

COMPASS GROUP PLC

GLOBAL SUPPLIER CODE OF CONDUCT



“SAFETY, INTEGRITY AND RESPECT IN EVERYTHING WE DO. IT’S THE COMPASS WAY”



PURPOSE



Compass Group (Compass/we) has a passionate commitment to uphold the highest standards of ethics and integrity which has earned us our position as global leader and trusted partner. We proudly provide great food and support services to millions of people around the world, every day. Compass' core Values, Code of Business Conduct and Business Integrity Policy guide the decisions, actions and behaviours of our people and serve as a foundation for the way we conduct business with our clients, suppliers, business partners and the communities in which we operate.

It is in this spirit that Compass' Global Supplier Code of Conduct (Code) sets out the principles, expectations and behaviours we require our supply chain partners (suppliers/ you) to adhere to.

We appreciate many of you who work with us have developed your own principles to guide your business dealings and work environment. To this end, we do not ask you to replace those with ours, but we do require you to continue embracing our values and uphold this Code's principles and supplier expectations in partnership with Compass.

VALUES

OPENNESS, TRUST AND INTEGRITY

PASSION FOR QUALITY

WIN THROUGH TEAMWORK

RESPONSIBILITY

CAN-DO SAFELY

OUR FOCUS AREAS



We want to do business with suppliers who share our values.

This Code promotes Compass' high ethical standards and principles in our supply chain and sets out our supplier sustainability and responsibility aspirations. These are the minimum standards we expect of you and your subsidiaries and nothing in the Code shall prevent suppliers from exceeding these standards.

Our five focus areas of engagement with our suppliers are:

- Business integrity and ethical principles
- Human rights and labour standards
- Health and safety
- Sustainability
- Speak Up, We're Listening

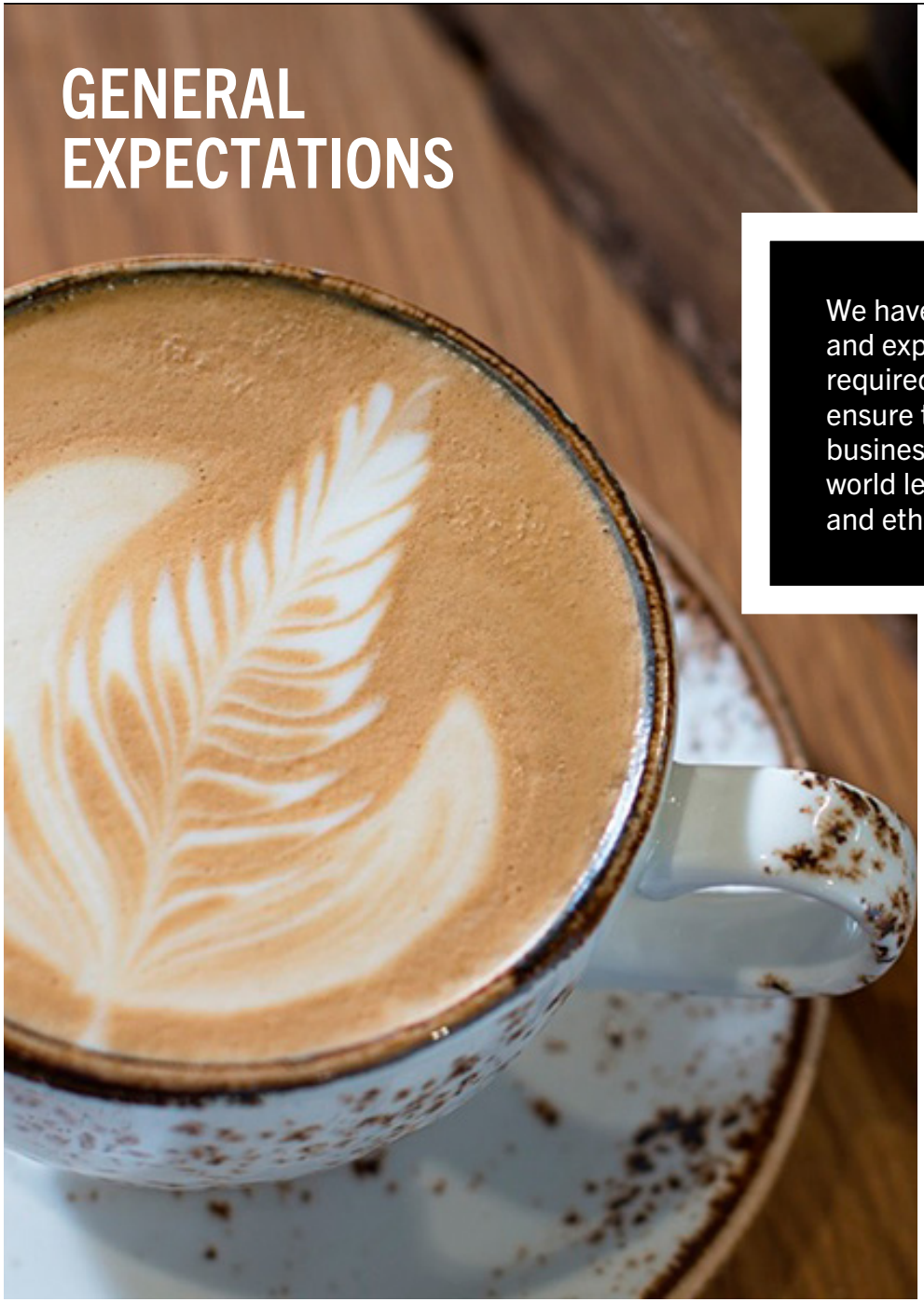
END-TO-END RESPONSIBILITY

We expect you to promote the principles and commitments set out in this Code to your relevant stakeholders and encourage responsible business practices in your own supply chains. From time-to-time we may ask you to openly share necessary information or participate in an audit or review (as required) relating to your business dealings with Compass, recognising the importance of helping to ensure the principles and commitments in this Code are being followed.

Compass acknowledges that deficiencies in processes may arise and that it could take time to implement a corrective plan to improve and remedy the situation. In the event of unsatisfactory progress being made or non-compliance with the Code, Compass may refuse to work with or take steps to terminate an agreement with any supplier.

This Code may be amended from time to time. The most recent version of the Code is available on Compass' website at https://www.compass-group.com/en/who-we-are/corporate-governance/policies.html

GENERAL EXPECTATIONS



We have clear standards and expectations of required behaviours to ensure that we conduct our business throughout the world legally, responsibly, and ethically.

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- comply with all applicable laws and regulations connected to your operations and your business dealings with Compass. Should there be a difference between requirements of this Code and applicable laws or regulations the supplier shall comply with whichever is more stringent
- uphold principles and commitments set out in this Code and instil these within your day-to-day business practices and, where relevant, through your own policies and procedures
- ensure you have appropriate processes in place to verify and demonstrate applicable compliance standards
- evaluate risks and conduct appropriate due diligence, risk assessment and, where required, audit your own suppliers, subcontractors and partners with specific regard to business ethics and integrity risks, including human rights and labour rights
- provide the appropriate information, training, and tools necessary to help employees and workers comply and ensure there is a mechanism to allow them to raise concerns safely and without fear of retaliation
- promptly report any concerns that may affect your compliance with this Code in a timely manner to your Compass business contact or via our confidential reporting programme, Speak Up, We're Listening

BUSINESS INTEGRITY



Our principle: we will carry out all business dealings ethically and expect our people and suppliers to uphold the highest standards, acting with integrity in everything they do.

Never share with us:

- information you receive from or about our competitors or their bids
- the bids you make to our competitors

Always:

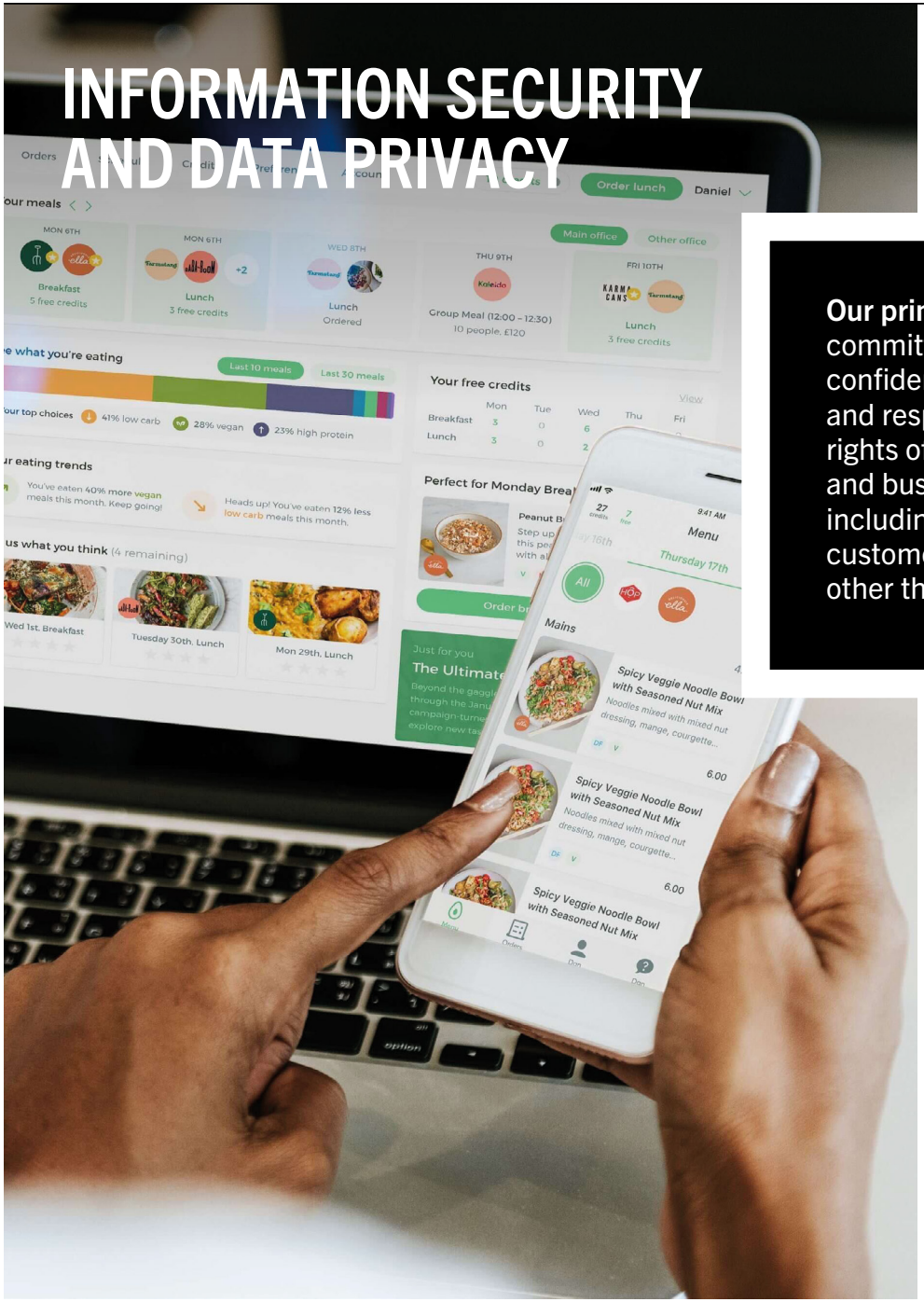
- tell us about any business integrity allegations or concerns you may have such as instances of bribery and corruption, anti-competitive behaviour or other improper or illegal circumstances

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- comply, at a minimum, with all applicable business integrity laws[1]
- adopt and promote clear commitments on ethical business practices
- never bribe, attempt to bribe, or get involved in bribery or corruption of any form, including any payments to government or public officials acting as facilitation (grease) payments
- ensure that any gifts or hospitality accepted, received, offered, requested or given are not lavish or excessive and do not create the feeling of obligation or the impression of an obligation. We expect you to respect there is a general prohibition of any gifts and hospitality during or in anticipation of a tender, bid or contract negotiation or renegotiation. The mere perception of a bribe, an improper or unfair advantage or conflict of interest can be damaging
- do not engage in or facilitate anti-competitive behaviour, anti-trust or anti-monopoly practices including inappropriate information exchange
- ensure that there are no conflicts of interest in your dealings with Compass. Inform your Compass contact if you become aware of a situation where personal activities, relationships or other interests conflict with your responsibilities to Compass, including in compliance with this Code
- do not take part in (directly or indirectly) or facilitate any form of money laundering, terrorist financing, economic or trade sanctions violations, tax evasion, theft or fraud
- maintain accurate financial books and business records, including invoicing, in accordance with all applicable legal and regulatory requirements and accepted accounting practices

1. Applicable business integrity laws may include but are not limited to bribery and corruption, conflicts of interest, competition, anti-trust or anti-monopoly, fraud, theft, financial misstatement, books and records, tax evasion, money laundering, terrorist financing, economic and trade sanctions, export controls, human rights and modern slavery.

INFORMATION SECURITY AND DATA PRIVACY



Our principle: we are committed to protecting confidentiality of information and respecting the privacy rights of all our employees and business partners including our suppliers, customers, clients, and other third parties.

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- comply, at a minimum, with all applicable data privacy and cyber security laws and regulations
- ensure that the use of proprietary and confidential information relevant to your business engagement with Compass is for authorised purposes and is only used by authorised individuals
- do not disclose (without appropriate consent) any confidential, personal or commercially sensitive information relating to Compass
- ensure that any personal data is only used for the agreed business purposes and has been obtained, processed, destroyed and transferred in accordance with applicable laws and relevant contractual obligations to Compass
- ensure that any data related to business with Compass is accurate and that any inaccurate data is erased, rectified or appropriately amended
- ensure that appropriate technical and organisational data protection measures are in place to safeguard data related to your business dealings with Compass
- inform Compass as soon as possible of any actual or suspected data breach and cooperate with any inquiries to help Compass look into the matter

HUMAN RIGHTS AND MODERN SLAVERY



Our principle: we are committed to the positive development and enhancement of human rights globally which includes working towards eradicating modern slavery and human trafficking. We are opposed to any and all forms of human rights violations or abuse.[1]

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- comply, at a minimum, with all applicable laws and regulations regarding human rights and modern slavery including but not limited to working hours and days worked, minimum wages, overtime, breaks and rest time, sick leave and annual holidays as well as other mandatory benefits, ensuring that appropriate records are kept
- treat all employees and workers humanely and ensure that all work is freely chosen
- ensure you do not use or benefit from any child, forced, bonded or compulsory labour
- ensure that all employees and workers meet the relevant legal minimum age of employment and have in place systems to prevent child labour and exploitation
- firmly oppose any form of human trafficking and immediately act on any suspected risks or activities in your supply chain
- immediately act on and investigate any suspected human rights issues in your business and within your supply chain

1. Compass respects the rights enshrined within the United Nations Universal Declaration of Human Rights, the Ethical Trading Initiative (ETI) Base Code, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact 10 principles.

NON-DISCRIMINATION, HARASSMENT AND INCLUSION

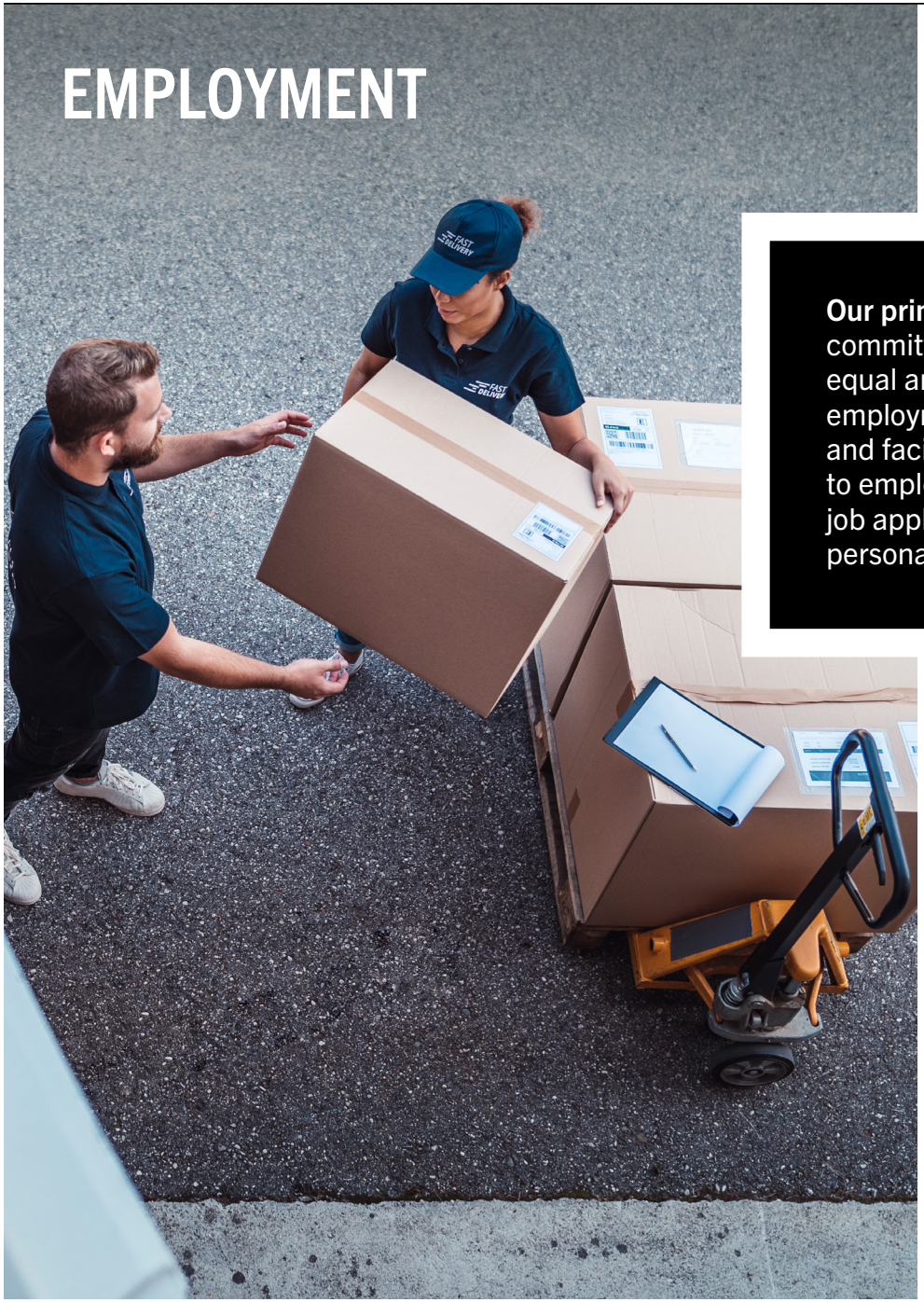


Our principle: we are dedicated to encouraging a welcoming, supportive, respectful and inclusive culture and are committed to equality, wellbeing and fairness for all our employees. We are opposed to any and all forms of discrimination, bullying or harassment.

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- comply, at a minimum, with applicable laws regarding employee and worker rights, fair treatment and employment
- promote a diverse and inclusive work environment that respects equal opportunities and every employee, worker or applicant's right to be treated fairly and with respect and implement relevant policies and practices conforming to applicable laws
- ensure that recruitment practices are free from discrimination
- do not subject employees and workers to or tolerate any form of unfair or unlawful harassment, discrimination or degrading treatment, whether physical, verbal, sexual, or any harmful acts including violence
- immediately act on any reports or identified instances of unlawful or unfair treatment

EMPLOYMENT



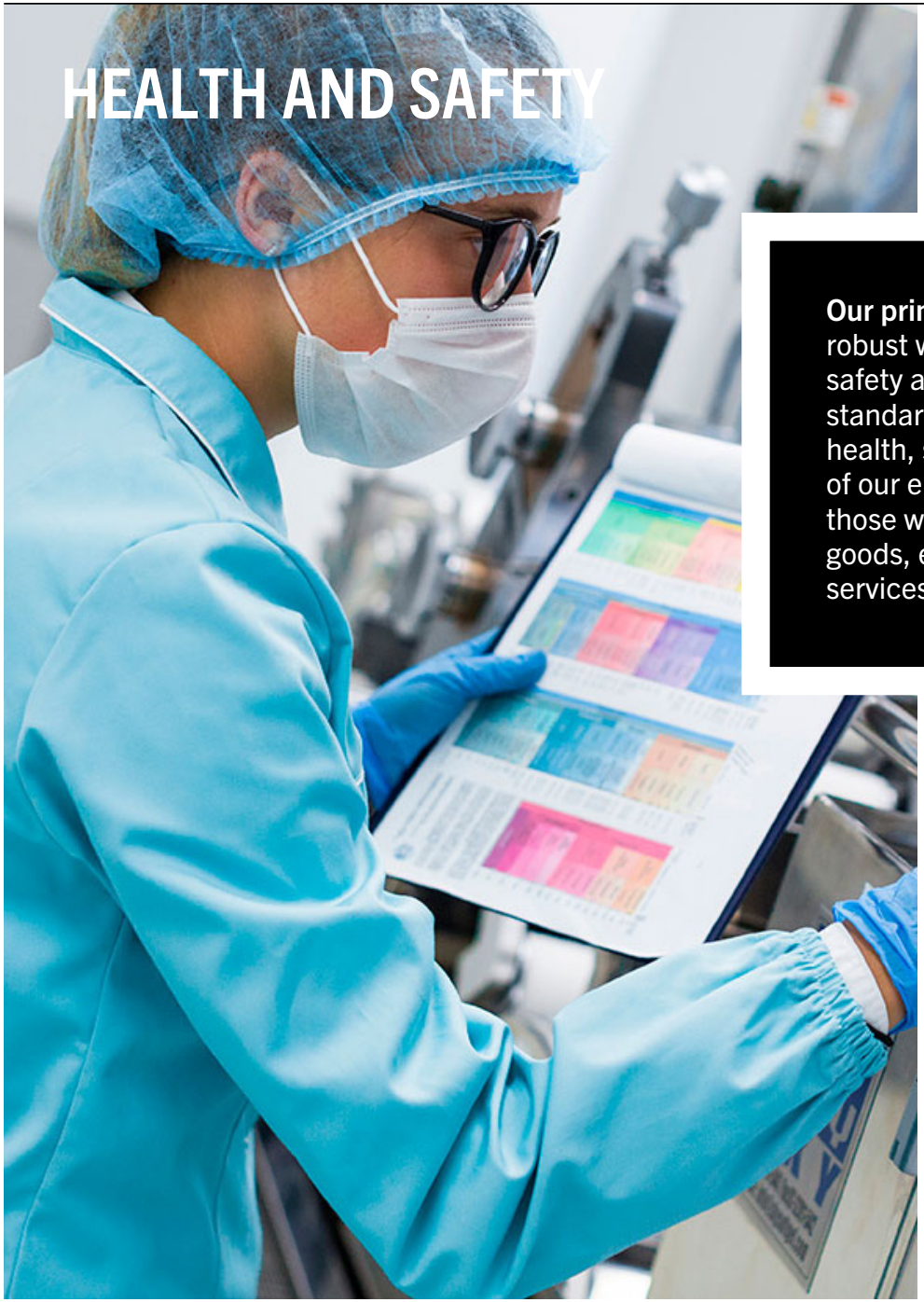
Our principle: we are committed to providing fair, equal and ethical employment opportunities and facilities (if applicable) to employees, workers and job applicants regardless of personal characteristics.[1]

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- put in place and promote ethical and positive working conditions which, at a minimum, meet local labour laws and regulations
- ensure that all work is based on a legally recognised employment relationship and that employees receive clear written information about their employment terms and benefits which comply, at a minimum, with applicable employment laws and regulations
- ensure that recruitment is carried out ethically and responsibly
- recognise and respect employees and workers rights to organise freely and bargain collectively

1. Personal characteristics may include but are not limited to race, sex, colour, ethnicity, religion, beliefs, age, disability, sexual orientation, gender identification, background or any other similar distinction which is not based on the inherent requirements of the work.

HEALTH AND SAFETY

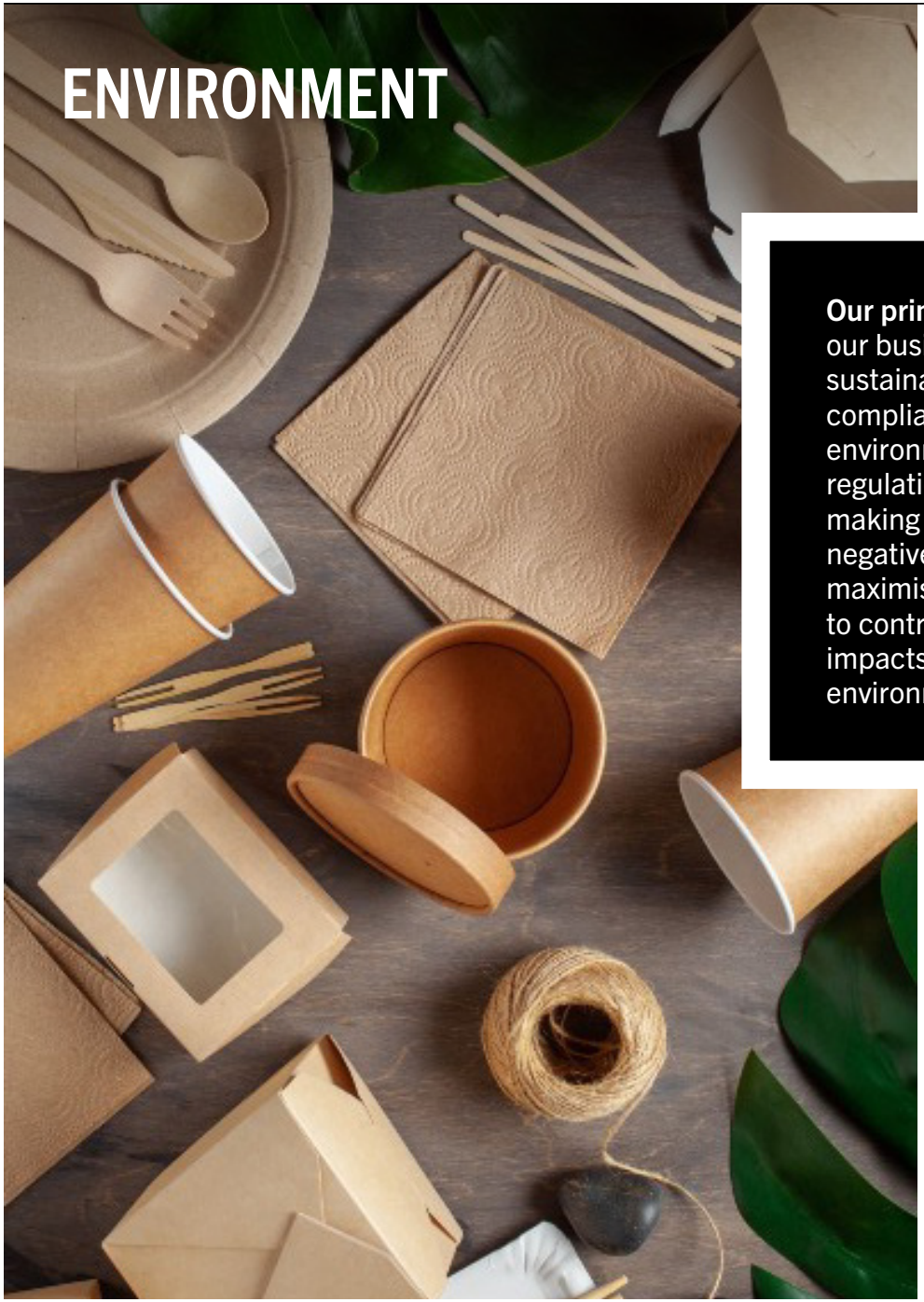


Our principle: we prioritise robust workplace and food safety and quality standards supported by the health, safety and wellbeing of our employees and all those who supply our goods, equipment and services.

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- comply, at a minimum, with all applicable laws and regulations, and adhere to relevant industry standards on workplace health and safety rules and procedures that apply to you and/or your Compass engagement. Report any concerns or issues that may occur in a timely manner to your Compass business contact
- employees and workers health and safety to be a priority throughout all aspects of our suppliers' activities, including implementing and maintaining relevant policies, standards, procedures and systems
- provide employees and workers with a safe and healthy working environment, and, where provided, safe and secure housing conditions
- promote and encourage a workplace culture of health and safety; implementing, where relevant, policies and practices including risk assessments and management and recording of incidents and accidents
- ensure that any unsafe work is stopped immediately, and only starts again once the hazard has been removed or the issue resolved
- ensure that all employees and workers receive adequate and relevant health and safety training and have the necessary tools and equipment to perform their roles safely and in a compliant manner
- if applicable to your business dealings with Compass:
  - ensure that you understand and comply with Compass' food safety and quality standards
  - always handle, prepare, store and transport food under sanitary conditions, including complying with applicable regulatory requirements

ENVIRONMENT



Our principle: we conduct our business in a sustainable way and in compliance with all relevant environmental laws and regulations, proactively making efforts to minimise negative effects and maximise the opportunity to contribute to positive impacts on the environment.

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- comply, at a minimum, with all applicable environmental laws, regulations, certifications and specifications relevant to your products or services including in relation to animal welfare (if applicable)
- operate in a sustainable manner with care for the environment reflected in your business activities
- take actions to protect and where possible, restore and enhance the environment connected to your operations
- strive to reduce negative impacts (such as deforestation) of your activities, products or services on the environment wherever possible

COMMUNITY



Our principle: we strive to make a positive impact on the communities in which we live and work, facilitate opportunities to support local communities and ensure that our commitments are transparent, ethical and in line with our values.

WHAT ARE OUR EXPECTATIONS OF SUPPLIERS?

- where possible, support local communities and minority groups' businesses and organisations including helping to develop local skills and capabilities
- wherever you can, help to reduce food waste in your operations, and support the redistribution of surplus food in the community
- respect the rights of indigenous people, including land rights, in your business activities



SPEAK UP!
We're listening

For more information or to raise a concern, visit our SpeakUp, We're listening portal.

For more information, please refer to the Compass Speak and Listen Up Policy.

SPEAK UP, WE'RE LISTENING

As a supplier to Compass, you and your employees, workers and contractors have access to Speak Up, We're Listening; Compass' confidential and independently operated multilingual whistleblowing programme.

We encourage you to Speak Up if something doesn't feel right or you have a concern about potential misconduct, criminal activities, unethical behaviours or other improper circumstances including those which may be inconsistent with this Code, Compass' Values, our Code of Business Conduct or our Business Integrity Policy.

We stand by the principle that if it doesn't feel right, follow your instincts.

Speak Up, We're Listening provides you a choice of whether to submit a report confidentially or anonymously. It is important to know that the information provided and the right to anonymity may be subject to local laws.

We are committed to appropriately reviewing and following up any concerns that may be raised. Likewise, we expect full cooperation and openness from our suppliers in any investigation, audit or inquiry in response to a concern being raised to continue upholding the principles and commitments in this Code, Compass' Values, Code of Business Conduct and Business Integrity Policy.