Modern Slavery Act Statement

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 2024.

Group Chief Executive Officer overview



As a global leader in food and support services, we know we can engender change and positively impact lives through our responsible business practices and supply chain management.

Respecting human rights is central to our Planet Promise, Compass Group's global commitment to a sustainable future for all - and with our broad reach and scale, we can influence communities all over the world.

Across the business we are continuously seeking to reduce risk and drive consistency in our operations and performance. Recent country exits enable a greater strategic focus on our larger core markets, which benefit from greater procurement expertise and closer links with the supply chain. Having a more concentrated country portfolio will provide greater insight into the value chain, unlocking improved supply chain visibility and greater risk mitigation opportunities. This will help us prioritise and target areas which have the greatest potential to make a lasting positive impact.

It's our continuous improvement mindset which is central to making further progress on eradicating modern slavery. Continued investment in training, improving tools and leveraging well embedded processes and governance, such as our Human Rights Working Group and Supply Chain Risk Management Steering Group, will help us to continue sharing best practices across the Group.

Looking ahead, and in line with our commitment to a sustainable future for all, we are building on the progress we have made to date. Our focus is on continuing to increase transparency whilst collaborating with clients, partners and communities to drive sustainable change.

Collaboration across the value chain is critical to elevate standards, and we are always exploring new partnerships with suppliers, governments, non-governmental organisations (NGOs), clients and communities to enhance human rights, raise awareness and improve social equity for all.

I'm pleased with the progress we've made as we continue working hard to enhance human rights and end modern slavery for all.



Dominic Blakemore
Group Chief Executive Officer, Compass Group PLC

2024 achievements

- Supplier Ethical Data Exchange (Sedex) rollout. Now used in 17 countries, including our largest markets, Sedex helps us to gain a high-level understanding of the inherent risks within supply chains, while also providing data on the ethical practices of supplier sites at a local level
- driving greater awareness and understanding of human rights across the Group. Over 17,000[1] leaders and colleagues completed our dedicated human rights training this year, as part of our Ethics and Integrity programme
- the continued progress we are making in the roll-out of our Third-Party Integrity Due Diligence (TPIDD) Policy. Helping our teams to assess and keep under review the ethical compatibility of the third parties that they work with, TPIDD has been initiated in most of our markets
- further embedding the Group's Supply Chain Risk Management (SCRM) strategy, including rolling out a SCRM country framework
- Compass Group Canada has published its first annual report entitled 'Fighting Against Forced Labour and Child Labour in Supply Chains'

1. On a risk-to-role basis, as per the Group's internal training records as at 30 September 2024.

Introduction



This is our ninth statement released under the Modern Slavery Act and provides our stakeholders with an update on the Group's progress during the financial year to 30 September 2024.

As a Group, we are deeply committed to upholding human rights, ensuring that all individuals are treated fairly, with dignity and respect. We expect the suppliers and partners of our businesses to maintain these same high standards throughout their value chains.

We recognise that modern slavery is an overarching term that encompasses slavery, servitude, forced or compulsory labour, human trafficking, sexual exploitation, and child labour.

Our efforts focus on understanding both our individual and collective responsibilities. We work to identify and address areas of concern, implementing transparent corrective actions, and work closely with our partners to build stronger, more responsible supply chains.

We remain steadfast in our mission to play our part in eliminating modern slavery in all its forms and fostering a safer, more equitable environment for all.

Business structure

We operate in around 30 countries across three geographical regions.

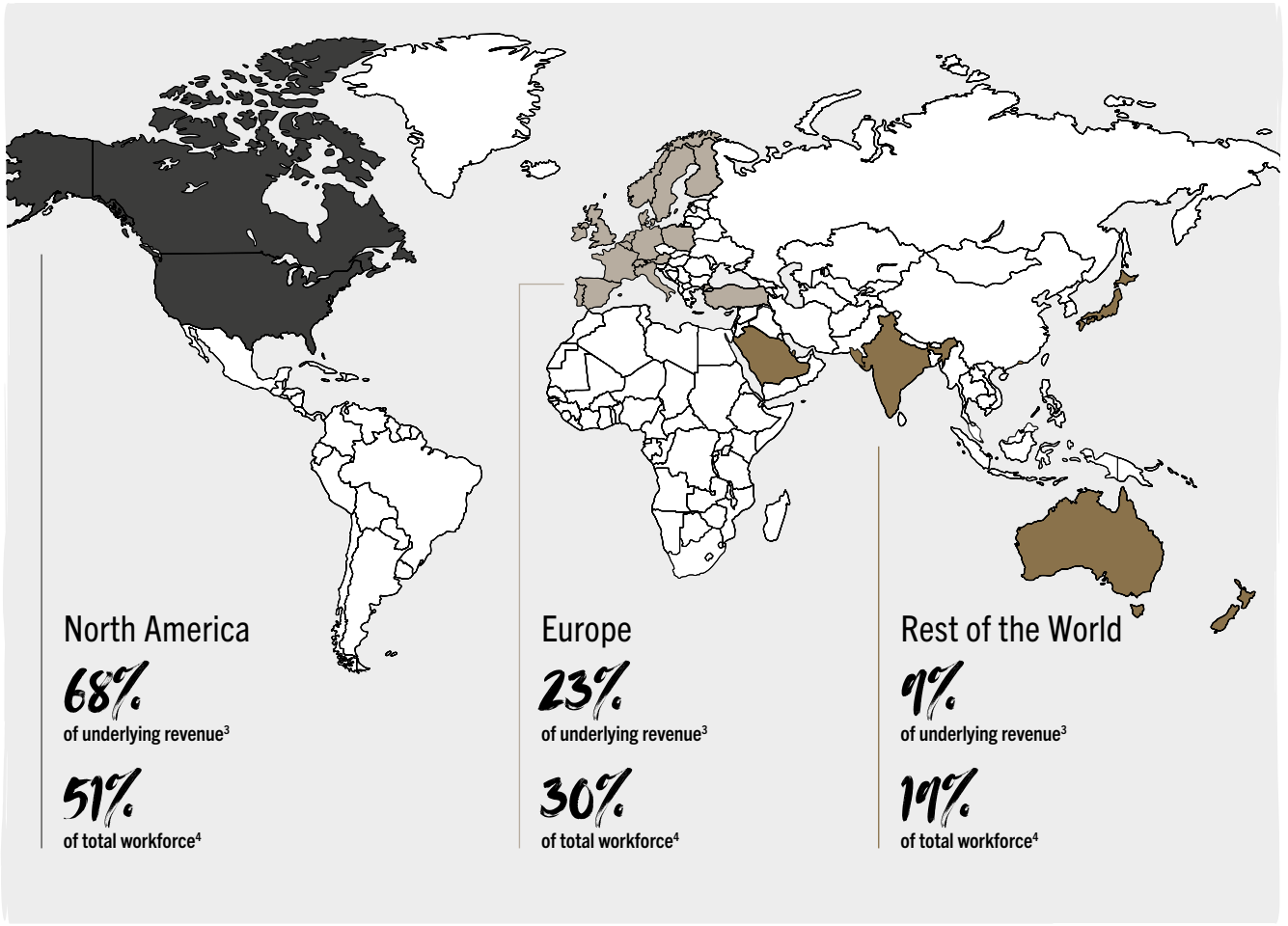
Compass Group is one of the world's leading providers of food and support services, operating in around 30 countries[1], employing and engaging c.580,000 people worldwide.

On a statutory basis, the annual revenue for the Group for the financial year ended 30 September 2024 was $42.0 billion, delivering an operating profit of $2.6 billion.

Our core competency lies in the provision of outsourced food services, which accounts for approximately 86% of total revenues. The remaining 14% is derived from support services, which include essential functions such as facilities management, hospital cleaning and guest services.

Compass Group's operations are organised into three main geographical regions and across five core sectors: Business & Industry; Education; Healthcare & Seniors; Sports & Leisure and Defence, Offshore & Remote. These sectors operate under a variety of local, regional and global business-to-business brands. Compass' decentralised organisational model[2] allows its subsidiaries to adapt to local market conditions, while still adhering to the Company's global governance and ethical standards.

For more information on our business structure, please visit: www.compass-group.com/en/what-we-do



1. The Group has refined its portfolio and has exited five countries during the year, those being Argentina, Angola, Brazil, mainland China and the United Arab Emirates. In addition, we have also agreed to exit Chile, Colombia, Mexico and Kazakhstan, subject to regulatory approval and completion procedures.
2. Compass Group PLC, the parent company of the Group, is a non-trading investment holding company which derives its distributable reserves from dividends paid by its subsidiary companies.
3. On a constant currency basis.
4. Average number of employees, including directors and part-time employees, as at 30 September 2024.

Own workforce

The majority of our people are involved in direct and front-line service roles, including catering, cleaning and facilities management. They are central to delivering the meals and support services that Compass provides to clients across multiple sectors on a daily basis. Our employees are seen as the heart of our operations, playing a pivotal role in driving success and sustaining our caring, winning culture.

Given the Group's decentralised structure, each subsidiary is responsible for managing its own recruitment, training and staff development in alignment with Compass' global standards. This approach enables our businesses to respond effectively to the unique needs of local markets while ensuring that labour practices remain consistent across all regions.

Most of the Group's employees are directly hired through our local subsidiaries. However, in sectors like Sports & Leisure, a smaller proportion of the workforce is composed of agency workers, typically employed during high-footfall events, such as concerts and sporting events, to meet the increased demand for services.

The number of migrant workers[1] in our businesses has significantly decreased in the past year, as we have exited some markets where this is the predominant employment model. As a result, there are approximately 5,000 foreign migrant workers across our remaining businesses in the Middle East, with new colleagues recruited through a network of vetted and approved recruitment partners and agencies.

1. Defined by the International Labour Organization (ILO) as "a person who migrates from one country to another with a view to being employed otherwise than on his own account and includes any person regularly admitted as a migrant for employment".

Supply chain

Compass Group businesses operate extensive and decentralised supply chains that support a diverse range of services and sectors. These supply chains involve thousands of suppliers, organised across multiple tiers, from growers and manufacturers to wholesalers and distributors. These suppliers are responsible for delivering the essential products and services Compass needs to meet the demands of its global and local clients, while also adhering to the Company's sustainability and ethical standards.

Each local market has its own procurement team, which sources products from both local and overseas suppliers. This allows Compass to remain agile and responsive to local market dynamics and contract requirements, while promoting the principles and expectations set out in our Global Supplier Code of Conduct, including ethical practices related to business integrity, labour standards, human rights and environmental sustainability.

To manage the complexity of this extensive supply chain, Compass Group has established a SCRM framework which expects suppliers to comply with our Global Supplier Code of Conduct (SCOC). This framework guides local teams in navigating the challenges of working with a vast network of suppliers, providing them with tools and guidelines to promote consistent application of ethical standards. By having this structured framework in place, our businesses can manage their procurement processes efficiently while maintaining close oversight of supplier compliance. See page eight for more information.

By engaging closely with direct suppliers and expecting them to promote the principles and commitments of the Global SCOC, as well as encouraging responsible business practices in their own supply chains, Compass fosters accountability across multiple layers of the supply chain.

The Group's largest categories of spend are centred around food and labour, including fresh produce, meat, dairy, beverages and packaged goods. In addition to food procurement, our businesses also invest significantly in non-food supplies, such as uniforms, kitchen equipment and operational services.



Policies and codes



Compass is committed to continuously reviewing and strengthening its policies and practices so that they promote ethical standards and address emerging risks across its businesses globally. This ongoing review process also includes sharing best practices to help our businesses to identify potential risks and enhance ethical practices within their supply chains.

Certain policies and codes are underpinned by internationally recognised standards, such as the International Bill of Human Rights, the Ethical Trading Initiative (ETI) Base Code, the ILO Declaration on Fundamental Principles and Rights at Work, The UN Global Compact 10 Principles, the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights.

New policy statement introduced in 2024

This year, our teams worked collaboratively with internal and external stakeholders and developed Compass' Responsible Sourcing Policy Statement (RSPS). This policy statement further reinforces Compass' commitment to ethical and sustainable business practices and outlines clear expectations for suppliers to uphold sustainable, ethical conduct, and alignment with Compass' core values. Together with other applicable policies and codes, the RSPS promotes responsible sourcing practices throughout our businesses' supply chains, encouraging positive change and advancing our sustainability goals.

Please see more details about our policies, statements and other related documents (such as our Five Golden Rules) on page six.

Code of Business Conduct (CBC) Provides principles-based guidance to support Compass in upholding high ethical standards and commitments, as well as complying with applicable laws and regulations.	The Code of Business Conduct (CBC) offers a comprehensive framework that outlines Compass' commitment to upholding ethical business practices. It emphasises safety, integrity and respect as core principles that must guide employees' behaviour in all situations. The CBC mandates compliance with applicable laws, and where it is more stringent than local regulations, its principles must be followed. An important theme of the CBC is its zero-tolerance stance on forced labour and modern slavery, ensuring that all business operations, including those of partners, align with the highest ethical standards. The CBC also addresses, amongst other things, equality and inclusion, reaffirming the Company's commitment to fairness and non-discrimination.
Global Supplier Code of Conduct (SCOC) Extends CBC principles to supply chain partners and sets out Compass' high ethical standards, expectations and principles.	The Global Supplier Code of Conduct (SCOC) extends the CBC's ethical commitments to Compass' supply chain partners globally, expecting suppliers to meet high standards in five critical areas: business integrity, human rights and labour standards, health and safety, sustainability, and speaking up. The SCOC highlights Compass' expectation for suppliers to firmly oppose all forms of human rights abuses, including modern slavery and human trafficking. The SCOC is an essential part of Compass' supply chain and third-party risk management framework, and supply chain partners are expected to adhere to the SCOC as stipulated in all supplier contracts. It also promotes open communication, encouraging partners to use Compass' confidential Speak Up, We're Listening channels to report concerns about unethical practices.
Speak and Listen Up Policy Empowers individuals to raise concerns in a safe, confidential way, guiding them on how to voice their concerns effectively.	The Speak and Listen Up Policy provides guidance for employees, suppliers and partners to raise concerns. The policy outlines various options for reporting issues, including direct communication and the Speak Up helpline/web platform. It emphasises that all reports will be reviewed by Group Ethics and Integrity, an independent team overseeing the Speak Up programme. The policy reinforces Compass' commitment to investigating concerns thoroughly and without retaliation, even if the concerns are mistaken or unfounded. It reassures all stakeholders that their voices will be heard, and their concerns taken seriously.
Human Rights Policy Highlights the responsibility to respect human rights within Compass' businesses and their supply chains.	The Human Rights Policy affirms Compass' commitment to respecting the human rights of workers across its businesses' operations and supply chains. The policy underscores the importance of fair treatment, inclusion and non-discrimination, particularly in relation to vulnerable groups, including women, children, LGBTQI+ individuals, migrant workers and minorities. The policy is aligned with international human rights standards, including key conventions from the International Labour Organization (ILO). It outlines performance indicators to monitor compliance, such as the number of substantiated human rights breaches and training completion rates, ensuring that Compass actively works toward eliminating modern slavery and promoting a fair work environment.
Supply Chain Integrity Policy Sets procurement guidelines to ensure supply chain integrity and ethical compliance.	The Supply Chain Integrity Policy guides Compass' global procurement activities, ensuring that suppliers comply with ethical standards and maintain transparency throughout their supply chains. The policy covers crucial aspects such as risk assessment, supplier approval and product traceability. By extending its oversight beyond direct suppliers, Compass aims to increase transparency and mitigate risks within deeper levels of the supply chain, ensuring that its commitments to human rights and sustainability are upheld throughout the procurement process.
Third-Party Integrity Due Diligence (TPIDD) Policy Establishes minimum requirements to assess and monitor new and existing third parties within the scope of the policy.	The Third-Party Integrity Due Diligence (TPIDD) Policy outlines the expectations and minimum standards required to assess the compatibility of new and existing third parties, including those who provide services or act as partners within Compass' value chain. It covers key business integrity risks such as trade and economic sanctions, bribery, corruption, anti-competitive behaviour, money laundering, fraud, human rights, modern slavery, data privacy and environmental concerns. The policy requirements help Compass understand and manage these risks to prevent business engagements from proceeding or continuing if any issues exist/arise.
Responsible Sourcing Policy Statement (RSPS) Ensures responsible sourcing is central to Compass' businesses and their operations.	The RSPS highlights Compass' commitment to ethical and sustainable practices across its businesses' supply chains. It focuses on reducing environmental impact, eliminating deforestation, promoting animal welfare and respecting human rights. The policy addresses risks related to forced labour, modern slavery and labour exploitation. Suppliers are expected to uphold high ethical standards, adopt sustainable practices, and ensure transparency and traceability in their operations. Compass expects suppliers to disclose supply chain data, comply with applicable policies, and use the Speak Up platform to report concerns. Non-compliance may lead to termination of agreements.
Five Golden Rules Summarises Compass' expectations for employee conduct, attitude, and priorities at work.	The Five Golden Rules encapsulate the core behaviours expected from Compass employees. These rules prioritise health and safety as the foremost concern in all our businesses' operations. Employees are prohibited from engaging in unethical or illegal activities, including corruption, bribery, anti-competitive behaviour or fraud. A foundation of respect, kindness and fairness towards colleagues is central to the Company's ethos. In all interactions with consumers, suppliers and colleagues, professionalism, honesty and transparency are required. Finally, the rules emphasise the importance of integrity in safeguarding Compass' reputation. These rules are designed to be easily understood by our businesses' large and diverse employee bases and are communicated through various channels, including websites, induction programmes, and training materials.

Governance



Compass recognises that continuous improvement in governance is crucial to combating modern slavery. By reinforcing clear standards and policies, and setting a proactive tone from leadership, we promote and further embed compliance and increase transparency and accountability across the organisation.

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 CEO.

The Corporate Responsibility (CR) Committee, a committee of the Compass Group PLC Board, is central to the oversight of our human rights and modern slavery strategies. The CR Committee comprises all of the directors of the Company. The Group General Counsel and Company Secretary, who is Secretary to the Committee, attends all Committee meetings and regular updates and reports are provided by the Group Chief Commercial Officer and the Group Chief People Officer (CPO) on areas falling within their respective remits.

The CR Committee is responsible for overseeing the Group's Corporate Responsibility, Ethics and Integrity, Health and Safety, Sustainability, and People and other Stakeholder Engagement strategies, and it approves the Company's annual Modern Slavery Act Statement for recommendation to the Board.

The Group CPO is responsible for setting the People strategy and agenda across the Group and acts as the global functional lead for the Group's Human Rights Policy, which is implemented by the country leadership teams, who are responsible for the promotion of our human rights standards and modern slavery commitments across their operations.

The HRWG and the SCRM Steering Group offer additional layers of strategic oversight and coordination.

The HRWG, led by a senior member of the Group People team and a member of the SCRM Steering Group, provides a global forum for best practice sharing, coordination and awareness raising on human rights issues, including modern slavery.

The SCRM Steering Group includes the Group Director of Purchasing Strategy, the Group Head of Ethics and Integrity, and the Group Director of Employment, Equity and Social Impact. These senior leaders report directly to members of the Executive Committee. Their leadership and collaboration guide the Company's approach to mitigating modern slavery risks through an integrated SCRM framework, which is consistently implemented in all countries and sectors where Compass' businesses operate.

In 2024, the Group continued to strengthen its system of internal controls, which include, but are not limited to, policies, internal audits and procedures aimed at managing risks and further embedding compliance to meet the requirements of relevant social, environmental and ethical legislation.

Due diligence

Due diligence is central to Compass' efforts to identify, assess, mitigate and prevent modern slavery risks across its businesses and their supply chains. It involves an ongoing review of internal practices, suppliers, business partners and stakeholders, to ensure compliance with human rights regulations and ethical standards.

Our approach to due diligence is proactive, aimed at identifying red flags and preventing human rights abuses including mitigating impacts where possible. When risks or incidents are identified, we take swift corrective action and monitor the effectiveness of our interventions to ensure long-term success. Each case enhances our understanding and informs future practices, creating a process of continuous improvement.

We use a range of due diligence tools and processes based on the specific risks or challenges faced, including Sedex, TPIDD, internal audits, payroll checks and training programmes - to mention a few. Additionally, we align with global best practices through collaborations with partners like Slave-Free Alliance and Earthworm Foundation.

Our cross-functional teams, including the HRWG and SCRM Steering Group, help our businesses improve the way they identify, mitigate and manage human rights risks across their operations and supply chains. Their role is to provide guidance, share best practices, and equip country teams with the necessary tools and knowledge to address these challenges.

Country SCRM framework: managing supply chain risks

This year, we developed our country SCRM framework in consultation with our local businesses, and initiated its rollout as a key element of Compass' strategy for managing supply chain risks, including modern slavery. The framework sets minimum standards across the Group, ensuring flexibility for the country teams to meet their local regulations while addressing risks like forced labour and human trafficking. It is based on three key pillars:

1 Governance and oversight

Clear roles and responsibilities promote accountability, with senior leaders overseeing supply chain risk management. Each country maintains a risk register, helping prioritise higher-risk areas and pre-emptively address potential issues.

2 Integration with procurement processes

By embedding SCRM into procurement and supplier management, we aim to make modern slavery risk management continuous. Higher-risk suppliers are subject to enhanced due diligence and compliance requirements.

3 Strategic supplier engagement

We work closely with suppliers and external partners to build supply chain resilience in higher-risk areas, focusing on mapping risks and addressing potential issues promptly.

Enhancing supply chain transparency: Compass Group's journey with Sedex

Sedex has been an instrumental platform in enhancing supply chain transparency for our businesses. By utilising Sedex, they have gained greater visibility across their supply chains, enabling them to better understand and manage the risks and opportunities related to ethical sourcing and responsible business practices.

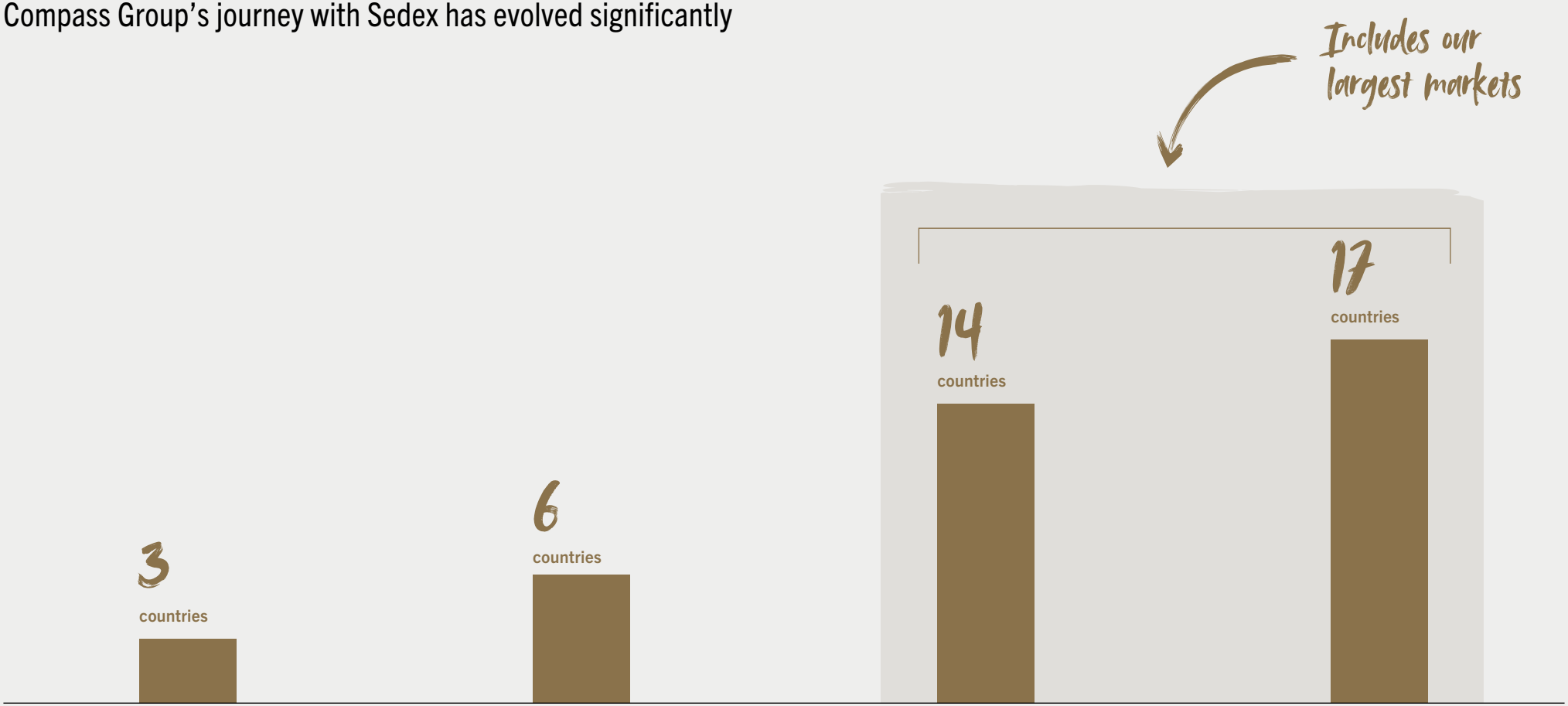
Through its suite of tools, such as independent third-party ethical SMETA audits, Sedex provides detailed insights into human rights, labour standards, and ethical practices at supplier sites. These tools allow our businesses to proactively identify risks related to modern slavery, enabling them to address issues before they escalate.

The integration of Sedex into our country SCRM framework has enabled our businesses to enhance their ability to manage risks, resolve non-compliances efficiently, and foster stronger supplier engagement.

Throughout this journey, we have continued to invest in training for our country procurement teams, equipping them with the knowledge and tools to leverage Sedex effectively. Over the past financial year, we enhanced our focus on responsible sourcing by fostering deeper collaboration between our local procurement teams and their suppliers. Through a series of targeted workshops and supplier engagement initiatives, we created opportunities for shared learning and alignment on critical issues such as Sedex's role in risk management, worker protection and ethical sourcing.

Looking ahead, we remain committed to expanding the use of Sedex across our markets.

Compass Group's journey with Sedex has evolved significantly



2021
Following the rollout in our UK business, groundwork for expansion began.

2022
Rollout expanded into Brazil, Spain and Portugal.

2023
Enhanced visibility over 1,247 supplier sites from 54 source countries.

2024
Enhanced visibility across 2,547 supplier sites, 56 source countries encompassing 690,000+ workers in the supply chain globally.

Risks and steps taken

Compass recognises that modern slavery and broader human rights risks may be present within both its businesses' operations and their supply chains – spanning the agriculture, food production, distribution and hospitality industries – and we have continued to develop and implement processes for our businesses to manage these risks effectively.

Over the years, we have refined our risk identification and management processes, ensuring they evolve to meet new challenges. In partnership with our country operations, research efforts, and partnerships with external specialists, we have identified the higher-risk categories that now guide much of our Procurement strategy.

These higher-risk categories – encompassing sectors and products most vulnerable to exploitation – reflect the most pressing concerns in our businesses' supply chains and include: beef, cocoa, coffee, disposables, fruit and vegetables, labour agencies, rice, seafood, tea and uniform.

Through awareness campaigns, training programmes, focused risk discussions, internal audits, collaboration within the HRWG, and consultations with external specialists, we have enhanced our businesses' ability to identify, share and respond to issues.

Country-led due diligence continues to evolve, incorporating new and existing tools and processes that consider each business's complexity, size, scale, operating sectors, client and supplier specifications, and individual human rights risks. This tailored approach ensures that human rights risks are managed efficiently at both global and local levels.

Our approach is supported by a combination of frameworks and collaboration as outlined, in addition to our Major Risk Assessment (MRA) process. The MRA is a regular structured risk review that integrates bottom-up inputs from countries and top-down guidance from Company leadership. This comprehensive process evaluates key risks facing the Group, including modern slavery and human rights issues, and these are considered biannually by the Board.

TPIDD and risk management

To enhance our ability to assess and address supply chain risks relating to business integrity, human rights and environmental issues, we have deployed a Group TPIDD process which is supported by an online screening and risk management tool, available Group-wide.

TPIDD helps us identify and understand risks that may exist and would prevent a business engagement from proceeding or continuing. Using a risk-based approach, it enables better assessments of third-party risk profiles and priority areas for greater scrutiny.

During the reporting period, over 5,000 labour agencies, suppliers, distributors, retailers and wholesalers were assessed in the Group TPIDD tool, with inherent risks of human rights violations or modern slavery flagged for around 5%. After thorough risk assessments, Compass decided to not pursue its business relationship with five entities, while remaining entities are closely monitored to ensure swift action in the event of a breach occurring.

Continuous improvement and internal audits

Throughout 2024, Group companies have made significant efforts to improve their processes for managing human rights and modern slavery risks.

These country-led initiatives, along with ongoing audits and process enhancements, demonstrate the Group's commitment to continually improving human rights protections and effectively managing modern slavery risks.

Our Indian business has enhanced existing measures to further prevent labour exploitation and child labour

Building on controls already in place, an automated system is now being implemented which tracks overtime and enforces mandatory weekly time off, reinforcing safeguards against excessive working hours. The onboarding process, already focused on compliance, has been strengthened to ensure that no one under the age of 18 is hired, reaffirming Compass India's commitment to child labour prevention. To uphold ethical recruitment practices, all job postings now feature explicit warnings against paying recruitment fees, while a salary calculator has been introduced to further ensure compliance with minimum wage laws, protecting vulnerable workers' pay.

Awareness of employee rights has also been enhanced through the display of Speak & Listen Up and Compass Golden Rules posters, encouraging staff to report any concerns. The posters, featuring QR codes, simplify access to our Speak Up, We're Listening programme. In addition, a POSH (Prevention of Sexual Harassment) training module was rolled out to strengthen workplace harassment prevention efforts. Compass India also launched a confidential Employee Assistance Programme (EAP) to provide mental health support.



In Germany, a focus on labour agencies and onboarding processes

Following a scheduled routine internal audit in 2023, several improvements were made by our German business to reduce modern slavery risks, particularly in the management of labour agencies. Recognising the potential vulnerabilities associated with agency labour, our German business centralised its booking process for temporary labour and implemented a framework agreement on modern slavery and human rights, which agencies must sign to be listed as suppliers. Enhanced onboarding procedures were also introduced, requiring mandatory ID and bank account verification for all new hires and employees changing bank accounts, ensuring identity and financial security. In Germany's Sports & Leisure sector, identity checks for employees are now carried out at the start of every event, further reinforcing compliance with ethical standards.



Engagement with our seafood supply chain

Forced labour and modern slavery in the seafood supply chain are longstanding global risks. We have consistently categorised seafood as higher risk and implemented enhanced due diligence in sourcing. While our businesses primarily source seafood through distributors, the supply chain is highly complex, and incidents in remote areas can affect multiple countries given the high concentration and scale of a few dominant distributors across many countries in this sector.

Last year, we partnered with the Earthworm Foundation to assess the social and environmental risks in the canned tuna supply chain in the UK and USA. Following the completion of this risk mapping, we cascaded the findings to all procurement teams across the Group's companies, equipping them with the information and knowledge needed to better understand these risks, manage them more effectively when encountered, and take prevention into consideration in their sourcing strategies.

This year, there were media reports highlighting potential issues of forced labour in some seafood processing plants in China. Our businesses took action to strengthen their due diligence efforts by extending Sedex and TPIDD checks further into the supply chain. They engaged directly with their seafood suppliers, enabling them to conduct a deeper evaluation of their ethical standards. This approach helped verify the chain of custody and assess the effectiveness of due diligence carried out by our businesses' direct suppliers within their own supply chains.

We worked closely with country procurement teams and held a global briefing with procurement directors to ensure a coordinated response. Additionally, in April 2024 we conducted seafood risk and due diligence training in partnership with the Global Sustainable Seafood Initiative (GSSI) to strengthen our businesses' risk management approach in the seafood sector.

During the year, we also continued to support the Coalition of Immokalee Workers (CIW) in their efforts to expand the Fair Food Program (FFP), specifically targeting the fish sector. We were invited to share our views on the FFP and Worker-driven Social Responsibility (WSR), due to the longstanding partnership our US business has had with CIW since 2009. This invitation was to attend a meeting with Scottish skippers to share our experiences of the FFP and WSR so they could understand how it could potentially be adapted for the UK fishing industry, in partnership with UK fishers, vessel owners and buyers. Our participation highlights our advocacy for CIW/FFP and its role in promoting better working conditions through direct worker engagement.

Ongoing country-level engagement continues to provide oversight so our businesses' sourcing practices align with human rights and ethical standards.





Evolving partnerships in the fight against modern slavery

The issue of modern slavery is complex and no one organisation can tackle it alone. We recognise the power of collaboration and the opportunities it provides to learn, share knowledge and amplify our impact. Through evolving partnerships, we are committed to combating modern slavery across our businesses' operations and their supply chains.

One key partnership is with Slave-Free Alliance (SFA), which acts as a 'critical friend' in helping us better understand the risks associated with modern slavery. SFA provides support with training, policy reviews, and identifying vulnerabilities within our businesses. This ongoing partnership continues to be an important part of our efforts to address modern slavery risks.

Our collaboration with the Earthworm Foundation continues, which last year focused on mapping risks in the tomato and canned tuna supply chains. This year, Earthworm has expanded its efforts to include a risk mapping exercise in the cocoa supply chain, helping us identify potential areas of concern and further refine our risk management strategies.

In the seafood sector, we sought the expertise of the Global Sustainable Seafood Initiative (GSSI). Recognising the complexity of the seafood supply chain, we asked GSSI to collaborate with us in assessing and understanding these risks more thoroughly. Their insights have been invaluable as we work to strengthen our due diligence in this higher-risk sector.

Compass Group USA's partnership with the Coalition of Immokalee Workers (CIW) and the Fair Food Program (FFP) has been central to promoting worker-driven social responsibility. As a longstanding buyer in the FFP since 2009, Compass Group USA remains committed to supporting the mission of CIW and FFP to empower farm workers, prevent exploitation and uphold human rights.

This year, our US business' Foodbuy Responsible Sourcing team attended the International Fresh Produce Association (IFPA) conference in Monterey, California, alongside CIW and FFP, to strengthen collaboration with contracted growers and expand FFP certification across the industry.

The Compass Group Foundation (an independent charity registered with The Charity Commission for England and Wales) has provided funding and supported awareness raising activities for organisations such as:

- National Underground Railroad Freedom Center, Ohio, USA – this project educates and raises awareness about human trafficking, particularly forced labour in the food supply chain and the service and hospitality sectors
- Emma's Torch, New York City, USA – a not-for-profit that trains refugees, asylees, and survivors of human trafficking in the culinary arts, helping them build meaningful careers in the food and hospitality industry and providing pathways for them to rebuild their lives

Through these diverse and evolving partnerships, we remain focused on learning from others, addressing the complexity of modern slavery, and leveraging our collective strength to create meaningful change.

Access to remedy

We are guided by our core values including openness, trust and integrity, which help maintain high ethical standards across our businesses. These values are embedded in our policies, including the Code of Business Conduct, Business Integrity Policy, Supplier Code of Conduct, Human Rights Policy, and Speak and Listen Up Policy.

Guided by these values, we recognise that addressing issues such as modern slavery and forced labour requires more than just having policies in place. It also calls for proactive engagement and open communication at all levels.



Speak Up, We're Listening

Our confidential reporting programme, Speak Up, We're Listening, is available in all the countries in which Compass' businesses operate. The programme ensures that employees, supply chain workers, and external stakeholders can report concerns at any time – 24/7, 365 days a year – in their local language. Managed by our independent Group Ethics and Integrity (E&I) function, this platform provides a secure, anonymous way for individuals to raise concerns, whether through the helpline, online platform, or case management system.

External reporting parties, including workers in the supply chain, suppliers and other stakeholders, can raise their concerns through their Compass point of contact, if applicable, or directly via Speak Up, We're Listening. Once a report is received, it is confidentially reviewed and assigned for investigation as needed.

At Compass, we ensure that everyone has access to multiple channels for raising concerns, including:

- direct communication with their manager or a more senior manager
- the Human Resources or Legal teams
- the country-specific Listen Up champions
- a member of the Group E&I team
- via Speak Up, We're Listening

A community of Speak Up contacts across all countries are assigned reports for follow-up, including undertaking confidential reviews and investigations. Once a report is submitted, the individual is notified that their concern has been received and assigned to the appropriate investigator. Our secure two-way communication system allows reporters to engage with their investigator, ask questions or request updates on their case at any time. Once the investigation is concluded and the matter resolved, the reporter is informed of the outcome.

Beyond addressing specific issues, we take the insights gained from reported concerns to improve our business or labour practices and prevent similar issues from arising in the future. This commitment to learning and continuous improvement strengthens our ability to identify risks early and respond effectively, enhancing our overall efforts to combat modern slavery and forced labour.

In the 12 months to 30 September 2024, there were 4,974 reports received through Speak Up, We're Listening, of which 34% were substantiated. Of those reports, 24 (representing 0.47% of the total number of cases received globally) were categorised as concerns related to the human rights agenda, with the following breakdown:

- Australia (1), Brazil (4), Ireland (1), Japan (1), Mexico (2), Qatar (2), Türkiye (2), UAE (6), UK (1) and USA (4); and
- of these, five cases were substantiated, with relevant remedial and corrective action.

We also received a number of reports related to broader human rights topics, including labour matters, working practices and alleged discrimination. These reports were followed up and investigated in an appropriate and timely manner.

A dedicated page about Speak Up, We're Listening can be found on our website and further information is available through our Group E&I portal. The Speak Up, We're Listening platform is accessible to anyone at https://compassgroup.onetrustethics.com/

Training for continuous improvement

Training remains a cornerstone of Compass' strategy to combat modern slavery and raise awareness of human rights risks within our businesses' operations and their supply chains. By increasing knowledge and understanding of modern slavery, its prevalence, and the vulnerabilities of at-risk populations, we empower our colleagues, workers, suppliers and partners to not only recognise signs of exploitation in others but also to be aware of their own situations and take preventive actions where necessary.

Our training approach allows flexibility to accommodate the specific risks and contexts of local operations. Training can take various forms – from formal online modules to in-person workshops, regional meetings and webinars – ensuring that awareness and vigilance are embedded throughout the businesses.

At the time of reporting, over 17,000[1] leaders across Compass had completed the 'Human Rights Training 2024: Doing What's Right' programme. This training refreshed their understanding of key areas such as the abolition of modern slavery, forced labour, workplace harassment and human trafficking. In addition to knowledge-building, the training encouraged leaders to critically assess situations that could occur within Compass and how they could prevent them. Upon completion, these leaders were required to reaffirm their commitment to our Human Rights Policy.

In addition to leadership training, we continued a range of ongoing activities to raise awareness across our businesses. These included online training modules, HRWG sessions, supplier meetings, and targeted training such as Sedex and Global Sustainable Seafood Initiative (GSSI) sessions focused on addressing complex supply chain challenges. We also conducted human rights and modern slavery discussions with leaders from across multiple countries and disciplines.

A key focus this year was the engagement with our procurement teams for the launch of the SCRM country framework, designed to address the unique risks present in our businesses' operations. This involved a series of targeted training sessions and discussions, including a key meeting in Compass India, where the framework was presented to suppliers with a specific focus on Sedex implementation.

Over 17,000 leaders[1] across Compass completed the 'Human Rights Training 2024: Doing What's Right' programme.



1. On a risk-to-role basis, as per the Group's internal training records as at 30 September 2024.

Effectiveness



Compass remains committed to enhancing its ability to identify and prevent modern slavery in all its forms.

This statement provides an overview of the initiatives, programmes and efforts carried out during the year. Given the breadth of the Group's operations, the statement highlights key areas of progress rather than addressing every initiative in detail.

Driving meaningful change across such a diverse group of businesses can be challenging, but we have prioritised clear communication and close collaboration to ensure these efforts become an integral part of daily operations.

We continue to track and evaluate the effectiveness of the steps taken to address modern slavery, with key achievements visible throughout this report. Since 2020, our implementation of Sedex has expanded to 17 countries, further strengthening supply chain transparency. Our human rights training programme has reached over 17,000[1] leaders.

Additionally, Group companies have integrated around 7,000 third parties into its TPIDD system, enhancing their ability to manage ongoing third-party risks. In the UK, audits of labour agencies, led by Datum (an independent compliance audit service), have resulted in 106 audits, with four agencies delisted, and this practice has been extended to Compass' business in the Netherlands.

Our ongoing commitment is to continue refining our processes, fostering an approach where exploitation in any form is unacceptable.

1. On a risk-to-role basis, as per the Group's internal training records as at 30 September 2024.



Looking ahead

We will continue to develop our Human Rights strategy across the Group's businesses and their supply chains to address human rights risks.

Commitments for 2025 and beyond:

Continuing to strengthen our efforts in raising awareness, providing training and fostering engagement on human rights and modern slavery across our businesses and their supply chains.

Expanding the global use of Sedex, with a focus on improving data quality, addressing non-compliances more effectively, and embedding Sedex further into our country-level risk management and procurement processes.

Advancing the rollout and implementation of our country-specific SCRM framework, ensuring it is tailored to address local risks and fully integrated into country operations.

Continuing the phased, risk-based implementation of our TPIDD process to further embed it into local control environments and third-party risk assessment procedures.

Developing a human rights self-assessment tool for markets, empowering teams to assess and improve their local practices in alignment with our global human rights commitments.



Over the past year, we have made meaningful progress in our efforts to combat modern slavery.

Conclusion

At Compass, we focus on practical solutions that make a real and lasting impact. Operating across a wide range of countries and managing the complexities of the global food supply chain brings unique challenges, but we are committed to addressing these with care and an emphasis on human rights and ethical practices, from sourcing ingredients to preparing and serving food. The same thoughtful approach extends to our support services, ensuring we deliver with integrity and responsibility.

Over the past year, we have made meaningful progress in our efforts to combat modern slavery, while recognising this is an ongoing journey. We also reviewed our global portfolio, exiting a number of countries, which has significantly reduced our risk exposure in certain areas including foreign migrant labour.

As we continue this work, we remain focused on ensuring that human rights are respected across our Group operations. By collaborating closely with our colleagues, business partners, clients and the communities we serve, we aim to uphold the dignity, wellbeing and fundamental human rights of everyone connected to our businesses. Together, we are committed to contributing to a more just, sustainable and equitable world for all.



Nelson Silva
Non-Executive Director of Compass Group PLC
Chair of the Corporate Responsibility Committee

Approved by the Board of Compass Group PLC on 20 November 2024

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
- CH&Co Catering Limited
- Dine Contract Catering Limited
- EFoods Limited
- Gather & Gather Limited