

# HUMAN RIGHTS POLICY | September 2022

Who does this apply to?

- All Compass employees and workers, including directors and officers
- All our majority-owned businesses, including subsidiaries and joint ventures
- All our business partners, including agents, intermediaries and suppliers
- Other third parties including contractors, consultants and business partners acting for or on our behalf

Where we have a minority interest, we will actively encourage the application of this Policy by these operations.

## Strategy and context

At Compass, our strategy comprises three pillars: **Performance, People, Purpose** and we have a passionate commitment to doing the right thing.

We are a global leader and trusted partner in food and support services, and through the People pillar of our strategy, we strive to foster a unique, caring, winning culture which offers opportunities for all and respects human rights.

The Purpose pillar of our strategy is focused on making a positive social and environmental impact by improving the health, safety and wellbeing of our people, consumers and communities and working with our suppliers and partners to do the same.

We approach human rights in the same way we conduct our business activities as set out in our [Code of Business Conduct and Global Supplier Code of Conduct](#) and the broader [Compass values](#) and guiding principles.

## Our commitment to Human Rights

**We believe that everyone is entitled to basic rights and freedoms, whoever they are, and wherever they live. Our commitment extends to ‘vulnerable groups’ which include but are not limited to:**

- Women and girls
- LGBTQ+<sup>1</sup>
- Children
- Refugees and migrant workers
- National minorities
- Senior citizens
- People with disabilities
- Indigenous people

We are committed to the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights and the core conventions of the International Labour

---

<sup>1</sup> LGBTQ+ stands for lesbian, gay, bisexual, trans, queer (or sometimes questioning), and other gender identities. The plus represents other sexual identities including pansexual and asexual.

Organization (“ILO”) and Ethical Trading Initiative Base Code. We are a signatory of the United Nations Global Compact and respect its principles.

Compass is specifically committed to the **four core conventions of the ILO** of:

- the freedom of association
- the right to collective bargaining
- the elimination of forced or compulsory labour, the abolition of child labour
- the elimination of discrimination in respect of employment and occupation

Based on this approach we adopt a **broad scope of respecting human rights** including:

- zero tolerance towards discrimination and inappropriate behaviour in all forms – in particular towards ‘vulnerable groups’
- advancing diversity, equity and inclusion, including gender equality and promoting the role of women, and of people from a broad range of minoritized ethnic backgrounds
- civil, political and environmental rights
- economic, social, land, and cultural rights and religious beliefs
- fundamental principles and rights at work

## Our Responsibility for Human Rights

**At Compass, we recognise the importance and responsibility of respecting human rights for all our employees within our own operations, those workers throughout our supply chain and the communities in which we have a business presence, including those who may inadvertently be affected by our operations, including in relation to land rights.**

We will continue to develop our knowledge and understanding of the salient human rights risks across our businesses, in recognition of the diverse and complex environments we operate in. Compass will always ensure it is compliant with local laws, at a minimum, in respect of human rights. For those countries where we operate within a less developed human rights framework, Compass will continue to follow an international approach by adherence to the expectations and requirements set out in this Policy. Together with our supporting group policies<sup>2</sup>, these define the minimum standards of behaviour that all Compass employees and Compass business partners, where applicable, are expected to uphold.

## Respect for Human Rights in our Workplace and Operations

We are committed to the active promotion of human rights for our employees, workers, contractors, consultants, our business partners, including agents, intermediaries and suppliers, consumers, clients, investors, shareholders and the communities in which we operate. This commitment goes beyond compliance as we aspire to play a role in the positive development and enhancement of human rights globally.

## Diversity, Equity & Inclusion

**We value all of our employees**, regardless of their background which include but are not limited to race, sex, colour, origin, ethnicity, religion, beliefs, age, disability, sexual orientation, gender identification or expression, political opinion or social background. We have made meaningful progress in our gender representation at senior levels and are focused on ensuring that the Compass workforce reflects the

---

<sup>2</sup> [Policies | Compass Group \(compass-group.com\)](https://compass-group.com)

diversity of our communities, closing the gap in opportunity and increasing social mobility.

We are particularly sensitive to the salient risk of harassment, discrimination and/or inequality faced by those belonging to 'vulnerable groups'.

We do not tolerate harassment (including sexual harassment), bullying or discrimination on these or any other grounds and recognise existing legally protected status (where applicable), and we strive to ensure all our people have the opportunity to succeed. This includes a commitment to providing a safe and secure workplace in all our operations and for our employees, workers, consultants and contractors working in any of our sites.

## Modern Slavery

**We are committed to eradicating modern slavery, labour exploitation of children or other vulnerable groups, and human trafficking in all its forms.** We aim to achieve this through constant vigilance and improvement of our processes and operations and by expecting and requiring our business partners to share our values and undertake similar commitments as a condition of working with us.

We are actively committed to the four conventions of the ILO and do not tolerate any form of exploitative practices such as forced labour, bonded or slave labour and human trafficking of any kind. All labour should be freely chosen, and employees should be free to leave on the terms set out in the employee's contract and in compliance with applicable labour laws.

We recognise that in certain environments workers may be asked to pay a recruitment fee as part of the cross-border migrant labour recruitment process and how this can potentially increase the risk of debt bondage and create vulnerabilities, forcing them into forced or involuntary labour. Therefore, we adopt the Employer Pays Principle across our operations, where no migrant worker should pay for a job.

We are committed to raising awareness of modern slavery risks, and to ensure that our employees and leaders across our operations understand that all forms of slavery and/or exploitation are unacceptable practices.

## Child Labour

We are committed to collaboratively identifying and remediating any instance of child labour and building resilience against child labour within our supply chain. **Compass will not tolerate the hiring of any child, under any circumstances.** Compass recognises that the salient risk to children can come in many forms, such as forced child labour, human trafficking, child marriage and organ harvesting.

We understand there is cultural contextualisation across the locations in which we operate. Compass adopts a minimum age of 15 years to partake in employment or the local legal minimum requirement under applicable law, whichever is higher. Any legal restrictions regarding the employment of minors must be observed and they are not permitted to perform unsafe, hazardous work or night work, as per the ILO core convention.

We support workplace apprenticeships, internships and other similar programmes that comply with applicable local laws and regulations.

## Respect for our Communities

We recognise that unsustainable practices over land and water use can lead to an adverse impact on both

the environment and human rights and that globally, disputes over land and water use are emerging as leading causes of conflict.

We are seeking to further develop our understanding of land and water rights as human rights in regard to our business operations. We recognise legitimate tenure rights as a human right, although our principal business does not transact in the direct purchase of land or access / provision of water. We recognise the right to safe water for anyone affected either directly or indirectly by our operations.

Our commitment to human rights extends beyond the requirements for our own sites and operations to the communities we operate in and the suppliers we choose. This is to safeguard not only the health and safety of our own workers and employees but to ensure that our business partners also provide a safe and healthy workplace that secures the wellbeing and welfare of their workers. This includes helping us to ensure we mitigate the risk of adverse human rights impacts to 'vulnerable groups' either directly or indirectly through our business partners and the communities they work in and with.

We aim to achieve this through the adoption of our Supply Chain Integrity Standards, Code of Business Conduct and Global Supplier Code of Conduct, which we require our business partners to comply with, where applicable.

## Speaking Up

**We are committed to holding ourselves accountable** and there are multiple channels available to employees and third parties to raise concerns and report potential breaches of our Codes of Business Conduct and Ethics, in line with our Speak and Listen Up Policy.

We aim to promote and foster a culture of care, with strong integrity and engagement and where everyone feels confident raising their voice. We promote our Speak Up programme including our confidential reporting helpline, online web-portal and other Speak Up resources, to provide the support and governance to ensure we sustain and strengthen this culture. The helpline is operated by an independent third party and is available internally and externally to ensure that all employees, business partners and any other stakeholders can raise their concerns in confidence, anonymously if they wish (subject to applicable local law), when they feel something isn't right. We operate a strict policy of non-retaliation and actively encourage all our stakeholders to use the helpline or other Speak Up resources, including those who raise concerns about human rights issues who may find themselves in a difficult position when raising their voice or in exercising their rights to freedom of expression, association, peaceful assembly and protest.

Compass is committed to reviewing, following up and investigating concerns, as appropriate, and ensuring those who raise concerns in good faith do not suffer any form of retaliation including threat, intimidation or other detrimental treatment.

Compass is committed to acting with integrity as a responsible business in all our operations globally. This commitment extends to providing access to or cooperating with the remediation of any breaches of human rights we identify we have or may have caused or contributed to in our operations. We aim to achieve this through our Speak Up resources, enabling effective remedy, whilst not preventing access to other forms of remedy if justified.

We have established a continuous improvement process designed to investigate, remediate and prevent reoccurrence of issues. This model forms part of our overall Group Ethics and Integrity programme, where we operate a continuous learning and improvement cycle. It includes the identification of root causes and corrective and preventative actions including the development of integrity insights and lessons learned. Our Audit Committee of the Board monitors the effectiveness of our Speak Up programme.

As part of this process, we are committed to working with our business partners or those adversely impacted in a similar way. Where potential or actual breaches of human rights are identified relating directly to our activities with Compass business partners, we will support our business partners in the appropriate remediation of those impacts through their own grievance or Speak Up processes, or support collaboration to provide remediation through third parties.

## Measuring our performance

**We are committed to conducting ongoing risk based human rights due diligence throughout our business and supply chain, and work with third party specialists by risk, priority, geography and issue.** We recognise the importance of due diligence in helping provide insight and visibility into the areas of heightened risk our business and Compass business partners face. Employees with direct involvement in areas of human rights risk also receive training on aspects specific to their roles.

The following key performance indicators will be used to assess Compass' performance in human rights:

- total number of incidents of substantiated human rights breaches and actions taken
- number of human rights concerns related to Compass reported via our Speak Up resources
- significant actual and potential adverse human rights impacts in the supply chain and actions taken
- Modern Slavery and Human Rights training

## Monitoring our effectiveness

This Policy will be reviewed annually by the Corporate Responsibility Committee of the Board. Each review will be informed by our prior year performance.

More detail on our approach to specific human rights, such as our relations with employees and other stakeholders including suppliers, are covered in greater detail in the relevant specific policies, which can be viewed on our website [here](#). These policies include our:

- Code of Business Conduct
- Code of Ethics
- Speak and Listen Up Policy
- Food Safety Policy Statement
- Supply Chain Integrity Standards
- Global Supplier Code of Conduct
- Diversity, Equity & Inclusion Policy
- Environmental Policy Statement

This Policy should be read in conjunction with those other policies.



**Dominic Blakemore**  
Group Chief Executive  
Compass Group PLC