HUMAN RIGHTS POLICY | September 2025

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 hold a minority interest in an operation, we will actively promote and encourage the adoption of this Policy by that operation.

Respecting Human Rights is a shared responsibility, and it is therefore incumbent on those who work for and partner with Compass to uphold and implement the expected standards and principles of this Policy.

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. Our Compass Commitments (Respect, Growth and Teamwork), together with our Compass Values, represent the basis of our culture which places people at the heart of the business and sets out how Compass employees are expected to act with integrity and treat each other.

The Purpose pillar of our strategy is focused on making a positive social and environmental impact by improving the health, safety and wellbeing[1] 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, ethically and with integrity as set out in our Code of Business Conduct and Global Supplier Code of Conduct; demonstrating our commitments and Compass Values in our actions and behaviours.

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
- LGBTQI+[2]

[1] Includes mental health

[2] LGBTQI+ stands for lesbian, gay, bisexual, trans, queer (or sometimes questioning), intersex and other gender identities. The plus represents other sexual orientations including pansexual and asexual.

- Children
- Refugees and migrant workers
- National minorities
- Senior citizens
- People with disabilities
- Indigenous Peoples

We are committed to respecting international human rights standards including the International Bill of Human Rights, the International Labour Organization's ("ILO") Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, the core conventions of the 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:

- advancing a culture that respects and promotes equality and opportunity for all
- zero tolerance towards bullying, harassment (including sexual harassment, discrimination and inappropriate behaviour in all forms
- fundamental principles and rights at work
- promoting a safe and healthy working environment

We also recognize, in alignment with international standards, the importance of civil, political and environmental rights; economic, social, land, and cultural rights; and religious beliefs. We further acknowledge the role of human rights defenders in promoting and protecting human rights.

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 and those of our Group companies, 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. In circumstances 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. Local leadership teams are expected to follow this Policy within their operations, with support and oversight from Regional and Group functions, as appropriate. Together with our supporting Group policies[3], these provisions define the minimum

[3] Policies | Compass Group (compass-group.com)

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 & Inclusion

We value all of our employees, regardless of their background, and we are committed to inclusion, fair treatment and opportunity for all, irrespective of personal characteristics. We seek to reflect the diversity of the communities in which we operate, helping close gaps in opportunity and supporting social mobility. We aim to create an inclusive environment where everyone feels respected, valued and able to thrive.

We are mindful of the heightened risks of harassment, discrimination or inequality faced by some groups. We have a zero-tolerance approach to harassment (including sexual harassment), bullying or discrimination on any grounds.

We are equally committed to promoting a safe and healthy working environment, which supports employees' wellbeing (including mental health), across all our operations and those of our Group companies, for employees, workers, consultants and contractors.

Modern Slavery

We are committed to eradicating modern slavery, labour exploitation, including that 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. The withholding of original identity or immigration documents is strictly prohibited.

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 Compass' operations and supply chains. **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, domestic servitude, organ harvesting or any other type of exploitative practice.

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.

Freedom of Association, Collective Bargaining and Working Hours

Compass is committed to fully respecting and complying with applicable local labour laws regarding workers' freedom of association and right to collective bargaining.

We respect the rights of Compass employees to freely decide whether to join, not join or form a labour union, without facing any form of retribution, coercion, or mistreatment. In cases where our employees choose to be represented by a legally acknowledged union, we will foster a positive and productive conversation with their legally and freely chosen representatives and commit to bargaining in good faith with such representatives. In situations in which the rights regarding freedom of association and collective bargaining are restricted by law, parallel means to dialogue must be facilitated.

Compass is fully committed to respecting and complying with all applicable national and local laws regarding working hours, including overtime. Compass is aligned to the ILO recommendation of maximum working hours but acknowledges that in some geographies and operating sectors alternative working shifts and arrangements maybe required for service delivery and operational resilience. In these cases, Compass will ensure that working hours are not excessive, in accordance with applicable laws and governed by pertinent contractual agreements.

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, where applicable, comply with and confirm adherence to.

Further enhancement of our monitoring, enforcement, and engagement with suppliers will be driven by the continuous implementation and maturation of our Supply Chain Risk Management frameworks and processes. These include, amongst other things, supplier evaluation and selection, supplier onboarding, and ongoing supplier management using tools, processes and key practices such as third-party due diligence, reviews and audits. Through these measures, we remain committed to fostering a responsible supply chain that aligns with our core values and upholds the highest standards of human rights and environmental stewardship.

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 Code of Business Conduct and Group Policies, 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. This ensures that all employees, business partners and any other stakeholders can raise their concerns – including those related but not limited to human rights, modern slavery and labour exploitation - 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.

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 have or may have caused or contributed to in our operations. We aim to achieve this through our Speak Up resources and escalation processes, enabling effective remedy, whilst not preventing access to other forms of remedy where applicable.

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 lessons learned and awareness training. 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 (as appropriate) 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:

- workplace safety measures, such as Total Recordable Injury Frequency Rate (TRIFR)
- 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 monitored on an ongoing basis to ensure our human rights commitments are upheld across our operations and supply chain. This Policy will be reviewed by the Board every three years, or more frequently if needed. 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 relevant policies and related documents, which can be viewed on our website here. These include our:

- Code of Business Conduct
- Business Integrity Policy
- Third-Party Integrity Due Diligence Policy (internal only)
- Speak and Listen Up Policy
- Workplace Health & Safety Policy Statement
- Food Safety Policy Statement
- Supply Chain Integrity Standards
- Global Supplier Code of Conduct
- Diversity & Inclusion Policy
- Environmental Policy Statement
- Deforestation Policy
- Modern Slavery Statement

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



Dominic Blakemore
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