Modern Slavery Act Statement 2025

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 2025. This provides our stakeholders with an update on the Group's focus areas and progress during the financial year.

www.compass-group.com

Chief Executive's Introduction



This year marks the publication of Compass Group's tenth statement under the UK Modern Slavery Act. It is a milestone that reflects both the progress we have made and the responsibility we carry. Over this period, Compass has become more focused, with a sharper portfolio of businesses that enable us to focus on our core markets, strengthening supply chain relationships and further embedding our standards.

Modern slavery, as we understand it, includes slavery, servitude, forced or compulsory labour, human trafficking, sexual exploitation and child labour. Our commitment is to uphold human rights in all its forms, ensuring that everyone connected to our businesses is treated with dignity and respect. We expect the same values from our colleagues, our suppliers and our partners.

Over the past decade, we have strengthened our approach in many ways — from continuing to evolve our responsible procurement practices and improving visibility across supply chains, to investing in training and awareness for our people. We have also continued to promote our 'SpeakUp, We're Listening' programme, which provides a trusted channel for stakeholders to raise concerns and helps ensure we address them appropriately.

Modern slavery remains a complex and persistent challenge. Tackling it requires vigilance, transparency and collaboration across businesses, suppliers, governments, NGOs and communities, and Compass will continue to play its part.



Dominic Blakemore
Group Chief Executive Officer

Compass Group PLC

Highlights from 2025

- ongoing efforts to raise awareness and engagement on human rights and modern slavery, with 21,000+ leaders[1] completing training through our global Ethics and Integrity programme
- continued rollout of the Supply Chain Risk Management (SCRM) framework, which has been applied in tenders and supplier reviews across several markets
- expanded our use of Supplier Ethical Data Exchange (Sedex), which has now been adopted across all regions, providing increased visibility of labour and human rights practices at over 2,600 supplier sites and covering over 750,000 workers globally
- Third-Party Integrity Due Diligence (TPIDD) has been further embedded across all regions, with more than 24,000 third parties now monitored globally. This enables the businesses to assess and keep under review the ethical compatibility of the third parties they work with
- Human Rights Self-Assessment Tool (HR-SAT) developed in partnership with Slave-Free Alliance, and will be piloted initially in our Asia-Pacific region

1. On a risk-to-role basis, based on the Group's internal training records as at 30 September 2025.

Business structure

Compass Group is a global leader in food services, operating in over 25 countries, employing and engaging over 590,000[1] people worldwide.

On a statutory basis, the annual revenue for the Group for the financial year ended 30 September 2025 was $46.1 billion, delivering an operating profit of $2.9 billion.

Our business is built on a clear strength in outsourced food services (which accounts for 86% of total revenues), complemented by support services (14% of total revenues) including facilities management, hospital cleaning, and guest services.

We deliver services across five core sectors — Business & Industry; Education; Healthcare & Senior Living; Sports & Leisure; and Defence, Offshore & Remote — through a portfolio of local, regional and global brands.

Our decentralised business model[2] means most decisions are made in-country. This structure, supported by global standards of governance and ethics, ensures consistency, whilst allowing our businesses to respond quickly to their clients and communities at a local level.

The Group completed its portfolio reshaping, with the exit from four countries (Chile, Colombia, Mexico and Kazakhstan).

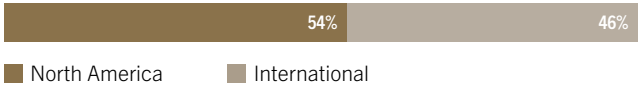
For more information about the countries in which companies in the Group operate, please view our interactive locations map: www.compass-group.com/en/what-we-do/locations

Breakdown by region

Underlying Revenue[3]



Workforce[1]



1. Average number of employees, including directors and part-time employees, as at 30 September 2025.
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.



Own workforce

The majority of our people work in operational front-line roles — from food services to support services (including cleaning and guest services). They are central to delivering the meals and services that Compass' businesses provide every day, and remain the driving force behind our success and the culture that defines us.

Within our decentralised structure, each country is responsible for managing recruitment, training and development in line with Compass' standards. This enables our businesses to remain responsive to local market needs while supporting consistency in labour practices.

Most colleagues are employed directly through our local subsidiaries. In some sectors, such as Sports & Leisure, a small proportion of our total global workforce is engaged through agencies to meet the temporary demands of large-scale events such as concerts and sporting fixtures.

The number of migrant workers[1] within the Group has continued to decline in recent years, reflecting our exit from certain markets where migrant labour formed a larger share of the workforce. We currently engage around 4,000 foreign migrant workers, primarily in the Middle East. These colleagues are recruited through vetted and approved recruitment partners and agencies.

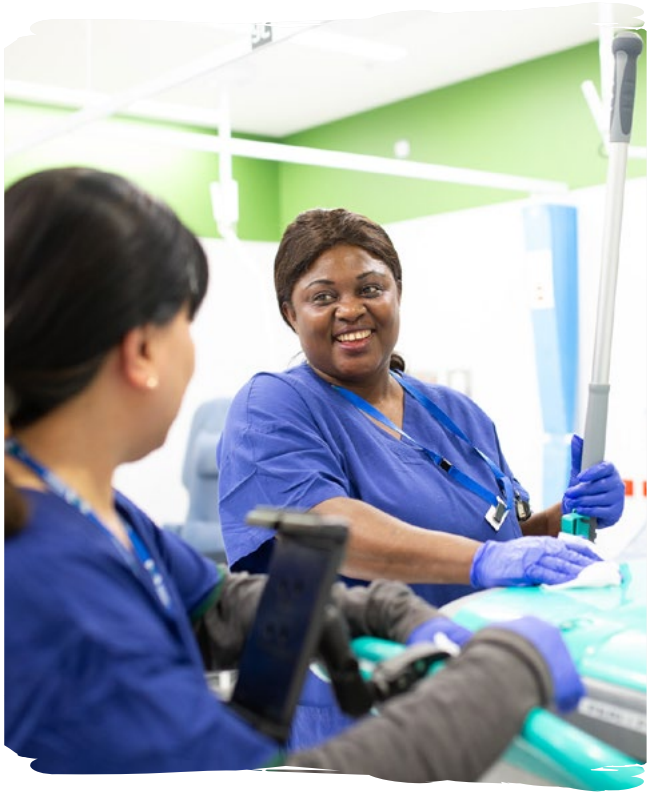
Supply chain

Compass Group businesses operate extensive and decentralised supply chains that support a wide range of services and sectors. These supply chains involve thousands of suppliers – and their workers - across multiple tiers; from growers and manufacturers to wholesalers and distributors. These partners provide the products and services Compass needs to meet the demands of clients.

Procurement is managed locally, with each market sourcing products from both domestic and international suppliers. This allows Compass to remain responsive to contract requirements and local market dynamics, while promoting the standards set out in its Global Supplier Code of Conduct (SCOC). The SCOC sets out clear expectations on business integrity, labour standards, human rights and environmental sustainability, guiding our suppliers in upholding ethical and responsible practices across the value chain.

To manage the complexity of these supply chain networks, we continue to roll out our Supply Chain Risk Management (SCRM) framework. This framework requires suppliers to comply with the SCOC and provides local teams with tools and processes — including Sedex and TPIDD — to integrate risk assessment into procurement decisions. Together, these processes help provide greater visibility of labour and human rights practices within our suppliers and support a more consistent approach to risk management.

The Group's largest categories of spend are labour and food, including fresh produce, meat, dairy, beverages and packaged goods. Our businesses also source a significant amount of products and services in non-food categories, such as uniforms, kitchen equipment and facilities management services. Externally recognised information sources[2] highlight that categories such as fresh produce, seafood, meat and garments can carry higher inherent risks of labour rights challenges. These categories therefore remain a strategic focus for our businesses' procurement teams, to monitor and manage associated risks.



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".
2. including reports by the International Labour Organization and other sources such as the Ethical Trading Initiative.

Policies and codes

Compass has a suite of policies and codes that relate to human rights, ethical conduct, and responsible sourcing.

Taken together, these documents set out our expectations of colleagues and suppliers and provide a framework that helps promote ethical standards and address emerging risks across our global operations.

We periodically review and refine these documents, sharing learnings to support our businesses in identifying risks and strengthening supply chain practices. Our human rights–related policies and codes integrate elements of internationally recognised standards, including 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 OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. These frameworks act as important reference points for the commitments we set and the expectations we communicate.

Embedding these policies and codes across a Group of Compass' scale is a continuous process. They are integrated in governance and oversight structures, procurement and applicable supplier engagement processes, and form part of training programmes, as well as being supported by due diligence tools such as TPIDD, Sedex and audits. While we recognise that application will vary by market, we aim to reinforce our standards through consistent references and practical implementation support. In 2025, we reviewed our Human Rights Policy to ensure continued alignment with international frameworks and relevance to our businesses and supply chains. The revisions to the policy, informed by internal and external stakeholder feedback, were approved by the Board.

A summary of our main policies and codes relevant to modern slavery and human rights is provided in the table, with further detail available here: www.compass-group.com/en/who-we-are/corporate-governance/policies

Code of Business Conduct (CBC)	Provides principles-based guidance to support Compass' businesses in upholding high ethical standards and commitments, as well as complying with applicable laws and regulations.
Global Supplier Code of Conduct (SCOC)	Extends Compass Group's CBC principles to supply chain partners and sets out our high ethical standards, expectations and principles.
Speak and Listen Up Policy	Empowers and guides individuals on how to raise concerns in a safe, and confidential way, guiding them on how to voice their concerns effectively.
Human Rights Policy	Highlights the responsibility to respect human rights within Compass' businesses and their supply chains.
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.
Responsible Sourcing Policy Statement (RSPS)	Ensures responsible sourcing is central to Compass' businesses and their operations.
Five Golden Rules	Summarises Compass' expectations for employee conduct, behaviours and priorities at work.



Governance

Compass recognises that a continuous improvement mindset combined with strong governance is crucial to playing our part in combating modern slavery. By reinforcing clear standards and policies, and setting a proactive tone from leadership, we promote transparency, accountability, and compliance across the organisation.

The Board of Directors delegates day-to-day operational management and strategy implementation to the Executive Committee, led by the Group CEO. Oversight of the human rights and modern slavery strategies sits with the Corporate Responsibility (CR) Committee, which in the year comprised all of the directors. The CR Committee is also responsible for recommending the annual Modern Slavery Act Statement to the Board for approval.

The Group Chief People Officer (CPO) sets the People strategy and leads on the Group's Human Rights Policy, implemented by regional and country leadership teams.

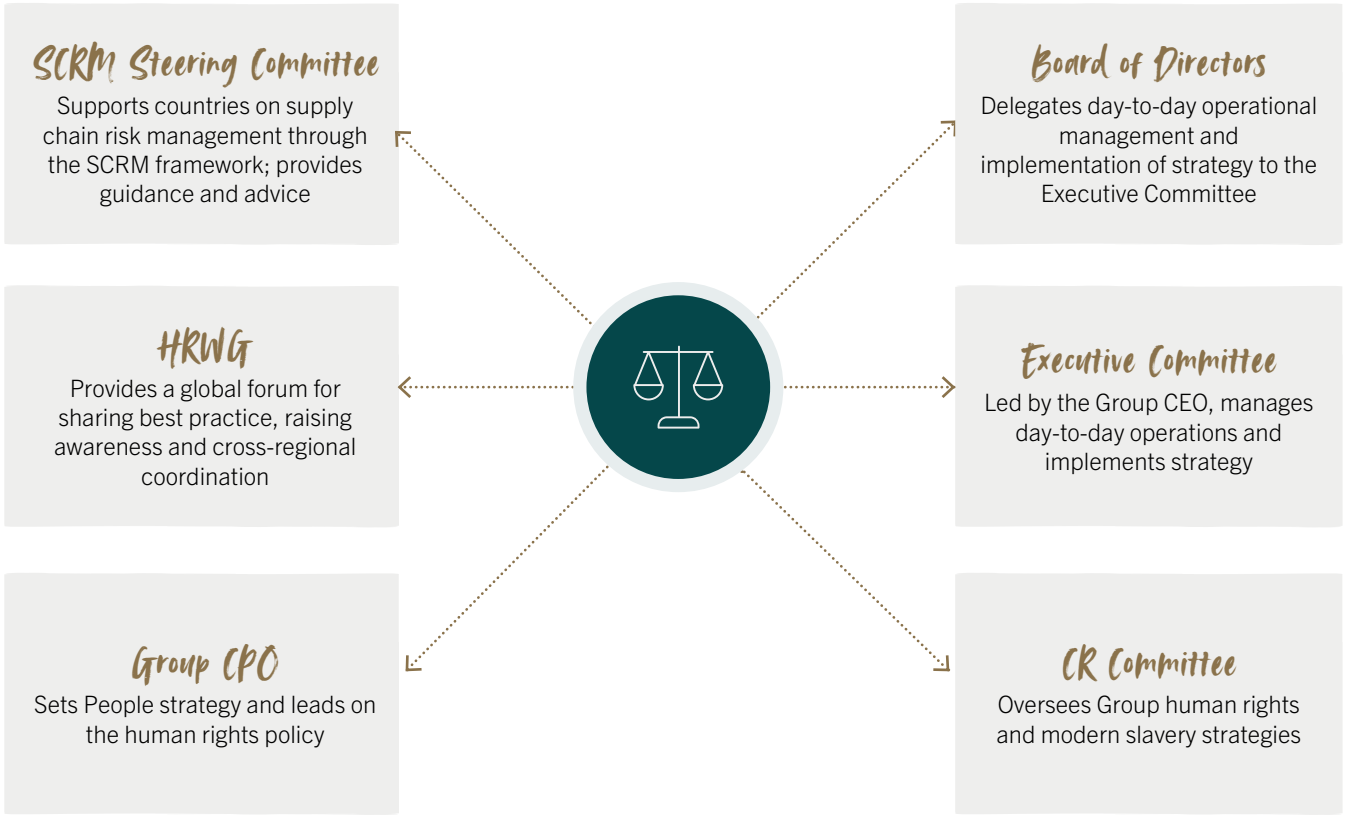
Specialist forums provide additional support and coordination:

- the Human Rights Working Group (HRWG) serves as a global forum for sharing best practice, raising awareness, and cross-regional coordination, with representation from all regions
- the SCRM Steering Committee, comprising senior leaders in procurement, ethics, and HR, supports our businesses on supply chain risk management through the SCRM framework and provides guidance, advice, and support where needed

In 2025, the Group continued to strengthen its system of internal controls, which include, but are not limited to, policies, internal audits and procedures aimed at mitigating modern slavery and human rights risks and further embedding compliance to meet the requirements of relevant social, environmental and ethical legislation.

For more information on our Governance, please visit: www.compass-group.com/en/who-we-are/corporate-governance

Governance structure and supporting forums



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.

The potential risks across these different areas vary, and so do the ways in which they are managed. Our businesses connect with sectors such as agriculture, food production, distribution and hospitality, where systemic risks are widely acknowledged. Over recent years, our businesses have refined the way they identify and mitigate these risks, and this work continues to evolve.

Within our businesses' workforce, potential risks relate primarily to the use of labour agencies, responsible recruitment practices, and aspects of working conditions such as working hours, overtime and the nature of certain roles. While our businesses have improved oversight of these areas, the scale and diversity of their workforce means that vigilance and ongoing monitoring remain essential.

Within supply chains, risk factors are shaped by the complexity of sourcing internationally and the characteristics of certain categories – including beef, cocoa, coffee, disposables, fruit and vegetables, labour agencies, rice, seafood, tea and uniforms. In collaboration with our country operations, research efforts, and partnerships with external specialists, these categories have been identified as potentially carrying a higher-risk of modern slavery and human rights abuses, and now guide much of our businesses' procurement strategies. In these areas, workers may face vulnerabilities such as exposure to forced labour practices, the charging of recruitment fees, restrictions on movement, or limited ability to raise concerns.

Identifying and responding to risks

To further strengthen the ability of our businesses to identify, share and respond to risks, we draw on a broad range of inputs. These include training programmes, awareness campaigns, internal audits, and structured discussions through the Human Rights Working Group, as well as insights from Sedex Members Ethical Trade Audit (SMETA) audit findings, media reporting, focused research, and feedback from our teams across geographies.

We also engage with external partners such as Slave-Free Alliance, who provide specialist perspectives and benchmarking. Oversight is reinforced by the SCRM Steering Committee, which brings together senior leaders to review progress and share best practice. Since 2024, we have been rolling out our Country SCRM framework, which defines minimum expectations and provides structured guidance for supplier evaluation, onboarding and ongoing management. The framework clarifies how and when to use tools such as Sedex and TPIDD as part of due diligence, while local country teams contribute through risk registers and leadership updates. These examples illustrate the breadth of approaches applied across our businesses, rather than representing an exhaustive list.

Country-led due diligence is tailored to reflect business complexity, client requirements and local context, while the Group's Major Risk Assessment (MRA) process provides a structured review of key risks, including modern slavery and human rights. The MRA integrates bottom-up inputs from our businesses with top-down leadership oversight, and outcomes are reviewed bi-annually by the Board.

Due diligence

Due diligence is an important part of Compass' efforts to identify, assess, mitigate and, where possible, prevent modern slavery and wider human rights risks across its businesses and their supply chains. It involves the ongoing review of internal practices, suppliers, business partners and stakeholders, supported by oversight and a focus on continuous improvement. Our approach is built on a common mindset and shared tools, but applied in ways that reflect local context.

This balanced approach allows country teams to draw on the Group's frameworks, tools, processes and platforms such as SCRM, Sedex and TPIDD, while tailoring their use to local laws, risks and client requirements. While the exact application may differ, these standards help us to remain aligned globally.

When applied in our businesses' operations, this approach translates into a focus on respecting employees' rights and being alert to signs of exploitation. Our businesses consider areas such as recruitment practices, right-to-work documentation, and the use of labour agencies, where risks of debt bondage, identity fraud or excessive fees can arise. We also review working conditions – including hours and the presence of fair grievance channels – as these can indicate vulnerabilities if not properly managed. Oversight comes through audits, payroll reviews and strengthened onboarding processes, while training and awareness activities help colleagues recognise early warning signs and raise concerns where something does not feel right.

The same mindset carries into our businesses' supply chains, where oversight is structured through the Country SCRM framework. This framework provides a common playbook for procurement teams to identify, assess and manage supply-chain risks in a proportionate way, such as:

- pre-award screening and controls: TPIDD and risk-based requirements like Sedex registration and completion of the Supplier Self-Assessment Questionnaire (SAQ)
- onboarding requirements: acceptance of the SCOC and, where relevant, ethical audits
- ongoing oversight: periodic reviews of ethical audit performance, corrective-action progress, and monitoring for any adverse media, sanctions or watchlist flags

Markets apply the same core pillars but tailor depth and cadence to local risk, category and contract requirements. Insights from country risk registers and supplier reviews may also be shared in Group forums such as the Human Rights Working Group or the SCRM Steering Committee, helping to refine practices over time.

Within the SCRM framework, Sedex has become a key tool for our businesses. Over the past five years, our journey has expanded from initial pilots in 2021, to becoming an important part of our companies' procurement approach, providing our businesses with increased supply chain visibility. Its independent audits and SAQs equip procurement teams with data on labour standards, human rights practices and ethical compliance. This enables our businesses' procurement teams to prioritise higher-risk suppliers, follow up on non-conformances and strengthen engagement. Training and supplier workshops have continued to build capability, supporting markets to utilise Sedex effectively and improving their approach to responsible sourcing.

TPIDD is another cornerstone of our risk-management approach. It provides screening and monitoring of third parties before and during engagement. More than 24,000 entities are now monitored globally, with inherent risks flagged for follow-up where necessary. By applying a risk-based approach, TPIDD helps procurement teams assess the ethical compatibility of potential business partners and ensures that higher-risk third parties are subject to enhanced due diligence and monitoring.

Our due diligence is also informed by a wide range of inputs. In 2025, Slave-Free Alliance acted as a critical friend in reviewing our approach and supporting the development of the new Human Rights Self-Assessment Tool (HR-SAT), which will help countries benchmark and strengthen their local practices. Alongside this, we continue to rely on insights from internal audits, payroll reviews, supplier assessments, media reporting and SpeakUp We're Listening cases, which together provide a fuller picture of potential risks and guide the actions we take.

When risks or incidents are identified, our businesses take corrective action and review outcomes to support long-term improvement. Their preferred approach is to engage with suppliers and work towards remediation wherever possible, but disengagement remains an option where issues are not addressed appropriately. Looking ahead, we will continue to embed Sedex and TPIDD across our markets, improve data quality and supplier engagement, and pilot the HR-SAT with selected countries in our APAC region – focusing on proportionality, vigilance and learning to reduce risks over time.

On pages 8 and 9 you'll find selected examples of how due diligence is applied in practice across our businesses.

Sedex provides our businesses' procurement teams with valuable insights through two key tools: independent SMETA audits from approved third-party auditors, and supplier SAQs, which highlight potential risks in labour standards, human rights practices and ethical compliance.

SMETA powered by Sedex

Strengthening right-to-work and identity checks

Routine reviews of payroll and personnel records in the Group's UK & Ireland (UK&I) business identified a small number of anomalies that were escalated for investigation. Follow-up checks suggested these anomalies could be a potential misuse of identity documentation, highlighting risks of identity fraud which is recognised as a potential indicator of labour exploitation. While the review revealed there was no evidence of exploitation, it reinforced the importance of maintaining robust controls to reduce potential vulnerabilities. The cases were escalated through human resources and compliance channels and addressed in line with internal policy and legal requirements.

In response, the business strengthened its approach to confirming employees identities and legal right to work. In some areas, digital checks were introduced through the Sterling platform (an independently operated external digital ID verification platform), combining biometric verification with a secure digital audit trail. This reduces reliance on paper-based checks, improves onboarding efficiencies, provides managers with greater assurance and creates an auditable record. In other areas, the business strengthened manual identity checks by introducing enhanced verification measures and providing managers with clear guidance to identify and escalate onboarding anomalies.

Together these measures help to strengthen the integrity of recruitment and onboarding processes, further reducing the risk of identity fraud and providing greater assurance that employees join the business legally and transparently. These measures also help ensure compliance with UK Home Office requirements and reinforce Compass' broader commitment to protecting colleagues and respecting rights. The UK&I team presented this case and its lessons at the HRWG, highlighting both the challenge and the corrective actions taken. This is one of several measures our businesses are taking to mitigate risks associated with false or borrowed identities.



Procurement due diligence in practice

In Germany, procurement teams put the SCRM framework into practice in two higher-risk purchasing categories: coffee and seafood.

Coffee re-tender

During a coffee re-tender process, supplier disclosures were collected through a supplier collaboration portal and screened via the TPIDD tools, including adverse-media checks and country-level risk data. The review highlighted risks linked to origin-country supply chains, including media reporting on labour rights concerns in Mexico — a geography identified high risk for child and forced labour in agriculture.

As a result, one supplier with sourcing exposure to this origin was not advanced further in the process due to unresolved risk factors, while others were engaged on transparency and traceability commitments.

Seafood supplier

In the seafood category, an audit identified areas for improvement in working conditions and worker protections at an indirect supplier site. These conditions were inconsistent with Compass' standards and are recognised as factors that can heighten workers' vulnerability to exploitation. Compass Group Germany engaged with its direct supplier to better understand the situation and to confirm that the site will remain in the annual SMETA audit cycle to help monitor conditions.

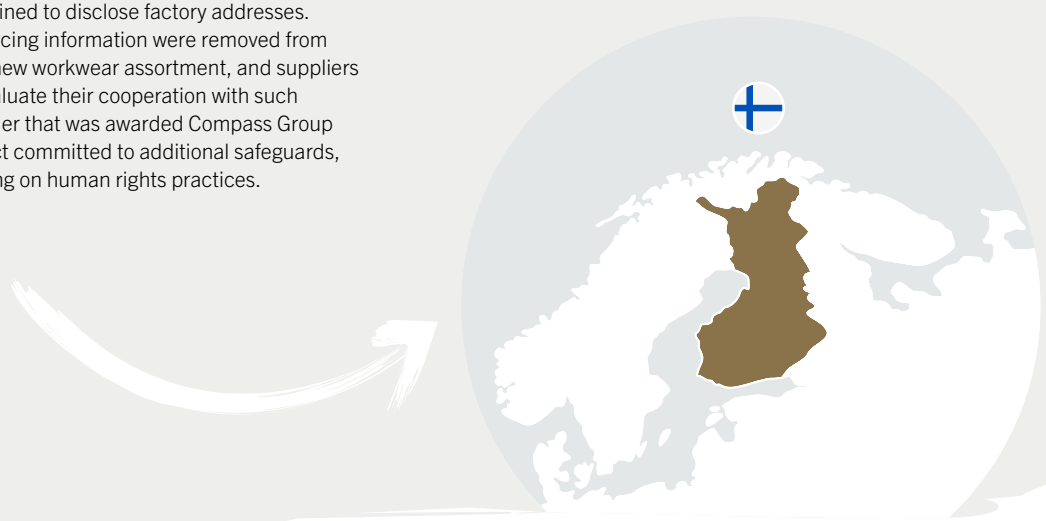
Together, these examples illustrate how procurement due diligence underpins Compass Group Germany's approach to managing modern slavery risks. Pre-award screening can result in supplier exclusion, while post-award risks are managed through engagement and remediation, with disengagement remaining an option if appropriate improvements are not achieved.

Managing labour risks in workwear sourcing

The procurement of workwear and uniforms was identified as a higher-risk category by Compass Group Finland due to the textile industry's complex supply chains and well-documented labour rights issues. During a re-tender, the business conducted pre-award assessments of two leading suppliers and used the TPIDD processes, supported by expertise from Compass Group colleagues. Information was gathered at product level, including production site addresses and workforce demographics.

The process highlighted transparency gaps, including supplier sub-contractors which declined to disclose factory addresses. Products without clear sourcing information were removed from Compass Group Finland's new workwear assortment, and suppliers indicated they would re-evaluate their cooperation with such sub-contractors. The supplier that was awarded Compass Group Finland's workwear contract committed to additional safeguards, including bi-annual reporting on human rights practices.

This case demonstrates how Compass Group Finland is extending the reach of its due diligence approach into non-food category supply chains. By requiring product-level transparency and excluding items where traceability is not assured, procurement teams can reduce exposure to modern slavery risks while raising supplier awareness and improving practices in higher-risk industries.



Developing a human rights self-assessment tool

In 2025, Compass Group's people team worked with Slave-Free Alliance and the Asia-Pacific region to develop a Human Rights Self-Assessment Tool (HR-SAT) to help countries benchmark and strengthen their local practices.

The tool provides a structured questionnaire covering areas such as recruitment and employment practices, oversight of labour agencies, working conditions, and grievance mechanisms. By working through the self-assessment questionnaire, country teams will be encouraged to reflect on their own practices, understand expectations at different maturity levels, and identify opportunities for improvement. They will also be asked to provide evidence and commentary, making the process a learning and improvement exercise rather than a compliance test.

During its development, colleagues in the Asia-Pacific region reviewed the concept and provided feedback on usability and local adaptation. Their input was incorporated into the final design, which will be piloted in the region in FY2026.

The HR-SAT was designed with reference to international standards such as the UN Guiding Principles on Business and Human Rights and the OECD Due Diligence Guidance, which emphasise risk-based human rights due diligence. The tool creates a structured way for countries to learn, compare, and improve over time.

Access to remedy

At Compass, our values of openness, trust and integrity guide how we work and are embedded in our policies. We recognise that addressing modern slavery and forced labour requires more than policy statements; it also requires practical ways for people to raise concerns and open communication at all levels.

To put this into practice, our confidential reporting programme, SpeakUp, We're Listening (SpeakUp), empowers colleagues, supply chain workers and external stakeholders to raise concerns about improper behaviour or potential violations of our policies and laws. It is accessible 24/7, 365 days a year via QR codes, web, or phone, and is available in multiple languages. Reports are managed by the Group E&I Team, which operates independently from other parts of the business. All reports are taken seriously with a commitment to providing a response to the reporter and ensuring appropriate actions are taken for all concerns raised.

Compass strictly prohibits and does not tolerate retaliation or any detrimental conduct in response to anyone raising a concern, irrespective of the outcome. SpeakUp is accessible externally and on our intranet, and to support awareness, it is communicated through onboarding packs, on-site posters and signage, team briefings and supplier communications.

Multiple reporting channels

- directly with a manager or senior manager
- human resources or legal teams
- country Listen Up champions
- Group E&I team
- Speak Up, We're Listening (helpline/online)

In the 12 months to 30 September 2025, 14 reports out of a total of 4,897 reports received through SpeakUp, We're Listening channels related to human rights concerns, half of which were substantiated and remedial and corrective actions were taken. We also received reports related to labour matters, working practices and alleged discrimination, all of which were investigated appropriately.

We take insights from reported concerns to inform corrective actions and strengthen controls, including updating policies where applicable and sharing lessons with our HRWG to prevent similar issues in the future,

To learn more about SpeakUp, We're Listening, including an FY2025 update, see: www.compass-group.com/en/who-we-are/ethics-and-integrity/speak-up

SPEAKUP! We're listening



4,897
SpeakUp reports received in FY2025.

14
of these were human rights-related,

7
of which were substantiated.

Country breakdown of human rights related reports

- **India (3)**
- **Türkiye (1)**
- **Spain (3)**
- **Italy (1)**
- **UK (3)**
- **Canada (1)**
- **USA (2)**

Training

Training and awareness remain central to Compass' approach to respecting human rights and upholding standards. They play a critical role in building vigilance, deepening understanding of risks within our operations and supply chains, and empowering colleagues, suppliers and partners to act when something doesn't feel right.

In FY2025, more than 21,000 employees[1] across key teams, including leadership and management, completed our Global Ethics & Integrity annual training, which included human rights awareness focusing on forced labour, harassment, ethical decision-making and how to raise concerns through SpeakUp, We're Listening.

The HRWG also continued to elevate the conversation across the Group. Sessions in FY2025 addressed lessons from topics like Operation Fort – the UK's largest modern slavery prosecution to date – as well as responsible recruitment, excessive working hours and audit findings, supported by external insight from Slave-Free Alliance.

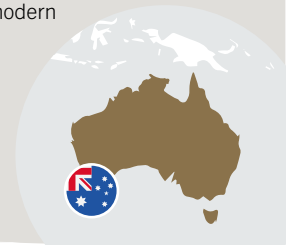
Over 21,000 leaders[1] completed our annual E&I training

1. On a risk-to-role basis, based on the Group's internal training records as at 30 September 2025.

Alongside our Group-led initiatives, our teams and businesses advanced awareness and engagement in ways tailored to local context and audiences. These activities underline that training and building awareness are not a one-off exercise, but a continuous process.

Supplier Engagement

At Compass Group Australia, human rights and modern slavery considerations are embedded into day-to-day supplier management. Quarterly Business Reviews (QBRs) with major suppliers now include these topics as standing agenda items, discussed alongside commercial performance, to strengthen accountability and accelerate follow-up on agreed actions. In parallel, procurement teams worked closely with suppliers from a recently acquired business to integrate them into Compass' responsible-sourcing framework and support their onboarding to Sedex for the first time. This engagement helped align expectations on labour rights and due-diligence standards across the combined supplier base, promoting consistent application of Compass' modern slavery commitments in the country.



Red flag training

In 2025, Compass Group Germany launched mandatory modern slavery awareness training. The e-learning highlights "red flag" scenarios — such as retention of identity documents, incomplete wage payments and signs of worker fear — to help managers and colleagues recognise early indicators of exploitation and escalate concerns through SpeakUp, We're Listening.



Sustainability Forum

In April 2025, Compass Group Finland hosted a Sustainability Forum on human rights, attended by around 40 cross-functional managers and directors. With keynote input from Finland's former Human Rights Ambassador, the forum explored Compass' Human Rights policy, the Modern Slavery Act, and supply-chain risk tools, supported by supplier case examples.



Effectiveness

Compass remains committed to enhancing its ability to identify and prevent modern slavery risks in all forms. Given the breadth of our businesses' operations, this statement focus on key achievements rather than every initiative in detail.

Our effectiveness is assessed by how well our policies, training and due diligence processes translate into practical improvements, supported by country insights and Group forums such as the HRWG and the SCRM Steering Committee.

During the reporting period, Sedex continued to be in use across Compass' markets, providing enhanced visibility of more than 2,600 supplier sites in 68 source countries, covering over 750,000 workers globally. More than 24,000 third parties have been assessed using our TPIDD tool and will continue to be monitored, enabling earlier risk identification and enhanced checks where required. Human rights training reached more than 21,000 leaders[1], supported by local initiatives such as Compass Group Finland's Sustainability Forum and Compass Group Germany's new e-learning programme. The information shared throughout this entire statement shows the collective progress we are making. The following examples are non-exhaustive, but demonstrate how our decentralised model is encouraging ownership and action at all levels:

- in Germany, an audit identified areas for improvement in working conditions and worker protections at a supplier site, which led to a corrective action plan being agreed and further audits scheduled
- in Finland, higher-risk suppliers were excluded from workwear procurement where product-level traceability could not be demonstrated
- in the UK&I, biometric identity and right-to-work checks were extended across additional business units; and new seafood suppliers in Indonesia were only approved after Sedex SMETA audits identified non-conformances that were closed out before onboarding
- in Australia, QBRs now track modern slavery actions alongside commercial items, strengthening accountability and accelerating follow-up

Looking ahead, we will continue refining our processes, piloting the Human Rights Self-Assessment Tool and considering how best to monitor effectiveness, while maintaining our commitment to continuous improvement.

Enhanced supply chain visibility with Sedex

2,600+
supplier sites

68
source countries

750,000+
workers globally

24,000+
third parties monitored by TPIDD

21,000+
leaders[1] undertook human rights training

1. On a risk-to-role basis, based on the Group's internal training records as at 30 September 2025.



Looking ahead



In line with our commitment to a sustainable future for all, we are continuing to focus on the initiatives and programmes that have driven our progress to date.

Our priorities are to further increase transparency whilst collaborating with clients, partners and communities to drive sustainable change.

Risk-to-role training and awareness raising

Continue expanding the reach of our training programmes and awareness raising activities, leveraging insights and lessons learned.

Further embedding the Country SCRM framework

Continue to embed the framework, promoting greater ownership and consistent use of data and tools to assess risks and guide responses at a country level.

Advancing Sedex and TPIDD integration

Broaden supplier participation and data coverage through Sedex and TPIDD, reviewing and following up on risk indicators and continuing to improve risk management processes and procedures.

Piloting the Human Rights Self-Assessment tool (HR-SAT)

Following its development in 2025, pilot the tool in selected countries, using early insights to refine future implementation and strengthen self-assessment capability.

Strengthening SCRM Steering Committee oversight

Enhance the Group's oversight of modern slavery and human rights risks through the SCRM Steering Committee, increasing visibility of progress and promoting cross-regional learning and accountability.

Conclusion

2025 marks the publication of Compass Group's tenth statement under the UK Modern Slavery Act.

Over that period, we have continued to strengthen our approach; embedding policies, refining processes, and working with colleagues and partners to mitigate risks across our businesses' operations and their supply chains.

Operating in diverse markets and navigating global food supply chains presents unique and complex challenges, yet Compass remains committed to upholding human rights and ethical practices at every stage, from sourcing ingredients to preparing and serving food.

By taking practical actions and collaborating with suppliers, clients, and communities, we aim to uphold dignity and wellbeing for our people and those connected to our businesses.

Reflecting on the last ten years of progress, we are proud of what we have achieved, recognising that tackling modern slavery is a continuous journey requiring ongoing attention, vigilance and improvement.

Our businesses' shared commitment is to create a future where justice, fairness, and sustainability are not just ideals, but everyday realities across our businesses' operations and their supply chains.

Arlene Isaacs-Lowe

Arlene Isaacs-Lowe
Chair, Corporate Responsibility Committee
Compass Group PLC

Approved by the Board of Compass Group PLC on 20 November 2025. This statement is published on the Group website homepage and filed on the UK Government's Modern Slavery Statement Registry.



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Annex

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

- Compass Group Holdings PLC
- Compass Group, UK and Ireland Limited
- Compass Contract Services (U.K.) Limited
- Compass Services (U.K.) Limited
- Compass Catering Services, Ireland Limited
- CH&Co Catering Limited
- Dine Contract Catering Limited
- EFoods Limited
- Gather & Gather Limited
- Gather and Gather Ireland
- PPP Infrastructure Management Limited
- Vacherin Limited