

SUPPLIER CODE OF CONDUCT

You don't have to be good to eat good food.

Camden
food co.

Camden
food co.

Camden
food co. we take the
natural route

Leave this food
NEW YORK
Love this moment

Born in nature,
made by us

Camden
food co.



SSP The Food
Travel Experts

April 2023

INTRODUCTION

At SSP, our purpose is to be the best part of the journey. This drives our culture as an organisation as we aspire to our vision to be the world's best travel food and beverage company.

To deliver our purpose and vision, we are focused on growing our market-leading positions in the food travel sector in international markets.

Sukh Tiwana

Chief Procurement Officer



We are committed to sourcing our products and services responsibly and sustainably, with due care for the environment and the people involved in their production and manufacture.

As such, this Supplier Code of Conduct outlines our minimum expectations for our suppliers. We also encourage our suppliers to strive for best practice and continuous improvement within their own operations and supply chains.

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

PURPOSE, SCOPE AND APPLICATION

This Supplier Code of Conduct ('Supplier Code') outlines the minimum standards we expect our suppliers to adhere to and work towards. It incorporates the supplier-related standards of our previous Ethical Trade Code of Conduct, our Responsible Sourcing Policy, our Environment Policy, and our Farm Animal Welfare Policy (dated April 2021) into one consolidated document. In addition, it includes new standards and expectations for our suppliers, as part of our commitment to continuous improvement.

This Supplier Code outlines SSP's expectations of its suppliers of goods and services (collectively referred to as 'Suppliers'). Some elements of this Supplier Code relate to specific types of Suppliers (such as for meat products), which are defined in the relevant sections.

Suppliers are expected to meet the standards set out in this Supplier Code, or demonstrate their own equal or better standards. We also encourage our brand partners to follow these or their own equal or better standards.

Definitions for terms and standards used in this Supplier Code can be found in [Appendix A](#).

SUPPLIER STANDARDS

Legal compliance

We expect our Suppliers to comply with all relevant laws, codes, and regulations, and to act in an ethical manner. Should there be a difference between requirements of this Supplier Code and applicable laws or regulations the supplier shall comply with whichever is more stringent.

Human rights

At SSP, we are committed to respecting human rights in our business operations and supply chains, as outlined in our [Human Rights Policy](#).

We expect our Suppliers to respect the human rights of all workers and individuals involved in the production and supply of goods or services to SSP, in accordance with 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.

This includes, but is 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.

Our Suppliers should have appropriate controls for managing, mitigating, and remedying human rights risks and impacts in their business operations and supply chains. Each Supplier should strive to comply with the Ethical Trading Initiative Base Code (see [Appendix B](#)), which is founded on ILO conventions and is an internationally recognised code of labour practice that SSP has adopted as our international standard. SSP works with the Supplier Ethical Data Exchange (SEDEX) to identify and manage any risks associated to human rights through our supply chains.

Product quality and food safety

It is critical that our food is safe to eat and the safety of our customers and the public is protected. We focus on maintaining the highest standards of food safety, as outlined in our [Global Safety Policy](#).

At a minimum, Suppliers are expected to:

- Meet all product quality and food safety standards mandated by applicable laws and regulations;
- Implement appropriate controls for food safety, such as the Hazard Analysis Critical Control Point (HACCP) management system, an internationally recognised standard for food safety;
- Comply with our product quality, food safety, nutritional, and accurate labelling requirements;
- Where relevant, obtain, and warrant to maintain, a recognised international industry third-party accreditation recognised by the Global Food Safety Initiative (GFSI) or an approved equivalent;
- When requested, provide relevant product information promptly, securely and in SSP's preferred digital format.

Environmental sustainability

Protecting our environment is a key pillar of SSP's Sustainability Strategy and we have an ambitious target to achieve net zero carbon emissions across our value chain (Scope 1, 2 and 3) by 2040.

We are committed to minimising our environmental impacts, as outlined in our [Environment, Sourcing and Farm Animal Welfare Policy](#).

Environmental impacts include (but are not limited to) greenhouse gas emissions, energy use, vehicle emissions, packaging materials and single-use plastics, waste management, food waste, water use and disposal, natural resource consumption, and deforestation and biodiversity loss.

At a minimum, we expect our Suppliers to:

- Work to identify, understand and take steps towards avoiding, minimising and mitigating their associated impacts on the natural environment;
- Where practicable, establish an environmental policy and management system;
- Work to reduce the greenhouse emissions and environmental impacts associated with the ingredients, products, goods, or services supplied to SSP and to make SSP aware of more environmentally friendly products, services or innovations available;
- Where relevant, work to increase the use of sustainable materials in packaging, including eliminating unnecessary single-use plastics, using paper and card from certified sustainably-managed forests, and using materials that are reusable, recyclable or compostable;
- Where relevant, seek to maintain, enhance and conserve biodiversity, including working to ensure key ingredients (e.g. palm oil, coffee, tea, cocoa, beef and soy) are from 'deforestation-free' sources, such as through recognised certification schemes (e.g. Roundtable for Sustainable Palm Oil (RSPO) or Rainforest Alliance);
- Provide the Group (where requested) with information relating to their environmental performance and reasonable assistance as we seek to reduce the environmental impacts of our products and to reduce Scope 3 carbon emissions.

Farm animal welfare

At SSP, we are committed to supporting farm animal welfare across our global supply chain, as outlined in our [Environment, Sourcing and Farm Animal Welfare Policy](#).

At a minimum, we expect our Suppliers of meat, fish, egg and dairy products to:

- Align their products with the internationally-recognised 'Five Freedoms':
 - Freedom from hunger and thirst: by ready access to fresh water and a diet to maintain their full health and vigour;
 - Freedom from discomfort: by providing an appropriate environment including shelter and a comfortable resting area;
 - Freedom from pain, injury or disease: by prevention or rapid diagnosis and treatment;
 - Freedom to express normal behaviour: by providing sufficient space, proper facilities and company of the animals own kind;

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- Freedom from fear and distress: by ensuring conditions and treatment which avoid mental suffering.
 - Ensure traceability to the farm-level;
 - Use only licensed slaughter premises;
 - Avoid using antibiotics routinely to promote growth and prevent disease in healthy animals, in accordance with the WHO Guidelines on Use of Medically Important Antimicrobials in Food-Producing Animals;
 - Avoid routine mutilations, including (but not limited to) castration, teeth clipping, tail docking, toe clipping, beak clipping and dehorning;
 - Avoid meat from animals that have not been subjected to pre-slaughter stunning, or (in the case of finfish) meat from animals that have not been rendered insensible;
 - Ensure ethical standards for animal transportation;
 - Exclude animals that have been produced through genetic engineering or cloning;
 - Source fish from well-managed marine sources that avoid over-fishing;
 - Source products that are aligned to Global Animal Partnership (GAP) standards for those species;
 - Meet or exceed applicable industry or national standards for supplies of eggs, such as the Lion Code of Practice by the British Egg Industry Council, European Regulation (EU) No. 1308/2013, USDA Shell Egg Grade and Standards.

Business integrity

At SSP, we are committed to upholding high standards of business integrity, as outlined in our Group policies, including our [Code of Conduct](#) and [Anti-Bribery and Anti-Corruption Policy](#).

At a minimum, we expect Suppliers to:

- Maintain appropriate and adequate procedures for their employees to comply with all applicable anti-corruption laws.
- Never bribe, encourage or attempt to bribe, or get involved in bribery or corruption of any form, including any facilitation payments to government or public officials or their agents, whether or not the payment is illegal under local law;
- Not accept, or offer or pressure our employees or business partners to accept inappropriate or disproportionate gifts, favours or hospitality;
- Not engage in, or facilitate, anti-competitive behaviour, such as bid rigging, price fixing, market sharing or abuse of market dominance;
- Avoid conflicts of interest in their dealings with SSP, and make us aware of any potential or apparent conflicts between their personal interests and the best interests of SSP;
- Not engage in, or facilitate, any form of money laundering, terrorist financing, economic or trade sanctions violations, tax evasion, theft or fraud.

Cyber security and data privacy

At SSP, we are committed to ensuring the confidentiality, integrity and availability of information and data for all our stakeholders, as outlined in our [Information and Cyber Security Policy](#).

At a minimum, we expect Suppliers to:

- Protect all confidential, personal, and sensitive information relating to SSP and its employees, business partners, suppliers and customers;
- Implement and maintain appropriate administrative, technical, and physical security controls to safeguard the information against unauthorized access, use, disclosure, modification, corruption, loss or destruction, in compliance with industry standards and best practices;
- Ensure any downstream suppliers or sub-contractors are informed and aware of security responsibilities and are aligned with industry standards and best practice;
- Notify SSP as soon as possible of any actual or suspected data breach and cooperate with any inquiries to support investigation activities;
- Always maintain data and information integrity, where relevant to services and dealings with SSP;
- Comply, and support SSP's compliance, with all applicable laws, regulations, and contractual obligations related to cyber security and privacy, and provide any necessary attestations, certifications, or audits to demonstrate compliance;
- Maintain robust data protection and security processes and, where required, follow appropriate SSP policies, including its [Information and Cyber Security Policy](#).

REVIEW AND COMPLIANCE MONITORING

This policy has been approved by the Board of Directors of SSP Group plc. We are committed to reviewing the policy every two years and reserve the right to reasonably change the requirements of this Supplier Code as necessary to keep up with relevant legislation and to reflect our sustainability targets and ambitions.

Our Chief Procurement Officer has overall responsibility for overseeing the implementation and management of this policy and keeping the Board advised on compliance.

To ensure adherence and continual improvement against this Supplier Code, SSP reserves the right to visit, assess or verify our suppliers' operations through internal and/or external assessment and audit mechanisms. We expect our Suppliers to provide all reasonable cooperation with this process, including access to relevant documentation and data and, where requested, to become a member of the SEDEX platform.

In addition, we expect Suppliers to:

- Take steps to ensure that all their workers, suppliers, agents, sub-contractors and other relevant third parties understand and adhere to the provisions of this Supplier Code, including (where appropriate in terms of the nature of supplier and the goods or services provided) maintaining adequate policies, procedures, due diligence, training and support;

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- Promote adherence to the requirements of this Supplier Code down their supply chains, and conduct appropriate due diligence for their own suppliers;
 - Have effective whistleblowing, grievance or equivalent procedures in place to enable their workers, in confidence and without fear of reprisal, to ask questions, raise concerns and/or report suspected or actual wrong doing;
 - Promptly investigate any credible concerns about suspected or actual breaches of the requirements of this Supplier Code;
 - Report, and encourage its workers to report, any suspected or actual breaches of the requirements of this Supplier Code to SSP as soon as they become aware of them via the channels outlined in 'reporting concerns' below.

In the event of serious, material and/or persistent non-compliance with the requirements of this Supplier Code, or where suppliers otherwise demonstrate inadequate commitment, persistent inaction or a lack of improvement, we reserve the right to take further action, including where we deem appropriate, terminate the business relationship with the supplier in question.

Reporting concerns

Suppliers should report any suspected or actual breaches of the requirements of this Supplier Code to SSP as soon as they become aware of them via:

- The Supplier's usual SSP company contact/contract manager;
- In writing to the SSP Chief Procurement Officer at: SSP Group plc, 32 Jamestown Road, London NW1 7HW, United Kingdom; or
- The SSP Speak Up channels, as outlined in our [Speak Up Policy](#).

All reports will be dealt with in accordance with SSP's [Speak Up Policy](#), including as to confidentiality, protection from retaliation and support for those that raise concerns. We encourage openness and a Supplier's relationship with SSP will not be affected by a report, even if they turn out to be mistaken.

APPENDICES

APPENDIX A: Definitions

- **Brand partner:** a brand that SSP operates as a franchise.
- **British Retail Consortium (BRCGS):** a consumer protection organisation which sets out key quality and safety standards throughout the food manufacturing industry. For details, please see brc.org.uk.
- **Child:** any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO Convention No. 138, the lower will apply. For details, please see [Convention C138 - Minimum Age Convention \(ilo.org\)](http://ILO.org)
- **Child labour:** any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.
- **European Chicken Commitment (ECC):** a set of six aspirational standards that focus on a transition to breeds with better welfare outcomes, increased living space, greater environmental enrichment and more humane stunning methods. For details, please see welfarecommitments.com.
- **European Regulation (EU) No. 1308/2013:** European Union regulation that sets out marketing standards for eggs, such as classification, labelling and packaging. For details, please see [EUR-Lex - 32013R1308 - EN - EUR-Lex \(europa.eu\)](http://eur-lex.europa.eu).
- **Global Animal Partnership (GAP) standards:** GAP is one of the largest animal welfare food labelling programmes in North America. GAP's Animal Welfare Certified standards cover various animal products such as beef, pork, poultry, eggs, dairy and farmed salmon. The standards assess how animals are raised, such as their living conditions, outdoor access, physical alterations and slaughter methods. For details, please see globalanimalpartnership.org/standards.
- **Global Food Safety Initiative (GFSI):** a business-driven initiative for the development of food safety management systems to ensure food facilities are processing safe food for consumers. For details, please see mygfsi.com.
- **Group policies:** all the latest versions of SSP Group policies referred to in this Supplier Code are available at: [Policies and statements | SSP \(foodtravelexperts.com\)](http://Policies and statements | SSP (foodtravelexperts.com)).
- **Hazard Analysis Critical Control Point (HACCP) management system:** an internationally recognised standard for food safety. For details, please see [Hazard Analysis Critical Control Point \(HACCP\) \(fda.gov/food\)](http://Hazard Analysis Critical Control Point (HACCP) (fda.gov/food))
- **ILO Declaration on Fundamental Principles and Rights at Work:** a document that expresses five core principles and rights for workers. For details, please see ilo.org/declaration.

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- **International Bill of Human Rights:** a set of documents that outline the basic rights and freedoms of all people that aim to protect human dignity and promote equality and justice for everyone. For details, please see [ohchr.org/international-bill-human-rights](https://www.ohchr.org/international-bill-human-rights).
 - **Lion Code of Practice:** a set of standards managed by the British Egg Industry Council (BEIC) that ensures the highest level of food safety and animal welfare for British eggs. For details, please see [britisheggindustrycouncil.org](https://www.britisheggindustrycouncil.org).
 - **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.
 - **Supplier Ethical Data Exchange (SEDEX):** a platform for storing, analysing, sharing and reporting on ethical supply chain and sustainability practices, including a common audit methodology called SMETA (Sedex Members Ethical Trade Audit) that covers labour standards, health and safety, environment and business. For details, please see [sedex.com](https://www.sedex.com).
 - **SSP own brands:** proprietary brands and bespoke concepts that SSP operates.
 - **WHO guidelines on use of medically important antimicrobials in food-producing animals:** these guidelines cover the use of medically important antimicrobials in food-producing animals, recommending that farmers and the food industry stop using antibiotics routinely to promote growth and prevent disease in healthy animals. For details, please see [who.int/publications](https://www.who.int/publications).
 - **United Nation's Guiding Principles on Business and Human Rights (UNGPs):** a set of guidelines for States and companies to prevent, address and remedy human rights abuses committed in business operations. For details, please see [ohchr.org/guiding-principles-business-and-human-rights](https://www.ohchr.org/guiding-principles-business-and-human-rights).
 - **USDA Shell Egg Grade and Standards:** standards maintained by the Agricultural Marketing Service of the U.S. Department of Agriculture for measuring the quality of eggs. For details, please see [Shell Egg Grades and Standards \(usda.gov\)](https://www.usda.gov/shell-egg-grades-and-standards).
 - **Worker:** Suppliers' employees and contractors, including permanent, full-time, part-time, temporary, contingent, sub-contracted, agency and migrant workers.
 - **Young person:** any worker over the age of a child as defined above and under the age of 18.

APPNDIX B: Ethical Trading Initiative (ETI) Base Code



Download the ETI Base Code and access additional guidance and resources at ethicaltrade.org/eti-base-code

Employment is freely chosen

- There is 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.

Freedom of association and the right to collective bargaining are respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively;
- The employer adopts an open attitude towards the activities of trade unions and their organisational activities;
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace;
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

Working conditions are safe and hygienic

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards;
- Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment;
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers;
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided;
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers;
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

Child labour shall not be used

- There shall be no new recruitment of child labour;
- Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child;

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- Children and young persons under 18 shall not be employed at night or in hazardous conditions;
 - These policies and procedures shall conform to the provisions of the relevant ILO standards.

Living wages are paid

- Wages and benefits paid for a standard working week 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 in 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 expressed permission of the worker concerned. All disciplinary measures should be recorded.

Working hours are not excessive

- Working hours comply with national laws and benchmark industry standards, whichever affords greater protection;
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not exceed 12 hours per week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

No discrimination is practiced

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Regular employment is provided

- To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice;
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

No harsh or inhumane treatment is allowed

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.