

## Our Speak and Listen Up Policy | November 2021

### Protect Our People. Protect Compass.



#### 1 Introduction

- 1.1 At Compass Group our people and culture make the difference in what we do and how we service millions of consumers around the world. We are committed to conducting our business with honesty and integrity creating an inclusive environment where people feel empowered and safe to Speak and Listen Up.
- 1.2 We expect all Compass personnel, including directors, officers, employees, workers, consultants and contractors anywhere in the World (referred to as “you” in this policy), and agents, intermediaries, consultants, suppliers, and other business partners (“Business Partners”) to uphold these standards and to act in accordance with our values and the Compass Group Code of Business Conduct (“our CoBC”) and related policies as well as with all applicable laws.
- 1.3 We value and foster a culture of integrity based on principles of openness, trust and accountability and encourage you and our Business Partners to Speak Up if something doesn’t feel right. Everyone at Compass has a duty and responsibility to Listen Up to those who raise their voice, and do the right thing by following up.

- 1.4 We encourage you to use our Speak Up resources below to seek guidance on ethical or compliance dilemmas and issues. We want you to express your views freely and to report, in confidence, any concerns regarding any unethical, illegal or other improper circumstances or behaviours which suggest our CoBC is not being followed. For more information on confidentiality and protection against retaliation refer to sections 9 and 10 below.

#### 2 Purpose

- 2.1 The aims of this policy are to:
  - assure you that we are here to listen and to empower you to raise your concerns in good faith in a way that you feel most comfortable with prior to using our Speak Up helpline;
  - inform you of your options where and how to raise your voice and refer your concerns;
  - provide guidance on how to raise those concerns including the role performed by Group Ethics & Integrity, a dedicated central team - independent of any other lines of business - which oversees and manages our global Speak Up programme, including the initial review of reports received through the Speak Up platform (web-intake) & helpline;

- remind you, as part of upholding our [values](#), it is your duty and right to promptly raise concerns in the knowledge they will be taken seriously, followed up and/or investigated appropriately;
- provide reassurance that you can raise any concerns in good faith without fear of retaliation, even if those concerns turn out to be mistaken or unfounded; and
- provide transparency about how concerns will be managed and followed up appropriately, demonstrating Compass' commitment to listening up.

### **3 Scope**

- 3.1 This policy applies to all Compass personnel, working at any Compass business, including any joint venture companies or consortia that are under Compass' day to day control or are majority owned, and all Business Partners working or representing any Compass business anywhere in the World.
- 3.2 Anyone who has concerns or information relating to misconduct that give rise to a potential or actual breach of our CoBC may raise such concerns under this policy. This includes but is not

limited to current and former employees, contractors, suppliers, service providers, trainees, joint venture partners, members of the communities in which we operate, and also their partners, dependants and relatives.

- 3.3 Compass will respect and comply with all applicable local laws. In the event that local laws have stricter or specific requirements including reporting party rights and protections, concern handling, investigations and other applicable obligations for any Compass business, a country based policy should be implemented by management by way of a local addendum to this Group Policy. Group Ethics & Integrity should be notified in such circumstances.

### **4 Policy Requirements: Our Duty and Right to Raise Concerns**

- 4.1 Asking questions, being curious and reporting known or suspected misconduct or improper circumstances or behaviours benefits and protects all of us.<sup>1</sup> We all have a shared duty and individual right to report concerns that circumstances inconsistent with our CoBC are being contemplated, occurring, or may have occurred, using our Speak Up resources.

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<sup>1</sup> breaches of our Code of Business Conduct, standards, policies and procedures; illegal conduct, such as theft, dealing in, or use of illicit drugs, violence or threatened violence, or criminal damage against property; fraud, money laundering, terrorist financing, tax evasion or misappropriation of funds; offering, giving or accepting a bribe; conflicts of interest; financial irregularities including false accounting, financial misstatements and misrepresentations; conduct causing

danger to people, the environment or the financial system; sexual harassment, discrimination, bullying or harassment; human rights issues such as modern slavery, child exploitation or the infringement of indigenous peoples' rights; and failure to comply with, or breach of, legal or regulatory requirements including disclosure obligations.

4.2 You are not expected or required to have absolute proof of misconduct or improper circumstances in order to raise a concern.

4.3 You should be led by your instincts and should provide as much information as possible when raising your concern about how this has arisen. We are here to support our people in doing the right thing. To that end, you will not face any form of disciplinary action or detriment in respect of a concern raised in good faith that is later found to be mistaken or unfounded (see Section 10).

4.4 Just as it is an expectation that any concerns be promptly reported, Compass also strives to assess and resolve all concerns in a timely manner. Any delays will be communicated to the appropriately involved parties. For those who feel comfortable, routinely following up on your concern will help to avoid any delays.

## 5 Getting the Right Help

5.1 We want to help everyone find the right help and support for their concerns or issues as quickly and efficiently as possible. Where your concern does not relate to a possible breach of our CoBC or concerns regarding any unethical, illegal, or other improper circumstances or behaviours you should use the following resources:

- For operational Health, Safety & Environmental issues, contact your local HSE manager; or
- For concerns relating to your own employment position or circumstances at work including grievances<sup>2</sup> that do not relate to a possible breach of our CoBC we encourage you to raise these concerns directly with your manager, your unit manager, or your local HR team.

## 6 Compass Group Speak Up Resources

6.1 For queries about or suspected breaches of our CoBC, tell someone you trust by speaking to:

- your manager or unit manager;
- your local HR manager ("HR") or Listen Up Champion ("LUC");
- a member of your country, Regional or Group legal team ("Legal");
- a member of Group Ethics & Integrity ("E&I"); or
- Raise your concern through the [Speak Up platform](#).

6.2 For those of you that are not online or prefer to report via telephone, dedicated country phone numbers for the Helpline are available on our [Ethics & Integrity portal](#) and are displayed on posters throughout Compass' workplaces and premises.

6.3 Reports received by and raised directly to management about suspected breaches of our CoBC must be referred to the country or regional Listen Up

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<sup>2</sup> Examples of grievance may include interpersonal conflict with your manager or another colleague or challenges to reviews in relation to performance, promotion, work arrangements or disciplinary action.

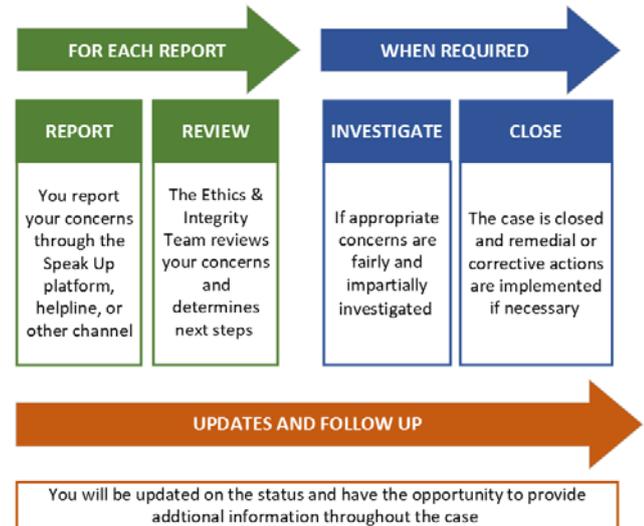
Champion and/or General Counsel and, in turn, will be assessed and entered into the Speak Up systems, as required.

## 7 Making a Report

- 7.1 If you become aware, or have reason to suspect, that unethical, illegal or other improper circumstances or behaviours connected to Compass are contemplated, occurring, or may have occurred, you are strongly encouraged to raise your concerns in a timely manner.
- 7.2 When you voice your concerns, you should provide as much information about the issue as you can to help address the concern effectively, including but not limited to:
- background, context, history and reason for the concern;
  - dates, places and, if possible, names or identifying details of those involved; and
  - any documents, files or references that may be relevant to the situation or you think would help Compass look into the issues. If you do not have all these details, do not let this hold you back from raising your concerns and providing additional details later.
- 7.3 We understand and respect that some people feel more comfortable not disclosing their identity, so you can report concerns anonymously and remain anonymous if you wish. We ask everyone who chooses to use the Speak Up platform or helpline to take note of their reference number and check back

in regularly or to engage directly, if you feel comfortable doing so, with the individual assigned to follow up on your concern.

- 7.4 The diagram below sets out the key steps that will occur when you voice your concerns under this policy.



## 8 Investigation

- 8.1 If appropriate, your report will be allocated for investigation. Investigations will be conducted respectfully, impartially and fairly, including affording these principles, rights and applicable privileges to the people mentioned in your report. From time to time, we may engage an external independent third party to lead or support an internal investigation or review of circumstances.
- 8.2 If you have provided contact details and/or are contactable anonymously through the Speak Up platform or helpline two-way messaging facilities, you will receive an acknowledgment that your report has been received and will be updated if your case is allocated for

investigation or follow-up.

8.3 You may be asked to confidentially participate in the investigation by continuing to provide information or additional details as needed. We will endeavour to provide you with appropriate progress updates, as necessary, and you will be informed when the case is ready to close and provided feedback on the outcome, subject to legal, privacy, and confidentiality considerations.

8.4 In raising concerns in good faith, you are expected to cooperate with all investigations by providing honest, truthful and complete information. If you are found to have been personally involved in misconduct including a breach of our CoBC or other policies, standards and procedures, reporting it will not absolve you from accountability – but your cooperation with the investigation will be considered as part of any decision that Compass makes.

8.5 Compass strives to resolve all matters internally but nothing in this policy should be interpreted to prohibit you from reporting, at any time, suspected unlawful conduct to any relevant governmental authority, regulator or other external party.

## 9 Confidentiality

9.1 Compass will seek to protect the confidentiality of any person making a report under this policy. Reports may be submitted using our Speak Up resources in way you feel most comfortable with,

including whether you wish to provide your personal identification details or remain anonymous. Our Compass Speak Up platform and helpline is operated by an independent third-party provider and is available 365 days a year, 7 days a week, 24 hours a day, in all of the countries in which we operate. Reports received are referred to Group Ethics & Integrity for confidential review and assignment for follow up and/or investigation, as appropriate.

9.2 Bear in mind that it may be helpful for you to identify yourself so that you can be contacted for additional information that may assist with following up your concern. If, however, you feel that you are not comfortable disclosing your identity, anonymous reports should contain sufficiently detailed information to enable us to effectively follow up on and address the reported concern.

9.3 If you receive any information about any report and related investigation you must treat this as confidential.

9.4 Your identity will not be disclosed without your consent to anyone beyond those dealing with and investigating the concerns or those included on a strict need-to-know basis to receive and act upon the findings or remedial actions, unless this is necessary and proportionate in the context of looking into the matter, undertaking an investigation and/or seeking legal advice.

## **10 Protection from Retaliation**

- 10.1 Compass strictly prohibits and does not tolerate retaliation or detrimental conduct in response to you raising a concern or being able to raise a concern.
- 10.2 Compass will protect you from being retaliated against or being subjected to detrimental conduct, having the ability to, contemplating or in fact raising concerns in good faith or in circumstances in which issues raised in your report turn out to be mistaken or unfounded.
- 10.3 Amongst other measures that are deemed appropriate we can provide you with details of available employee support services and engage with HR or other functional partners (unless conflicted) if concerns about your health and wellbeing arise.
- 10.4 Protection against detrimental conduct or retaliation also applies to individuals conducting, assisting or participating in an investigation under this policy.
- 10.5 If you believe you have been subjected to any form of retaliation or detrimental conduct as a result of contemplating making a report, having raised a concern or assisting in any investigation, or you witness retaliation against someone else, you should use the Compass Speak Up resources (set out in paragraph 6) to report it.

- 10.6 We follow up with everyone who raises a concern using the Speak Up platform or helpline to check whether they believe they have suffered any form of retaliation.

## **11 Compliance with this policy**

- 11.1 Anyone who is found to have breached this policy by neglecting to report or escalate a breach or suspected breach of our CoBC to our Speak Up resources without good reason, or by retaliating or being party to retaliatory conduct against any person within the scope of this policy, may be subject to disciplinary action. In the case of Business Partners, this may include but may not be limited to termination of any relationship with Compass.
- 11.2 In addition, any person who is found to have intentionally made a false allegation, provided false or misleading information in the course of an internal review or investigation or is otherwise found to have acted in bad faith may be subject to disciplinary action.

## **12 Monitoring and Review**

- 12.1 The Group Head of Ethics & Integrity will lead a review of this policy on an annual basis, taking into consideration its scope, efficiency and effectiveness, changes to relevant laws and management information collected regarding Speak Up reports and investigations.

12.2 The Group Head of Ethics & Integrity will report on their review of the policy and the effectiveness of the Speak Up programme in accordance with the terms of reference governing Compass Group PLC's Corporate Responsibility and Audit Committees, respectively. Compass Group PLC's Corporate Responsibility Committee will approve any suggested amendments to this policy, as appropriate.

12.3 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed via the Group Ethics & Integrity portal using the [ask a question](#) facility.

This policy has been approved by the Compass Group Plc Executive Committee and Board of Directors.



**Dominic Blakemore**

Group Chief Executive

12.4 Any exceptions to this policy require approval from the Group Head of Ethics & Integrity.

### **13 Records and Privacy**

13.1 Compass Group cares about your privacy and will retain records, as part of the confidential Speak Up, We're Listening programme, in compliance with applicable data protection and retention guidelines.

### **14 Miscellaneous**

14.1 This policy does not form part of any Compass personnel's contract of employment and we may amend the policy at any time.