

Statement 2024



Serve a better future by enriching people, communities and the planet.





DeltaFM



Eurest 28 Villages

RESTAURANT ASSOCIATES









Acknowledgment of Country

Compass Group Australia wishes to acknowledge the Traditional Custodians of the lands and waters throughout Australia.

We recognise their strength and resilience and pay our respects to their Elders past, present, and emerging. Compass Group Australia extends that respect to all Aboriginal and Torres Strait Islander people and recognises their rich culture and continuing connection to land and waters, as the longest living culture for over 60,000 years.

Aboriginal and Torres Strait Islander people are advised that this report may contain names and images of people who are deceased. All references to Indigenous and First Nations peoples in this report are intended to include Aboriginal and/or Torres Strait Islander people.

FORWARD-LOOKING STATEMENTS

This statement contains forwardlooking statements in relation to Compass Group Australia, including statements regarding Compass Group Australia's opinions, targets, commitments and expectations, market and industry conditions and risk management practices. Such forward-looking statements are based on management's current information. assumptions and projections (including financial, market, risk, regulatory and other relevant environments that may affect Compass Group Australia in the future), and by their nature subject to known and unknown risks, uncertainties and assumptions. Actual results, performances and developments may be materially different from the forward-looking statements expressed in this Statement.



Image Credit: "Compass Group's Journey" by Chern'ee Sutton – contemporary Indigenous Artist from the Kalkadoon people.

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Our Commitment



As a global leader in food and support services, Compass Group Australia remains committed to doing what is right—for our people, customers, shareholders, the communities we serve, and the planet. Following our 2023 Purpose launch, *to Serve a Better Future by enriching people, communities and the planet*, our focus in 2024 and beyond, has been to reinforce these ideals.

Within Compass Group Australia's Strategy, our Purpose pillar prioritises positive social and environmental impact by enhancing health, safety, and well-being while collaborating with suppliers and partners to uphold these values. Our Purpose is guided by four key beliefs:

- Everyone should be seen and nourished as a whole person
- Great service starts with understanding what people value most
- To positively impact a community, we must respect what makes it unique
- Positive change for our planet's future starts with better choices today.

We uphold strong governance and ethical standards, conducting business with integrity, prioritising safety, and treating others with respect. Our success and growth depend on upholding these commitments, and we understand that not only is it the right thing to do, but our actions influence the trust others have in our business.

Serve a better future

by enriching people, communities and the planet.



This marks Compass Group Australia's fifth Modern Slavery Statement, reflecting our evolving systems, processes and purpose. Our 'Eradicating Modern Slavery in our Supply Chains' policy, introduced in 2019, continues to drive our progress, and this is complemented by our WorldFirst[™] ethical sourcing framework which supports our operations and clients through ethical procurement policies, processes and supply chain investments.

Guided by our ultimate parent, Compass Group PLC, we continue to invest in strategies, tools, and processes to identify and mitigate modern slavery risks across our operations and supply chain, and this includes continued engagement with Sedex (Supplier Ethical Data Exchange) and the introduction of our Third-Party Integrity Due Diligence Policy.

Five years into our journey to support the eradication of Modern Slavery, we are proud of our accomplishments and to share our ongoing progress.

Joanne Taylor Managing Director Compass Group Australia 12th of March 2025

Toby Edmunds Executive Director Foodbuy Australia 12th of March 2025

OUR MODERN SLAVERY FOCUS AREAS

FOCUS AREAS	STATUS/PROGRESS
 Reviewing sourcing, contracting, and supplier selection processes through Foodbuy Pty Ltd 	Launched the Third-Party Integrity Due Diligence Process, assessing all new and high-risk suppliers. Over 1,100 supplier profiles have been created and assessed since June 2023.
2. Communicating expectations and enforcing standards through contracts	Supply Chain Sustainability & Risk Lead continues to work with the procurement team and suppliers to maintain focus on compliance with governance and policies, assisting suppliers with Sedex profiles and internal policy development.
3. Utilising industry expertise to conduct third-party audits	Continued to utilise Sedex and SMETA audits to assess the risk of modern slavery in our supply chain Approach includes a requirement for suppliers to commit to a formal SMETA audit as part of their contractual terms coupled with additional audits during contract life-cycle.
4. Investing in targeted training	100% of procurement team completed modern slavery training; company-wide training is ongoing through Compass Group's global platform.
5. Providing access to <i>Speak and Listen Up!</i> helpline	Speak and Listen Up! continues to be used as the confidential and anonymous (if preferred) channel to raise sensitive concerns. No modern slavery concerns were reported during the period. The helpline remains available for employees and supply chain partners.
6. Leadership accountability in addressing concerns	The Australian Leadership Team investigates all relevant matters, ensuring accountability at the highest levels.

As market leaders in our industry, Compass Group Australia continues to be aligned with the aims of, and remains committed to, complying with the *Modern Slavery Act 2018* (Cth), and will continue to both invest in and work towards the ultimate goal of eradicating modern slavery worldwide.



IN FY24 REPORTING PERIOD:

- 100% of Foodbuy Australia team trained in modern slavery risk awareness
- Targeted modern slavery training delivered to mid- and senior-level management across Compass Group Australia
- Continued development of our Third-Party Integrity Due Diligence Policy platform, now reaching more than 50% of Total Spend reviewed on the platform and applied to all new suppliers onboarded in the period
- 85% of our Tier 1 high-risk categories spend for modern slavery risks reviewed
- 80% of our Tier 2 (Manufacturers) in High-Risk categories assessed
- Presented at a Sedex online forum for APAC members on best practices and learnings in implementing modern slavery governance
- Continued commitment, attendance and participation in the global Human Rights Working Group in sharing both best practice insights and case studies with our global Compass Group peers
- Strengthening engagement with both SME and social enterprises, to undertake and complete SEDEX Self-Assessment Questionnaire alongside independent SMETA auditing.

1. Introduction to Compass Group Australia

This statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (Act). It describes the steps Compass Group (Australia) Pty Ltd (ABN 41 000 683 125 of 35-51 Mitchell Street, McMahons Point, NSW 2060) (**CGA**) and its wholly owned or controlled subsidiaries have taken between 1st October 2023 to 30th September 2024 (**Reporting Period**) to identify, assess, and take action to eradicate potential modern slavery risks in Compass Group Australia's operations and supply chain.

The following CGA subsidiaries are Reporting Entities for the purposes of the Act.

- Compass Group B&I Hospitality Services Pty Ltd ABN 82 089 388 143
- Compass Group Defence Hospitality Services Pty Ltd
 ABN 80 089 388 134
- Compass Group Education Hospitality Services Pty Ltd ABN 60 129 203 998
- Compass Group Healthcare Hospitality Services Pty Ltd ABN 79 114 320 615
- Compass Group Remote Hospitality Services Pty Ltd ABN 98 113 561 363
- Delta FM Australia Pty Ltd ABN 64 157 852 054.

This joint statement is made by CGA on behalf of the Reporting Entities and all of CGA's other wholly owned or controlled subsidiaries (**Compass Group Australia**).

CGA's Board and Australian Leadership Team have approved this statement and support Compass Group Australia's efforts to eradicate modern slavery.





OUR STRUCTURE AND OPERATIONS

Compass Group Australia operates several brands, including ESS, Omega Security, Medirest, Eurest, Chartwells, Delta FM, Rapport, Morrison Living, 28 Villages, Levy and Restaurant Associates. We provide a broad range of food and beverage catering and facilities management services, including employee and student dining and food halls, retail and vending solutions, corporate and events catering, fine dining and concierge services, front of house and reception services, client site maintenance, cleaning and accommodation management, patient and resident meals, security and facilities management and supply chain design and management services.

Our operations across Australia are extensive and include both onshore and offshore facilities, reflecting our diverse client base encompassing schools and universities, hotels and cultural institutions, corporate business and major venues, the energy, resources and Defence sectors, and hospitals and aged care facilities. Compass Group Australia also has a small operational presence in Timor-Leste.

On 13 December 2024, Compass Group Australia acquired a majority shareholding in Applejack Hospitality Services Pty, the owner of 11 restaurants, bars, pubs and cafes in Sydney. Due to the timing of the acquisition, being outside of the reporting year, the Applejack Group has not been included in this Statement.

Compass Group Australia and the Reporting Entities are companies incorporated in Australia. Compass Group Australia's ultimate parent company is Compass Group PLC, which is listed in the UK and has operations throughout the world. Compass Group PLC shares our goal of eradicating modern slavery and has published its own Modern Slavery Statement pursuant to the provision of section 54 of Modern Slavery Act Statement 2024 (UK), found here*

*https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/compass-group-modern-slavery-statement-2024.pdf



AS COMPASS AUSTRALIA, WE...

Serve a better future

by enriching people, communities and the planet.

And we do this because we believe that...



Everyone should be seen and nourished as a whole person



Great service starts with understanding what people value most





Positive change for our planet's future starts with

better choices today

unique

To positively impact a community,

we must respect what makes it



MODERN SLAVERY GOVERNANCE FRAMEWORK

As a leading food and support service company in Australia, we recognise and value both our responsibility and the positive role we play in eradicating modern slavery. We are aware of the inherent risks modern slavery can pose from the internal and external operating factors and have embedded ethical business practice requirements, through our policies and organisational structure.







OUR OPERATIONS

15,000+ employees 700+ client locations 52 million meals served each year

Our Australian footprint

Hundreds of thousands of people around Australia rely on us to not only provide their breakfasts, lunches and dinners but a full range of support services. We partner with our clients to create tailored service solutions that deliver exceptional quality and value for money for their customers and employees.

Our global spread

Globally, we bring together the combined strength of a Group which operates in:

countries with more than

people we engage and employ globally, serving



delivering the same superior standards of service globally, daily, personally.

OUR SERVICES



Canteens & Food Halls



Facilities Management





Design & Construction



Retail & Vending solutions



Cleaning & Accommodation Management



BUSINESS & INDUSTRY Meeting the food and support service needs of clients from consumer retail to in-house staff canteens.



Venues

& Events

Health

& Wellness

Fine Dining and Concierge



Airline Lounge Passenger Services



FACILITIES MANAGEMENT Offering our clients both hard and soft FM services, supported by Intelligent FM technology.



Patient & Resident Services



Corporate

Catering

Transport Services



EDUCATION

Providing specialist food, hospitality and management services to schools and universities throughout Australia.



SECURITY SERVICES

A specialist division providing clients with tailored security services including personnel, electronic monitoring and emergency response.



OFFSHORE & REMOTE Supplying food and associated support services to remote mining and construction camps and offshore platforms.



DEFENCE Supplying food and associated support services to the Australian Department of Defence.



HEALTHCARE & SENIOR LIVING

Providing non-clinical services to hospitals and residential aged care homes including catering, cleaning, laundry and maintenance.



STADIA & VENUES

Levy specialises in delivering high quality food and drink experiences in the sport, arena and confex sectors.



OUR SUPPLY CHAIN

Compass Group Australia operates through a vast and intricate supply chain, working with over 1,800 suppliers and subcontractors. To uphold best practices and ensure procurement due diligence, the company manages its sourcing through <u>Foodbuy Pty Ltd</u>[†], a wholly owned and dedicated centralised procurement and supply chain business.

Foodbuy Australia is responsible for sourcing, contracting, and providing the technology and expertise to efficiently manage the supply of goods and services across Compass Group Australia's operations, as well as for its independent clients. This includes food and beverage production and distribution, cleaning consumables, supply manufacturing and distribution, vehicles, IT equipment, PPE, logistics, labour hire, and subcontracted services such as trades. We maintain the same high ethical standards for our suppliers and manufacturers as we do for our own operations.

Both Compass Group Australia and Foodbuy Australia value their strong working relationships with Australian-based producers, manufacturers, suppliers, First Nations businesses, and Small and Medium Enterprises. While we prioritise local procurement, some products are sourced internationally or produced overseas. We also acknowledge that many of our Australian-based suppliers operate within their own complex global supply chains.

2. Our Modern Slavery Risk Areas

The nature of our operations is associated with delivering hospitality and support services, which are recognised by the International Labour Organisation (ILO) as potentially posing higher risk of modern slavery, compared with some other industries.

In identifying and assessing the risks of modern slavery within our operations and supply chain, we utilise an extensive risk-based approach and a set of tools, processes, and information, including:

- The International Labour Organisation's publications and research, including the Ethical Trade Initiative Base Code for Labour Standards: <u>ETI Base Code</u>**
- Sedex (Supplier Ethical Data Exchange) risk assessment tools and supplier self-assessment questionnaire
- SMETA (Sedex Members Ethical Trade Audit) audits and other third-party labour audits conducted at our suppliers' facilities
- Our Third-Party Integrity Due Diligence platform, mandatory for all new suppliers
- Outcomes of publicly available relevant investigations and screening results uncovered through the Third-Party Integrity Due Diligence platform
- Regular supplier visits and performance reviews conducted by our Procurement team in collaboration with the Health, Safety, Environment, and Quality (HSEQ), Legal and Diversity, Equity and Inclusion teams
- Guidance and learnings from Compass Group PLC's Global Human Rights Working Group
- Engagement with consultants and specialist subject matter experts to assess internal labour hire and payroll systems
- Information and escalation from our *Speak and Listen Up!* anonymous whistle-blower program available to all Compass Group employees and suppliers.

Compass Group Australia identifies and assesses modern slavery risk arising from internal and external operating factors separately, allowing for flexible and targeted risk management, monitoring, and prevention.



** https://www.ethicaltrade.org/eti-base-code#:~:text=7.1%20There%20is%20no%20discrimination,union%20membership%20or%20political%20affiliation.

INTERNAL OPERATING FACTORS

Our people work across a large variety of industries, servicing clients in multiple sectors on a daily basis, and are central to our operations. Our large and diverse workforce, alongside our commitment to delivering outstanding services in a safe environment requires that we continually assess and review the recruitment and working conditions within our own operations and client sites under our management. This includes regular review of our human rights policies and frameworks in relation to the communities where we operate, safeguarding workers' rights, First Nations Peoples' rights and community wellbeing.

During the Reporting Period, we focussed on the following identified potential risk areas within our internal and external agency recruitment process:

- Verification of age
- Entitlement to work
- Language competency
- Labour hire
- Payment accuracy
- Excessive hours and overtime
- Salary bondage.

Reflecting on the significant changes in the Australian labour market and employment environment since the early 2020s (predominantly due to the COVID-19 pandemic), our operations have required an increased use of labour agencies to ensure the continuity of service provision to our clients. Since the use of labour hire agencies is inherently associated with a higher risk of modern slavery, compared to sourcing through our own recruitment team, in the Reporting Period we have:

- Developed and embedded additional strategies and processes to further clarify our ethical sourcing requirements to our contracted labour hire agencies; including contract enhancements, right to audit, and expectations around the Employer Pays Principle, where no worker should have to pay any recruitment fees to get a job
- Completed a review of our labour hire agencies' risk profile, which led to amendments being introduced in our Compass Group Australia agency agreement terms and conditions with audits conducted when required
- ✓ Enhanced and increased our internal recruitment capacity and capability to reduce the ongoing requirement for external labour hire agencies across our business.





EXTERNAL OPERATING FACTORS

As a leader in the catering industry with a diverse supplier base, Compass Group Australia acknowledges the risks of modern slavery within our extensive domestic and international multi-tiered supply chain. Given the complexity, scale, and variety of the products and services we procure, we remain committed to identifying and addressing these risks.

Our direct and indirect supply chains span industries such as textiles, agriculture, food production and distribution, and hospitality and facilities management services sectors that may present a heightened risk of modern slavery.

During the reporting period, in alignment with our structured risk assessment framework and four-year strategy, we have continued to focus on high-risk supply chain categories, including:

- Horticulture and meat processing, particularly where seasonal workers—both domestic and migrant—are employed
- Apparel manufacturing in high-risk regions

- Food warehousing and distribution
- Engagement with small and medium-sized subcontractors and service providers, including domestic and international labour hire agencies.

We also recognise the increased risks within our indirect supply chain, particularly with international suppliers whose operations can be more challenging to assess. Key product categories identified as having an elevated risk of modern slavery within our operations include:

- Coffee, cocoa, and tea
- Seafood
- Rice
- Fruit and vegetables
- Apparel and uniforms.

These risks are reviewed annually in collaboration with the Modern Slavery Working Group and Compass Group's Ethics and Integrity team to ensure continuous improvement and accountability.

To enhance supply chain transparency, we leverage Sedex to assess risks associated with suppliers' locations and commodities, alongside our internal Supply Chain Risk Framework. In the reporting period, aligned with our Global Supplier Code of Conduct, we have reinforced Sedex membership within our supply base and encouraged suppliers to complete the Sedex Self-Assessment Questionnaire. To support businesses with limited resources, we have provided direct guidance, training, and on-site support, ensuring fair participation without undue burden.

Beyond Sedex, Foodbuy Australia's Procurement team and Compass Group Australia's Health and Safety teams conduct risk assessments for all prospective suppliers. Existing suppliers undergo regular performance reviews, including discussions on working conditions and, when necessary, audits. In FY24, this process was further strengthened through the implementation of our Third-Party Integrity Due Diligence process, which is now mandatory for all new suppliers. This initiative allows for active monitoring of suppliers through a centralised platform, reinforcing our commitment to ethical sourcing and supply chain accountability.

3. Actions to Assess and Address Risk



ADDRESSING RISKS IN OUR INTERNAL OPERATING ENVIRONMENT

To ensure compliance with modern slavery regulations and uphold ethical recruitment practices, our Recruitment team conducts rigorous audits at multiple levels. Specifically, our recruitment processes and approved Enterprise Agreements capture and cover the associated risks in our people onboarding and payment process. Our risk assessment and remediation are covered by the following protocols:

- Dedicated internal Recruitment and Payroll team
- Collection and verification of working rights and identification documentation
- Validation of international applications working rights via <u>https://immi.</u> <u>homeaffairs.gov.au/</u> online visa verification tool
- Integrated Recruitment and Payroll systems which capture work rights status
- Efforts to reduce agency labour through utilising Compass Group-specific casual labour pools
- Weekly and Monthly spot checks on new hires to validate recruitment process adherence
- Quarterly KFC (Key Financial Controls) audits of our processes
- Annual reviews with our parent company.

Weekly audits by team leaders verify full process completion for every hire, ensuring merit-based hiring, work rights validation, and a fair recruitment process. National Recruitment Managers perform monthly audits to identify and remediate any process gaps. Quarterly audits, as part of the formal CGA KFC process, focus on contract and work rights compliance. Additionally, an annual audit by the Global Compass Group PLC team has confirmed our processes as among the strongest within the Group. To mitigate risks related to salary bondage, Payroll conducts guarterly audits, identifying anomalies in bank accounts that could indicate potential exploitation.



As part of our commitment to First Nations communities, we actively engage with numerous Aboriginal and / or Torres Strait Islander entities, including Ashburton Aboriginal Corporation, Bloodwood Tree, Workforce Australia, Creating Communities, BTAC, Kariyarra Aboriginal Corporation, Koolankga Group, Saltbush, Wiradjuri Condoblin Corporation, and many others.

These partnerships facilitate a deeper understanding of the unique needs of each community, enabling us to effectively identify and engage with potential jobseeker candidates within those local areas. We provide ongoing support and guidance throughout the entire recruitment process.

Collaborating with Aboriginal organisations within communities allows us to create positive pathways towards meaningful mainstream employment opportunities for more vulnerable workers. It is imperative that we continue to work closely with First Nations Leaders and their communities to ensure our operations demonstrate the utmost respect and recognition of their rich cultural heritage, including their deeply rooted cultural practices and obligations.



This approach also ensures the creation of culturally safe workspaces for First Nations employees. Our employment standards are carefully considered to respect and accommodate necessary cultural practices and protocols that remain integral and faithfully practiced within their communities. Additionally, around 35% of Compass Group's Australian workforce (5,537 team members) is employed under Enterprise Agreements, with the others employed through individual contracts or Modern Awards. Agreements confer minimum pay and entitlements and typically provide for consultation regarding significant operational changes. Compass Group recognises the rights of team members to negotiate collectively, with or without the involvement of third parties.

CASE STUDY

Introduction of the KFC (Key Financial Control) Audit Requirement – Targeting Salary Bondage

As part of our KFC audit process, we've introduced a quarterly process where our Payroll team will conduct reviews to assess the potential of salary bondage existing within our workforce.

Salary bondage can occur where a candidate is coerced into an employment via a third party and the benefits of the employment do not go to the employee directly. This can be due to personal debt or other factors. This creates a scenario where the employee feels they cannot leave their current job without facing severe financial consequences.

The aim of the audit is to identify anomalies in bank accounts that could indicate potential exploitation for the employees. This can include a same bank account used for multiple employees.

POLICY AND STANDARDS

Compass Group Australia is committed to continuously reviewing and strengthening its policies and practices to maintain the highest ethical standards and address emerging risks across its businesses globally. Ongoing review processes include sharing best practices across our global organisation to help identify potential risks and enhance ethical practices within each country's supply chains.

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

The following policies provide minimum standards and guidance to all members of Compass Group Australia and suppliers with regards to Human Rights, Modern Slavery and Responsible Sourcing:

- Code of Business Conduct (CBC Compass Group PLC) launched in 2023, provides principles-based guidance to support Compass in upholding high ethical standards and commitments, as well as complying with applicable laws and regulations
- Global Supplier Code of Conduct (SCOC Compass Group PLC) launched in 2022 and applies to all of Compass Group's supply chain partners globally. It extends the Code of Business Conduct principles to supply chain partners and sets out Compass high ethical standards, expectations and principles
- Human Rights Policy (Compass Group PLC) highlights the responsibility to respect human rights within Compass's businesses and their supply chains
- Supply Chain Integrity Policy (Compass Group PLC) is applicable to all Compass Group procurement activity, and sets out how Compass Group encourages compliance with the ETI Base Code
- Business Integrity Policy (BIP Compass Group Australia) sets out clear standards of behaviour that Compass expects from all personnel to demonstrate and showcases Compass's commitments to promoting a culture that upholds honesty, ethics and integrity
- 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
- Employee Code of Conduct (Compass Group Australia) last updated November 2023 and outlines CGA's policy and procedure for appropriate behaviour standards for all employees
- Speak and Listen Up (Compass Group Australia) last reviewed / updated December 2023: Empowers individuals to raise concerns in a safe, confidential way, guiding them on how to voice their concerns effectively. This policy is supported by an internal portal to facilitate the engagements
- Recruitment Policy (Compass Group Australia) last reviewed December 2022: Outlines the management of recruitment, transfers, secondments and other contract variations for new and existing employees.

ADDRESSING RISKS IN OUR SUPPLY CHAIN

Our due diligence framework continues to evolve, integrating new and existing tools to assess and manage risks effectively across our supply chain. By considering Compass Group Australia's complexity, size, operational sectors, and specific supplier and client requirements, we tailor our approach to address human rights risks, particularly for higher-risk categories.

This approach is reinforced through a combination of internal frameworks and collaborations with Compass Group's global network, including relationships with third-party industry leaders such as Sedex. The Global Supplier Code of Conduct, issued by Compass Group PLC, remains central to our third-party risk management strategy, ensuring ethical and responsible sourcing practices across all our operations.

To strengthen our ability to assess and mitigate risks related to business integrity, human rights, and environmental concerns, we have deployed a Third-Party Integrity Due Diligence process. This initiative is supported by an advanced online screening and risk management tool designed to enhance supply chain transparency and accountability.

First piloted in FY23 by Compass Group Australia and officially rolled out across multiple Compass Group countries in FY24, the Third-Party Integrity Due Diligence process has been instrumental in identifying potential risks, including adverse media reports linked to supplier profiles. Over 800 supplier profiles—including labour agencies, subcontractors, distributors, retailers, and wholesalers—were created on the platform during the reporting period.

Through this process, we have identified high-risk suppliers, and in certain cases, Compass Group Australia has chosen not to proceed with engagements following a thorough risk assessment. For those flagged as high risk, ongoing monitoring ensures swift intervention if any compliance breaches occur.





Beyond screening new suppliers, the Third-Party Integrity Due Diligence process also facilitates active, daily monitoring of existing supplier profiles. If new adverse media or risk indicators emerge, automated alerts are sent to the procurement team and Risk Manager, triggering a structured response process. The Third-Party Integrity Due Diligence process covers a broad spectrum of risks, including:

- Trade and economic sanctions
- Bribery and corruption
- Anti-competitive behaviour
- Money laundering and terrorist financing
- Fraud and theft
- Data privacy breaches
- Human rights and modern slavery violations
- Environmental concerns, such as pollution and biodiversity loss
- Regulatory enforcement actions and compliance failures.

To ensure the effective implementation of the Third-Party Integrity Due Diligence process, we have conducted extensive training for our procurement team, equipping them with the necessary skills to identify, assess, and escalate risks appropriately. Looking ahead, we plan to expand the platform's reach to encompass our entire supplier base and integrate it within our newly established Supply Chain Risk Management framework.

In parallel with the Third-Party Integrity Due Diligence process, Compass Group Australia continues to strengthen supplier engagement through the Sedex global platform. Sedex membership is now a requirement within our supplier agreements, particularly for SMEs operating in high-risk categories. To facilitate this transition, we have provided direct guidance and support to suppliers in establishing their Sedex profiles, including assistance with completing self-assessment questionnaires, ensuring greater transparency and compliance across our supply chain.



CASE STUDY

SME Sedex Engagement

During the period, we reinforced the requirement for suppliers in high-risk categories to have an active Sedex profile with a completed Self-Assessment Questionnaire, alongside a SMETA audit of no less than twelve months where required.

We are conscious of the impact this might have on SME partners who might have limited capabilities and resources to address these new obligations. As such, we have been providing direct support to help suppliers go through the process and become compliant, ensuring a fair opportunity to all. This included spending a day at a supplier's facilities to complete the self-assessment questionnaire alongside them and guiding them through each step to ensure compliance.

We also supported a micro enterprise in the Tea category via a direct engagement with their wholesaler on behalf of the supplier, which led to a review of the wholesaler's processes and governances towards the tea plantations they purchase from. This deep dive led to us obtaining certification and proof of onsite labour audits in the plantations, highlighting the importance of a strong understanding of the modern slavery risks for all parties in the supply chain. The supplier consequently joined Sedex and are maintaining their Self-Assessment Questionnaire at 100% completion.



CASE STUDY

Addressing risks in a global environment

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

A global briefing was held with procurement directors in key Compass Group countries. This led to a project where we strengthened our due diligence efforts and engaged directly with each Seafood suppliers to better understand their supply chain. This included ensuring that their Sedex profiles were up to date alongside the country of origin for the Seafood products provided to Compass Group.



TRAINING AND AWARENESS

Training and awareness are essential to identifying and addressing the risks of modern slavery. In the Reporting Period, we have invested in further training for our procurement team, achieving a 100% trained milestone for all Foodbuy Australia team members. Our training approach is two-fold:

- 1. Internal ethical procurement training focussed on raising awareness and recognising signs and indicators of modern slavery, as well as the escalation processes and procedures in case a concern has been identified.
- 2. External training delivered in collaboration with Sedex, aimed at providing relevant tools to enable our procurement team to effectively assess risks and gain increased visibility over the extended supply chain.

Our modern slavery framework is underpinned by a four-year Modern Slavery Eradication Plan, which is subject to annual reviews and assurance gateways at the Foodbuy Executive level.

4. Assessing the Effectiveness of our Actions



Our approach to assessing the effectiveness of our actions in supporting our commitment to eradicating modern slavery remains consistent and includes the following indicators which are regularly tracked by the Modern Slavery Working Group:

- 1. Number of human rights grievances reported by Compass Group's people via *Speak and Listen Up* program!
- 2. Total number of incidents of substantiated human rights breaches and actions taken
- 3. Significant actual and potential adverse human rights impact in the supply chain and actions taken
- 4. Proportion of high-risk suppliers reviewed compared to the total high-risk spend
- 5. Outstanding audit non-compliances and relevant corrective actions
- 6. Third-Party Integrity Due Diligence platform adoption rate and implementation updates.

Compass Group Australia closely collaborates with Compass Group PLC's Global Human Rights Working Group to enhance knowledge and information sharing across geographies. Speak and Listen Up! remains an important element of identifying and promptly addressing the risks of modern slavery in our direct operations and within our supply chain. Our suppliers and their workers have access to this confidential and independently operated multilingual whistle-blower program. Information received through Speak and Listen Up! Is promptly addressed at the highest Compass Group executive levels of the relevant jurisdiction.

CODE OF BUSINESS CONDUCT CONCERN? IF IT DOESN'T FEEL RIGHT, FOLLOW YOUR INSTINCTS

Physical Violence | Drugs & Alcohol | Harassment | Human Rights | Bribery & Corruption | Theft & Fraud | Illegal Activitie



 ↓
 Scan me for more info

 KUPI
 1800 950 676

 www.letintegritybeyourguide.com/speakup

 UP
 100 205 January



OUR SUPPLY CHAIN

In the Reporting Period, no human rights-related issues have been raised through Speak and Listen Up! In Australia. However, understanding and acknowledging the complexity and multi-dimensionality of modern slavery, we do not take the absence of Speak and Listen Up! contact as the evidence of lack of modern slavery-like conditions in our extended supply chain. To identify, assess, minimise, and manage risk, we are proactively engaging with Sedex and our suppliers to continually increase our overall supply chain transparency and traceability.

Through our FY24 programs, Supply Partners representing 85% of our annual purchasing in high risk spend categories are now fully assessed for their modern slavery governance, alongside 75% of our Tier 2 (manufacturers), which was a process started in FY24 and thus a great achievement thanks to our focus on Sedex onboarding and the TPIDD policy implementation. The Supply Chain Sustainability & Risk manager alongside the Procurement Team have also engaged pro-actively with multiple suppliers to review audit findings and corrective actions to ensure that all issues identified have been addressed.

5. Consultation Process

All of Compass Group Australia's subsidiaries and controlled entities share the common values and commitment to responsible business practice, including the efforts to eradicate modern slavery.

In compiling and finalising this statement, we have engaged and consulted with:

- The Australian Leadership Team on behalf of Compass Group Australia's wholly owned subsidiaries and the entities that it controls.
- Members of our Recruitment, Payroll, Human Resources, and Health and Safety teams who are engaged in ensuring compliance with our operating policies and procedures across Compass Group Australia's operations.
- Members of our Foodbuy procurement and supply chain organisations responsible for supporting Compass Group Australia's procurement.
- The Compass Group Global Human Rights Working Group.

This statement was formally approved by CGA's Australian Leadership Team on 12th of March 2025 before being signed by CGA's Managing Director and Executive Director – Foodbuy Australia.



