COMPASS
GROUP

MODERN SLAVERY ACT
STATEMENT 2021

www.compass-group.com

Compass Group PLC (Compass) presents its annual statement pursuant to the provisions of section 54 of the Modern Slavery Act 2015 (the Act) for the year ended 30 September 2021.

GROUP CHIEF EXECUTIVE OFFICER OVERVIEW



Our people are at the heart of who we are and what we do. As an ethical, sustainable, and inclusive business, the commitments we make to our people, our clients and our suppliers, the values we live by, and the standards we uphold, are all central to the positive impact we have on the world, every day.

The global pandemic has had such a profound impact on people worldwide and has reinforced our firm commitment to protecting the dignity, wellbeing, and human rights of the people who work in our businesses, in our supply chains and the communities we serve.

To truly empower people, support livelihoods, enhance human rights and improve social equity for all, we must work together to eradicate modern slavery in all its forms.

Key to achieving this is understanding our individual and collective responsibilities; proactively seeking out areas of concern and rectifying them quickly and transparently; engaging with external stakeholders to independently assess our progress and identify key risk areas; and working collaboratively with peers and partners to drive changes that address the root causes of the issue.



The scale, influence, and international reach of the Group's operations means that we are in a position to make a real difference. Building on a solid base, over the past year we have made further positive progress, including:

- working with the Slave-Free Alliance to map our human rights activity and draft a strategic plan to drive progress within the Group's businesses and particularly in key higher-risk areas
- relaunching our independent global Ethics & Integrity helpline and online reporting platform for raising concerns in confidence; Speak Up, We're Listening
- expanding our Human Rights Working Group to include representatives from additional countries
- establishing a team of procurement leaders from across our regions to evaluate opportunities to improve supply chain due diligence
- training more of our people on human rights including those in the procurement, people, and legal functions around the Group, and running human rights risk assessment workshops in parallel
- rolling out SEDEX (Supplier Ethical Data Exchange) across more countries to improve visibility of the Group's supply chains and undertake risk assessments

As a Group, while we are working hard to identify and mitigate potential risks across our operations and supply chains, we recognise that there is still more to do.

In the coming year, we will continue to concentrate our efforts where we can make the biggest difference so as to ensure best practice across the Group's businesses and their supply chains. This will be supported by the launch of our new Global Supplier Code of Conduct in 2022. We have also committed to expand the reach and scope of our human rights and modern slavery training, and continue our collaboration with business partners, governments, NGOs, clients and communities to raise global standards and bring about the changes needed to end modern slavery and enhance human rights for all.

Dominic Blakemore
Group Chief Executive Officer, Compass Group PLC

INTRODUCTION

This is Compass Group's sixth Modern Slavery statement issued under the Modern Slavery Act. It updates our stakeholders on the Group's progress during the financial year to 30 September 2021, including how we have adapted and strengthened our processes and awareness campaigns to detect, address and prevent modern slavery in the Group's operations and supply chains.

We recognise that, despite increased international awareness and action, modern slavery continues to be a growing global issue, to which no industry is immune. We fully support the elimination of modern slavery in all its forms and are committed to upholding human rights, always treating people in our businesses fairly and expecting our suppliers to uphold these same high standards in our businesses' supply chains.



BUSINESS STRUCTURE

Compass is a global leader in food services, providing delicious and nutritious meals to millions of people, every day, across 45 countries. On a statutory basis, the annual revenue for the Group for the financial year ended 30 September 2021 was £17.9 billion, delivering an operating profit of £545 million.

Our global addressable market is large and disparate. The Group structures its businesses across five sectors: Healthcare & Senior Living (33% of annual revenue), Business & Industry (31%), Education (18%), Defence, Offshore & Remote (10%) and Sports & Leisure (8%). This structure allows us to develop a deeper understanding of our clients and the challenges they face. By adopting a collaborative approach, we can use our combined efforts to drive positive change on a global scale.

The Group operates within three key geographical regions:

- North America - 61% of revenue
- Europe - 26% of revenue
- Rest of world - 13% of revenue

The Board of Directors has delegated responsibility for the day-to-day operational management and implementation of its strategy to the Executive Committee, which is led by the Group Chief Executive Officer.

The Executive Committee comprises the executive directors, Group General Counsel and Company Secretary, Regional Managing Directors for North America, United Kingdom & Ireland, Europe & Middle East, Asia Pacific and Latin America, the Group Chief People Officer and the Group Chief Commercial Officer.

People are at the heart of our business and we believe the way we organise, train and develop them is a critical competitive advantage for the Group.

We employ and engage around 480,000 people globally. Whilst most are hired directly by our local operations, a smaller number are agency workers. Around 5% of the workforce of Group companies are foreign migrant workers, mostly concentrated in our Middle East operations. Our operations are generally decentralised in nature, with employees in regional and country head offices helping to instil common standards, values and governance across our global operations.

The Group procures approximately £7 billion annually from a large base of global and regional partners alongside smaller local and minority suppliers.

Large spend categories include food items such as meat and poultry, fruit and vegetables, seafood, beverages, frozen and grocery products as well as equipment and supplies for our operations, including uniforms and personal protective equipment. Whilst we have some global and regional contracts and relationships, most of our purchasing activity is managed at a country level.

COMPASS GROUP

POLICIES AND CONTRACTUAL CONTROLS

Our policies are underpinned by our adherence to several important internationally recognised standards including:

- **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**

The Group's regional and country managing directors are responsible for ensuring that the Group's policies and standards are properly implemented and adhered to in their own businesses and supply chains and for monitoring the ongoing effectiveness of the policies and standards.

Our Code of Business Conduct (CBC) sets out the ethical standards that stakeholders - including our people, clients, investors, suppliers, and local communities - can expect when dealing with the Group's businesses. The CBC affirms our commitment to conducting our business safely with honesty, integrity and respect. It includes a commitment, as a minimum (subject to compliance with applicable laws), to act within the ETI Base Code, the first principle of which is that employment is freely chosen. The CBC applies internally to all employees across the Group's operations and countries globally. It also applies to the Group's supplier partners globally and forms part of the contractual arrangements with them. Where applicable, suppliers are asked in their contracts with Group companies to:

- carefully review the CBC
- ensure that the CBC is disclosed to relevant personnel
- undertake and agree that, in connection with suppliers' performance under the contract, relevant personnel shall act consistently with the applicable principles of the CBC in all material respects

Our Group businesses are required to actively manage their third parties to ensure that they continue to act in accordance with the CBC. In line with our Speak Up and Listen Up Policy, any suspected breaches of the CBC (including by third parties) or examples of behaviour inconsistent with Compass' values must be referred to designated functional leaders, such as Legal and HR, or reported via our independent and confidential Speak Up, We're Listening helpline and/or online platform. Where instances of non-conformity with the CBC are substantiated, we will work with the supplier to try to remedy the issue identified. In those instances where it is not possible to rectify matters, or the situation requires it, we will review, suspend or terminate the relationship.

Our Code of Ethics supports our CBC. This year, around 4,500 employees, including members of the Executive Committee, senior managers, leaders and employees in control functions were required to complete the annual end of year declaration and forward-looking pledge affirming their compliance with, and commitment to, our CBC and Code of Ethics.



Our Five Golden Rules, which include the principle of operating fairly and with respect, are communicated to frontline teams including via payslips, induction materials and posters.

Our Human Rights Policy states our commitment to the four core conventions of the ILO, including the elimination of forced or compulsory labour and the abolition of child labour.

We are committed to further strengthening our policies and contractual controls and continue to build tools and share best practice to increase visibility, identify risks and improve ethical practices across the Group businesses and in our sector.

SUPPLY CHAIN

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.

This policy is underpinned by our Supply Chain Integrity Standards; an internal document which details the minimum requirements for the Group's procurement departments to implement. These include requirements concerning risk assessment, transparency, supplier approval, product specification, product surveillance and traceability.

The policy requires questionnaires to be completed by suppliers, asking them to agree to comply with the ETI Base Code. As part of self-assessment questionnaires in some of our markets, including the UK and Australia, suppliers are also asked to specifically disclose if they or their subsidiaries use any forced, bonded, or involuntary prison labour.

Compliance against these standards is determined through independently validated self-assessment. Procurement teams within each country are awarded either Bronze (minimum requirement), Silver or Gold status in relation to the robustness of their overall vendor assurance approach.

Our standards require supply chain complexity to be managed and minimised where commercially practical. The Group's relationships are closest with tier one suppliers however, increasingly, our businesses also work further upstream with tier two suppliers for better visibility of their supply chains.

Procurement teams are required to have an enhanced level of visibility beyond tier one suppliers concerning high-risk product categories, with a minimum of tier two supplier visibility required for Silver and Gold status.

The Group has engaged external specialists to support the launch of our Global Supplier Code of Conduct which is due to be implemented in 2022. Underpinned by Compass' CBC, Code of Ethics and Human Rights Policy, the code provides a supplier focussed framework of expected behaviours and will encourage suppliers to commit to upholding Compass' principles and values. This approach will continue to build mutual trust and foster values-driven relationships across our supply base. Non-compliance will be dealt with appropriately and may result in the suspension or termination of the relationship if identified issues are not remedied in a reasonable timeframe.

As part of the roll out of the new supplier code, we will promote awareness within the supplier community of our Speak Up, We're Listening programme to encourage suppliers to raise any concerns directly via their Compass business partner (if applicable) or via our accessible, independently managed and confidential reporting helpline and/or online platform.

GOVERNANCE

At Compass, we recognise that strong governance is essential for driving improvements and managing and mitigating the risks of modern slavery and human trafficking.

The Compass Group PLC Board is responsible for ensuring that Compass meets its human rights responsibilities, including those regarding modern slavery. Further oversight and guidance are provided by the Corporate Responsibility Committee (CR Committee), the Global Head of Sustainability, the Group Chief People Officer, the Group Chief Commercial Officer, the Group Head of Ethics & Integrity, the Global Human Rights Working Group and the Regional Governance Committees.

The CR Committee comprises the Non-executive Directors of the Board, the Chairman, the Group Chief Executive Officer and the Group Chief Financial Officer.

The Group Chief People Officer is responsible for setting the people strategy across the Group, which is implemented by the local People functions in our operating countries and regions.

The Group Chief Commercial Officer, who reports directly to the Group Chief Executive Officer, acts as the global functional lead for the Group with respect to our Human Rights Policy and has reporting responsibility for human rights on behalf of our operations and supply chain.

The Group's systems of internal control including the policies, procedures and activities that underpin these systems are designed to manage rather than eliminate risk and to ensure compliance with relevant legislation, regulation and best practice including that related to social, environmental and ethical issues. These systems provide reasonable, but not absolute assurance that the Group has reduced the risk that slavery and human trafficking could be found in its businesses or in their supply chains.

COMPASS GROUP'S GLOBAL HUMAN RIGHTS WORKING GROUP

The Global Human Rights Working Group (HRWG) has been operational since February 2020. The cross-functional group comprises internal audit, purchasing, HR and legal representatives from 14 countries, which represent higher-risk areas in relation to human rights as well as our larger markets. A core objective of the HRWG is to promote awareness of human rights risks, including salient modern slavery risks.

In 2021, we expanded the HRWG further with the addition of representatives from the Latin America region. Activities of the HRWG during the last year have focused on issues related to the ETI Base Code.

In the past 12 months, members of the HRWG have discussed human rights risks, including child labour risks, and have shared best practice throughout the Group on how leading companies are respecting human rights within their operations and supply chains.

The HRWG has undertaken human rights training provided by the World Business Council for Sustainable Development and open-source training on business and human rights by other third parties, including the Danish Institute for Human Rights. Learnings from these sessions are being used to assess future training requirements for the Group's people.

Members of the HRWG received presentations from industry experts including the Slave-Free Alliance and SEDEX; the latter of which demonstrated technical solutions available to the Group to help manage modern slavery and other human rights risks.

During the year, members of the HRWG also reviewed suppliers' modern slavery statements and conducted background research on specific higher-risk categories.

DUE DILIGENCE

We understand the fundamental importance of due diligence and robust risk management to identify, prevent and mitigate incidences of modern slavery in the Group's supply chain and operations.

Our approach to due diligence combines research, risk assessments, alignment with and implementation of industry standards and best practice, utilising cross-functional working groups, stakeholder engagement and applications of relevant policies.

In June 2021, we established a partnership with the Slave-Free Alliance (an anti-slavery social enterprise), which is acting as our 'critical friend' to help us to improve our due diligence processes and to address salient human rights risks.

MONITORING OUR SUPPLY CHAIN USING SEDEX

This year, we rolled out SEDEX across more countries to improve visibility of the Group's supply chains and to undertake risk assessments. The results of these risk assessments will be used to collaborate with our suppliers to effect improvements in managing supply chain risks.

Within our United Kingdom & Ireland (UK&I) business, SEDEX has been used to identify sourcing countries with the highest human rights risk in order that these geographies can be prioritised. Our UK&I business is also accessing supplier self-assessment and audit reports on SEDEX and was able to review SEDEX Members Ethical Trade Audits (SMETA) from over 60 suppliers in higher-risk categories, generated from a prioritisation assessment exercise. Using a risk-based approach, audit non-conformances were followed up to ensure the remediation of actions identified.

SEDEX is being rolled out in our Australian business, which enables it to monitor suppliers using the system. In Sweden, SEDEX is being used to analyse country of origin data for produce in our supply chain, with plans to gather new information regarding suppliers' production sites and the measures they take to minimise risks related to human rights. Our North American business is currently investigating platforms (including SEDEX) that align with and will enable the business to confirm that the ETI base code is being met in its supply chain.

HUMAN RIGHTS IMPACT ASSESSMENT

Our Australian business conducted an online impact assessment workshop in January 2021, which included members of its procurement team being trained on modern slavery and conducting a human rights impact assessment. Risks were discussed at length and suggestions for improvements included:

- strengthening human rights due diligence processes as part of supplier risk assessments
- developing additional supplier contractual and onboarding requirements and monitoring
- enhancing controls over one-time vendors and suppliers (especially smaller project vendors and interim labour)

Subsequently, in Australia, SEDEX is being used to track and monitor high-risk tier one suppliers whilst medium-risk and high-risk tier two suppliers will begin to be monitored next using the system. By October 2021, 43% of priority category suppliers in Australia were being tracked via the system, which is equivalent to 75% of priority category spend in Compass Group Australia.

SUPPLIER ENGAGEMENT AND ASSESSMENT

During the year, our North American business engaged with key suppliers in high-risk categories to better understand each supplier's policies and procedures related to Compass' CBC, with a focus on human rights.

Through this engagement process, the North American business identified actions that could be taken in all purchased categories to improve the business' ability to confirm its supply chains are in compliance with the CBC. The North American business will look to test and implement some of these identified actions in 2022.

To further enhance its supplier due diligence going forward, our Benelux (Belgium, the Netherlands, and Luxembourg) business plans to introduce the Global Sustainable Enterprise System in 2022 - the global standard for comprehensive sustainability assessment and certification - to rate, verify and certify the sustainability performance of its supply chain, including worldwide accepted standards for fair labour conditions.

RISKS AND STEPS TAKEN

Compass' country-led due diligence processes identified several potential modern slavery and human rights risks that could be present within our businesses' operations and supply chains. We are committed to continual improvement and below we highlight the actions being taken to address those potential risks.

LABOUR AGENCIES IN THE UK

Further to the work undertaken last year in reviewing the use of labour agencies in the UK and Ireland, our UK&I business has reduced the number of agency suppliers it uses from over 200 to 130, to more closely manage risk and strengthen oversight. As part of the onboarding procedures in the UK&I, all agencies are vetted on issues related to modern slavery risks; for example, they must have published an up-to-date modern slavery statement. This has resulted in several agencies being rejected for failure to ensure robust processes are in place. Agency suppliers are regularly audited through an independent specialist. Of the top labour agency suppliers to the UK&I business, over 70% have received an audit in the last six months with plans in place to achieve 100% by March 2022.

CROSS-BORDER RECRUITMENT IN THE MIDDLE EAST

We want all our Group companies to maintain vigilance in their cross-border recruitment practices. Our joint venture companies in the Middle East recruit labour from several countries and operate under a policy whereby it is strictly forbidden for labour agencies to charge a recruitment fee to potential employees, irrespective of the source country or what is permissible by source country laws. The local teams have continued to raise awareness with candidates and employees in the region around acceptable and unacceptable recruitment practices by agencies and will terminate relationships with agencies that are found to have violated our operating principles.

Travel and visa entry restrictions applying during the pandemic meant greater challenge in overseeing compliance of our operating principles across all source countries and destination countries. However, where we identified some isolated incidences of concern, these were thoroughly investigated and, where necessary corrected, with new controls put in place.

As an indication of the importance of employee welfare and support, a new senior role was created in the Middle East. The Social Impact Director, Middle East, has responsibility for further developing and implementing an effective compliance monitoring programme across the Group's businesses in that region.

AGENCY LABOUR IN CHINA

In 2020, our internal audit team reviewed 13 third party Chinese labour agencies on key processes, including agency employee onboarding and salary and benefit payments. When reviewing compliance regarding minimum wage in a sampled province, we found 70 employees were paid less than the minimum statutory wage (representing 3.1% of the total agency work population in China).

An investigation followed and identified human error as the cause of the problem in the sampled province. The shortfall was subsequently paid to the employees affected in full. Process changes have been implemented to prevent the problem re-occurring, including:

- an update of the e-attendance system to reflect the latest minimum wage legislation
- minimum wage master data now reviewed by the local management team monthly

Although this was not an instance of modern slavery, it fell short of the standards we expect. Processes have been strengthened in this area and our local teams are committed to ongoing improvement.



A review of all pay arrangements in all other provinces in China was subsequently carried out and no further issues were identified.

SUPPLY CHAIN FORCED LABOUR ALLEGATIONS IN MALAYSIA

We have been alert to risks within the disposables gloves industry. Following allegations of forced labour and the subsequent banning of imports from a large Malaysian disposable glove manufacturer by US Customs and Border Protection, we took action by investigating the issue with our regional procurement directors and reviewing our supply chains.

Whilst we did not discover any direct contracts with this manufacturer, we recognised that their products could possibly be purchased through other suppliers, which was identified as a potential risk. We therefore required all direct suppliers of Group companies to pause the supply of product from this manufacturer should they be using them, until further investigation was completed.

Recognising the ongoing risks in this supply chain, a team of procurement leaders from our regions was established to evaluate opportunities to improve due diligence. As a result, we identified the need to drive more consistency in the processes and are exploring new tools and systems to facilitate greater information sharing across our markets.

SEAFOOD SUPPLIERS TO THE UK

In late 2020, as part of a retender for the supply of fish into our UK&I business, the procurement team requested wholesale suppliers to disclose their actions on modern slavery. Our human rights consultant, Slave-Free Alliance (SFA), reviewed their responses and provided recommendations for further action to mitigate risks and drive improvements. These recommendations allowed the UK&I business to select specific suppliers and exclude others based on their responses.

HUMAN RIGHTS STRATEGIC PLAN

In 2021, with the SFA's assistance, we formulated a draft human rights strategic plan that includes recommended actions to take regarding:

- potential risks within Group businesses' own operations, including workers provided with accommodation, agency labour and migrant workers recruited using recruitment intermediaries
- key risks within Group businesses' supply chains, including garments, seafood and fresh produce
- driving awareness and education within the businesses in respect of human rights topics

We intend to use this plan to drive further progress in the Group's processes, due diligence, training and awareness campaigns over the coming year, with a particular focus on the key higher-risk areas identified.



ACCESS TO REMEDY

The Group promotes a culture of honesty, fairness, inclusivity and respect, while our values of openness, trust and integrity guide our behaviour. These values reinforce how we promote and uphold our high ethical standards in accordance with our policies, the CBC, Code of Ethics and our Human Rights Policy, as well as all applicable laws.

Open communication, collaboration and adopting a risk-based approach are essential in identifying, preventing and appropriately dealing with potential wrongdoing and other sensitive issues. We are committed to maintaining a culture where everyone feels confident and safe in voicing concerns without fear of retaliation. We are committed to remediating concerns raised and sharing lessons learned to prevent re-occurrence.

Speak Up, We're Listening is Compass' confidential reporting programme that is available in all 45 countries where we operate, in applicable local languages. The programme's helpline, online platform and case management system are operated by an independent third party provider. It is available 24 hours a day, seven days a week, 365 days a year and is managed by Group Ethics and Integrity (E&I); a dedicated team of professionals that is independent of any lines of business.

Speak Up, We're Listening provides the reporting party with several resources to raise concerns and the choice to submit a report confidentially and anonymously (subject to compliance with applicable local laws).

Employees can raise concerns via:

- their manager
- a more senior manager
- HR
- legal
- the country Listen Up Champion
- a member of Group E&I
- the Speak Up online platform
- dedicated country phone helpline provided to all colleagues

External reporting parties can contact their Compass relationship manager (if applicable) or can raise their concern through the online platform or phone helpline. Reports received through Speak Up, We're Listening are referred to Group E&I for confidential review and assignment for follow up and/or investigation, as appropriate.

Once assigned, reports are dealt with by a community of Speak Up investigators who conduct a confidential review and/or investigation. For each report received, we engage with the reporter to advise their report has been received by Group E&I and will be assigned to the appropriate person/investigator to follow up. The individual reporter can check back using the two-way communication channels in the system, through engaging with their assigned investigator, or asking Group E&I directly about their case. Each reporter receives a close out message, so they know their concern has been addressed, an investigation concluded and/or a matter resolved.

In the 12 months to September 2021 there were no Speak Up reports received through the helpline or via the online platform that were categorised as concerns raised around the issue of modern slavery and human trafficking.

However, through Speak Up, we received some reports related to human rights topics including alleged discrimination and working practices. These reports were followed up and/or investigated in an appropriate and timely manner with our standard processes being followed.

SPEAK UP, WE'RE LISTENING RELAUNCH

Our Speak Up, We're Listening programme was relaunched and rebranded globally from 1 October 2021 with a coordinated roll out and engagement campaign across all 45 countries.

A dedicated page on our Speak Up, We're Listening programme can be found on the Compass Group PLC website, personally endorsed by our Group Chief Executive Officer, and further information is available through our Group E&I portal, which is accessible to anyone at www.letintegritybeyourguide.com

Further initiatives are planned for 2022 to continue raising awareness of our programme and reinforce our commitments to listening and following up when our people, partners, communities or interested parties raise their voice.

TRAINING

We are committed to raising awareness about the importance of human rights and the issue of modern slavery in our Group businesses.

Our people are our first line of defence in identifying any signs of modern slavery. We have sought to improve their awareness of the issue and provide training and guidance in helping to recognise the signs of modern slavery. For example, at a UK&I Foodbuy team meeting for more than 200 colleagues, a training session was presented on modern slavery and human trafficking to help drive awareness.

Through our e-learning training platform, the Modern Slavery and Human Rights module has been assigned for completion to certain senior leaders, managers and colleagues at Group level and to employees in 16 countries involved in supply chain and procurement activities, as well as members of the HRWG and the Chairman of the CR Committee. At the time of reporting, 551 employees have completed the training; 92% of the target group. We are committed to extending the scope of the target population this year to continue to raise awareness of this important issue to an even broader audience.

Furthermore, several members of our HRWG from multiple regions attended human rights Train the Trainer webinar classes provided by the World Business Council for Sustainable Development. We intend to provide this training to more of our people in the coming year and are committed to increasing the reach and scope of our human rights and modern slavery training across the Group businesses.



EFFECTIVENESS

Compass has taken the opportunity over the past year to reflect on the progress of its human rights agenda to date and start to formulate a new strategy and direction for the future, which will include continuing to review and monitor its human rights policy implementation.



CASE STUDY

COMPASS GROUP AND THE SLAVE-FREE ALLIANCE

In Spring 2021, Compass became a member of the Slave-Free Alliance (SFA) which is part of Hope for Justice, a not-for-profit organisation dedicated to eradicating modern slavery and improving human rights. Initial work with the SFA involved assessing the design and strategic approach to our current human rights activities. Compass' policies were reviewed and gap analysis workshops were conducted. Findings were presented along with a strategic plan to make progress and further embed human rights principles and practices to ensure the welfare and rights of all workers in Group companies' supply chains and operations. Following on from this work, we are now looking to take the first steps recommended in this strategic plan to make further progress.

Marc Stanton, Director at Slave-Free Alliance, said: *"Compass Group has already shown great commitment to playing its part in creating slave-free supply chains and operations. The whole team is thoroughly invested in doing everything possible to ensure that workers are protected and not exploited."*

"We have carried out extremely positive work to help the team map out their human rights strategy, but this is just the beginning. We are looking forward to working with Compass Group closely in the future to achieve great strides towards our shared goal of a slave-free supply chain."

CASE STUDY

MIGRANT LABOUR RECRUITMENT IN THE MIDDLE EAST

Our businesses in the Middle East are alert to the risks inherent in cross-border migrant labour recruitment and are implementing an enhanced and ongoing ethics and compliance programme across all recruitment channels. Without doubt, the pandemic has presented new obstacles and challenges, placing greater reliance on trusted partners in the recruitment of colleagues, whose processes are closely monitored.

In light of the changing circumstances due to the pandemic, for example new requirements around quarantine, during 2021 our UAE and Qatar businesses took the opportunity to review their recruitment standard operating procedures. Their review set out to ensure local processes and colleague experience met our own high standards of conducting business with honesty, integrity and respect, the standards of all applicable source and destination country laws, and against the 11 ILO forced labour indicators.

There were good standards of compliance overall and the businesses generally complied with the 11 ILO forced labour indicators. Where exceptions were identified, actions were taken quickly to remedy them, and the businesses continue to strengthen their practices overall:

- since adopting a 'no cost' recruitment model for all recruitment (irrespective of source country), steps are being taken to provide for greater and earlier clarity in communication to prospective candidates by the recruitment agencies of what constitutes 'recruitment fees' that are reimbursed as part of the free recruitment policy, and evidence required to support the same.

- the first tier recruitment agency contracts are now enhanced, including with KPIs and a requirement for the new provisions to be mirrored in the engagement contracts with second tier agencies. Measures are being taken to provide sufficient training and auditing of the second tier (sub)agencies that are subcontractors to the contracted source country recruitment agencies.

- given the pandemic-related travel challenges of HR staff from UAE and Qatar attending recruitment days in person, a prior HR employee (who had moved back to Nepal) has been recruited by our Middle East business to support their on-the-ground presence in Nepal. Similar structures are being implemented in India.

- employment offers are now provided to candidates in their source country language.

- a new dedicated source country grievance channel was opened for potential candidates to use during the recruitment process, like the grievance mechanisms in place for workers with employment contracts, such as the Company's Helpline and Speak Up hotline. This grievance and information mechanism will be further enhanced in the coming year.

- new arrivals who are required to quarantine are provided with a monetary stipend while they are under COVID quarantine in UAE prior to starting work.

- from 1 April 2021 in UAE and Qatar as applicable, for those colleagues who were not provided food as part of their accommodation, their food allowances were enhanced while also providing cash allowance advances to new recruits to purchase food on immediate arrival to their destination country.

- through oversight by operational management, it was discovered that a minority of unit staff had not been paid in July 2021, and this was remedied the following month. There was no evidence that this was an institutional common practice.

- two members of staff did not hold their own passports as these were with the client for security pass processing and were immediately returned.

- the cost of Emirates identification cards (previously paid for by the employee) is now also covered by the business.

- a Compliance Monitoring programme for all first and second tier recruitment agencies will be introduced, with regular audits to be conducted.

LOOKING AHEAD

We will continue to develop our human rights strategy across our Group operations and supply chains to address human rights risks and improve in this area.

Our commitments for 2022 are:

- launching our Global Supplier Code of Conduct across our Group businesses
- expanding the use of SEDEX in more of our markets, alongside the UK&I, Australia and Sweden, to improve due diligence processes
- growing awareness of human rights through additional modern slavery e-learning and training across the Group businesses
- increasing resources within the Group, designated to drive improvements in our human rights programme design and implementation, both internally and in our supply chain
- continue to work with the Slave-Free Alliance to develop our approach on human rights management globally

We look forward to reporting on our progress in next year's statement.

CONCLUSION

Compass is committed to supporting the dignity, wellbeing and human rights of all our people, the communities in which we operate, and those affected by our operations. We will continue to work with our business partners, clients and communities to develop our capabilities and work towards ending slavery in all its forms.



Nelson Silva
Non-executive Director of Compass Group PLC
Chairman, Corporate Responsibility Committee

Approved by the Board of Compass Group PLC on
3 February 2022 for release on 4 February 2022

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ANNEX

Subsidiary companies of Compass Group PLC meeting the criteria to require the preparation of an annual Slavery and Human Trafficking Statement, in accordance with section 54 of the Modern Slavery Act 2015, that are included within the scope of this Compass Group PLC statement:

Compass Group Holdings PLC
Compass Group, UK and Ireland Limited
Compass Contract Services (U.K.) Limited
Compass Services (U.K.) Limited