

# MODERN SLAVERY ACT STATEMENT 2022



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“Our people are the heart of our business. As one of the world’s largest employers, with operations touching the lives of millions of people every day, we strive to protect the dignity, wellbeing, and human rights of all the people who work in our businesses, our supply chains, and the communities we serve.

We are committed to play our part in eradicating modern slavery in all its forms and recognise that our scale and global reach give us the ability to influence others, to bring about real and positive change.”

DOMINIC BLAKEMORE, GROUP CHIEF EXECUTIVE OFFICER, COMPASS GROUP PLC

## KEY POLICIES & PROGRAMMES

- We adhere to several internationally recognised standards:
  - The UN Universal Declaration of Human Rights
  - The Ethical Trading Initiative (ETI) Base Code
  - The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
  - The UN Guiding Principles on Business and Human Rights
  - The UN Global Compact 10 principles
- Our [Code of Business Conduct](#) (CBC) sets out the ethical standards that our people, clients, investors, suppliers, and local communities can expect when dealing with the Group’s businesses.
- Our [Code of Ethics](#) supports our CBC. This year, c.13,000 employees on a risk to role basis (2021: 4,500), including members of the Executive Committee, were required to complete the annual declaration and forward-looking pledge affirming their compliance with, and commitment to, our CBC and Code of Ethics.
- Our new [Global Supplier Code of Conduct](#) launched in August 2022 and applies to all the Group’s supply chain partners. It is an integral part of our approach to maintaining an effective third-party risk management framework, specifying the minimum requirements we expect from our suppliers.
- Our [Human Rights Policy](#) (updated in September 2022) states our commitment to the four core conventions of the ILO, and reinforces our global commitments to respecting the human rights of all vulnerable groups.
- Our [Global Supply Chain Integrity Policy](#) is applicable to all Group procurement activity and suppliers, and sets out how Compass encourages compliance with the ETI Base Code.
- Our independent and confidential reporting programme [Speak Up, We’re Listening](#) is available in all 40 countries where we operate, in applicable local languages, 24/7, 365 days a year.

## EXAMPLES OF RECENT PROGRESS

- Renewing our partnership with the Slave-Free Alliance to improve our due diligence processes, address salient human rights risks and provide advice regarding modern slavery and human trafficking.
- Rolling out Sedex (Supplier Ethical Data Exchange) across more countries, including Brazil, Portugal and Spain, to further extend our due diligence processes (currently used by the UK&I and Australia).
- Working with Earthworm Foundation to map the social and environmental risks within the fresh tomatoes and canned tuna supply chains of our UK and US businesses.
- Integrating human rights and modern slavery training into our Group Ethics & Integrity programme, training c.12,000 of our leaders on a risk to role basis to better detect, address and prevent modern slavery.
- Forming a new Supply Chain Risk Management Committee, whose remit includes strategic human rights oversight and risk management.
- Expanding our cross-functional Human Rights Working Group to include representatives from all our regions in more than 20 countries.
- Appointing a new Group Director for Employment, Equity and Social Impact, responsible for driving improvements in our human rights programme design and global implementation.
- Updating our Human Rights Policy, including further reinforcing our global commitments to respecting the human rights of all vulnerable groups and emphasising our zero tolerance to forced and child labour.



In 2023, we will continue to develop our human rights strategy across our Group operations and supply chains to address human rights risks through:

- Collaboratively implementing our strategic plan and embedding our updated Human Rights Policy.
- Further promoting and raising awareness of our new Global Supplier Code of Conduct.
- Expanding Sedex to more countries and embedding due diligence tools into our procurement processes.
- Launching a Group-wide Third-Party Integrity Due Diligence Policy and Migrant Labour Working Group.
- Further increasing awareness of human rights through a programme of sharing insights and effective practice, and biannual e-learning across the Group’s businesses.
- Continuing our work with the Slave-Free Alliance and other third party experts to further develop our approach on human rights management globally.

OUR  
COMMITMENTS  
FOR 2023