

HUMAN RIGHTS POLICY | June 2020

Who does this apply to?

- All Compass employees, including directors and officers
- All our majority-owned businesses, including subsidiaries and joint ventures
- All our business partners, including intermediaries, suppliers, and vendors
- All third parties including contractors, consultants and other business partners acting 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, we have a clear, simple and effective strategy: **Performance, People, Purpose**. Our vision and values guide our decisions, actions and behaviours and we have a passionate commitment to doing the right thing.

We are the industry leader in food service and our people around the world are at the heart of our business. We are committed to supporting the dignity, wellbeing and human rights of all our employees, the communities in which we operate, and those affected by our operations. We approach human rights in the same way we conduct our business activities (as set out in our [Code of Business Conduct](#)) and the broader [Compass Values](#) which capture and reflect our expectations and the spirit of how we operate and what we stand for.

The Purpose pillar of our strategy is focused on initiatives across the Group which improve the health and wellbeing of our people and consumers, are beneficial for the environment and are better for the communities with whom we engage.

Our commitment to Human Rights

We believe that everyone is entitled to basic rights and freedoms, whoever they are, and wherever they live. We are fully 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 Organization (“ILO”) and Ethical Trading Initiative. We fully respect the principles of the United Nations Global Compact.

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 particular towards vulnerable groups, such as minority groups, migrant workers, children and women
- advancing diversity and inclusion, including gender equality and promoting the role of women, and of people from a broad range of ethnic backgrounds
- civil and political rights
- economic, social and cultural rights
- fundamental principles and rights at work

Responsibility for Human Rights

We recognise that Compass is responsible for how our operations impact our employees, all of the workers across our supply chain globally, and the communities in which we operate. This Policy, the Compass Values and supporting policies define the minimum standards of behaviour which all Compass employees and Compass Business Partners are expected to uphold.

Respect for Human Rights in our Workplace and Operations

We believe that we can be part of the positive development and enhancement of human rights globally. We are committed to this goal through the active promotion of human rights with our employees, Business Partners in our supply chain, consumers, clients, investors, shareholders and the communities in which we operate. This commitment goes beyond compliance and is anchored in our Performance, People, Purpose strategy.

Diversity & Inclusion

We value all of our employees, regardless of race, sex, colour, origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or background. We do not tolerate harassment or discrimination on these or any other grounds and recognise legally protected status across all of our countries, and we strive to ensure all our people have the opportunity to succeed. This includes a commitment to providing a safe workplace in all our operations where our employees, consultants and contractors working in any of our sites can be assured of a safe and healthy workplace that looks after their physical and mental wellbeing. We have made meaningful progress in our gender representation at senior levels and are focused on ensuring that the Compass workforce reflects the diversity of our communities, closing the gap in opportunity and increasing social mobility.

Modern Slavery

We are committed to eradicating modern slavery, exploitation of children, and human trafficking in all its forms. We aim to achieve this through constant vigilance and improvement of our operations and by requiring our Business Partners to share our values and undertake similar commitments as a condition of working with us.

Respect for our Communities

Our “Zero Harm” ambition includes a commitment to respecting the ownership and use of land and natural resources as part of our broader sustainability strategy. We recognise that unsustainable practices over land

and water use can lead to an adverse impact on both environmental 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 and sustainability issues. We recognise legitimate tenure rights as a human right, although our principal business does not transact in the direct purchase of land. We recognise the right to safe water for anyone affected either directly or indirectly by our operations.

We are evolving our partnerships and sourcing principles and will engage and work with our value chain to use our scale and influence to promote greater awareness and action to protect the land and water rights of communities and impacted stakeholders. We accept our responsibility to ensure the communities we operate in and the suppliers we choose should reflect our values. This includes helping us to ensure we mitigate the risk of adverse human rights impacts to women or children either directly or indirectly through our Business Partners and the communities they work in and with.

Our commitment to human rights extends beyond the requirements for our own sites and operations. 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. We aim to achieve this through the adoption of our Supply Chain Integrity Standards and Code of Business Conduct which form part of our contractual arrangements with our Business Partners.

Speaking Up

We are committed to holding ourselves accountable and there are multiple channels available to employees and third parties to report potential breaches. We want to maintain a culture of engagement where everyone feels confident raising their concerns and we promote our whistleblowing helpline and programme “Speak Up” to provide the support and governance to ensure we sustain it. The helpline is operated by an independent third party to ensure that all employees, Business Partners and any other stakeholders can raise their concerns in confidence and anonymously, when they feel something isn’t right. We operate a strict policy of non-retaliation and actively encourage all our stakeholders (including human rights defenders who are often in an exposed position when raising issues or those exercising their rights to freedom of expression, association, peaceful assembly and protest) to use the helpline or other Speak Up channels with the assurance that we will not tolerate any form of threat or intimidation to those who raise their concerns in good faith.

Compass Group 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 caused or contributed to in our operations. We aim to achieve this through our Speak Up mechanisms designed to enable effective remedy while not preventing access to other forms of remedy if justified.

We have an embedded continuous improvement process designed to investigate, remediate and resolve issues when raised. This model forms part of our overall Ethics & Compliance programme, where we operate a continuous learning and improvement cycle. It includes the identification of root causes and corrective actions developed in response to lessons learned from our Speak Up cases. To provide assurance that recommended remediation is undertaken effectively, the remediation process is monitored by Group

Internal Audit and progress reported back to both the Audit and Corporate Responsibility Committees of the Board.

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 directly to our activities with our Compass Business Partners, we will support our Business Partners in the remediation of those impacts through their own grievance or Speak Up processes, or support collaboration to provide for non-judicial remediation through third parties.

Measuring our performance

We are committed to conducting ongoing human rights due diligence throughout our business and supply chain, and work with third party specialists by 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. Members of our team with direct involvement in areas of human rights risk also receive training on aspects specific to their role.

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 grievances related to Compass reported by employees via Speak Up
- significant actual and potential adverse human rights impact in the supply chain and actions taken

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 such as 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
- Food Safety Policy Statement
- Supply Chain Integrity Standards

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



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Group Chief Executive
Compass Group PLC