

SSP Canada's Modern Slavery Report

Introduction

This modern slavery report has been 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, 2024 and ending on September 30, 2025 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.

1 Our organisational structure, business operations and supply chains

SSP Canada Food Services, Inc. operates 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.

We design, create and operate food and beverage outlets in airports across 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 Our policies on modern slavery, forced labour and child labour

SSP Canada maintains a framework of policies that support our commitment to ethical business practices and respect for human rights:

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>

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/puzn3abd/ssp-group-supplier-code-of-conduct-2025.pdf>

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/djmik411/ssp-global-human-rights-policy-2025.pdf>. Our **Human Rights Policy** is linked to many international standards, including the ILO Labour Standards. Our **Human Rights Policy** sets out standards to prevent child labour by applying a minimum age policy in accordance with International Labor Organization (ILO) Convention No.138 on Minimum Age. Further, our **Human Rights**

Policy is committed to having full compliance with all applicable laws regarding working hours, overtime and fair compensation, and aligning with ILO standards on maximum working hours.

The **Ethical Trading Initiative (ETI) Base Code**, which is founded on ILO conventions is appended to both our **Supplier Code of Conduct** and our **Global 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.

SSP Canada communicates its human rights and modern slavery policies through a combination of internal and external channels to ensure awareness, understanding, and consistent application. Internally, all employees are required to comply with our **Colleague Code of Conduct** and are provided with access to relevant policies, guidance materials and training through onboarding processes, mandatory compliance training, and internal learning platforms. SSP's broader framework also includes structured training programs and supporting materials designed to reinforce awareness and practical application of human rights requirements across the organization.

Externally, **SSP Canada** communicates its expectations to suppliers and business partners primarily through our **Supplier Code of Conduct** and through contractual obligations requiring compliance with applicable human rights, labour and ethical standards. Suppliers are expected to either adhere to SSP standards or demonstrate equivalent controls.

SSP Canada promotes a culture of transparency and accountability through accessible reporting mechanisms, including a confidential whistleblowing channel that allows employees, suppliers and other stakeholders to raise concerns, including suspected modern slavery, anonymously where permitted by law. All concerns are reviewed and investigated where appropriate, and retaliation is strictly prohibited.

Compliance with **SSP Canada's** policies is supported through contractual controls, supplier due diligence processes, internal monitoring and, where necessary, corrective action plans. Non-compliance may result in remedial actions, including enhanced monitoring, implementation of corrective measures or termination of business relationships, consistent with SSP Group practice. **SSP Canada** is committed to the continuous development and strengthening of its approach to identifying, preventing and addressing modern slavery risks.

During the reporting period, SSP's **Global Human Rights Policy** was updated to provide more detailed guidance on key human rights risks and to formalise the adoption of the Employer Pays Principle, reinforcing the prohibition of worker-paid recruitment fees. In addition, we have enhanced our **Supplier Code of Conduct** to align with updated human rights expectations and expanded its application to include broader categories of suppliers and business partners.

3 Risk management processes in place to assess and address the risk of modern slavery, forced labour and child labour practices

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.

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 ILO also indicate that the employment of migrant workers increases risk exposure. **SSP Canada** is mitigating these higher-risk supply chain exposures through enhanced risk-based due diligence, including the use of the Supplier Ethical Data Exchange (SEDEX) risk assessment tools, targeted supplier audits, and reliance on independent certification schemes for key commodities, supported by strengthened **Supplier Code of Conduct** requirements.

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. **SSP Canada** is addressing heightened risks associated with migrant workers through enhanced operational controls, including adoption of the Employer Pays Principle, implementation of a new Migrant Worker Standard, and strengthened due diligence and audit procedures for labour agencies and recruitment practices.

4 Our due diligence processes

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.

SSP Canada uses 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.

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.

SSP Canada recognises that remediation actions may have unintended impacts on vulnerable individuals. As no instances of modern slavery were identified during the reporting period, **SSP Canada** did not undertake remediation actions that could have resulted in loss of income to affected individuals. If instances were to be identified, **SSP Canada** would assess appropriate actions, which may include investigation, corrective action plans, supplier engagement or termination, and consideration of impacts on affected individuals.

5 Training provided to employees on modern slavery, forced labour and child labour

SSP Canada is committed to providing appropriate training and resources to help strengthen and enhance our approach to tackling modern slavery. We have mandatory compliance e-learning and in-person 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.

To further reinforce our strategy, **SSP Canada's** human rights and modern slavery e-learning course for 2025 have been updated. This training is designed for a wider audience of employees and incorporates practical business scenarios. The program will be implemented in phases throughout 2026, commencing with senior managers and subsequently extending to colleagues in key functions such as procurement and recruitment.

In 2026, we plan to further develop additional resources aimed at further enhancing human rights and modern slavery training and awareness initiatives.

6 Effectiveness in combatting modern slavery risks

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 and for those contracted suppliers with higher human rights risks, ensure those suppliers undergo our human rights due diligence;
- (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.

These KPIs support ongoing monitoring and improvement of **SSP Canada's** approach to managing modern slavery risks.

7 Any other information the organization considers relevant

Our approach to managing modern slavery risks is aligned with the broader governance and oversight framework of our parent company, SSP Group plc, which provides central policy direction, guidance and performance monitoring.

At the Group level, the Board of Directors has overall responsibility for overseeing human rights risks and the effectiveness of related policies and controls. Responsibility for implementation is supported by senior leadership and functional teams, including sustainability, legal and procurement functions, ensuring accountability across all levels of the organization.


Human rights considerations are embedded within SSP's wider sustainability strategy, which includes specific commitments and measurable targets relating to responsible sourcing and respect for human rights.

SSP also collaborates with external organisations and subject matter experts to strengthen its approach to modern slavery risk management, including participation in industry initiatives and engagement with third-party advisors to assess and improve policies and practices.

SSP Canada will continue to align its approach with evolving regulatory requirements and industry best practices, while leveraging Group-level expertise, tools and frameworks to support effective implementation at the local level.

8 Approval

- 8.1 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 22, 2026.

By: 

George Mboya
Deputy CEO, and Director
Date: May 22, 2026

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