COMPASS GROUP

CODE OF BUSINESS CONDUCT

THE COMPASS WAY





OUR FRAMEWORK

OUR VISION AND VALUES

Our Vision is to be a world-class provider of contract food service and support services, renowned for our great people, our great service, and our great results.

Our Values set out what we collectively believe in and guide our behaviours, including our commitment to Safety, Integrity and Respect in **everything we do**.

OUR CODE OF BUSINESS CONDUCT

Our Code of Business Conduct supports us in upholding our high ethical standards and commitments. It sets out the principles, standards and expectations of how we conduct business globally and how we should engage with and treat one another.

OUR GROUP POLICIES

Our Group Policies establish the minimum requirements and behaviours expected to support embedding our Values and Code of Business Conduct wherever we operate. They are mandatory and form the foundation for local policies and practices.

MESSAGE FROM DOMINIC BLAKEMORE

As a global leader in food services, Compass Group always strives to do what's right; for our people, our customers, our shareholders, the planet, and the communities we serve.

To achieve this, we are committed to maintaining strong governance and high ethical standards throughout our global operations and to conduct business with integrity, to never compromise on safety, and to treat others with kindness and respect.

The Group's success and future growth depends on everyone upholding these commitments. Because, whatever our role in Compass, how we act and behave can affect how we are viewed and impact the trust that our stakeholders have in us.

Our Code of Business Conduct (the "Code") reflects who we are and provides a clear path – for everyone working with, for, or on behalf of Compass – to always do what's right.

We all have a shared responsibility to understand, follow and embed the principles, standards and behaviours set out in the Code, which is approved by the Compass Group PLC Board of Directors and Group Executive Committee. Should you ever feel concerned the Code is not being followed, please speak to your Line Manager, or submit a report through our confidential reporting programme, Speak Up, We're Listening.

I want to thank everyone for playing your part in putting the Code to work everywhere, every day, now and in the future. Together, we can ensure Safety, Integrity and Respect is at the heart of everything we do. It's the Compass Way.

DOMINIC BLAKEMORE
Group Chief Executive Officer



"OUR CODE OF BUSINESS CONDUCT REFLECTS WHO WE ARE AND PROVIDES A CLEAR PATH – FOR EVERYONE WORKING WITH, FOR, OR ON BEHALF OF COMPASS – TO ALWAYS DO WHAT'S RIGHT."

This Code may be amended from time to time. The most recent version of the Code is available on Compass' website


I BELIEVE
IN THE CODE


WE STAND
BY THE CODE


TOGETHER, WE
LIVE OUR VALUES

WHAT IS THE COMPASS CODE OF BUSINESS CONDUCT?

The Compass Group ("Compass"/"We"/"Our"/"Company") Code of Business Conduct (the "Code") sets out the minimum standards and behaviours we expect from everyone working for or on behalf of Compass. It guides us when there are questions or situations where the right course of action may be unclear. Building mutual trust and confidence in those who work for, partner with and invest in us is key to our continued success, and depends on each of us acting professionally, responsibly and in accordance with the standards and principles set out in this Code. By following the Code, we can protect each other and the Company's reputation for integrity and strong governance.

WHO DOES THE CODE APPLY TO?

The Code applies to everyone working with, for or on behalf of Compass, including without exception temporary and contract staff regardless of location, role or level of seniority.

IT IS THEREFORE IMPORTANT THAT YOU UNDERSTAND THE RULES AND PRINCIPLES YOU MUST FOLLOW AND THE STANDARDS AND BEHAVIOURS THAT ARE EXPECTED OF YOU.

It is your responsibility to ensure that you have read and properly understood the contents of the Code and associated Group Policies. If there is anything in the Code that you don't understand or are unsure of, speak to your Line Manager. Contractors, intermediaries, representatives, joint venture partners and companies we invest in (our "business partners") are expected to follow and comply with this Code. Our suppliers are also expected to meet the standards and principles of this Code and comply with the Global Supplier Code of Conduct.



VISION & VALUES

Our Vision and Values capture in words the spirit of Compass and what we stand for. They underpin the decisions and actions of our people; are evidenced in our customers' experience of the service we deliver; drive our performance and will further enable sustainable growth over time.

Our Values set out what we collectively believe in and guide our behaviours.

Openness, Trust and Integrity

We set the highest ethical and professional standards. We want all our relationships to be based on **honesty**, **respect**, **fairness** and a commitment to open dialogue and **transparency**.

Passion for Quality

We are passionate about delivering superior food and service and take pride in achieving this. We look to replicate success, learn from mistakes and develop the ideas, innovation and practices that will help us improve and lead our market.

Win Through Teamwork

We encourage individual ownership but work as a team. We value the expertise, individuality and contribution of all colleagues, working in support of each other and readily sharing good practice, in pursuit of shared goals.

Responsibility

We take responsibility for our actions, individually and as a Group. Every day, everywhere we look to make a positive contribution to the health and wellbeing of our customers, the communities we work in and the world we live in.

Can-do Safely

We take a positive and commercially aware "can-do" approach to the opportunities and challenges we face.



FIVE GOLDEN RULES

Our Five Golden Rules encapsulate the Code and provide context to our strategic and disciplined focus on People, Performance and Purpose as our key strategic priorities.

1. **Health and safety is our number one priority** – make sure it is your number one priority too.
2. **Any unethical or illegal activity is strictly prohibited** including corruption, bribery, anti-competitive behaviour or fraud.
3. **Be kind and caring.** Treat each other fairly, with respect and dignity.
4. **Always be professional, polite, honest and transparent** when dealing with customers, suppliers and colleagues.
5. **Act with integrity.** Don’t do anything which could harm Compass’ reputation.

LIVING THE CODE – WHAT IS EXPECTED OF YOU?

Our words and actions must always reflect our values and demonstrate the highest ethical standards in how we conduct our business and engage with our customers, investors and business partners.

This Code provides principles-based guidance and the expected standards and behaviours to help do what's right. Our pledge is to:

- uphold the standards, principles and commitments set out in this Code and instil these within our day-to-day work
- follow all processes and procedures that are in place to ensure that we adhere to applicable compliance requirements
- foster a safe, respectful and inclusive workplace with access to the information, training and tools needed to help employees and colleagues adhere to the expectations in this Code.

All employees and business partners must comply with applicable laws and regulations. Where there is a difference between the requirements of this Code, Group or local Policies and applicable laws or regulations, you must apply whichever is more stringent.

We should not engage any contractor, agent, consultant, supplier, customer or any other third party whose business practices conflict with the Code. If engaging any third party to act on behalf of Compass, it is our responsibility to always consult the Legal team and undertake reasonable due diligence to ensure that our values and principles align, and risks are appropriately assessed.

Anyone found to be in breach of applicable laws or whose actions and behaviours are inconsistent with our Code could face disciplinary action up to and including dismissal.



OUR ETHICAL DECISION-MAKING MODEL

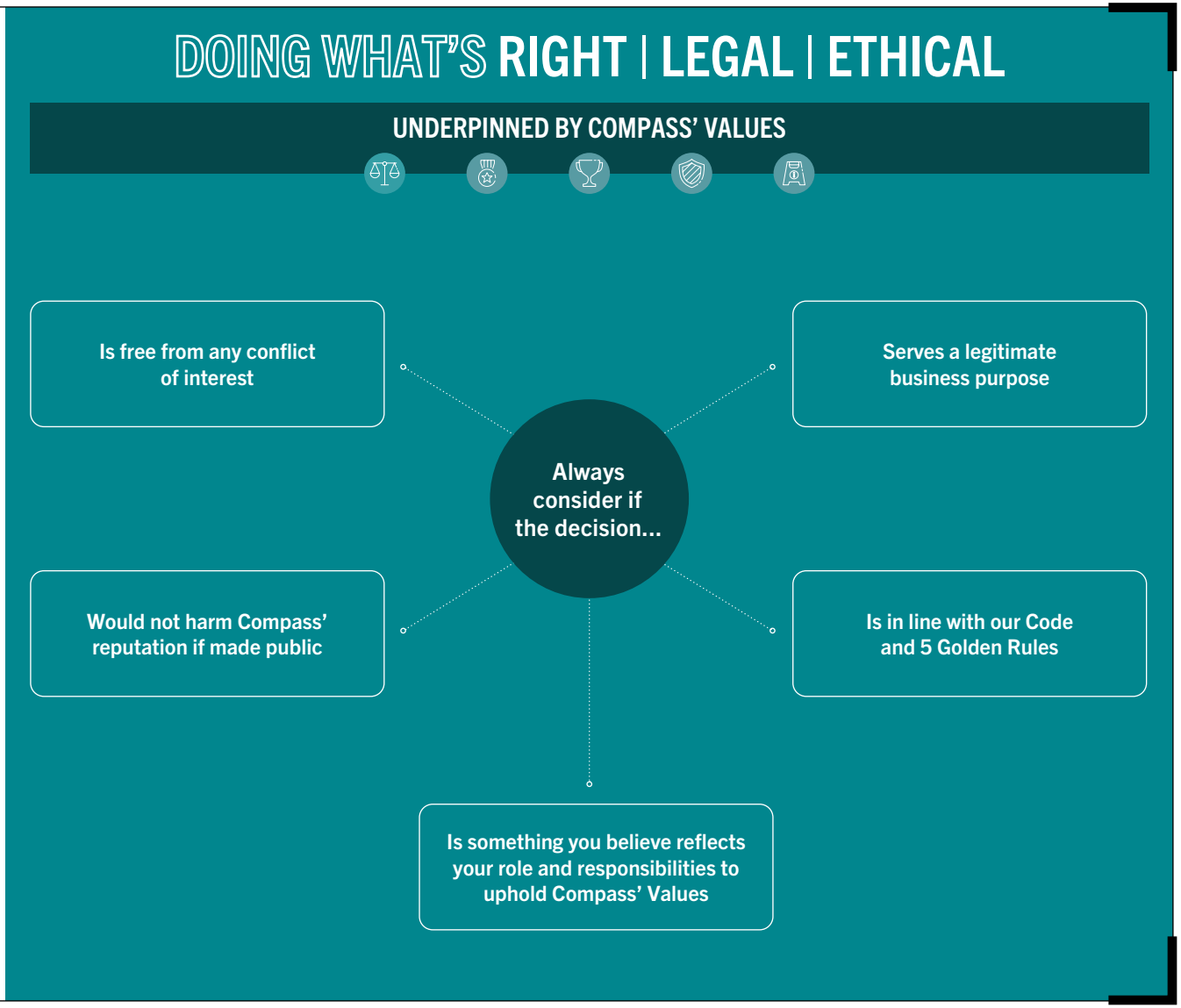
Using our ethical decision-making model can help us make the right choices. It will help determine what we **should** do rather than what we **can** do. Doing what's right is always informed by the circumstances we face and may involve going beyond what is required by law. Because something is **legal** or culturally acceptable in one jurisdiction does not necessarily make it legal in another jurisdiction. The guiding principle will always be whether it is **ethical** and in line with Compass' values.

Before making a decision or being asked to agree with a decision made by someone else, always consider if that decision:

– is free from any conflict of interest
– serves a legitimate business purpose
– is something you believe reflects your role and responsibilities to uphold Compass' Values
– would not harm Compass' reputation if made public
– is in line with the Code and Five Golden Rules.

If the answer is no to any of these questions, we must pause, reconsider and seek advice from our Line Manager, Legal and/or Group Ethics & Integrity before taking any further action.

SEEKING ADVICE IS A SIGN OF STRENGTH, NOT WEAKNESS.



THE COMPASS WAY



SUSTAINABILITY

AS A LEADING INTERNATIONAL FOOD SERVICE BUSINESS, WE FOCUS ON WHERE WE CAN HAVE THE BIGGEST POSITIVE IMPACT ON THE GLOBAL FOOD SYSTEM, THE ENVIRONMENT AND LOCAL COMMUNITIES.

This includes engaging a wide range of stakeholders at a global, country and local level who influence or are affected by our day-to-day business and aligning our sustainability strategy with the United Nations Sustainable Development Goals, focusing on areas where we can have the most impact.

We conduct our business in a sustainable way and we proactively make efforts to minimise negative effects (such as by reducing climate net zero greenhouse gas emissions) and maximise the opportunity to contribute to positive impacts on the environment. To this end, it is important that we promote and encourage environmental responsibility in all areas within our control, regardless of our position.

Compass is committed to making continuous progress on the sustainable development of the communities in which we live and work, facilitating opportunities to support local communities and ensuring that our commitments are transparent, ethical and in line with our values.

For more information, refer to our Environmental Policy Statement and our Sustainability page on our website

DO

- comply with all applicable laws, regulations and Group Policies, standards and procedures in relation to environmental matters
- help safeguard the environment and minimise the impact of our operations
- ensure energy efficiency and carbon emissions are considered in all aspects of our work and take steps to save energy and reduce our carbon footprint wherever possible
- work to reduce food waste in our operations and where possible, support the redistribution of surplus food in the community
- actively reduce unnecessary packaging and work to introduce sustainable alternatives over single-use products and fossil fuel-based plastics
- ensure that we are equipped with the right information, training and tools necessary to implement responsible environmental practice
- strive to support local communities, minority groups' businesses and organisations including helping to develop local skills and capabilities

DON'T

- dispose of waste material in an illegal manner
- carry out activities that waste water
- ignore our responsibilities to influence business partners to contribute to positive impacts on the environment
- disregard indigenous peoples' rights or land rights
- grant community support to improperly influence a business decision
- publish, authorise or disclose sustainability data or information that is inaccurate, false or misleading
- publish, disclose or release non-public sustainability data or information without appropriate approvals in accordance with the Group Approvals Manual (internal only) and/or Group or local Policies

HUMAN RIGHTS AND MODERN SLAVERY

We respect the human rights and dignity of people throughout our operations and global supply chains, including those considered as belonging to "vulnerable" groups. We comply and expect our suppliers to comply with all applicable local laws including those that promote decent, safe working conditions and individual security; laws prohibiting forced and child labour; prohibitions on human trafficking; and laws that safeguard freedom of association and the right to engage in collective bargaining.

We are committed to the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, the core conventions of the International Labour Organisation and Ethical Trading Initiative Base Code. We are a signatory of the United Nations Global Compact and respect its principles, which means wherever we work in the world, we will always seek to respect and uphold the fundamental Human Rights and freedoms of everyone who works for or with us, and of the people and communities we work among.

WE HAVE ZERO TOLERANCE TO FORCED LABOUR AND ARE COMMITTED TO PLAYING OUR PART TO ERADICATE MODERN SLAVERY AND HUMAN TRAFFICKING IN ALL ITS FORMS.

For more information, refer to our Human Rights Policy and our Modern Slavery and Human Trafficking Statement

DO

- comply with local legal requirements in relation to all types of employment arrangements, including but not limited to permanent, short-term, casual or agency employees and workers
- follow and uphold the principles of our Human Rights Policy
- treat every employee and/or worker fairly and with dignity and respect, regardless of their background, which includes but is not limited to race, sex, colour, origin, ethnicity, religion, beliefs, age, disability, sexual orientation, gender identification or expression, political opinion or social background
- provide transparent, fair and confidential procedures for our employees to raise relevant concerns. These must enable employees to discuss any situation where they believe they have been discriminated against, harassed or treated unfairly or without respect or dignity
- continue to promote the principles of respecting human rights and seek to further raise awareness of modern slavery and human trafficking risks throughout our supply chains
- respect indigenous peoples' rights or land rights

DON'T

- use, benefit from or permit to be used, forced or compulsory or trafficked labour
- use, benefit from or permit to be used any form of child exploitation
- support the charging of any fees or costs for recruitment of cross-border migrant workers to ensure alignment with the employer pays principle
- engage in any direct behaviour that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, age, role, gender identification or expression, identity, colour, religion, ethnicity, country of origin, sexual orientation, marital status, dependents, disability, social class or political views
- assume someone else will, or ignore our personal responsibility to, report a potential human rights incident or issue

EMPLOYMENT AND INCLUSION

We are committed to hiring, developing and retaining diverse talent which reflects the communities in which we live and work. We are dedicated to encouraging a supportive, respectful and inclusive culture where colleagues are welcomed, can be themselves and feel that they belong.

COMPASS IS COMMITTED TO EQUALITY, WELLBEING, INCLUSION AND FAIRNESS FOR ALL OUR EMPLOYEES. WE ARE OPPOSED TO ANY AND ALL FORMS OF DISCRIMINATION, BULLYING OR HARASSMENT.

We also expect our business partners to uphold practices of zero tolerance to discrimination in respect to employment and occupation, and fostering an environment of diversity, equity and inclusion.

Compass takes a holistic approach to ensure people feel respected, including but not limited to their background, race, sex, gender identification or expression, identity, age, sexual orientation, religion, ethnicity, marital or civil partnership status, pregnancy or maternity or disability.

For more information, refer to our Diversity, Equity & Inclusion Policy and Compass Commitments

DO

- comply with all applicable local laws, regulations and labour standards
- treat people equitably, fairly and without discrimination
- put in place and promote ethical, positive, safe and fair working conditions
- ensure that all work is based on a legally recognised employment relationship and that employees and workers receive clear written information about their employment terms and benefits
- make all employment decisions, including hiring, promotion, training and transfers solely based on merit, aptitude and ability and in compliance with relevant local laws, regardless of the work arrangement type
- recognise and be sensitive to behaviours that might be acceptable to some cultures, backgrounds or perspectives but not to others and adjust such conduct as may be reasonable and/or necessary
- make appropriate, reasonable adjustments as necessary to support those who need it (e.g. adjustments of working arrangements for those with a disability, for those with caring responsibilities etc.)

DON'T

- hire any individual younger than 15 years old or the local legal minimum age requirement, whichever is higher
- tolerate any form of harassment, bullying, discrimination, hostile, offensive, intimidating, malicious, insulting or degrading treatment, whether physical, verbal, sexual, or any harmful acts including violence or threats of violence
- engage in any direct behaviour that is hostile, offensive, intimidating, malicious, insulting or degrading towards a specific individual or individuals. This includes whether done individually or collectively with others
- engage in any indirect behaviour which is offensive, intimidating, malicious, insulting or degrading towards a specific individual or individuals, and/or could be construed as harassment or bullying

RESPONSIBLE SOURCING

WE ARE COMMITTED TO SOURCING OUR PRODUCTS AND SERVICES IN A SUSTAINABLE, ETHICAL AND SOCIALLY CONSCIOUS WAY.

Where possible, we source ingredients from suppliers local to our units, purchase seasonal and organic produce and participate in fair trade initiatives. We place great emphasis on responsible sourcing.

The chemicals and other products we buy and use to support the delivery of our services are responsibly sourced and transported to ensure our people and customers are not unnecessarily exposed to risk.

We recognise the importance of maintaining both visibility and transparency within our supply chains to maximise positive impact and also to protect those who work within it from potential abuse and exploitation.

We are committed to continuously seeking to influence and raise animal welfare standards throughout our global supply chains.

DO

- comply with all applicable laws and regulations in relation to our sourcing and procurement activities
- continue to embed the principles of our Global Supplier Code of Conduct throughout our supply chains
- conduct appropriate due diligence to ensure that, from supplier onboarding through to supply and payment, the relationship is conducted in accordance with the guiding principles of this Code and Group and/or local Policies
- promote improving animal welfare wherever we can have a positive impact in our supply chains
- support diversity, equity and inclusion focused suppliers wherever possible
- respond to red flags in relation to ethical supply chain risks in a timely way

DON'T

- compromise ethical values, standards, behaviour, quality or safety in our engagements with suppliers
- take the easy or convenient option to continue doing business with a supplier or distributor (or indirectly their supplier). This includes in circumstances when it is not the right thing to do or in the event of unsatisfactory progress being made to remediate an issue or non-compliance with the Code or our Global Supplier Code of Conduct

You can find more information about our work with suppliers by reading our Global Supplier Code of Conduct, our Supply Chain Integrity Policy Statement and our Responsible Sourcing page on our website

HEALTH AND SAFETY



WORKPLACE HEALTH AND SAFETY

Our commitment to zero harm stems from our caring and inclusive culture whereby the health, safety and wellbeing of our employees, workers, customers and the communities we serve are our top priority.

WE PROMOTE ROBUST WORKPLACE SAFETY AND QUALITY STANDARDS THROUGHOUT OUR OPERATIONS AND EXPECT THE SAME FROM OUR BUSINESS PARTNERS.

We strive to continuously improve our health and safety performance and regularly measure compliance against our standards to assure our customers and others who work with us that we are operating the safest environment possible.

For more information, refer to our Workplace Health & Safety Policy Statement

DO

- comply with all applicable laws and regulations, and adhere to relevant industry standards on workplace health and relevant safety rules and procedures
- seek to prevent injury to any employee, customer, on-site supplier or contractor
- stop unsafe work immediately
- follow and adhere to Group and local workplace health and safety Policies, standards and procedures
- ensure that employees are competent, appropriately trained and provided with appropriate personal protective equipment to safely perform their work
- ensure we only undertake work that we are trained, competent, capable and medically fit to do
- promptly report any actual or near miss injury, ill health, unsafe or hazardous condition that is related to our work or ability to perform our duties
- investigate and conduct a root-cause analysis of all serious incidents and near misses
- share lessons learned with our colleagues to help prevent reoccurrence of incidents
- review health and safety policies regularly to ensure that they are kept up to date with legislative and regulatory requirements and leading practice

DON'T

- ignore an unsafe act or hazard. If we observe someone else performing an unsafe or hazardous act, we should explain to that person why it is unsafe, ask that they stop and follow local procedures to remediate the issue
- come to work or undertake any work-related activity whereby our ability to perform a function or duty safely is impaired by drugs, alcohol or other substances
- perform a task or function that we are not appropriately trained for or capable of undertaking in a safe and compliant manner
- allow a team member to continue working whilst impaired or to perform a task or function that is unsafe or non-compliant
- assume someone else will report an unsafe or hazardous situation

FOOD SAFETY

OUR PRIORITY IS TO SERVE FOOD TO OUR CUSTOMERS THAT IS PREPARED TO THE VERY HIGHEST STANDARDS USING QUALITY PRODUCTS AND INGREDIENTS.

To ensure safe and effective practice, we have developed a set of common minimum operating standards and behaviours which must be practiced at every location where we operate. These are underpinned by regulatory requirements and leading industry practice.

DO

- comply with all applicable laws and regulations and all Company food safety frameworks, policies and procedures
- handle, prepare, store and transport food under appropriate and sanitary conditions that do not expose it to the risk of contamination
- ensure food products and ingredients are only sourced from reputable, approved suppliers who meet our standards
- provide employees with the information, training and tools necessary to do their job in a safe, hygienic and compliant manner
- ensure employees who provide customer information on food allergens, intolerances and sensitivities are appropriately trained
- promptly report any actual or potential food safety issue and take immediate steps to avoid risk of contamination
- review food safety policies regularly to ensure that they are kept up to date with legislative and regulatory requirements and leading industry practice

DON'T

- expose food to situations that create a risk of contamination
- perform a task or function that we are not appropriately trained for or capable of undertaking or which is not in compliance with Company food safety frameworks, policies and procedures
- allow a team member to continue working or to perform a task or function that is unsafe or non-compliant with Company food safety frameworks, policies and procedures
- shortcut or circumvent our food safety policies, protocols or procedures, or ignore regulatory requirements or guidance
- operate a unit, food preparation kitchen or storage facility without the required permit or licence in accordance with local laws or regulations
- mislead a customer about the use of products, ingredients or additives
- knowingly omit ingredients or fail to highlight allergen risks in food or beverage labelling
- assume someone else will report an unsafe or non-compliant situation

For more information, refer to our Food Safety Policy Statement

PERSONAL INTEGRITY



CONFLICTS OF INTEREST

All employees and anyone working for or with Compass are expected to avoid having personal interests (including personal activities and financial interests) which could conflict with their responsibilities, duties and obligations to Compass.

Conflicts of interest arise when personal interests are placed ahead of the interests of Compass and those personal interests unduly influence or are perceived to influence business judgments, decisions or actions. In these situations, it may make it difficult to perform work for Compass objectively, fairly and effectively, and may have legal, regulatory and reputational consequences.

WE SEEK TO ALWAYS ACT IN THE BEST INTERESTS OF COMPASS AND FOR THIS REASON DISCLOSING POTENTIAL AND/OR ACTUAL CONFLICTS OF INTEREST HELPS FOSTER A CULTURE OF OPENNESS, TRUST AND INTEGRITY.

DO

- comply with all applicable laws and regulations
- ensure our personal activities, interests and relationships do not conflict with our duties and responsibilities to Compass
- report and disclose any actual, perceived or potential conflict of interest in a transparent and timely manner. Where a conflict cannot be avoided, manage it appropriately and transparently, taking advice from our Line Manager, Legal or Group Ethics & Integrity
- record in the applicable disclosures register any actual or potential conflict of interest

DON'T

- inappropriately take or divert to others any business opportunities for personal gain or to further or benefit a personal relationship
- misuse our position or authority at Compass to advance our personal interests or those of friends or family or individuals/ organisations personally known to us
- accept appointments, debate, vote, or participate in any decision-making process or activity when a conflict of interest exists or might arise that involves us

For more information, refer to our Business Integrity Policy or contact Legal or Group Ethics & Integrity

CONFIDENTIAL AND INSIDE INFORMATION

WE ARE COMMITTED TO PROTECTING ALL CONFIDENTIAL INFORMATION AND ONLY DISTRIBUTING OR SHARING IT ON A NEED-TO-KNOW BASIS WITH THE NECESSARY APPROVALS.

We ensure that only employees or authorised third parties, with a genuine business need, have access to confidential information.

Our customers, employees, business partners and stakeholders expect us to maintain strict controls on the confidential information we hold or use. Sharing or using confidential information incorrectly can have serious consequences, including significant fines and penalties, criminal charges, civil action and loss of trust.

Confidential information includes electronic or documentary information in relation to matters such as products or processes, about our customers and suppliers, vendor lists, pricing, marketing or service strategies, non-public financial reports, policies or procedures, information on asset sales, mergers and acquisitions. This list is not exhaustive.

Inside information is also a form of confidential information and has a meaning defined by law. It is information of a precise nature, which has not been made public, that relates directly or indirectly to Compass Group which, if it were made public, would be likely to have a significant effect on the price of Compass Group securities. Dealing in Compass Group securities while in possession of inside information is a criminal offence in the UK, US and many other countries.

For more information, refer to our Share Dealing Code (internal only) or contact the Group Company Secretariat

DO

- comply with all applicable laws and regulations
- adhere to our Share Dealing Code where you have been advised you are a restricted person or placed on a project or an insider list
- ensure confidential information or inside information is only disclosed on a need-to-know basis and with specific authority to do so
- take care when handling or using confidential or inside information
- remain aware that using inside information to deal in securities; recommending, encouraging or inducing somebody else to deal; or disclosing inside information (except where you are required to do so as part of your employment or duties) could give rise to a breach of insider dealing laws, which can amount to a criminal offence
- take care not to disclose confidential or inside information in public places, including taking all necessary steps to protect information in documents and on technology devices away from the workplace
- seek advice if we are unsure what is confidential or inside information or whether any activities could lead to insider dealing risks

DON'T

- copy, disclose or use any confidential or inside information for personal gain or advantage
- copy, share or use confidential or inside information with anyone else, including relatives, friends or colleagues who do not need to know
- disclose or share confidential or inside information (including to internal stakeholders or colleagues) without specific authority, or prior to release of trading updates or other market announcements
- buy, sell or otherwise deal in Compass shares (or those of any other listed company) if we are in possession of inside information. We should not ask other people to trade on our behalf or confide in others the inside information that we have
- copy or take confidential information with us if our employment with Compass ends
- share confidential or inside information in an unsafe or insecure manner. If unsure what transfer mechanism provides adequate protection, seek guidance from Digital & Technology



COMMERCIAL INTEGRITY

FAIR COMPETITION

We are committed to competing fairly, globally.

Antitrust, antimonopoly and competition laws ("competition laws") protect consumers and promote fair competition by prohibiting any coordinated action between market participants to fix or artificially adjust prices, divide markets, or share customers, limit production or supply, rig bids or otherwise restrict trade. The sharing of commercially sensitive information with competitors (directly or via a third party) is also prohibited. Anti-competitive conduct, including price-fixing involving companies operating at different levels of the supply chain is also prohibited. Competition laws are designed to ensure that businesses compete fairly and do not prevent, restrict or distort competition (or have the intention of doing so) to provide quality goods and services at fair prices.

WE PROMOTE FAIR COMPETITION AND MAINTAIN THE TRUST OF OUR CUSTOMERS, BUSINESS PARTNERS, INVESTORS AND THE GLOBAL BUSINESS COMMUNITY BY UNDERSTANDING AND COMPLYING WITH APPLICABLE COMPETITION LAWS.

This includes rejecting participation or otherwise engaging in cartel-related activity with competitors or other third parties who might be coordinating bids or tenders.

For more information, refer to our Business Integrity Policy or contact Legal or Group Ethics & Integrity

DO

- comply with competition laws for all categories and markets in which we operate
- ensure that our business relationships with customers and business partners are properly documented and approved by Legal
- exercise caution and obtain relevant approval when participating in a trade association, trade conference or other industry forum to ensure we do not engage (actively or passively) in any anti-competitive behaviour
- seek legal advice if intending to collaborate with competitors or suppliers in relation to industry, environmental, sustainability or other governance initiatives to ensure any agreement does not restrict or have a negative effect on competition
- seek legal advice in advance if intending to enter into a supply or other commercial agreement with a competitor
- notify Legal or Group Ethics & Integrity or submit a report through Speak Up, We're Listening as soon as possible should you become aware of any activities or third party arrangements that could give rise to anti-competitive practices

DON'T

- rig bids or tenders or have communication with competitors or other third parties in relation to any bids or tenders (except, for instance, in connection with an official joint bid or joint venture being dealt with by your local Legal team)
- share commercially or competitively sensitive information directly or indirectly with competitors unless such arrangements have been approved by Legal
- agree or even discuss with competitors pricing, including the price at which Compass sells or intends to sell goods or services, or any other financial or non-financial commercial strategies
- attempt to dictate to customers the price at which they resell goods or services supplied to them by Compass, where applicable
- agree with any other company to limit the production of goods or the supply of services, or to divide markets or customers with them or to collectively boycott a market participant
- automatically adopt suppliers' recommended retail prices. We should make our own pricing decision and record it

COUNTERING BRIBERY AND CORRUPTION

We are committed to upholding the highest standards of integrity and professionalism in everything we do.

Corruption is an abuse of entrusted power. Its impact on society and communities is damaging. Bribery occurs when someone directly or indirectly offers, promises rewards or gives to or accepts or requests a financial or other *advantage* from anyone, intending that the person receiving the benefit improperly performs their duties or obligations.

An *advantage* can include anything of value such as money, gifts, hospitality, favours, improper signing bonus or rebates, donations, sponsorships or community investments. It could also include non-monetary benefits or an opportunity, such as the promise of employment for a family member or close friend.

As a signatory to the United Nations Global Compact, we are committed to work against corruption in all its forms, including extortion and bribery.

ANY UNETHICAL OR ILLEGAL ACTIVITY IS STRICTLY PROHIBITED.

For more information, refer to our Business Integrity Policy, Group Approvals Manual (internal only) or speak to Legal or Group Ethics & Integrity

DO

- comply with all applicable anti-corruption laws and regulations
- act with integrity in order to protect Compass' reputation and ensure the long-term success of our business
- reject any demand for, or offer of, a bribe
- obtain management approval and seek legal advice in advance when offering, giving or accepting an advantage in connection with a business transaction or deal
- ensure those acting on our behalf or performing services for us share our values and principles and work with integrity
- exercise extra care when dealing with government officials or third parties interacting with or representing government officials including those performing services on Compass' behalf
- seek prior approval before offering or accepting any gifts or hospitality, in accordance with Group and local Policies and procedures
- ensure charitable donations, in-kind donations, sponsorships and community investments are used in line with Compass' Business Integrity Policy and corporate social responsibility objectives
- notify Legal, Group Ethics & Integrity or submit a report through Speak Up, We're Listening as soon as possible should you become aware of any activities or third party arrangements that could give rise to bribery and corruption

DON'T

- offer, accept or pay bribes in any form, no matter where we operate, no matter what the situation is, and no matter who is involved
- give or offer facilitation (grease) or other *sweetener* payments, unless faced with a situation where your personal safety is threatened if you refuse to make payment
- give improper payments of cash (or cash equivalents) including inappropriately paying someone else's personal bills or expenses
- provide any advantage or benefit to government officials to influence decision-making
- allow or otherwise authorise our consultants, advisors, agents or intermediaries to pay bribes directly or indirectly
- offer, give or accept any advantage, regardless of value, which might be construed as influencing a business decision

OTHER ECONOMIC CRIME COMPLIANCE

WE ARE COMMITTED TO HELPING IN THE GLOBAL FIGHT AGAINST MONEY LAUNDERING, TERRORIST FINANCING AND TAX EVASION.

These activities are damaging to global communities around the world.

Compass complies with applicable sanctions and trade control programmes. Sanctions programmes are put in place by governments and intergovernmental organisations that prohibit or restrict transactions by or with certain individuals, entities, sectors and/or countries ("sanctioned activity"). Compass aims to take effective and necessary precautions to ensure we do not engage in sanctioned activity that would violate law or unnecessarily expose us to reputational risk.

Money laundering is the effort made to hide or disguise the proceeds of crime and keep them in criminal hands.

Terrorist financing includes receiving or providing money or property where it's intended or potentially used for the purposes of terrorism or laundering terrorist property.

Tax evasion is the illegal non-payment or underpayment of tax anywhere in the world. It involves knowingly helping another person commit tax evasion or otherwise being complicit in their actions.

Compass strictly prohibits doing business in a way that assists or facilitates such crimes wherever we operate.

For more information, refer to our Business Integrity Policy or contact Legal or Group Ethics & Integrity

DO

- comply with all applicable laws and regulations
- understand and apply the procedures and controls in place to prevent and detect the concealment of illegal or illicit funds
- undertake reasonable checks in relation to financial transactions with business partners in order to ensure we do not receive the proceeds of criminal activities or engage in sanctioned activity, as this can amount to a criminal offence
- remain alert to red flags regarding tax evasion, notably the purpose and method of payment, recipient and location of bank accounts
- stay vigilant when processing invoices and payments and receiving or receipting funds, ensuring irregularities are addressed or escalated in a timely manner
- notify Legal, Group Ethics & Integrity immediately or submit a report through Speak Up, We're Listening as soon as possible if we have any suspicions about actual or potential money laundering, terrorist financing, tax evasion or sanctions breaches

DON'T

- under no circumstances, knowingly enter any form of commercial or other arrangement that involves illegally acquired funds or assets, or that results in the financing of terrorism or engaging in sanctioned activity
- knowingly engage a counterparty who is connected to organised crime or other criminal activity
- accept, receive, offer or give unusual cash transactions outside the ordinary course of business unless approved at the appropriate level by Legal and Finance
- simply assume reasonable third party checks have been undertaken. Failure to check may put Compass and its employees at risk
- issue payments to a third-party bank account that is not located in a jurisdiction where the third party operates, is headquartered or where the goods or services originated from or are delivered to

ACCURATE FINANCIAL BOOKS AND RECORDS

WE BELIEVE IN CONDUCTING BUSINESS IN AN HONEST AND TRANSPARENT WAY.

Engaging in any fraudulent, misleading or dishonest behaviour is strictly prohibited.

Everyone involved in creating, processing, and recording information in Compass' financial books and records is held responsible for ensuring the integrity of the information.

Our books and records must accurately reflect our financial and business transactions in accordance with our applicable accounting standards and our system of internal controls.

For additional information, refer to the Group Approvals Manual (internal only), Business Integrity Policy or contact Group Finance or your country finance team

DO

- comply with all applicable laws and accounting standards
- follow and comply with our system of internal controls
- ensure that all accounting records, financial reports and statements present in reasonable detail a complete, fair and accurate view of our businesses' financial health
- ensure the Group Approvals Manual and local processes are adhered to and appropriate documentation is submitted to support submissions and approval requests
- ensure transactions we approve and record are supported by a legitimate business purpose
- retain accounting records and documentation in accordance with local tax, financial and legal obligations

DON'T

- withhold or falsify any record, financial or non-financial, or mischaracterise any transaction to conceal its true nature, purpose and/or recipient
- create, maintain or authorise others to improperly produce or maintain undisclosed or unrecorded accounts, funds or assets
- conceal, destroy or improperly alter company records, accounts and documents
- dispose of or otherwise transfer any Compass assets without authorisation and proper documentation under the Group Approvals Manual
- enter contractual or financial arrangements without obtaining the required local and/or Group approvals
- provide false, misleading or incomplete representations in relation to Compass' financial processes or specific transactions

DATA PRIVACY

Compass holds personal data about our colleagues, customers, suppliers, shareholders and other third parties. Personal data includes any information that identifies an individual or makes them identifiable. This information can be held in paper files as well as electronically.

IT IS CRUCIAL THAT WE ENSURE THAT PERSONAL DATA IS ALWAYS KEPT SECURE.

Treating personal data with care is very important to our business. When collecting personal data in our business, we must strike an appropriate balance between an individual's right to privacy and the legitimate business purpose or legal requirement for using, processing or storing their personal data. When we work with others who we may share personal data with, or receive personal data from, we make it clear to them the importance we place on privacy and the standards we require to be met.

If you think that the standards in the Group Data Privacy Policy (internal only) or applicable country privacy policy have not been met, become aware of a data breach or have concerns about sharing or using personal data, contact your country Data Protection Champion, Legal or Group Ethics & Integrity immediately

DO

- comply with all applicable data privacy laws and regulations
- ensure when collecting and handling personal data or personal identifiable information ("personal data"), it is for a legitimate business purpose
- ensure personal data is only used for the purposes for which it was obtained and be careful not to collect more personal data than is necessary for the relevant purpose
- respect the rights of data subjects and act in accordance with local law in responding to requests or notices received, where applicable
- store personal data securely on Compass' information technology systems
- share personal data (whether internally or externally) for legitimate business purposes only, on a need-to-know basis and in a secure manner
- ensure that personal data is transferred to a third party via approved transfer mechanisms. If unsure, seek guidance from Digital & Technology
- ensure that anyone receiving personal data understands the importance of keeping the data private and secure, using it only for the agreed purpose
- report potential data privacy incidents immediately to Legal or your country Data Protection Champion

DON'T

- hold personal data for longer than is permissible or necessary
- use personal data for unauthorised purposes
- transfer data to other countries in an unsafe or insecure manner or without adequate protection
- provide data to unauthorised persons in or outside of Compass
- assume someone else will, or ignore our personal responsibility to, report or record a potential data privacy incident

EXTERNAL ACTIVITY



DEALING WITH REGULATORY BODIES AND POLITICAL ACTIVITY

As part of doing business, Compass sometimes engages with government bodies, public interest groups, industry associations and other similar bodies around the world. Whilst doing this, we must ensure compliance with local laws governing political activity.

In many instances, the laws that apply when working with the government may be stricter than those that apply when working with private companies. As with everyone we do business with, we work to be a responsible partner to the government and adhere to the highest ethical standards.

IT IS COMPASS POLICY NOT TO MAKE ANY POLITICAL DONATIONS.

DO

- comply with all applicable laws and regulations
- ensure that we are truthful and accurate, and that Compass' legitimate interests are protected
- co-operate with any government or authorities' investigations and audits
- keep the appropriate Line Manager informed about any planned communication with designated governmental agencies and seek their approval before engaging with such parties
- obtain relevant approvals if certain routine activities unintentionally fall within the wide definition of matters constituting political donations and political expenditure under the UK Companies Act 2006
- seek guidance from Group Company Secretariat if unsure of what activity could be defined as a political donation and/or political expenditure

DON'T

- make a donation on behalf of Compass to any political organisation which promotes a political party or activities
- make political donations or provide contributions to a political party or candidate for office
- engage in lobbying or have contact with legislators, political candidates, regulators, government employees or public interest groups, unless we are doing so under the guidance of Group Legal, Group Communications and Group Investor Relations

For more information, refer to our Business Integrity Policy or contact Legal or Group Ethics & Integrity

EXTERNAL COMMUNICATION

We may sometimes be asked to respond to questions from external individuals or organisations, or receive enquiries from the media, press, analysts or the investment community.

WE ARE COMMITTED TO SHARING ACCURATE INFORMATION ABOUT OUR OPERATIONS AND FINANCIAL PERFORMANCE WITH OUR STAKEHOLDERS, INCLUDING MEDIA, PRESS, INVESTORS AND REGULATORS.

We will comply with our market disclosure obligations and are open and honest in our external communication.

For more information, contact your Communications team, Group Investor Relations or Legal

DO

- obtain approval from Group Communications, Group Investor Relations and Group Legal before providing responses to media or press for or on behalf of Compass Group PLC
- ensure that advice and approvals, where required, are obtained from our Legal and Communications teams before providing responses to media or press for or on behalf of a Compass operating entity
- obtain authorisation and advice from our Legal and Communications teams before making contact with any government, regulators, legislators or lobby groups on behalf of a Compass operating entity
- check with our Communications and Legal teams on disclosure to the media or press if unsure

DON'T

- make public statements or respond, formally or informally, to the media, analysts or investment community unless designated as a Compass spokesperson and/or authorised to speak on Compass' behalf
- release any statement, press release or presentation (oral or written) which may contain or amount to inside information without prior approval from Group Company Secretariat, Group Legal and Group Investor Relations

COMPANY ASSETS



COMPANY ASSETS AND BRAND PROTECTION

At Compass, we operate with high integrity. Our reputation depends on the integrity of our business dealings and actions.

Our company assets are the tools, equipment, goods, systems, information and data we use in our work every day.

WE ALL HAVE A RESPONSIBILITY FOR ENSURING OUR COMPANY ASSETS, WHETHER PHYSICAL, DIGITAL OR INTELLECTUAL PROPERTY, ARE ONLY USED FOR LEGITIMATE BUSINESS PURPOSES, AND THAT WE HANDLE THEM WITH CARE AND PROTECT THEM FROM LOSS, DAMAGE, THEFT, FRAUD OR MISUSE.

As a market leader in the food service and support services sector, we often produce recipes, processes, non-public ideas and strategies that belong to Compass which we must protect. We protect our intellectual property (including brands, trademarks, copyright, patents and trade secrets) and closely monitor for unauthorised use of our intellectual property by others.

For more information, refer to the applicable Group or local Information Technology Acceptable Usage Policy or contact Digital & Technology or Legal

DO

- comply with all applicable laws and regulations
- use information technology in accordance with the applicable Group or local Acceptable Usage Policy
- protect Company assets and always guard them against misuse, loss, fraud or theft and only use them in a professional and responsible manner at all times
- ensure that Company assets that we use or come into contact with as part of our work are not damaged, misused or wasted
- protect our intellectual property rights and only use our intellectual property for legitimate business purposes, under appropriate protections
- stay alert and report to Digital & Technology unauthorised attempts to access our systems or devices such as phishing emails or other cyber threats
- seek guidance from Digital & Technology if unclear or unsure about using or accessing digital assets or information technology
- ensure we report any misuse of company assets by others to our Line Manager or submit a report through Speak Up, We're Listening

DON'T

- access, transfer or remove Company assets without permission or use them for inappropriate purposes
- knowingly commit, be a party to or be involved in any fraudulent activities or theft whatsoever
- agree to share or assign our intellectual property rights outside Compass without first consulting with our local Legal team and seeking approval
- use Company assets for personal gain or for reasons unconnected with our role at Compass
- misuse our clients' intellectual property rights
- install or use any unauthorised hardware or software on any Compass information technology system
- intentionally bypass any information technology or cyber security control



SPEAK UP, WE'RE LISTENING

We take reports and concerns raised through our Speak Up, We're Listening programme very seriously and will follow up on allegations of wrongdoing or unethical behaviour promptly. To safeguard its integrity, our Speak Up, We're Listening 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.

For queries about suspected or actual breaches of the Code, tell someone you trust in the way you feel most comfortable with, using any of our Speak Up resources:

- your Line Manager or more senior manager
- your local Human Resources manager or Listen Up Champion
- a member of your country, Regional or Group Legal team
- a member of Group Ethics & Integrity
- or raise your concern through the Speak Up, We're Listening platform

Confidentiality

Compass commits to protect the confidentiality of any person making a report. When submitting a report, you can choose to remain anonymous. It is important to know that the information provided and the right to confidentiality or anonymity may be subject to local laws.

Anti-retaliation

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.

Compass commits to protect you and the individuals conducting, assisting or participating in an investigation against detrimental conduct or retaliation.