



UN Global Compact Communication on Progress – 2020

CEO Statement of Continuing Support

Compass Group PLC is pleased to reaffirm its continued support for the United Nations (UN) Global Compact and to renew its commitment to support the ten universally accepted principles of the UN Global Compact with respect to human rights, labour standards, environmental protection and anti-corruption. We also support other international frameworks such as the UN Sustainable Development Goals (UNSDGs) which are embedded into our sustainability strategy.

Due to the impact of COVID-19 on Compass it was necessary for us to postpone our Communication of Progress submission in order to focus our resource on business critical operations so as to safeguard Compass for the longer term benefit of all of our stakeholders, an approach which was endorsed by the UN Global Compact. This document therefore provides an update on our activities for our financial year ended 30 September 2019. We will report on our response to the challenges of 2020 in our next communication to be published in 2021.

Throughout the pandemic, our priority has been the health and safety of our employees and consumers, and we continue to manage the business to protect the interests of all of our stakeholders, including our people and the communities in which we operate.

I'd like to thank all of my Compass colleagues around the world who are supporting clients and governments in providing critical and essential services. Their dedication, combined with the many initiatives to prepare and distribute food to help those most in need, make me extremely proud of the contribution our people are making in the fight against COVID-19.

During the financial year 2019, we reviewed our sustainability strategy to make sure that it supports our future ambitions. We began the review by examining our strategy framework to determine if it remained appropriate and invested time listening to the views of our colleagues, clients, consumers, suppliers and other stakeholders to understand what we could do better.

We also conducted a materiality assessment which considered the importance of environmental and social topics that could have an impact our business, directly or indirectly and affect our ability to create value over the short, medium and long term. We also assessed material issues based on their relevance to our strategic plans and objectives.

Based on the outcome of the materiality assessment and taking into account the views of stakeholders we concluded that Safety and People remain at the heart of our strategy and our updated materiality matrix continues to focus on three key pillars that are core to the continued long-term success of our business:



We have identified targets and actions across these pillars, underpinned by a clear commitment to minimise the impact of our own operations and to protect the welfare of our colleagues, clients and consumers.

To make progress, we are working closely with our stakeholders. Our aim is to make a positive impact and we have improved existing and created new initiatives focused on enhancing diversity and inclusion, reducing food waste, promoting a more sustainable diet, advocating responsible sourcing and much more. A few examples of the actions we have taken are set out below.

In 2019, we signed a global partnership with the EAT Forum: a non-profit start-up targeted on transformation to protect the planet and its resources. EAT connects scientists, politicians, business leaders, chefs, innovators and change makers to create a healthy and sustainable global food system. Together, we are working to move the world to healthy and sustainable diets; realign food system priorities for people and the planet; produce more of the right food, from less; safeguard our land and oceans; and radically reduce food losses and waste.

Other alliances forged during the year include our involvement with the World Business Council for Sustainable Development and with organisations such as the Ellen MacArthur Foundation, to promote a more sustainable world through the circular economy. Furthermore, we committed to set a 'Science Based Target' to reduce the greenhouse gas emissions of our operations, in line with the 2015 Paris Agreement to limit global warming to 1.5 °C.

Of course, there is more work to be done, but we are fully engaged with the challenges and committed to progress. As the biggest food service business in the world, we take our responsibilities seriously and we are working together with our people, clients, suppliers and partners and remain confident that together, we can make a difference.

Dominic Blakemore

Compass Group Chief Executive

16 December 2020



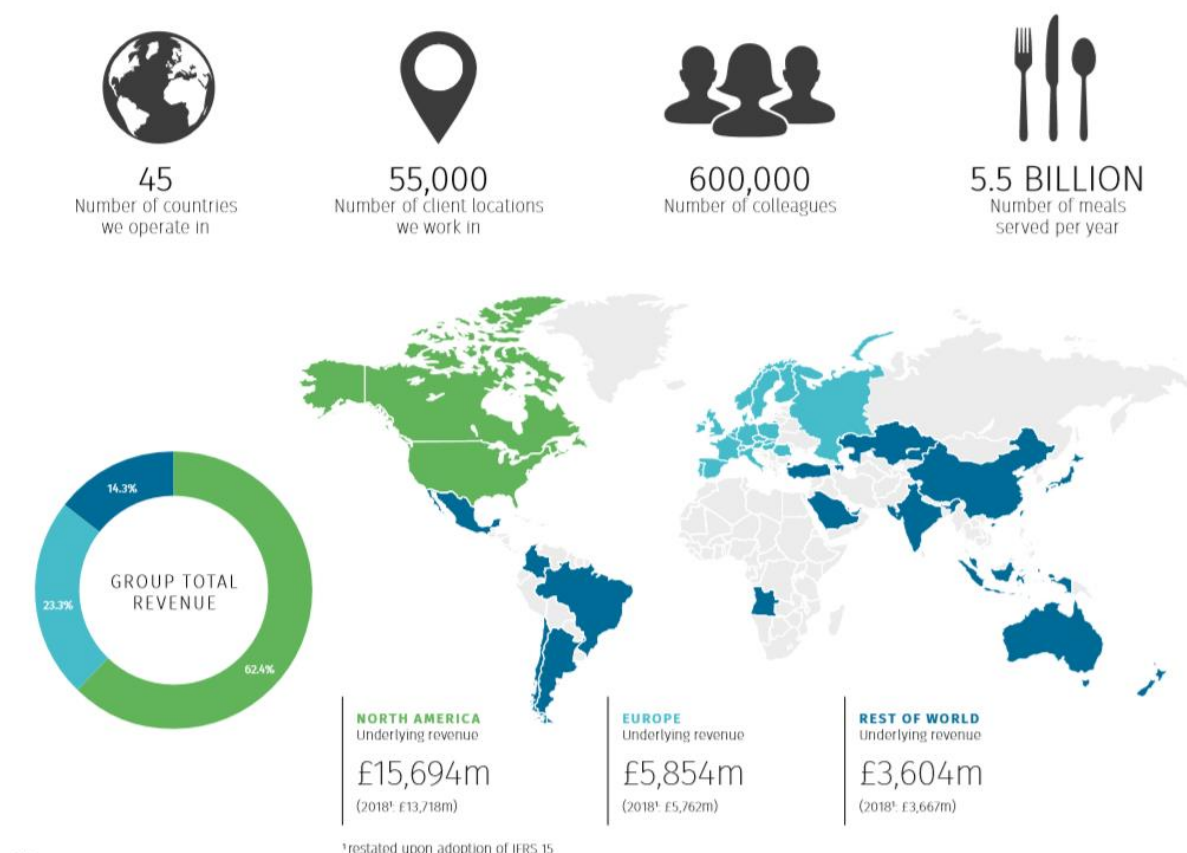
1. About Compass¹

Compass provides food and support services to millions of people every day. We have a global footprint, with some 600,000 colleagues working in around 45 countries across 55,000 client locations.

We manage the business in three geographic regions, North America, Europe and Rest of World. We segment our markets into various sectors and sub-sectors using our portfolio of brands. The five sectors in which Compass operates are: Business & Industry; Healthcare & Seniors; Education; Sports & Leisure; and Defence, Offshore & Remote.

Food service is our core competence. We are the industry leader and create value for our clients and consumers by providing them with a range of dining solutions that are innovative, healthy and sustainable.

Our scale and focus on execution mean that we can provide our clients and consumers with the best value in terms of quality and cost as well as the most exciting and innovative solutions.



¹correct as at 30 September 2019

For more information please see our Annual Report available [here](#).



Our Governance process

Responsible businesses must also adhere to the highest levels of corporate governance. Our country leadership teams operate within a strict governance framework with clearly defined parameters. At the same time, we empower them to manage the business whilst maintaining sufficient flexibility to enable the entrepreneurial spirit which supports the Company's strategic priorities to continue. The Corporate Responsibility (CR) Committee plays a key role in agreeing, monitoring and overseeing the delivery of our corporate responsibility, people, health, safety and sustainability, ethics and compliance and stakeholder engagement strategies, ensuring that our policies and practices align with the Group's culture, purpose and values.

For more information about our Corporate Governance practices, please see our [2019 Annual Report](#).

Our Sustainability Strategy

Understanding where we can make the biggest impact and taking account of what matters most to our stakeholders, alongside industry trends, is important to us. In 2018, we formulated our sustainability strategy. In 2019, we reviewed and confirmed this using our materiality analysis. For more information please visit our [website](#).

We centre our strategy on three key pillars:

- Health and Wellbeing – helping people to make better nutritional choices, be supported in their mental health and follow healthier lifestyles;
- Environmental Game Changers – reducing food waste and single-use plastics, and promoting plant-forward meals;
- Better for the World – sourcing responsibly, enriching local communities and collaborating for big change.

This work would not have been possible without the dedication of our people and prioritising safety. That is why Safety and People come first, underpinning the foundations of our strategy.



The United Nations' Sustainable Development Goals

Compass' sustainability strategy ensures that our focus is on contributing to nine of the UNSDGs where we believe we can have the greatest impact.

To read more about our approach with the UNSDGs and our sustainability strategy more generally, please see our [2019 Group Sustainability Report](#) and our [2019 Annual Report](#).

2. Human Rights

Principle 1: *Businesses should support and respect the protection of internationally proclaimed human rights; and*

Principle 2: *Make sure that they are not complicit in human rights abuses*

Assessment, policy and goals

We have a duty to treat people fairly in our own operations and supply chains, and are committed to eradicating modern slavery, human trafficking, and ending the exploitation of vulnerable people. We take a comprehensive approach with robust policies and risk assessment programmes. Implementation of our Human Rights Policy and Code of Ethics is paramount. These are in line with the United Nations Guiding Principles and the core conventions of the International Labour Organization Ethical Trading Initiative.

Within our business the rights of our employees are protected and respected by the implementation of our Code of Business Conduct (CBC), Human Rights Policy, Supply Chain Integrity Policy and Code of Ethics. Our compliance programmes and policy frameworks provide internal governance for our



businesses, suppliers and other business partners. The way we operate, which is reflected in our policies and Code of Ethics, is built on a foundation of several important internationally recognised declarations, standards and codes including:

- The UN Universal Declaration of Human Rights;
- The Base Code of the Ethical Trading Initiative (ETI);
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- The UN Guiding Principles on Business and Human Rights;
- The UN Global Compact ten principles.

We recognise the UN Guiding Principles on Business and Human Rights (UNGPs) (a framework of guiding principles which seek to protect and respect human rights and eradicate human rights abuses) as fundamental to our approach to human rights both in our direct operations and supply chains, and we are committed to upholding these principles.

As part of our commitment to human rights and worker welfare, we require our suppliers to treat their workers in the same way that we treat our own, and to this end, it is our policy to ensure that our supply contracts specify a commitment to comply with our Code of Business Conduct, found on our website www.compass-group.com.

Our procurement teams and suppliers are required to comply with our Global Supply Chain Integrity Policy. This policy is underpinned by our Supply Chain Integrity Standards and defines the supply chain principles and standards to which we expect our suppliers to adhere. This includes the nine-point Ethical Trading Initiative Base Code. We are members of the SEDEX initiative, a collaborative platform to share responsible sourcing data on suppliers.

Please find more information in our latest Modern Slavery Act Statement on our website www.compass-group.com and in our [2019 Group Sustainability Report](#).

Implementation

The Group Director of Safety and Sustainability, who reports directly to the Group Chief Executive Officer, acts as the global functional lead for the Group with respect to the human rights policy and has reporting responsibility for human rights across direct operations and within the supply chain. The Group Director of Safety and Sustainability is also a member of the Executive Committee and attends all meetings of the Corporate Responsibility Committee. The operational responsibility for execution of our policies sits with our regional and in country managing directors.

In 2019, we formed a cross functional, multi-national Human Rights Working Group to focus on the topic of human rights across our business. This working group is responsible for overseeing our human rights strategy, including reviewing and updating the human rights policy and



implementing initiatives and projects as well as overseeing areas of assessment of human rights across the Group.

We know that policies, codes and strategies without action or verification are ineffectual. We take great care to assess the adherence and effectiveness of our policies, especially in the areas of our supply chain we have identified to be higher risk.

We conduct comprehensive risk assessments of the current and emerging vulnerabilities within the higher risk segments of our supply chain. This is underpinned by expert risk analysis and rigorously researched, political, human rights and environmental risk indices provided by an independent specialist in human rights. The outcomes of these risk assessments and horizon scanning activities help us to identify our priorities as we look to mitigate or eliminate identified risks. We are also developing a Group framework to evolve and develop our approach to purchasing and to further strengthen our policies, standards and controls.

Compass provides multiple channels for stakeholders to raise their concerns. Our global whistleblowing programme, Speak Up, is managed by an independent company. This allows our employees, suppliers and members of the local community to raise, in confidence, any concerns they may have about how we conduct our business, or report if they are witness to, or subjected to, any abuse of human rights. Each case is investigated and followed up by an assigned case manager. The CR, Audit and Executive Committees receive regular updates on the nature of the reports and agree specific actions, including assessment and changes as required, reporting back to the Board.

Measurement of outcomes

In 2019, we began working with an independent third party to identify and better understand our human rights risks. Our human rights working group will assess the policy and processes we rely on to manage our risks and impacts.

As well as respecting human rights within our direct operations, it is important this is extended to our supply chain. As part of our Human Rights Impact Assessment, we identified the categories with the highest human rights risk within our supply chain as seafood, hot beverages, fresh produce, agency labour, garments and disposables. Any potential supplier breaches of our CBC, uncovered via audit or any other means, are fully investigated and, where possible, remedied. Suppliers whose breaches cannot be remedied are terminated.

By training employees, we are better able to spot any signs of modern slavery in our supply chain, and to support potential victims. In the UK and North America, for example, our e-learning programme for our procurement teams has helped to raise awareness of the issue of slavery and human trafficking and is helping us to mitigate potential risks. In 2020, we are committed to extending this programme to our top 20 countries which account for over 80% of our global procurement spend. We conduct internal and independent audits to verify compliance with local



employment law and identify any instances of non-compliance or poor practice in our supply chains. Particular focus is given to regions which we consider present the greatest risk such as Asia and the Middle East.

The content of our global whistleblowing programme, “Speak Up,” report is analysed to ensure we focus on and direct resources to potential areas of vulnerability. In 2018/2019, we received 3,767 reports (2018: 3,812). We raise awareness of Speak Up online and through posters in our sites. These materials have been translated into 34 languages so that they can be used in all our markets.

In the last financial year:

- There were no incidents of substantiated human rights breaches;
- There were zero human rights grievances related to Compass reported by employees and suppliers via ‘Speak Up’;
- There were zero significant actual and potential adverse human rights impacts in the supply chain via ‘Speak Up’;
- Our top 20 countries have continued to operate programmes to support fair trade and ethically sourced, locally sourced, or sustainably sourced products;
- 44% of total coffee and tea spend in our Top 25 countries is certified ethically traded.

Case study: Independent audits of our UK fresh produce supply chain

In 2019, we commissioned independent ethical audits within our UK fresh produce supply chain to SEDEX Members Ethical Trade Audit (SMETA) standard. We traced products back down through our supply chain. The audits evaluated health, safety and labour standards and were conducted from the Compass supplier, through intermediaries, right back to the grower in the field. The results to date have not discovered any modern slavery and human trafficking violations. However, they did provide valuable insight on some areas for improvement in and around labour standards, including previously unidentified issues such as the use of seasonal and intermittent contracts.

“This highlights the importance of supply chain cooperation and collaboration,” explains Chris McCrystal, Global Head of Responsible Sourcing, Compass Group. “We are working with the affected supply chain to identify remedial actions. We plan to conduct further assessments and audits throughout our supply chain into the next financial year to highlight areas for improvement, inform our process and serve to strengthen our relationships with suppliers.”

3. Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: The elimination of all forms of forced and compulsory labour;



Principle 5: The effective abolition of child labour; and

Principle 6: The elimination of discrimination in respect of employment and occupation.

Assessment, policy and goals

We are committed to providing a consistent work experience for each of our colleagues, encouraging a positive environment in which everyone will feel genuinely valued.

We want people from every walk of life to feel welcome at Compass, to be able to be themselves, and to grow their career with us. Diversity reflects our communities and helps us to understand our consumers.

Our diversity and inclusion strategy is set around a framework of three pillars: People, Culture and Community formed under the brand of “Everyone Together”.

As detailed above, in our CBC we uphold the International Labour Organization core conventions.

This includes upholding the freedom of association and the right to collective bargaining as well as being committed to the abolition of child labour and elimination of forced or compulsory labour both within our operations and our supply chains.

We do not tolerate any form of discrimination, and we seek to create a safe, positive, open, working environment wherever we operate. These commitments are embedded within our:

- [Code of Business Conduct \(CBC\);](#)
- [Human Rights Policy;](#)
- [Supply Chain Integrity Policy Statement;](#)
- [Workplace health and safety policy and standards;](#)
- [Slavery and Human Trafficking Statement.](#)

To ensure these principles are embedded across our entire business, we require all suppliers, including labour agencies, to adhere to our CBC. The CBC includes our expectations in respect of labour rights, slavery and human trafficking. Our suppliers are also required to comply with our Global Supply Chain Integrity Policy. This policy is underpinned by a robust set of standards which clearly define our responsible sourcing commitments and the values we expect our suppliers to uphold.

An important component and a priority of our responsibility to employees is their safety. Our Workplace Health & Safety Policy sets out common minimum operating standards and behaviours which apply to all our locations. Our health and safety performance is reviewed at every management meeting in Compass and at each Group Executive Board meeting.



Implementation

On recruitment, all colleagues are required to review and agree to abide by our principles to treat colleagues fairly and with dignity and respect. It is also clearly communicated that discrimination of any kind will not be tolerated. Although our global CBC is well embedded within our business, we are not complacent. To maintain visibility of the CBC's principles, we conduct training and regular performance reviews, including an annual requirement for key colleagues of influence to confirm their compliance with our CBC. We also conduct regular internal audits of policies by country and of compliance with local laws and regulations. Our governance structures demonstrate our commitment to preventing any form of discrimination and is a priority at all levels of our business.

Compass respects and values the individuality and diversity that every employee brings to the business and we seek to create a positive, open working environment. Our HR policies and practices are also developed to support our principles. We recruit colleagues to reflect the communities in which we work.

To promote career progression, we ensure that our people, irrespective of background and experience, can develop and have a successful career with us. We want to ensure that our managers are equipped to recruit, develop and grow our diverse and inclusive workforce.

We have a number of internal programmes to support high performing women in their careers. In Australia, for example, female colleagues participated in the Ignite leadership and personal development programme, which involved workshops, podcasts, personal study, and mentoring sessions with senior leaders. According to feedback, each of the participants felt they had gained skills which enabled them to take on more senior positions, and almost half of the participants had progressed their careers since the initiative was introduced. In 2019, we also became the first large UK organisation in the hospitality sector to sign up to the UK government's Social Mobility Pledge, underlining our commitment to equal opportunities.

We recognise the importance of providing inclusive environments and creating the right culture to enable all our people to thrive and in 2019 we commenced the roll out of Inclusive leadership training through face-to-face workshops and digital solutions. We actively support employee network groups, Diversity and Inclusion Action Councils, and communicate regularly on diversity and inclusion by supporting initiatives such as International Women's Day. We were also delighted to launch our first Global Inclusion Index and by incorporating key inclusion questions into our global engagement survey, we have been able to better understand our areas of strength and opportunities for more support across the diversity and inclusion (D&I) agenda.

We also focus on enhancing D&I in our local communities, through our partnerships with clients, as well as our relationships with suppliers.



Our employees are able to report any breach of the CBC to their line manager, and in addition, they can also use our confidential and anonymous reporting service, Speak Up. Allegations of wrongdoing are reported to the Audit Committee and the CR Committee which in turn report to the Board. All allegations are investigated at the most appropriate level of the organisation.

We are working to improve supply chain transparency across our business through the education and training of our procurement teams. For example, in 2019 our UK business rolled out the use of the Supplier Ethical Data Exchange (SEDEX) to 66% (2018: 50%) of suppliers within those categories we consider carry a higher risk. SEDEX is a database used to assess, track and share information on suppliers, and during the course of 2020, we intend to extend the roll out of SEDEX to other countries.

We also work to support diverse suppliers. In the USA, for example, for over 20 years, we have operated a supplier diversity programme and are proud to have over 850 minority or female owned regular suppliers, representing contracts valued at over US\$700 million a year.

Measurement and outcomes¹

We measure and report on the gender split of our employees. Overall, women make up 59% of our total workforce and 31% of our senior leadership team (up from 30% last year). We have significantly increased the number of women on our Executive Committee to 38%, having been an all male team just three years ago.

We have been recognised for the progress we made in our D&I agenda during 2019 when we became global diversity champions for Stonewall working to create an LGBT-inclusive workplace. In addition, our business in the USA was recognised in the Forbes 2019 list of Best Employers for Diversity.

Under our Culture pillar, we have continued to focus on creating an inclusive and welcoming environment for all. We began our rollout of an unconscious bias training workshop, starting with the Group Executive Committee and cascading the session through a number of country leadership teams.

In the UK, we published our 2019 Gender Pay Gap Report which showed our median gender pay as 12.5% compared to the ONS published national average of 17.3%. Read more [here](#).

The sustainability metrics below relate to our Top 25 countries, see our [website](#) and our [2019 Group Sustainability Report](#) for more information.

¹ correct as at 30 September 2019



People	2018-2019	2017-2018
Developing Our People		
Improvement in employee retention rate		
• Total employees	1%	0%
• Management	3%	-2%
• Unit management	0%	2%
Number of unit managers trained through Leadership in Action development programme	2,500	N/A
Number of graduates hired and tracked across the global business	2,000	1,000
Engaging Our People		
Total number of cases reported by employees globally, via Speak Up	3,767	3,812
Global engagement survey participation	48%	N/A
Creating a Diverse and Inclusive Environment		
Female representation in the global workforce, % of total	59%	57%
Women holding global leadership team positions, % of total	31%	30%

Case study: Taking action through Diversity & Inclusion Action Councils

In a number of our markets, such as Australia, Japan, and the USA, we support the formation of employee action councils on diversity and inclusion (DIACs). These are groups of colleagues, working together to progress the inclusion agenda. Our people tell us that it is a powerful experience to be a part of a DIAC and participate in the development of strategy that is designed to have an impact on every associate - regardless of gender, race, sexual orientation, age or disability status. It is also the mission of the DIACs to provide the organisation and their respective sectors with the appropriate information and guidance on D&I related items, innovative approaches to celebrating our differences, and effective initiatives aligned to our three pillars. "Just as people are at the heart and soul of our business, our DIACs are the heartbeat of our People Strategy," explains Cindy Noble, Chief People Officer at Compass North America. "We believe this model provides us with an innovative, valuable and sustainable approach to associate engagement which is critical in achieving our ultimate goal of creating an inclusive environment."



Case study: Recruiting people in the community with disabilities

We know that having a workforce that reflects the diversity of the wider community can lead to greater customer loyalty and satisfaction. In 2019, our Australian business set a goal to hire 50 people with disabilities. To help achieve this goal, we partnered with employment service providers to actively recruit people who identify as having a disability. By September, we had employed 84 people with disabilities. “We are well set up to offer people with disability fulfilling work and are keen to benefit from everything they have to offer,” explains Vanessa Davies, D&I lead, Australia. “We are actively trying to recruit more people with disabilities into our business. They tell us they love having a job and being part of a team.”

4. Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: Undertake initiatives to promote greater environmental responsibility; and

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

Assessment, policy and goals

As a leading food service business, we focus on where we can have the biggest positive impact on the global food system and the environment. Under the “Environmental game changers” pillar, our sustainability strategy is focusing on the following topics:

- **Food waste:** we recognise the huge global challenge of food waste and fully support UNSDG 12.3 to reduce food waste by 50% by 2030;
- **Single-use plastics:** we recognise that the prevalence of single-use plastics is a significant, global issue and one which our stakeholders care very deeply about. This is why we are taking steps to reduce its use in our operations;
- **Plant-forward meals:** eating less meat is good for the planet. Over the last year we have included many plant-based options in our restaurants which have a lower environmental impact than many animal-based dishes.

We recognise the role we have to play in limiting our impact on the environment. Alongside reducing food waste, and increasing plant-based meals across our business, in February 2019, we committed to set a ‘Science Based Target’ to reduce the carbon footprint of our direct operations, in line with the 2015 Paris Agreement to limit global warming to 1.5°C. Building our achievements we will be setting these targets and taking actions to reduce our impact across the Group over the coming years.



We source our products from all around the world. Our priority is to ensure we partner with suppliers who meet our high standards of food safety and quality, ethical trade, animal welfare and sustainability. Our global supply chain integrity requirements ensure that we work only with suppliers who share our values. Under the “Better for the world” pillar of our sustainability strategy we are focusing on reducing the environmental impacts of our supply chain.

Our comprehensive Environmental Policy statement can be found on our [website](#). We have set clear objectives against which we will measure and report on our environmental performance. We expect similarly high standards from our suppliers and contractors. Specifically, we will:

- Report on the implementation of and compliance with our Environmental Standards, including food waste reduction programmes;
- Reduce the water and energy used in our principal offices;
- Reduce the CO₂ emissions of our vehicle fleets;
- Reduce waste packaging in our supply chain;
- Seek to reduce food miles by increasing the use of seasonally available products sourced from the relevant domestic market;
- Ensure that all our employees are provided with the information, training and tools necessary to implement responsible environmental practices.

In UK, we developed an Environment Toolkit to ensure compliance with our Environmental Management System (EMS), which is certified to ISO 14001:2015 standard for catering and support services. Furthermore, several of our countries and operating sites are ISO 14001 certified.

Implementation

Food Waste

We work with a number of food waste measurement and reduction systems around the world to raise awareness, change behaviour and monitor our ability to reduce food waste. We have a three-pronged approach to reducing food waste:

- reducing the amount of unsold/uneaten food;
- inspiring consumers to waste less (through Stop Food Waste Day);
- diverting food waste from landfill, for example through repurposing or donating surplus food to people in need.

We are cutting waste in our restaurants by improving the efficiency of how we order food, making use of every bit of an ingredient in the kitchen and repurposing unused food into new dishes. We challenge our teams to plan, forecast and purchase effectively to prevent wastage.

Single-Use Plastics



We are working directly with our clients, procurement teams and suppliers to help reduce our use of disposable plastic items. This is helping to ensure that fewer single-use plastics are being used, replacing them with reusable or biodegradable alternatives.

Plant-Forward Meals

In January 2019, the scientific journal *The Lancet* published a report in conjunction with the EAT Forum about a recommended diet for a sustainable planet.

With analysis and recommendations on how to eat for a sustainable planet which aligns with our plant-forward focus, Compass has partnered with the EAT Forum to help promote the sustainable planet diet across our business. Many of our chefs and kitchens provide a multitude of plant-forward meals and have witnessed increasing consumer satisfaction and high uptake of plant-based options. We are helping clients to incorporate plant-forward meals into their menus.

Climate change and greenhouse gas emissions

As well as monitoring energy usage in our offices and working closely with clients to improve energy efficiency at their sites, we implement environmental management systems to reduce our impact on the environment, including water conservation.

2019 was the first year of collecting sustainability data in a newly launched system from countries which constitute 96% of the Group's revenue. This data gives us greater visibility of our sustainability performance, including greenhouse gas emissions. We will be analysing our carbon footprint, setting a reduction target and executing our reduction strategy over the coming years and will communicate in due course.

For more information about our climate change reporting and strategy, view our Carbon Disclosure Project (CDP) report on [CDP website](#).

Sourcing Responsibly

We know that sourcing specific food products, such as beef or soy from the Amazon biome or palm oil, can lead to deforestation and desertification. We are committed to preventing this and actively seek to reduce our sourcing of products from the Amazon biome region such as soy or beef. Our goal is for the palm oil used to prepare food in our kitchens to be 100% certified sustainable from physical sources by 2022.

We are active members of the Roundtable on Sustainable Palm Oil (RSPO) and the Round Table for Responsible Soy (RTRS). Compass UK is also a member of a roundtable on sustainable soy convened by EFECA.



We want to play our part in improving the health of the oceans and are buying more and more responsibly sourced fish. Our global commitment is to buy 50% certified sustainable seafood by 2020.

Measurement and outcomes

Food Waste

In the UK, approximately 250 sites already use Winnow technology to measure, monitor and reduce food waste and our UK distribution centres have donated 40 tonnes of surplus food, equivalent to 93,000 meals, to charity FareShare since 2014.

Globally, millions of zero-food waste meals were served on Stop Food Waste Day 2019 throughout Compass cafés in hospitals, schools, corporations, arenas, museums, senior living communities and more. The external reach of our campaign stepped up significantly in 2019 with #stopfoodwasteday which reached an audience of 89 million in 100 countries. High profile individuals and organisations helped to raise awareness, including the UN's World Food Programme and Food and Agriculture Organization, WWF, Jamie Oliver, British and French Vogue, Fast Company and others.

In the USA, our Bon Appétit brand donates through many food recovery programmes across the country, including Chefs to End Hunger. 74% of Bon Appétit's sites donate food to people in need, and 96 accounts are Food Recovery Verified (meaning they are verified by a third party organisation on an annual basis to confirm they are consistently donating their food).

Single-Use Plastics

We recognise the industry-wide issue of single-use plastic and are taking steps to reduce its use in our operations. In India, various single-use plastic products (cups, cutlery, straws, garbage bags, plates and bowls) have been removed or replaced with multiuse washable alternatives.

We are working closely with suppliers to redesign packaging and encourage clients and consumers to rethink their use of disposable plastic items. This is helping to ensure that fewer single-use plastics are being used, replacing them with reusable alternatives. Where plastic is still used, we encourage the adoption of plastics that can be easily recycled. In Australia, for example, three zoos where we provide the catering all stopped offering plastic straws and bags in May 2019.

Plant-Forward Meals

We are helping clients to incorporate plant-forward meals into their menus. Compass Argentina joined the 'Veg Revolution', for example, and a new menu has been added once a week in nearly 70% of our contracts. We are also helping to raise awareness of the impact of eating less meat on our health and that of the planet. In Portugal, our award-winning 'Choose Beans' campaign led to a 27% increase in legumes consumption in only one year across targeted sites. In Sweden, we



collaborated with Research Institutes of Sweden (RISE) to develop a calculator to show customers the carbon footprint of each menu option. We communicated this information on posters, making it easier for our consumers to understand the high carbon footprint of red meat and dairy products.

Sourcing Responsibly

So far, 37% of our palm oil is certified sustainable and we are working to increase this throughout our business.

For the past 17 years, our US business has been dedicated to sourcing sustainable seafood and in 2018, 87% of the seafood purchased by our US business was certified sustainable. In 2019, on a global basis, 42% of fish and seafood purchased by the Group was certified from sustainable sources.

Our performance in 2019

The environmental metrics below relate to our Top 25 countries, see our [website](#) and our [2019 Group Sustainability Report](#) for more information.

Environment	2018-2019	2017-2018
Plant forward meals		
Carbon footprint of beef and eggs purchased, tCO ₂ e	2.1 million	N/A
Spend on fruit and vegetables of total food spend	15%	N/A

Global greenhouse gas (GHG) emissions for the period 1 October 2018 to 30 September 2019	Unit	2018-2019 Current reporting year*	2017-2018 Previous year
Combustion of fuel & operation of facilities (Scope 1)	Tonnes (t) CO ₂ e	174,627	129,516
Electricity, heat, steam and cooling purchased for own use (Scope 2 – location based)	tCO ₂ e	45,875	8,095
Total Scope 1+2	tCO ₂ e	220,502	137,611
Emissions intensity per EM revenue	tCO ₂ e/EM	9.1	6.3

*In 2019, we increased the scope and changed the data collection and estimation methodology of reporting.



5. Anti-corruption

Principle 10: *Businesses should work against corruption in all its forms, including extortion and anti-corruption.*

Assessment, policy and goals

As a world leader in our industry, we recognise that we must set the very highest standards for ethical business practice and each one of our employees shares that responsibility to uphold our standards and to conduct our business in a professional, safe, ethical and responsible manner.

Bribery or corruption in any form is unacceptable and Compass has a zero-tolerance approach to corruption. We are committed to complying with all laws in the countries in which we operate and to transparency in all our business dealings. We are also committed to creating a working environment, in which all our people uphold the highest standards of integrity and professionalism. This is particularly important in our dealings with governmental, federal, state, public and local authority officials in any country.

Our CBC explains our approach beyond fundamental compliance to all relevant laws by demonstrating our commitment to obtaining and maintaining the highest level of ethical standards wherever we operate. Our CBC sets out what Compass expects of its employees, business partners and suppliers and provides guidance on how Compass employees should live Compass' values in their everyday work. For instance, the Code states that, "no employee may offer or receive – or influence others to offer or receive – any money or material gift that could be construed as a bribe or influence."

Other relevant policies (internal purposes only) include:

- Fraud Policy;
- Group Gifts and Hospitality Policy;
- Group Approvals Manual.

The Compass Group Theft and Fraud Policy confirms the Group's zero tolerance approach to fraudulent, dishonest or deceptive activities or behaviour, including in the case of corruption. The Code of Ethics reinforces the Group's overall approach to doing business in an ethical way. Both are available for all employees on the Group's intranet.

The Group's Speak Up policy (an extension of the Code of Ethics incorporated within the Group's Code of Business Conduct (CBC)) sets out arrangements for the receipt, in confidence, of complaints on accounting, risk issues, internal controls, auditing issues and related matters which would, as appropriate, be reported to the Audit Committee. Speak Up is a standard review item on all internal audit work programmes.

The Audit Committee also receives updates on any allegations of bribery and fraud in the business at every meeting, with individual updates being given to the Audit Committee, as needed, in more



serious cases of alleged bribery, fraud or related activities. The Group's theft and anti-fraud policies are a subset of the CBC, which does not tolerate any activity involving fraud, dishonesty or deception. These policies, for which the Audit Committee retains overall responsibility, set out how allegations of fraud or bribery are dealt with, such as by the local People function or finance team, and the frequency of local reporting that feeds into the regular updates, which are presented to the Audit Committee. Reporting of these matters to the Audit Committee is managed and overseen by the internal audit function. The Speak Up policy operates when a complaint is received through the whistleblowing channel and that policy redirects the fraud or bribery allegation for investigation at the most appropriate level of the organisation which may, for example, be by a member of the local People function or, on occasion, the Audit Committee itself.

The CBC and Code of Ethics are available on the Company's website www.compass-group.com.

Our suppliers must comply with our Code of Business Conduct, and this is stipulated in our supply contracts. Our suppliers are also required to comply with our Global Supply Chain Integrity Policy. This policy is underpinned by a robust set of standards which clearly define our responsible sourcing commitments and the values we expect our suppliers to uphold. All these policies can be found on our website www.compass-group.com. We support our suppliers in achieving these standards through regular engagement, training and best practice guidance.

Implementation

The Group's zero tolerance based Codes of Business Conduct and Ethics continue to govern all aspects of our relationships with our stakeholders. All alleged breaches of the Codes, including any allegations of fraud, are investigated.

The Group undertakes a robust risk management assessment that helps properly identify major risks and ensures the internal control framework remains effective through regular monitoring, testing and review. Emerging regulatory and compliance risks are included in this process to enable visibility and planning to address them.

A strong culture of integrity is promoted through our Ethics and Compliance programme and our Speak Up helpline. All alleged breaches of our Codes, including any allegations of fraud, are investigated and dealt with appropriately.

Regulation and compliance risk is also considered as part of our annual business planning process.

To implement our Code of Ethics, we have established reporting and compliance procedures. This includes the appointment of a Head of Ethics and Compliance at Compass Group, training for relevant employees, raising awareness of our whistleblowing procedures for employees and suppliers, and the integration of the CBC into employee and supplier contracts. All employees



whose location or role poses a potential corruption risk must complete our anti-bribery and corruption training module.

We have established a series of procedures, reviewed annually, to ensure anti-corruption is embedded at every level of our organisation. All senior management are required to review and confirm that they have complied with the CBC, of which anti-bribery and corruption is an important component. The status of our compliance programme is reviewed on a regular basis, including at Regional and Group Governance Committees and the Group Risk Committee.

When employees sign their contract of employment and during annual performance reviews, they confirm acceptance of the CBC and confirm their continued adherence to it. In addition, all managerial colleagues are required to complete and pass ethics training, an e-learning course which includes modules on bribery and corruption.

The Corporate Responsibility Committee retains overall responsibility for the Group's CBC programme, the training of employees and the way in which management obtain assurance in this area, including the annual self-certification process which saw more than 3,014 key employees of influence confirm their continued compliance with the CBC and the Code of Ethics in the year ended 30 September 2019.

Compass Group is certified with TRACE International, a globally recognised anti-bribery organisation.

TRACE assists Compass, as well as other global companies, in conducting business ethically and in compliance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other anti-bribery legislation. As a member we have access to compliance resources and tools to implement anti-corruption and bribery processes. We have been a member of TRACE International since 2015.

For further details regarding the content of this statement, please contact:

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