

SSP Canada's Modern Slavery Report

1 Introduction

- 1.1 This is the first modern slavery report prepared by **SSP Canada Food Services Inc., SSP Quebec Food Services, Inc. / Services Alimentaires Quebec SSP Inc.** and **SSP Canada Airport Services, Inc.** (collectively, "**SSP Canada**") pursuant to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. This joint report is made for the financial year commencing on October 1, 2022 and ending on September 30, 2023 and outlines the measures we have in place and the efforts we have commenced to assess and address risks of modern slavery and human trafficking in our business and supply chain.

2 Our organisational structure, business operations and supply chains

- 2.1 **SSP Canada Food Services, Inc.** has two (2) subsidiaries: **SSP Quebec Food Services, Inc / Services Alimentaires Quebec SSP Inc.** and **SSP Canada Airport Services, Inc.**, where SSP Group, plc is the ultimate parent company.
- 2.2 We design, create and operate food and drink outlets in eight (8) airports within Canada. Our clients are primarily airport operators seeking to develop the right range of food and beverage brands and services to satisfy the needs of the travelling customer. Our ingredients and raw materials come from highly diversified supply chains. Our suppliers are primarily product manufacturers, distributors and wholesalers that can be many layers removed from the upstream farms or fisheries where the raw commodities are produced.
- 2.3 To learn more about our business, please visit our website at <https://america.foodtravelexperts.com>.

3 Our modern slavery risk profile

- 3.1 For our supply chains, the greatest area of possible risk exposure relates to suppliers in manufacturing, agriculture and fishing as they are recognised as having higher inherent modern slavery risks. Global estimates of modern slavery by the International Labor Organization (ILO) also indicate that the employment of migrant workers increases risk exposure.
- 3.2 In our business operations, the greatest area of possible risk exposure relates to the employment of migrant workers in front-line team member roles and the employment of contract labourers for the purpose of building out our restaurant units as they are recognised as having higher inherent modern slavery risks.

4 Actions taken to combat modern slavery risks

- 4.1 **SSP Canada** is currently building on the processes and procedures it has in place to prevent and reduce the risks of modern slavery, forced labour or child labour in its business operations and supply chains. Currently, the processes and actions being utilized by **SSP Canada** include, but are not limited to, the following:
- (a) ensuring appropriate contractual obligations reinforcing **SSP Canada's Supplier Code of Conduct and Human Rights Policy** are included in our standard agreements with suppliers and seeking the supplier's commitment to compliance with both that code and policy and any modern slavery legislation.

- (b) providing training to our employees to raise awareness of this issue within the organisation;
- (c) using the Supplier Ethical Data Exchange (SEDEX) as the primary means for conducting human rights due diligence on our contracted suppliers. SEDEX is a platform for storing, analyzing, sharing and reporting on ethical supply chain practices. **SSP Canada** expects its suppliers to become members of SEDEX; and
- (d) sourcing key ingredients for our own brands that come from farms or fisheries certified against recognised sustainability standards that include for human rights and forced labour criteria.

5 Our policies on modern slavery

- 5.1 **SSP Canada's Colleague Code of Conduct** reflects our commitment to acting ethically and with integrity in all our business relationships and to ensuring full respect for the human rights of anyone working for us in any capacity. It must be followed by all our employees and sets out how they all 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 and encourages employees to report any breach of the Colleague Code of Conduct through a freephone confidential helpline operated 24 hours a day, 7 days a week. The reporting can be done anonymously if they wish. A copy of our **Colleague Code of Conduct** can be found on our website at: <https://www.foodtravelexperts.com/media/kclht10g/code-of-conduct.pdf>
- 5.2 **SSP Canada** makes sure our suppliers are aware of our policies and adhere to the same high standards. Our **Supplier Code of Conduct** sets forth our expectations of all suppliers of goods and services to **SSP Canada** related to human rights, product quality, food safety, environmental sustainability, farm animal welfare and ethical business practices. It expressly prohibits the use of modern slavery, forced labour and child labour and requires suppliers to have appropriate controls for managing, mitigating and remedying human rights risks and impacts. A copy of our **Supplier Code of Conduct** can be found on our website at: https://www.foodtravelexperts.com/media/lidlyo0w/ssp-supplier-code-of-conduct-2023_final.pdf
- 5.3 **SSP Canada's Human Rights Policy** sets out our minimum standards for protecting human rights. It applies to all individuals working at all levels, including senior managers, officers, directors, employees, consultants, contractors, and other workers. A copy of our **Human Rights Policy** can be found on our website at: <https://www.foodtravelexperts.com/media/irydlhie/ssp-human-rights-policy-final.pdf>
- 5.4 The **Ethical Trading Initiative (ETI) Base Code**, which is founded on ILO conventions is appended to both our **Supplier Code of Conduct** and our **Human Rights Policy**. It reflects our commitment to ensuring that our prohibition of modern slavery is implemented through concrete measures both in our operations and throughout our supply chains. It contains clauses on freedom of employment, freedom of association, safety and cleanliness of working conditions, child labour, wages, working hours, discrimination, regular employment and mistreatment.

6 Our due diligence processes

- 6.1 **SSP Canada** seeks to do business with suppliers that have similar values, ethics and moral business practices as **SSP Canada**, including those related to human rights.
- 6.2 **SSP Canada** uses the Supplier Ethical Data Exchange (SEDEX) as the primary means for conducting human rights due diligence on our contracted suppliers. SEDEX is a platform for storing, analyzing, sharing and reporting on ethical supply chain practices. **SSP Canada** expects its suppliers to become members of SEDEX.
- 6.3 Further, as part of its modern slavery prevention initiatives, **SSP Canada** requires contracted suppliers to agree to a contractual provision which obligates the supplier to comply with our key policies. These include the following: (1) **Supplier Code of Conduct**, (2) Human Rights Policy; and (3) **Environment**,

Sourcing and Farm Animal Welfare Policy. These policies reflect **SSP Canada's** commitment to acting ethically and with integrity in all its business relationships and to enforcing effective systems and controls to prevent modern slavery from taking place in its business and supply chain.

7 Training

- 7.1 **SSP Canada** is committed to providing appropriate training to help strengthen and enhance our approach to tackling modern slavery. We have mandatory compliance e-learning programs that are a requirement for new management-level colleagues to complete as part of their induction. This includes mandatory modern slavery training for all our senior managers.

8 Remediation measures

- 8.1 In the reporting period, no instances of modern slavery, forced labour or child labour were identified through our due diligence processes or reported via our freephone confidential hotline. One supplier audit did, however, identify minor non-conformances relating to maintenance of sprinkler systems and employee awareness/training/communications on ETI policies and standards. For all issues identified, we reviewed the supplier's corrective actions to ensure they were addressed in the agreed timescale.

9 Remediation measures relating to loss of income to vulnerable persons

- 9.1 **SSP Canada** recognises that any remediation measures potentially have the unintended consequence of inflicting loss of income on vulnerable groups, such as migrant labourers, unskilled labourers, indigenous people, women, or children. We have not identified instances of modern slavery in our business operations and supply chains; therefore, we have not taken any remediation measures that would have led to loss of income to the most vulnerable families.


10 Effectiveness in combatting modern slavery risks

- 10.1 Our actions are measured against our targets and key performance indicators (KPIs), namely:
- (a) Each year, continue to work to ensure our contracted suppliers are signed up to our Supplier Code of Conduct;
 - (b) Each year, continue to work to ensure that our own brand products are palm oil free, or using Roundtable for Sustainable Palm Oil (RSPO) Certified Sustainable Palm Oil;
 - (c) Each year, continue to work to ensure that hot beverages (tea, coffee and hot chocolate) for our own brands come from farms certified against recognised sustainability standards;
 - (d) Each year, continue to work to ensure fish/seafood for our own brands come from fisheries certified against recognised sustainability standards; and
 - (e) Each year, continue to work to ensure senior managers have received modern slavery training as part of their induction.
- 10.2 Our KPI's enable us to measure effectiveness and monitor our progress in managing modern slavery risks within our business and supply chain.

11 Approval

- 11.1 This joint report was approved by the Board of Directors of **SSP Canada Food Services, Inc.** pursuant to subparagraph 11(4)(b)(ii) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* on May 24, 2024.

By: _____


George Mboya
CFO and Director
Date: May 24, 2024

I have the authority to bind **SSP Canada Food Services, Inc.**