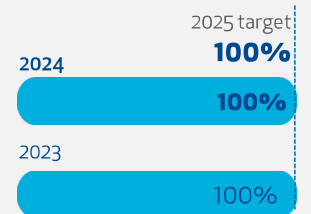
% of contracted suppliers have signed up to our Supplier Code or demonstrated their own standard



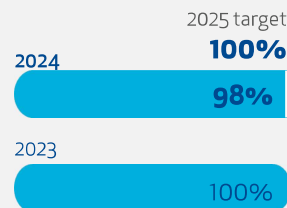
% of high-risk contracted suppliers undergone our human rights due diligence reviews



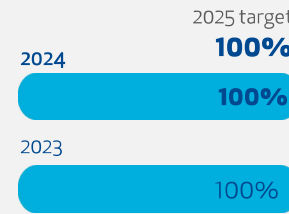
% of hot beverages for our own brands from sources certified against independent standards



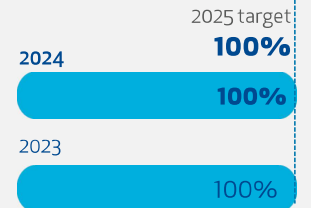
% of fish/seafood for our own brands from sources certified against independent standards



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



% of senior managers that have completed modern slavery training



## 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.

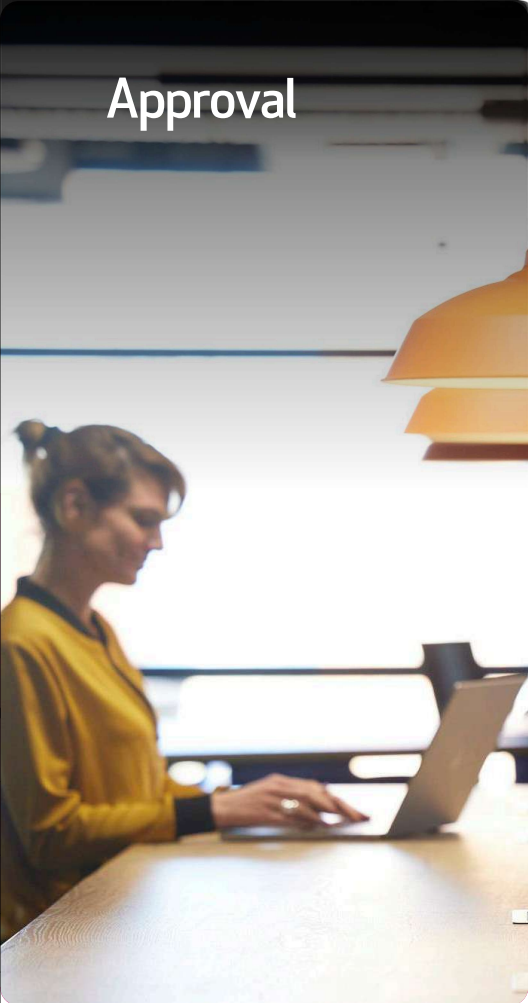
### Next steps

We plan to undertake the following actions in 2025 to further strengthen our approach :

- Roll-out a strengthened human rights and modern slavery 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.
- Adopt and implement a revised Human Rights Policy and associated internal standards and procedures, which SSP Group is reviewing and updating in response to key recommendations from the Slave-Free Alliance.
- Review and streamline our supplier base to focus on a smaller number of selected supplier partnerships, helping to enhance supply chain security and controls.
- Integrate ARE contracted suppliers into our Supplier Code requirements.
- 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.
- Integrate ARE business into our sustainability targets and associated procedures.



# 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 2024.

## SSP Australia Catering Pty Ltd

### Airport Retail Enterprises Pty Ltd

Signed by the Board of Directors, by the below named director on behalf of SSP Australia Catering Pty Ltd and Airport Retail Enterprises Pty Ltd

Name	Job title	Signature	Date
Johnathan Robinson	Director	 Johnathan Robinson (Mar 24, 2025 11:00 GMT+8)	17 March 2025
Dominic Cain	Director		17 March 2025
Matthew Jordan Hill	Director		17 March 2025
Steve Tang	Director		17 March 2025



**Email**  
modernslavery@ssp-au.com

**Website**  
[www.foodtravelexperts.com](http://www.foodtravelexperts.com)

**SSP Australia Catering Pty Ltd**  
Suite 201, 83 York Street  
Sydney NSW 2000  
Company number: 134 475 924

**Airport Retail Enterprises Pty Ltd**  
401 Nudgee Rd,  
Hendra, QLD 4011  
Company number: 008 749 031