COMPASS
GROUP

2023

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 2023.

Group Chief Executive Officer Overview



As one of the world's largest employers, people are at the heart of everything we do.

We believe that everyone has the right to work in a safe and supported environment where they feel valued and respected and have opportunities to learn and grow. We embrace diversity and inclusion and are committed to helping our people overcome any barriers that may exist in society today. And, above all, we strive to uphold the dignity, wellbeing and human rights of everyone who works in our businesses, our supply chains and the communities we serve.

We remain firmly committed to playing our part in eradicating modern slavery in all its forms and recognise that our scale and global reach enable us to positively influence others and bring about real change.

However, despite increasing public scrutiny and continuing efforts from companies, governments, communities and society as a whole, modern slavery remains a serious global issue.

2023 has been another unprecedented year of global conflict, with the continuing war in Ukraine, rising inflation fuelling a global cost of living crisis and increasing tensions in the Middle East. Such prolonged periods of social and geopolitical unrest significantly increase the risks of human trafficking and forced, bonded and child labour, making the fight to eradicate modern slavery, in all its forms, more vital than ever.

Over the past year, we have made further positive progress towards this goal, including:

- launching Striving For a More Equitable World, an online training module designed to increase awareness of the Group's Human Rights Policy and the Group's zero-tolerance approach to unacceptable practices such as forced labour, child labour and discrimination. The training module was completed by over 11,000[1] employees on a risk to role basis; c.94% of the target group
- refreshing our Human Rights Policy to provide greater clarity on our stance with regards to freedom of association, collective bargaining and working hours
- increasing the number of countries that use the Supplier Ethical Data Exchange (Sedex) to 14, further extending our human rights due diligence processes and improving supplier visibility
- launching our Third-Party Integrity Due Diligence Policy (TPIDD), which sets out the minimum expectations, requirements and standards to ensure that we adequately assess the compatibility of third-parties that may work with us
- amplifying the learnings of our 2022 risk mapping project with Earthworm Foundation, a not-for-profit organisation, throughout our global businesses to better equip our procurement teams when making their responsible sourcing decisions
- improving migrant workers' recruitment journeys and experiences in our award-winning Middle East businesses, through the appointment of dedicated compliance officers in source countries and the launch of Employee Happiness Forums, their Applicant Care Centre concept and Committed to Care programme
- driving continued awareness of our Global Supplier Code of Conduct (SCOC) across the businesses in the Group, including incorporating SCOC implementation within purchasing reviews at a country level
- refreshing and re-launching our Code of Business Conduct (CBC), reinforcing Compass' zero tolerance to forced labour, the Group's commitments to equality, wellbeing, inclusion and fairness, and its commitment to working towards the eradication of modern slavery and human trafficking in all its forms
- underscoring the importance of ethics and integrity in our corporate culture through a week-long CBC campaign, followed by a dedicated online training module which was completed by c.17,000[1] employees across all Compass geographies

I am extremely proud of everything our teams have achieved this year but, as ever, there is still more work to do.

Everyone, from our front-line workers to our global leadership, has a role to play in calling out and standing up to injustices and creating a supportive and caring environment for all. As a Group, we are working hard to identify and mitigate any incidences and potential risks of modern slavery across our operations and their supply chains.

In the coming year, in line with our commitment to continuous improvement, we will continue to build on our progress to date. We will concentrate our efforts and resources where we can make the greatest impact, ensuring best practice is consistently shared and implemented across the Group's businesses and their supply chains.

We will continue engaging our supplier partners to further promote and raise awareness of our new SCOC, while rolling out Sedex into additional markets and further strengthening and embedding due diligence procedures and tools into procurement processes.

We are also committed to delivering new collaborations, working with our peers and partners, including suppliers, governments, non-governmental organisations (NGOs), clients and communities, to enhance human rights, raise global standards and improve social equity for all.

This will include additional training and improved processes and tools, to further educate all our stakeholders on these important issues, as we work together to bring about the changes needed to help enhance human rights and end modern slavery for all.

Dominic Blakemore
Group Chief Executive Officer
Compass Group PLC

1. As per the Group's internal training records as at 30 September 2023



Introduction

This statement is our eighth Modern Slavery statement released under the Modern Slavery Act.

It provides our stakeholders with an update on the Group's progress during the financial year to 30 September 2023, including how we have continued to evolve and strengthen our policies, processes and partnerships to identify, assess, address and prevent modern slavery in the Group's operations and their supply chains.

For the Group, our colleagues and partners, it also provides an additional opportunity to reflect on our shared accomplishments over the past 12 months and to explore areas for further improvement.

As a Group, we are committed to upholding human rights, always treating people fairly, with dignity and respect, and we expect our businesses' suppliers to uphold these same high standards throughout the value chain. Key to achieving positive change is understanding our individual and collective responsibilities, working collaboratively to proactively seek out areas of concern and rectify them quickly and transparently.

We acknowledge that modern slavery is an overarching term that encompasses slavery, servitude and forced or compulsory labour, human trafficking, sexual exploitation and child labour. At Compass, we are committed to eradicating modern slavery in all its forms.

Business Structure

Compass is a global leader in food and support services, providing bespoke services to a wide range of clients across the public and private sectors, including businesses, hospitals, schools, universities, sports stadia, oil rigs and historical venues.

Our core competency is the provision of outsourced food services, which represents c.85% of our business. The remaining c.15% of the business provides targeted support services such as high-quality hospital cleaning and facilities management. Our Group companies deliver these services in thousands of client locations across c.35 countries, from densely populated urban areas to some of the most remote places in the world.

c.35	550,000+	5.5 bn
Number of countries in which we operate	People we employ and engage around the world	Number of meals served per year

The Group structures its businesses across five sectors: Business & Industry (35% of annual revenue), Healthcare & Senior Living (24%), Education (18%), Sports & Leisure (15%), and Defence, Offshore & Remote (8%). Compass Group companies operate in these sectors (and related sub-sectors) under a variety of local, regional and international business-to-business brands, which allow us to develop a deeper understanding of our clients and the challenges they face, while delivering bespoke offers according to clients' specific requirements. Some of the brands the Group operates under are:

Business & Industry	Eurest, Restaurant Associates, Bon Appétit Management Company, Flik
Healthcare & Senior Living	Morrison Healthcare, medirest, Crothall Healthcare
Education	FISD, Chartwells, SSC Services for Education
Sports & Leisure	Levy
Defence, Offshore & Remote	ESS Support Services Worldwide

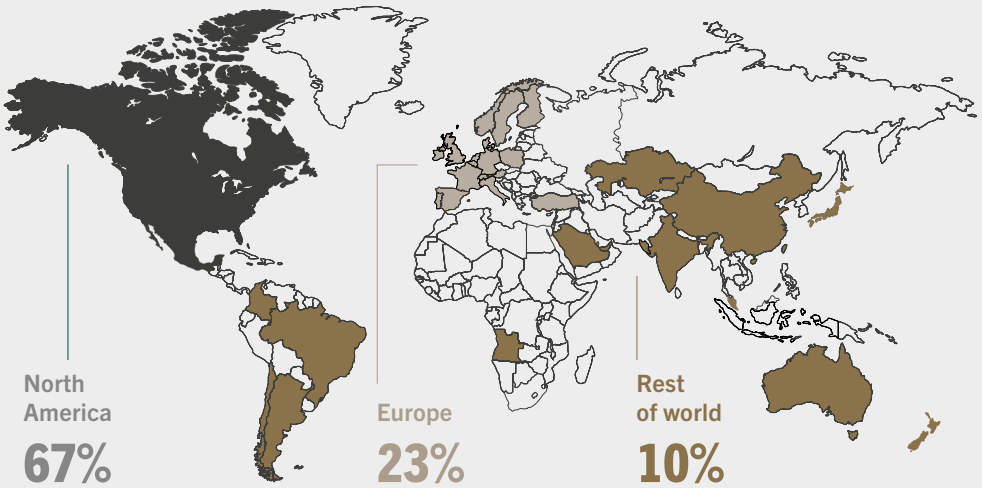
For our clients, we unlock the full benefits of food service outsourcing. Our scale is a benefit in food procurement, labour management and back-office costs. It underpins our competitiveness and enables us to deliver sustainable growth over time.

On a statutory basis, the annual revenue for the Group for the financial year ended 30 September 2023 was £31.0 billion, delivering an operating profit of £1.9 billion.



Business Structure continued

The Group operates within three key geographical regions:



North America
67%
of (underlying) revenue[1]

Europe
23%
of (underlying) revenue[1]

Rest of world
10%
of (underlying) revenue[1]

Within these regions, our 10 largest countries by revenue[1] are: USA, UK, Canada, France, Australia, Germany, Brazil, Türkiye, Japan and Spain.

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

The Executive Committee comprises the Group CEO, Group Chief Financial Officer (CFO), Group General Counsel and Company Secretary, Group Chief People Officer (CPO), Group Chief Commercial Officer (CCO), the Managing Director (MD) for the United Kingdom and Ireland (UK&I) and the Regional Managing Directors (RMDs) for North America, Europe and Middle East, Asia Pacific, and Latin America.

Our operations are decentralised in nature[2], with country managing directors and leadership teams responsible for local operations, strategy, execution and compliance, in alignment with the Group's values, policies, governance, standards and frameworks. Depending on the region, an additional layer of regional and functional leadership is present.

Compass is a people business and we employ and engage 550,000+ people globally. Our teams are behind the meals and support services that people around the world receive every single day. They are the source of our competitive advantage and the conduit for our unique, caring and winning culture.

The workforce breakdown[3] among our three regions is as follows:

- North America: 49%
- Europe: 31%
- Rest of world: 20%

Most of the Group's workforce are employees, recruited and hired directly by our local subsidiary operations, with a smaller number of agency workers. Agency workers are primarily engaged in our Sports & Leisure sector, usually to support specific high footfall events (i.e., concerts and sports tournaments).

A small proportion of the Group's workforce are foreign migrant workers, 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."

Foreign migrant workers are mostly concentrated in our Middle East businesses and primarily originate from Ghana, Bangladesh, India, Nepal and Uganda. The total migrant population in our Middle East businesses comprises approximately 22,000 employees, representing approximately 4% of the Group's workforce, and the regular recruitment of new colleagues is performed by a network of carefully and regularly vetted and trained recruitment partners and agencies.

Given the services we provide as a Group and the characteristics of our business, our largest categories of spend relate to food and labour.

Our food spend includes a wide array of sub-categories such as fresh produce (fruits and vegetables), meat, poultry, seafood, dairy, frozen and dry grocery items, a diverse range of beverages, and packaged confectionery and snacks. In addition, other non-food supplies are also purchased, including packaging, uniforms, kitchen equipment as well as services.

The supply chains in our Group companies are complex, comprising multiple tiers and a vast network of tens of thousands of growers, manufacturers, wholesalers and distributors globally to source the products and services necessary to meet the demands of our clients, and to deliver our sustainability goals. This supply chain structure enables our businesses to adapt to changing market demands and client requirements effectively.

Within this complex network, the largest suppliers primarily fall into the categories of food wholesalers and broadline distributors, however the relationships our businesses have with their suppliers often extend beyond these groups.

In our commitment to combat modern slavery and uphold human rights, we recognise the pivotal role that our suppliers, and their suppliers, play. While every link in our businesses' extended value chains is important, efforts are focused on the suppliers that have a direct relationship with our businesses and we expect that our stated standards, principles and compliance requirements are cascaded by them further down the supply chain. This targeted approach ensures that our endeavours are not only meaningful but also capable of creating a ripple effect, encouraging ethical practices throughout the whole value chain.

1. On a constant currency basis
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. Average number of employees, including directors and part-time employees as at 30 September 2023

Policies and Codes

Compass is committed to regularly reviewing and further strengthening its policies and codes, while continuing to build tools and share best practice to identify risks and improve ethical practices across the Group's businesses and throughout their supply chains.

Our policies are underpinned by our acknowledgement of and commitment to several important internationally recognised standards including:

- The International Bill of Human Rights
- The Ethical Trading Initiative (ETI) Base Code
- ILO Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights
- The UN Global Compact 10 principles
- The OECD (Organisation for Economic Cooperation and Development) Guidelines for Multinational Enterprises

The Group's country managing directors, with support from regional management and functional specialists, are responsible for ensuring that the Group's policies and standards are properly implemented and adhered to in their own businesses and supply chains and for monitoring the ongoing effectiveness of the policies, expected standards and minimum requirements.

Our *Code of Business Conduct* (CBC), which was comprehensively refreshed and re-launched in June 2023, provides principles-based guidance to help our businesses do what's right. This guidance includes:

- upholding the standards, principles and commitments to conduct business safely, with integrity and respect
- ensuring adherence to applicable compliance requirements with access to the information, training and tools needed to help employees and colleagues uphold the expectations in the CBC

All employees and business partners must, as a minimum, comply with applicable laws and regulations. Where there is a difference between applicable laws or regulations and the requirements of the CBC, Group or local Policies, the guidance is to apply whichever is more stringent.

The CBC emphasises, amongst other things, Compass' zero tolerance to forced labour and its commitment to working towards the eradication of modern slavery and human trafficking in all its forms. It also includes a dedicated section on Employment and Inclusion, reinforcing Compass' commitments to equality, wellbeing, inclusion and fairness.

Our *Five Golden Rules* summarise the Group's expectations of its employees in relation to conduct, attitude and priorities at work. They encapsulate all the areas covered in the CBC and include the principles of operating fairly and with respect:

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.





Policies and Codes continued

The Five Golden Rules are delivered in an easy to understand and straightforward way, that is accessible to the Group's large and diverse employee population. They are available and are communicated to employees via Compass' website, induction materials, posters, online training and, in some countries, on payslips.

The Group's *SCOC* was launched in 2022 and applies to all of the Group's supply chain partners globally.

It represents an extension of our CBC and values, and sets out the high ethical standards, principles and behaviours expected from the Group's supply chain partners. The SCOC is an integral part of our approach to maintaining an effective third-party risk management framework.

The five focus areas of the SCOC are:

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

Under the section entitled 'Human rights and labour standards', the SCOC reinforces, amongst other things, Compass' opposition to all forms of human rights violations or abuse, our commitment to working towards the eradication of modern slavery and human trafficking and specifies the minimum requirements we expect from suppliers.

The SCOC also sets out our expectations relating to health and safety, non-discrimination, harassment and inclusion, and the employment terms of workers.

The SCOC forms part of the contractual requirements for all suppliers. The Group's businesses are required to actively manage their third-parties to ensure that they continue to act in accordance with the CBC, the SCOC, and all other existing policies and codes which apply.

The SCOC further promotes and encourages the Group's supply chain partners to Speak Up when something doesn't feel right and advocates the use of our independent and confidential Speak Up, We're Listening helpline and online platform to report concerns about potential misconduct, criminal activities, unethical behaviours or other improper circumstances.

In line with our *Speak and Listen Up Policy*, any suspected breaches of the CBC or examples of behaviour inconsistent with Compass' values must be referred to designated functional leaders, such as Legal and Human Resources, or reported via Speak Up, We're Listening. Where instances of non-conformity with the CBC and/or SCOC are substantiated, we will support our business partners to remedy any identified issues, if necessary and appropriate, including collaboration with third-parties. In instances where it is not possible to rectify matters, or the situation warrants it, the relationship will be reviewed, suspended or it will be terminated.

Over the past year, we have continued to drive awareness of the SCOC to ensure our values, principles and expectations are front of mind for all suppliers to Group companies, including continuing to embed strengthened business integrity compliance provisions into supplier agreements and, in several markets, incorporating SCOC awareness into annual supplier conferences and other events. In order to reach wider audiences and improve accessibility, in-country business websites have been updated to include local language versions of the SCOC. Our Group Internal Audit team has now incorporated SCOC implementation into their purchasing reviews at a country level. This provides additional assurance that markets are fully and consistently embedding the SCOC as contractual requirements with their suppliers.

Policies and Codes continued

Our *Human Rights Policy* states the importance and responsibility of respecting the human rights of all workers within Compass' operations, throughout our businesses' supply chains and in the communities in which they operate. It highlights that respecting Human Rights is a shared responsibility and it is therefore incumbent on those who work for and partner with Compass to work together to uphold and implement the expected standards and principles of the Policy.

The Human Rights Policy confirms our commitment to respecting several international human rights standards and specifically to the four core conventions of the ILO, including the elimination of forced or compulsory labour and the abolition of child labour.

It also highlights that our commitment to respecting human rights extends to vulnerable groups, which include but are not limited to:

- women and girls
- LGBTQI+
- children
- refugees and migrant workers
- national minorities
- senior citizens
- people with disabilities
- indigenous people

The Policy sets out the following key performance indicators that are used to assess Compass' performance in human rights:

- total number of incidents of substantiated human rights breaches and actions taken
- number of human rights concerns related to Compass reported via our Speak Up, We're Listening resources
- significant actual and potential adverse human rights impact in the supply chain and actions taken
- modern slavery and human rights training

Amongst other important topics, the Human Rights Policy reinforces Compass' commitments to raising awareness of modern slavery risks and ensuring that employees and leaders understand that all forms of slavery and exploitation are unacceptable practices.

In 2023, c.11,000[1] of our leaders around the world, on a risk to role basis, completed the online training Striving For a More Equitable World, aimed at increasing awareness of the Group's Human Rights Policy, our commitments and our zero-tolerance approach to unacceptable practices such as forced labour, child labour and discrimination. More information can be found in the Training section on page 15.

We understand the importance and value of regularly reviewing our policies, especially in the complex realm of human rights within a global business. Recently, we refreshed our Human Rights Policy to provide greater clarity on our stance on freedom of association, collective bargaining and working hours. These updates reflect our ongoing commitment to upholding and respecting human rights standards transparently and effectively within the Group.

Our *Global Supply Chain Integrity Policy* is applicable to our Group companies and their procurement activity, and sets out how Compass encourages compliance with the ETI Base Code.

This Policy is supported by our Supply Chain Integrity Standards, an internal document outlining the Group's essential procurement guidelines. These guidelines cover crucial aspects such as risk assessment, transparency, supplier approval, product specifications, product monitoring and traceability.

While our Group companies' primary interactions occur with their direct suppliers, our businesses are extending their reach upstream, engaging with secondary suppliers to gain a clearer understanding of their supply chains.

Our TPIDD, launched in 2023, sets out the expectations, requirements and minimum standards to ensure that our businesses adequately assess and keep under review the ethical compatibility of the third-parties that may work with them. This includes ensuring they understand the extent to which risks may exist that would prevent a business engagement from proceeding with a new or continuing with an existing third-party. Risks covered under the TPIDD include, amongst others, human rights and modern slavery risks.

Our Third-Party Due Diligence process is supported by a technology tool (currently OneTrust) and covers the stages of screening, risk assessment, decision making and monitoring of new and existing third-parties. This process and policy were designed by our Group Ethics & Integrity team, a group of internal subject matter experts, who sought specialist external advice to ensure alignment with regulatory expectations and received senior management endorsement. Currently in its pilot stage in 10 countries, the process will be widely deployed across Compass' remaining countries in the next financial year. It will also be integrated into other policies, procedures and processes aimed at further improving Compass' key integrity controls and modern slavery prevention framework. It will be another important and effective tool for our colleagues around the world to support their ethical and sustainable business decision making processes.

1. As per the Group's internal training records as at 30 September 2023



Code of Business Conduct review and launch

In the fight against modern slavery, a comprehensive code of business conduct plays a crucial role, serving as the moral compass that guides an organisation's actions and decisions.

Our CBC supports us in upholding our high ethical standards and commitments. It sets out the principles, standards and expectations of how we and our Group companies conduct business globally and how we should engage with and treat one another. It explicitly states, amongst other important things, Compass' unwavering commitment to working towards the eradication of modern slavery and human trafficking, respecting human rights and our zero tolerance to forced labour, human trafficking and exploitation, setting a strong tone against such practices.

Importantly, a well-defined code of business conduct also educates employees about the signs of modern slavery, promoting awareness and encouraging vigilance. By integrating anti-slavery measures into a code of business conduct, companies empower their workforce to be proactive in identifying and addressing potential issues, thereby significantly contributing to the global fight against modern slavery while combating corruption.

In 2023, Compass Group's Ethics & Integrity team led an extensive piece of work to refresh and review Compass' own CBC. This work involved close collaboration between various teams across the organisation, as well as external partners, who provided insight and input into the review. It culminated with the launch of the new CBC during Ethics & Integrity week in June 2023.

During the week, a senior group of diverse leaders each took it upon themselves to highlight the importance of the CBC to Compass employees and to ask them to read it, to understand what is right and to know what to do when something appears to be wrong.

This activity was followed by a creative and engaging communication campaign which included a message from Compass' Group CEO via a training session, CBC awareness videos, computer screensavers and country communications toolkits, reaching all of Compass' businesses around the world. It also contained a video featuring 45 Compass employees from 16 countries, bringing the Five Golden Rules to life.

The refreshed CBC is available in 19 languages to maximise its accessibility for colleagues and featured a dedicated section on Human Rights and Modern Slavery, explaining with the help of practical examples, the DOs and DON'Ts for all those who work for, with or on behalf of Compass.

As a global leader, Compass can make a real difference in the world by playing our part in working towards the eradication of modern slavery, competing fairly wherever our businesses operate and supporting the many communities our businesses serve. Our actions, behaviours and decisions have a significant impact, which is why Compass Group's CBC is far more than a corporate governance document. It serves as a guide for our people and partners to follow and reflect on what is right and what is wrong.

We will continue our efforts to embed the CBC and to ensure we put it to work every day, now and in the future.



Governance

Compass understands that strong governance is essential in combating modern slavery as it establishes clear standards and policies and sets a strong tone from the top, ensuring compliance and fostering transparency.

Through its Corporate Responsibility (CR) Committee, the Compass Group PLC Board is responsible for overseeing the implementation of the Group's strategies, policies and procedures relating to human rights and modern slavery. Further oversight and guidance are provided by the Group CPO, Group CCO, Group Head of Ethics & Integrity (E&I), Global Human Rights Working Group (HRWG), Supply Chain Risk Management (SCRM) Committee and Regional Governance Committees.

The CR Committee comprises all of the independent non-executive directors of the Board, the Chair of the Board, Group CEO and Group CFO. The Group General Counsel and Company Secretary attends all meetings of the Committee.

The Group CPO reports directly to the Group CEO and is responsible for setting the people strategy and agenda across the Group. The Group CPO acts as the global functional lead for the Group in respect of our Human Rights Policy, which is required to be implemented by our regional and country leadership.

The SCRM Committee provides the Group's strategic human rights oversight and sets the Group's approach regarding salient human rights risks in our businesses' supply chains, supported by the three senior functional heads: the Director of Group Purchasing Strategy, Group Head of E&I and Group Director of Employment, Equity and Social Impact.

These senior leaders all report directly to members of the Executive Committee (the Group CCO, Group General Counsel and Company Secretary and Group CPO and collaborate on the strategic approach across our businesses and their supply chains.

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

Compass Group's Global Human Rights Working Group (HRWG)

Elevating awareness, considering risks and translating learnings into actions

Our HRWG is a cross-functional, multi-country group which comprises representatives from more than 20 countries across all regions of Compass Group, including members from the Procurement, Human Resources, Sustainability, Communications and Legal disciplines.

The HRWG performs an important role in raising awareness, providing training, discussing our human rights salient risks, sharing best practices, and cascading related strategies, policies and tools throughout our global businesses. It also provides a collaborative space for participants to discuss business challenges, concerns and areas of improvement and to review and learn from current human rights and modern slavery examples reported in the public domain.

During each HRWG meeting in the year, members discussed pertinent and recent news stories reported in the international press relating to allegations of human rights violations and modern slavery within corporate supply chains, debating how such issues might impact upon our organization and what measures are required to prevent them occurring. Examples included allegations of forced labour in the UK Seasonal Worker visa scheme for agricultural workers and instances of sexual abuse in African tea plantations. These discussions have led us to evaluate our own practices and take necessary actions to maintain ethical standards and safeguard both our people and the business.

Other highlights of the HRWG in the period included:

- Slave-Free Alliance training focused on People and Procurement professionals, and their roles in modern slavery identification, mitigation and prevention
- Earthworm Foundation presentation on the environmental and social risk mapping of fresh tomato and canned tuna supply chains in both the UK and US
- presentations and coordinating feedback on the plans and activities of Compass Group's SCRM Committee, including the Group's SCRM strategy and framework, TPIDD launch and Sedex expansion progress
- Compass Italy's presentation on SA 8000 re-certification (an international standard for social accountability in the workplace)
- a deep dive on Compass' refreshed Human Rights Policy, international human rights standards, human rights salient risks and concerns, as well as elements of the Group's human rights due diligence processes

Due Diligence

Due diligence plays a pivotal role in identifying and preventing modern slavery within Compass' businesses and their supply chains. It involves a meticulous examination of internal practices, suppliers, business partners and stakeholders to ensure ethical practices and compliance with human rights standards and anti-slavery regulations.

We understand and recognise the fundamental importance of due diligence and robust risk management, so that our businesses can identify, mitigate and prevent the risk of incidences of modern slavery in their supply chains and operations. We also remain committed to taking steps to address any incidents that are found or any adverse impacts on people, as well as monitoring the effectiveness of any measures taken, while communicating and learning from them.

Our approach to due diligence builds on existing processes and tools already in use and known to the Group (for example Sedex, TPIDD, internal audits, payroll checks and training) as well as new and existing partnerships and projects with industry leading organisations and external advisers (e.g., Earthworm Foundation). This enables us to combine research, risk assessments, alignment with and implementation of industry standards and best practice, utilising cross-functional working groups, stakeholder engagement and applications of relevant policies to increase our understanding of human rights abuse risks and our ability to detect and prevent any human rights abuse from taking place in our businesses and their supply chains.

This proactive approach contributes significantly to the global fight against human trafficking and exploitation by fostering ethical business practices and upholding human rights, while also safeguarding our businesses from legal consequences and reputational damage.

During the year, the HRWG and SCRM Committee focused on further understanding and discussing Compass' human rights and modern slavery risks, both within our businesses' operations and in their wider supply chains. We have continued to analyse related risks with external partners including the Slave-Free Alliance and to commission supply chain risk mapping projects with experts such as Earthworm Foundation.

These mapping projects and discussions continue to help us assess the maturity and suitability of our processes and tools, while feeding into our future action plans. They also reinforce the importance of expanding existing initiatives (such as Sedex) and other focused internal and external checks, audits and training.

Given the size and complexity of the Group, its businesses and their supply chains, we take a risk-based approach and will continue to invest in education, awareness, technology, partnerships and training, to ensure Compass' due diligence processes and internal dialogue continue to evolve.



Earthworm Foundation Risk Mapping Project

In 2022, as part of our efforts to enhance the visibility of our businesses' supply chains, we engaged with Earthworm Foundation, a not-for-profit organisation which specialises in working with companies to support the transition to responsible sourcing for a wide range of natural raw materials.

The initial objectives of the project were to:

- better understand the social and environmental risks present in Compass' fresh tomato and canned tuna supply chain for the UK and US markets
- learn more about supply chain mapping, to further inform our due diligence processes and responsible sourcing approach for natural raw materials overall

The work confirmed that both fresh tomatoes and canned tuna have highly complex supply chains with different inherent risks associated with each country of origin:

- in the UK, tomatoes are frequently sourced from countries such as the Netherlands, Türkiye, Spain, Morocco, Canary Islands and Tunisia, whereas, in the US, beyond domestic production, tomatoes are predominantly sourced from Mexico and Canada
- as for canned tuna for our UK business, it is sourced through one importer (which primarily sources its raw materials from a single fishery in Africa); in the US, it can come from a wide range of canneries, vessels and fishing zones

The project also revealed the multitude of risks embedded in the production processes for tomatoes and canned tuna, ranging from varying labour practices to complex sourcing structures, influenced by source country regulations and vessel flags. By recognising these complexities, the procurement teams in both our UK and US businesses have since strengthened their due diligence efforts in these two categories.

Based on the outputs of this project, further actions were taken to better understand and mitigate the risks identified:

- training sessions were conducted for the procurement teams across the Compass regions, equipping them with valuable insights and strategies to engage more effectively with suppliers of tomatoes and canned tuna
- our US business has increased the purchasing of tomatoes certified by the Fair Food Program and has continued their supplier engagement programmes in these high-risk categories
- both our UK and US businesses are jointly discussing how to further support the Coalition of Immokalee Workers (a long-standing partnership which began in 2009) and the Fair Food Program, with their planned international expansion, focused specifically on fresh produce beyond tomatoes and other seafood categories
- with Türkiye highlighted as a potential high-risk country of origin, the local in-country procurement team has shared the project learnings with their main tomato supplier, which in turn has committed to implementing specific actions derived from the work. This knowledge sharing initiative aims to extend best practices to other producers in Türkiye, fostering a more sustainable production approach alongside potential long term positive impacts for tomato farm workers

Compass Group's partnership with Earthworm Foundation will continue in 2024, with new projects exploring additional geographies and product categories.

Continued expansion of Sedex across the business

Our businesses' supply chains are complex and multi-tiered, and we continue to adapt our approach in finding solutions which provide them with new and alternative ways to gain better visibility and transparency of suppliers and the goods and services purchased from them.

Sedex continues to provide a compelling solution in this regard, offering a unique 'window' into our businesses' network of suppliers around the world. Its platform, audit methodology and processes enable our businesses to gain a high-level understanding of the inherent risks within their supply chains, while also providing data and insights (through its SMETA social and environmental audits and methodology) on the ethical practices of supplier sites at a local level.

The SMETA data provides valuable insights into non-compliances and good practices related to human rights, labour practices, safety and environmental standards, empowering our businesses to address any issues with precision and speed.

During the year, we continued to invest management time and resources to expand the use of Sedex across the Group's businesses. Sedex is now being used by 14 countries (including all of our top 10 countries by revenue) improving the oversight of 1,247 supplier sites across 54 source countries, covering an estimated population of more than 650,000 workers.

We also trained our businesses' procurement teams and their suppliers to maximise the opportunity and visibility that the tool brings in the context of SCRM, worker protection and more sustainable practices .

Over the past 12 months, Group companies have had access to the SMETA audits of more than 600 Sedex members . Together with our other policies, processes, procedures and standards, these have informed our businesses' procurement teams on their product category sourcing strategies, supplier selection, onboarding and ongoing supplier reviews and renewals.

On a risk and need basis, our businesses' procurement teams have interacted with suppliers regarding their SMETA audit results, including how they approach non-conformities and remediation solutions and reviewing resolutions in follow-up audits. We will continue to expand the use of Sedex within our Group companies around the world, taking a risk-based approach, to educate both colleagues and suppliers on the benefits of increased supply chain visibility. Our businesses will also continue integrating the Sedex tools further into their SCRM activities, sourcing and Third-Party Due Diligence processes.

We firmly believe that solutions like Sedex, when well implemented and managed, can have a tangible positive impact on working conditions within our businesses' supply chains.



Sedex in action

Compass Australia, one of our top 10 markets which pioneered the use of Sedex in their operations, used the Sedex platform this year to audit suppliers which represent c.79% of its Tier 1 high-risk category spend. This review included assessments of suppliers' risk profiles, reviews of suppliers' Modern Slavery Statements and related policies covering modern slavery risks, along with third-party labour audits. As at 30 September 2023, the business had 166 suppliers directly linked to them via the Sedex platform.

Compass Australia's progress in this area can be attributed to the business taking its suppliers on the modern slavery governance journey, including briefing them on the benefits of using Sedex and actively working with them to become Sedex members. Its engagement with potential suppliers via Sedex has also allowed the procurement team to review existing SMETA audit results, identify any issues of concern and require any non-conformances to be closed out prior to completing the onboarding process.

Risks and Steps Taken

The Group's businesses remain alert to the potential and persistent risks associated with modern slavery and broader human rights issues within their operations and supply chains.

As one of the world's largest food and support services groups, we are acutely aware that our businesses' direct and indirect supply chains, which span the agriculture, food production, distribution and hospitality industries, have a heightened risk of labour abuse and/or modern slavery (included but not limited to labour exploitation and forced labour).

Our businesses have focused their efforts on raising awareness of salient human rights risks, including those impacting vulnerable groups (such as migrant workers and agency labour).

Through our ongoing initiatives such as awareness campaigns, training programmes, focused risk discussions, collaboration within our HRWG, consultations with external specialists, and the establishment of the SCRM Committee, we have significantly enhanced our ability and that of our Group companies to identify, share and respond to critical information swiftly. Acknowledging the continuous nature of these risks, we are resolute in pursuing proactive measures, ensuring sustained efforts to address these challenges effectively.

The Major Risk Assessment process (MRA) is the cornerstone of our risk management framework and it is a structured biannual bottom-up and top-down risk review completed by all countries that considers the key risks facing the Group, including human rights and modern slavery risks.

Country-led due diligence continues to evolve with new and existing tools and processes which take into consideration each business' complexity, size, scale, operating sector, client and supplier specifications, and individual human rights risks. We are committed to continual improvement and the examples that follow highlight some actions and initiatives taken during the past 12 months to address potential risks.



Enhancing internal audits and reviews

Regularly verifying company payroll for duplicate bank accounts and addresses is an effective method to identify irregular patterns that could be a sign of potential exploitation and modern slavery. It also serves as a crucial measure in preventing financial fraud and safeguarding both employees and the organisation from fraudulent practices, while protecting vulnerable workers, particularly migrants and low-wage earners, by ensuring their identities are authentic and their rights are upheld.

This year, our internal audit teams have refined their methodology for payroll checks, including implementing these changes across three relevant European businesses' payrolls by auditing sampled data. This enhanced process ensures a comprehensive evaluation, identifying elements that, when combined, may indicate instances of forced labour under specific circumstances.

Our UK&I business also worked with its payroll provider to automate similar and constant payroll checks, where potential duplication of key personal data is flagged and investigated.

The audits performed in the three European countries and the UK&I reviews did encounter cases of duplicated bank accounts and/or addresses. Further investigation to date indicated that these irregularities were benign (e.g., genuine employees who share the same residence; couples who legitimately share the same bank account).

In January 2023, some of our businesses in Asia Pacific performed a focused review of their recruitment practices, specifically exploring ethical recruitment and recruitment fees. Our Australian business decided to halt its engagement with a potential recruitment partner overseas until the recruiter adjusted its practices, as the due diligence indicated that the potential partner may not comply with Compass Australia's ethical recruitment requirements.

Labour agencies

Our businesses are aware of the increased risks of modern slavery when hiring colleagues through labour agencies.

Using labour agencies might heighten the risk of modern slavery and human rights violations due to several key factors:

- some agencies often operate in sectors demanding low-skilled or temporary labour, making it easier to exploit vulnerable workers such as migrants or individuals with limited employment options
- limited regulation and oversight in these sectors could also create an environment where unscrupulous practices thrive, leaving workers susceptible to unsafe conditions, long hours, underpayment and the denial of basic labour rights
- deceptive recruitment practices, including false promises and hidden fees, can lead to debt bondage and entrapment, leaving workers unable to escape exploitative situations
- the lack of transparency in labour agency operations further complicates supply chain tracing, enabling hidden exploitation within complex networks

The transient nature of temporary work further exacerbates the issue. Workers provided by agencies fear reporting abuses due to the risk of losing their jobs, fostering a culture of silence. As a result, companies employing labour agencies, like Compass, must be vigilant, ensure rigorous scrutiny, transparency and ethical standards to prevent complicity in modern slavery.

In light of the above considerations, Compass' EME regional team has established a revised working protocol concerning labour agencies. This protocol encompasses various aspects, including but not limited to the selection, onboarding and management of labour agencies, adherence to Compass' SCOC, incorporation of mandatory contract clauses and an overall enhancement of due diligence processes.

Risks and Steps Taken continued

In the last 12 months, our UK&I business further developed its partnership with Datum, an independent compliance audit service, auditing a total of 139 labour agencies from their preferred suppliers list (PSL). The scope of these audits included, but were not limited to, rates being paid, right to work documentation, employment contracts, payslips and evidence of holiday payment or accruals.

Out of the 139 audited agencies, five were delisted for breaches in the PSL and 12 were served amber warnings or improvement notices for minor infringements together with the necessary remedial actions. In addition, following feedback received by Compass from agency workers, 11 agencies were re-audited.

To further enhance existing process, agencies are now being required to provide evidence of their processes in relation to workers' rights and protections.

The work with Datum has so far covered every geographical region in the UK and has audited positions from delivery drivers to gardeners, and chefs to hospital porters, allowing for better controls, risk mitigation and enhanced agency worker experience and engagement.

In the coming year, the UK&I business will further enhance its labour agency due diligence processes and will include random focused interviews with agency workers, creating an additional channel for reporting anything that does not seem right.

Middle East operations: Ethical Recruitment and Committed to Care

We deeply appreciate the significant role and positive impact that migrant workers contribute, both in their home countries through remittances, for example, and in the destination countries where they have decided to work. We also acknowledge the challenges they face, documented by organisations like the ILO and the International Organization for Migration, and as widely reported in the international press.

In the last few years, and as reported in previous modern slavery statements, our Joint Venture (JV) entities in the Middle East have taken proactive measures to improve their related due diligence and strengthen ethical recruitment processes, recognising the potential vulnerability of this population and reinforcing their commitment to respecting the rights of all their workers.

They have delivered significant progress in understanding and addressing the challenges faced by migrant workers and have further delved into the complexities of the labour supply chain, focusing on the detailed journeys of migrant workers from their home countries to their destination, and scrutinising the roles and approaches of recruitment agencies. This work is a continuation of a comprehensive plan built by the business, which was informed by a review and assessment conducted by internal and external experts in 2021.

This approach of continuous improvement has not only been successful in improving migrant workers' recruitment journeys and experiences, but it has also garnered external recognition and prestigious awards, highlighting the genuine efforts the team has made in safeguarding the rights and welfare of migrant workers. During the year, our JV entity in the UAE was the 2023 Gold winner in two relevant categories in the Employee Happiness Summit & Awards: Best Company to work for – Large ; and Best Recruitment Strategy.

During the period, in addition to continuing its established practices, the Middle East team also:

- audited all the recruitment agencies working for them and, as a result of the findings, delisted 13 (both in India and Kenya)
- appointed dedicated compliance officers based in the source countries, responsible for regularly reviewing the processes with both candidates and agencies, after selection is completed
- introduced the Applicant Care Centre concept, providing another seamless and transparent communication channel for local and overseas hires. Through platforms like WhatsApp, selected candidates can directly interact with the talent teams in our JV entities, bypassing the need for intermediary agencies. This initiative enhances transparency and fosters direct communication, empowering candidates by opening an additional independent and direct channel with the JV entities. This is in addition to the Speak up, We're Listening programme and the implementation of Employee Happiness Forums, a designated and formal space where colleagues from across the business have regular time to sit with senior management and share their ideas and challenges
- launched a forward-looking, culture based Committed to Care programme in December 2022, building on ongoing efforts to provide employees with ethical employment, wellbeing support and opportunities for learning and career development

The Middle East activities in this field have become a source of inspiration for the entire Group and the learnings and best practices from this region have been and will continue to be extensively shared across Compass, influencing global perspectives on ethical recruitment and emphasising the importance of focusing on the wellbeing and welfare of vulnerable migrant workers.

The HRWG and the recently launched migrant labour working group (MLWG) will continue to be used as powerful tools for awareness raising and knowledge sharing.

These initiatives underscore Compass' dedication to championing ethical practices and ensuring the safety and dignity of migrant workers working within its businesses.



Access to Remedy

Compass cultivates a culture rooted in honesty, fairness, inclusivity and respect, driven by our core values of openness, trust, and integrity.

These values serve as our moral compass, ensuring steadfast adherence to the high ethical standards outlined in our policies such as the CBC, Business Integrity Policy, SCOC, Human Rights Policy and Speak and Listen Up Policy, alongside all relevant laws.

Open communication, collaboration and a risk-based approach are fundamental in identifying, preventing and addressing potential misconduct and sensitive matters appropriately. We are deeply committed to fostering an environment where everyone feels empowered and safe to voice concerns, devoid of any fear of reprisal. Immediate action is taken to address concerns, when they arise, and we actively share the insights gained to prevent recurrence, promoting a learning-oriented culture.

Our confidential reporting programme, Speak Up, We're Listening is available across all countries where our businesses operate. It is accessible to anyone and available 24 hours a day, seven days a week, 365 days a year in local languages. This programme is managed by Compass Group's E&I function, a dedicated team, independent of any other lines of business and includes a helpline, online platform and case management system, allowing individuals to report concerns confidentially and anonymously, in compliance with local laws, emphasising our commitment to ethical transparency and accountability. Employees can raise concerns via many channels, including but not limited to:

- their manager
- a more senior manager
- Human Resources
- Legal
- the country Listen Up Champion
- a member of the Group E&I team
- the Speak Up, We're Listening online platform
- a dedicated country phone helpline

External reporting parties (including but not limited to workers in the supply chain, suppliers, etc) can contact their Compass point of contact (if applicable) or can raise their concern through the online platform or phone helpline. Reports received through Speak Up, We're Listening are referred to Group E&I for confidential review and assignment for follow up and/or investigation, as appropriate.

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

SPEAK UP!
We're listening

In the 12 months to 30 September 2023, there were 4,130 reports received through the Speak Up, We're Listening programme, of which 38.3% were substantiated. Of those reports, 10 (representing 0.24% of the total number of cases received globally) were categorised as concerns related to the human rights agenda, with the following breakdown:

- Brazil (1), Chile (1), Colombia (1), Finland (1), Netherlands (1), Saudi Arabia (1), Türkiye (1), UK (1) and USA (2); and
- of these cases, four cases were substantiated, with relevant remedial and corrective action taken

We also received, through Speak Up, 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 with our standard processes being followed.

To help embed the principles of the CBC, Group E&I launched bi-annual training in 2023 to approximately 17,000[1] leaders on a risk to role basis across the world to further raise awareness of, amongst other CBC areas, human rights, discrimination and other key topics, to set forth expectations and actions when receiving or managing concerns at Compass and encouraging use of the Speak Up, We're Listening programme.

Of all those who completed the E&I trainings (all modules including Striving For a More Equitable World):

- 95% agreed the training raised their awareness of ethics and integrity principles
- 96% agreed they found the training useful to apply in the workplace

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



1. As per the Group's internal training records as at 30 September 2023

Training

Training stands as a fundamental pillar in Compass' strategy to combat modern slavery and raise awareness about human rights risks within our businesses' operations and their supply chains.

We firmly believe that increasing awareness and understanding about modern slavery globally, including its prevalence and the populations which are vulnerable to it, enables colleagues, workers, suppliers and partners to detect signs and take preventive actions effectively. By educating our workforce and relevant stakeholders, we enhance our ability to protect individuals from exploitation.

The leaders and employees of our businesses serve as the primary defence against modern slavery, playing a pivotal role in fostering a culture of intolerance towards abuse. They are essential in swiftly identifying any suspicious activities and escalating concerns promptly. This proactive approach ensures that any form of exploitation is met with immediate attention and appropriate action.

We emphasise the importance of recognising the presence of modern slavery, which not only bolsters our commitment to eradicating it, but also strengthens our resolve. Furthermore, this awareness serves as a foundation, opening the door for more specific conversations using tailored training programmes to address modern slavery and other human rights risks.

Through this collective effort, we strive to create a safe environment where exploitation is not tolerated, setting a strong example for ethical conduct across our businesses' operations and their supply chains.

During the year, Compass has made significant investments in multiple training programmes and awareness-raising events, tailored to various audiences within and outside the organisation.

Capitalising on the refresh of the CBC, Compass underscored the importance of ethics and integrity in its corporate culture through a comprehensive, Group-wide, week-long CBC campaign, followed by a specific CBC online training module. The CBC online training module was completed by c.17,000[1] employees on a risk to role basis, across all Compass geographies.

This strategic approach not only ensured that employees across different levels and departments were well-versed in the updated ethical guidelines but also reinforced the Group's commitment to fostering a workplace rooted in strong values and principles. By integrating ethics and integrity training as part of its values driven culture, Compass is actively promoting a shared understanding of ethical standards, nurturing a cohesive and conscious workforce.

Recognising the importance of our Human Rights Policy and the commitments made in it, we developed an online training film Striving For a More Equitable World.

This training summarises the contents of the Policy, raising awareness about Compass' human rights commitments, human and workers' rights, and specifically features, amongst other things, our commitment to upholding the four core conventions of the ILO:

- the freedom of association
- the right to collective bargaining
- the elimination of forced or compulsory labour and the abolition of child labour
- the elimination of discrimination in respect to employment and occupation

The training module also explains what employees and/or workers can do if they feel their human rights or someone else's rights have been compromised and promotes our confidential reporting programme, Speak Up, We're Listening.

At the time of reporting, over 11,000[1] employees on a risk to role basis had completed the training during the last 12 months; c.94% of the target group.

Numerous additional training and awareness initiatives on human rights and modern slavery were conducted across the businesses during the year . Noteworthy activities include Sedex training for internal global, regional and procurement teams across all geographies, emphasising ethical supply chain practices. Additionally, Sedex training and awareness sessions and webinars (which included modules on modern slavery) were delivered to over 400 suppliers in Australia, Japan and the Nordics.

Another related and significant event during the year was the UK&I Foodbuy conference, where Compass' expectations regarding ethics and integrity, modern slavery and human rights - detailed in our SCOC - were presented and explained to an audience of c.300 suppliers. During the year, members of the HRWG and specific teams from our businesses' People and Procurement functions around the world have continued to participate in several training and awareness interventions designed to elevate the conversation around modern slavery and human rights.

As part of our human rights strategy, we will continue to raise awareness and deploy training across our businesses and plan specific interventions on a risk-based approach.

At the time of reporting

over 11,000[1] employees

on a risk to role basis had completed the human rights training Striving For a More Equitable World; c.94% of the target group.

1. As per the Group's internal training records as at 30 September 2023

Effectiveness

Compass continues to work hard towards increasing its efficiency and effectiveness at identifying and preventing modern slavery in all its forms.

This 2023 MSA statement is a comprehensive but not an exhaustive update of the initiatives, projects, activities, tools, systems, programmes, awareness campaigns, webinars, partnerships and conversations which have been carried out during the year and/or are underway.

In an organisation of our global scale and complexity, the task of implementing effective change management should not be underestimated. Throughout the year, significant time and effort was dedicated to transparent communication and close collaboration with our various businesses on the themes of modern slavery and human rights. The aim was to ensure that such initiatives were not just executed, but also seamlessly integrated into the daily operations of our Group companies, eventually becoming an inherent part of their routine practices.

Despite the further progress we have made this year, it is clear that there is much more to be done. Businesses like Compass must maintain constant vigilance to detect and prevent instances of exploitation both in their supply chains and internal operations. Continuous scrutiny and proactive measures are essential to rooting out modern slavery within corporate structures.

Exploiters evolve their methods to escape detection, capitalising on the complexities of global supply chains, while varying degrees of protection for workers' and human rights across different regions can give rise to environments where modern slavery can persist.

Our commitment is to continuously improve our processes, in support of our culture where exploitation in any form is unacceptable.

Recruitment Fees

Given the ever-present global challenge of the illegitimate and illegal use of recruitment fees, our businesses have worked to increase the level of internal awareness and understanding of the Employer Pays Principle. This included further clarifying the provisions of this principle in our Human Rights Policy, sharing ethical recruitment standards and best practices via the HRWG, leveraging existing and new processes to support the assessment of risks such as TPIDD, Sedex and internally focused reviews of recruitment practices.

During the year, one of our businesses in Europe received an allegation which raised the suspicion that related or associated costs of recruitment had been charged to migrant workers coming from India.

This business immediately conducted a thorough review of the allegation, including interviewing workers and the recruitment agency. As a direct outcome of this investigation, our business:

- reimbursed the related recruitment fees paid by the migrant workers
- ceased working with the associated recruitment agency
- reviewed all its processes and standard operating procedures related to migrant workers

To the best of our knowledge, no other instances of alleged recruitment fees are known to have been paid by migrant workers in our businesses' direct operations or were reported during the period.



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. Our commitments for 2024 are:

- continuing to promote and increase awareness of human rights and modern slavery across the Group's businesses and their suppliers
- further embedding the Group's SCRM strategy into the organisation, including rolling out a refreshed SCRM country framework
- investing in the further expansion of Sedex globally, embedding it into existing risk management processes at a country level
- progressing the Group-wide TPIDD implementation
- engaging in further supply chain risk mapping projects and initiatives, as well as amplifying our collaborations with external experts on human rights and modern slavery
- progressing with the MLWG discussions and advocacy of ethical recruitment practices

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

Conclusion

At Compass, our unwavering commitment lies in upholding the dignity, wellbeing and fundamental human rights of everyone associated with our businesses' operations. This includes our employees, the communities we serve and those influenced by our endeavours. We are dedicated to collaborating with our business partners, clients and communities, fostering strong relationships while enhancing our capabilities. Together, we will continue to play our part in eradicating modern slavery in all its forms, affirming our belief in a just, sustainable and equitable world for all.



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

Approved by the Board of Compass Group PLC on 16 November 2023

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

