

# Modern Slavery Statement 2022





 **COMPASS**  
GROUP

Nourishing communities that help the planet thrive

**Chartwells**  


**ESS**  
Support Services Worldwide

**Eurest**

**RESTAURANT  
ASSOCIATES**

**medirect**  


 **DeltaFM**

 **OMEGA**  
SECURITY SERVICES

*Morrison*  
LIVING

**Foodbuy**

# Our Commitment



As a global leader in its industry, Compass Group recognises and embraces its responsibility in making a positive contribution to the people, customers, and the communities in the various markets in which we work and live. This is reflected in Compass Group's 'Planet Promise' global commitment to a sustainable future. It encompasses our values as an ethical, sustainable, and inclusive business; the commitments we make to our people, our clients, and our suppliers; and our efforts to have a positive impact on the world through sourcing responsibly.

In Australia, through the relationships between our operations community and our Foodbuy Australia procurement team, we continue to invest in processes, systems, and training to ensure we source our products and services from suppliers that share these same ethical values and especially in relation to the efforts towards the eradication of modern slavery and in respecting human rights across our supply chain both domestically and globally.

We share these commitments openly, embed them within our commercial relationships and encourage everyone to help us uphold the high ethical standard we expect of ourselves and our suppliers.

This is Compass Group Australia's third Modern Slavery Statement—an opportunity to review and assess the maturity of our systems and processes, designed to support our *Eradicating Modern Slavery in our Supply Chains* policy first issued in 2019. Since then, we have launched our WorldFirst™ ethical sourcing framework to support our clients with their ethical procurement objectives and heightened our focus internally on identifying potential risks of modern slavery in our operations and supply chain. We continue to be supported and guided in these endeavours by our ultimate parent company, Compass Group PLC, which is listed in the UK and is committed to complying with the *Modern Slavery Act 2015* (UK).

We continue to focus on the key areas identified at the onset of our modern slavery eradication journey and to track their progress.

## OUR MODERN SLAVERY FOCUS AREAS

FOCUS AREAS	STATUS/PROGRESS
1. Continually reviewing and assessing our sourcing, contracting and supplier selection processes and technologies through our centralised and globally recognised procurement business, Foodbuy Pty Ltd.	The new <a href="#">Global Supplier Code of Conduct</a> * issued by Compass Group PLC has been included into procurement templates and the supplier selection process alongside a structured communication and formal acknowledgement process from our supply chain, reflecting over 80% of our continued use products and services.
2. Actively communicating our expectations to our suppliers and enforcing standards through our contracts.	Discussing the risks of modern slavery is becoming an increasingly regular part of our conversations with suppliers and our site visits. New supplier contracts contain anti-modern slavery provisions. Online information sessions for suppliers will be rolled out in 2023.
3. Conducting targeted audits through third parties and partnerships with industry expert organisations.	We use Sedex (Supplier Ethical Data Exchange), suppliers' ethical certifications, and third-party audit findings, to assess the risks of modern slavery and have reviewed the audit findings of our suppliers on Sedex during the Reporting Period.
4. Investing in targeted training for our teams, supported by the learnings from Compass Group's global, multi-disciplinary Human Rights Working Group.	<p>Modern slavery awareness training is mandatory for everyone in our procurement business, and we maintain 100% training completion rates for our procurement team.</p> <p>Modern slavery awareness training for the wider Compass Group team continues to be rolled out via Compass Group's global training platform with a focus on leaders on a risk to role basis, and also through internal legal compliance training sessions.</p> <p>Key stakeholders from our Australian business meet monthly with their global counterparts to share best practice and learnings through the multi-disciplinary Human Rights Working Group.</p>
5. Providing our people with access to the independently operated helpline <i>SpeakUp!</i> to report any concerns relating to modern slavery.	We continue to use <i>SpeakUp!</i> as the confidential and anonymous (if preferred) channel to raise sensitive concerns. In the Reporting Period there were no modern slavery-related concerns raised through <i>SpeakUp!</i>
6. Investigating and addressing concerns that are identified at the very highest levels of our Australian Leadership Team.	The Australian Leadership Team is accountable for investigating all relevant matters raised from internal and external sources.

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



**Jo Taylor**  
 Managing Director  
 Compass Group Australia  
 13<sup>th</sup> March 2023



**Andrew Brightmore**  
 Executive Director  
 Foodbuy Australia  
 13<sup>th</sup> March 2023

\*[http://foodbuy.com.au/wp-content/uploads/2022/08/Foodbuy\\_GlobalSupplierCodeofConduct\\_FINAL.pdf](http://foodbuy.com.au/wp-content/uploads/2022/08/Foodbuy_GlobalSupplierCodeofConduct_FINAL.pdf)



### **IN FY21-22 REPORTING PERIOD:**

- 100% of the Foodbuy Australia team have been trained in modern slavery risks awareness
- Targeted modern slavery training delivered to mid-and senior-level management across Compass Group Australia, on risk to role profile
- Released and implemented Compass Group's new Global Supplier Code of Conduct
- Engaged a dedicated Supply Chain Sustainability & Risk Manager, supported by the Modern Slavery Working Group
- Reviewed progress against our four-year Modern Slavery Plan, including review of our designated high-risk categories and the next phase of supplier auditing.

# 1. Introduction

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, McMahon's Point, NSW 2060) (**CGA**) and its wholly owned or controlled subsidiaries have taken between 1 October 2021 to 30 September 2022 (**Reporting Period**) to identify, assess, and take action to eradicate potential modern slavery risks in Compass Group Australia's operations and supply chain.

- 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

## (Reporting Entities)

This 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 (CGA) operates several brands, including ESS, Omega Security, Medirest, Eurest, Chartwells, Delta FM, Morrison Living, 28 Villages 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, 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, major venues, the energy, resources and Defence sectors, hospitals & aged care facilities, and business & industry. Compass Group Australia also have a small operational presence in Timor-Leste.

CGA and the Reporting Entities are companies incorporated in Australia. CGA'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 2022 \(UK\)\\*\\*](https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/Compass%20Group%20Modern%20Slavery%20Act%20Statement%202022.pdf)

\*\*<https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/Compass%20Group%20Modern%20Slavery%20Act%20Statement%202022.pdf>.



## MODERN SLAVERY GOVERNANCE FRAMEWORK

As one of the largest catering and support services companies in Australia, we recognise and value both our responsibility and the positive role we can play in helping to eradicate 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 both through our policies and organisational structure.

Figure 1: Compass Group (Australia) Pty Ltd's modern slavery governance framework







## OUR OPERATIONS

**52 million**

Meals p.a.

**700**

Locations  
Australia wide

**13,000**

Employees

**46,000**

Rooms serviced  
each day

**70,000**

Training courses  
completed p.a.

## Services



Canteens  
& Food Halls



Security Services



Retail & Vending  
Solutions



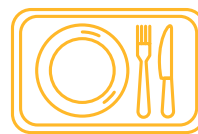
Venues & Events



Fine Dining  
& Concierge



Corporate Catering



Patient & Resident  
Services



Facilities  
Maintenance



Design  
& Construction



Cleaning &  
Accommodation  
Management



Health &  
Management



Airline Lounge  
Passenger Services



Logistic & Transport  
Services



**SCHOOLS & UNIVERSITIES:** operating under the brand 'Chartwells', Compass Group Australia operates high school cafes and university dining halls, including providing live-in college/boardings school meals and special event catering, as well as providing facilities services such as cleaning.



**BUSINESS & INDUSTRY:** operating under the brand 'Eurest', Compass Group Australia delivers a range of catering and facilities support services to business and industry clients throughout Australia. This includes providing catering, facilities, cleaning and concierge services to offices and other workplaces.



**VENUES & EVENTS:** operating under the brand 'Restaurant Associates', Compass Group Australia provides food and hospitality services at venues as well as providing in-house catering services to a portfolio of corporate clients.



**HOSPITALS & AGED CARE:** operating under the brand 'Medirest' and 'Morrison Living', Compass Group Australia provides specialist food, hospitality and support services to residents and patients in public and private hospitals and senior living/aged care facilities. This includes catering, cleaning, housekeeping, reception, garden maintenance and security services.



**FACILITIES MANAGEMENT:** operating under the brand 'DeltaFM', Compass Group Australia services defence organisations, offshore projects and remote industries and provides them with end-to-end facilities management and project management services.



**SECURITY:** operating under the brand 'Omega Security', Compass Group Australia provides clients with tailored security services, including security personnel, electronic monitoring, emergency response, access control, and risk management.



**ENERGY, RESOURCES & DEFENCE:** operating under the brand 'ESS Support Services Worldwide' and '28 Villages', Compass Group Australia provides workplace support in large-scale accommodation centres for companies operating the oil, gas, mining, construction and defence sectors.



## OUR SUPPLY CHAIN

Compass Group Australia's operations rely on an extensive and complex supply chain of over 3000 suppliers and subcontractors. To ensure best practice and procurement due diligence, Compass Group Australia operates a wholly owned and dedicated centralised procurement and supply chain business, [Foodbuy Pty Ltd](https://foodbuy.com.au/).<sup>†</sup> Foodbuy Australia is responsible for sourcing, contracting, and providing the technology and capability to appropriately manage the supply of products and services used across Compass Group Australia's operations in addition to separate Foodbuy Australia clients. This includes food and beverage production and distribution, cleaning consumables and supplies manufacturing and distribution, vehicles, IT equipment, PPE, logistics, labour hire, and services provided by subcontractors such as trades. We hold our suppliers to the same ethical standards and expectations as we do our direct operations.

Both Compass Group Australia and Foodbuy Australia recognise the shared values of their Australian-based producers and suppliers, Aboriginal and Torres Strait Islander businesses, and Small and Medium Enterprise supply partnerships. Despite all efforts to procure locally, some of the products we use are sourced from international suppliers, and we acknowledge that our direct Australian-based suppliers may rely on their own complex international supply chains

**100%**  
of our raw beef, lamb, pork,  
and poultry are sourced from  
Australian farms

<sup>†</sup><https://foodbuy.com.au/>



## CONTINUED COMMITMENT TO WORLDFIRST™

Since the previous Reporting Period, Compass Group Australia and Foodbuy Australia have continued to build internal capability and external client awareness of the Compass Group WorldFirst™ platform, which provides insights and knowledge share to support ethically responsible supply chains. Each element of the WorldFirst™ framework is supported by dedicated

tools and resources, with one of the key pillars being the eradication of modern slavery and building transparent supply chains. Foodbuy Australia's dedicated Supply Chain Sustainability & Risk Manager is supported by the Modern Slavery Working Group, composed of members from the procurement and legal professionals, to increase our supply chain transparency.



## 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 Organization (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 Organization's publications and research;
- Sedex (Supplier Ethical Data Exchange) risk assessment tools and supplier self-assessment questionnaire;
- A mandatory and robust internal Supplier Risk Assessment conducted prior to onboarding a new supplier;
- Regular supplier visits and performance reviews conducted by our Procurement team in collaboration with the Health, Safety, Environment, and Quality teams;
- Guidance and learnings from Compass Group PLC's Global Human Rights Working Group;
- Outcomes of publicly available relevant investigations;
- Engagement with consultants and specialist subject matter experts to assess internal labour hire and payroll systems; and
- Information and escalation from our *Speak 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.



## INTERNAL OPERATING FACTORS

We continually assess and review the recruitment and working conditions within our own operations and client sites under our management.

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; and
- Salary bondage.

Following the COVID-19 pandemic and reflecting the significant changes in the Australian labour market and employment environment, 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;
- Commenced the review of labour hire agencies' risk profile; and
- Enhanced and increased our internal recruitment capacity to reduce the ongoing use of labour hire agencies in our business.





## EXTERNAL OPERATING FACTORS

We understand that our direct and indirect supply chain includes industries such as agriculture, food production and distribution, as well as products and services associated with entry-level workers in hospitality and facilities management services, which may have a heightened risk of modern slavery.

During the Reporting Period and in line with our structured risk assessment framework and four-year strategy, we identified the following potential high-risk supply chain categories:

- Horticulture and meat processing, involving both domestic and migrant seasonal workers;
- Food products warehousing and distribution; and
- Engagement with small and medium-sized subcontractors and service providers (including domestic and international labour hire agencies).

We understand the increased risks of modern slavery within our indirect supply chain, particularly with suppliers whose operations are based internationally and can be more difficult to assess.

We have identified the following key product categories as having increased risk, and most present within our operations:

- Coffee and cocoa;
- Seafood;
- Sugarcane, meat, nuts, corn and sunflower products, palm oil, sesame and beans, and rice;
- Textiles and clothing;
- Tobacco products; and
- Consumables.

We use Sedex to support our assessment of inherent risks associated with new suppliers' location and commodities. In the Reporting Period, we implemented the requirement for new suppliers to obtain a Sedex membership and 100% completion of the Self-Assessment Questionnaire, to increase supply chain transparency and accountability.

In addition to using Sedex as an assessment tool, Foodbuy Australia's Procurement team and Compass Group Australia's Health and Safety teams conduct risk assessments on all prospective suppliers. Our existing suppliers are subject to regular performance reviews, which include conversations about working conditions, and audits where required.

### 3. Actions to Assess and Address Risk



#### ADDRESSING RISKS IN OUR INTERNAL OPERATING ENVIRONMENT

We continually work to identify, assess, manage, and mitigate risk within our payroll, recruitment and associated Human Resources processes. 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 and trained internal recruitment and payroll team;
- Collection and verification of working rights and identification documentation;
- Validation of international applications working rights via <https://immi.homeaffairs.gov.au/> online visa verification tool;
- Integrated recruitment and payroll systems which capture work rights status;
- Efforts to reduce agency labour with Compass Group Australia's specific casual labour pools; and
- Monthly spot checks on new hires to validate recruitment process adherence.

Finally, our recruitment team have established a quarterly risk management review process where key risks associated with modern slavery are assessed (e.g. labour hire suppliers' compliance with our

anti-modern slavery contractual provisions and reporting obligations). This risk management cadence will lead to ongoing action and improvement planning as we test and assess these risks.





## ADDRESSING RISKS IN OUR SUPPLY CHAIN

As part of the continued efforts to review the global and domestic supply chain risks, Compass Group Australia have conducted a review of our standardised processes and documentation for supply contracts. As a result, our contracts now include detailed expectations and auditing requirements in relation to risks of modern slavery.

This includes leveraging technology to carry out formal supplier risk assessments (SRA) on both existing suppliers (during ongoing contractual periods) and new suppliers, to ensure both groups meet Compass Group's required safety, quality, certainty of supply, and social and ethical standards. Foodbuy Australia redesigned Compass Group Australia's pre-existing supply chain SRA platform in 2021, which is discussed in fuller detail in our statement for the previous reporting period. This technology solution was rolled out to all of Foodbuy Australia's national procurement category teams in Australia in 2022 as part of the existing regional and domestic supplier pre-selection standards, and 'inflight' procurement review processes.

In the Reporting Period, Compass Group PLC has issued and released an updated Global Supplier Code of Conduct (SCOC), with reinforced focus on

transparency, human rights, and labour standards. The SCOC represents an extension of our Code of Business Conduct and values, and sets out the high ethical standards, principles and behaviours we expect from our Supply Chain partners. The SCOC is an integral part of our approach to maintaining an effective third-party risk management framework. The five focus areas are business integrity and ethical principles; human rights and labour standards, health and safety, sustainability, and *Speak Up!*

The revised [Global Supplier Code of Conduct\\*](#) was issued to all key suppliers by direct and formal communication at the executive level and required acknowledgment of receipt and acceptance of terms. In addition, the values, standards, and requirements within the Code were communicated to all members of our Foodbuy Australia team and supported by specific training.

The Code launch was published through all media channels including our websites, LinkedIn, and Facebook, and embedded in all our standardised sourcing, tendering, and supply contract documentation.

\*[http://foodbuy.com.au/wp-content/uploads/2022/08/Foodbuy\\_GlobalSupplierCodeofConduct\\_FINAL.pdf](http://foodbuy.com.au/wp-content/uploads/2022/08/Foodbuy_GlobalSupplierCodeofConduct_FINAL.pdf)

To support the recognition, understanding and acknowledged compliance to this Code, alongside our broader values and expectations in positive action on modern slavery risks, our Foodbuy Australia procurement and supply chain teams reinforce the Code and its contents through our supplier Quarterly Business Review processes alongside all new and renewal and contracting activities.

*Speak 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 Up!* is promptly addressed at the highest Compass Group executive levels of the relevant jurisdiction.

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, reaching 100% 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 supported by the four-year Modern Slavery Eradication Plan, which is subject to annual reviews and assurance gateways. As a result of the latest review, Compass Group Australia established the Modern Slavery Working Group to support the Supply Chain Sustainability & Risk Manager, and to formalise the modern slavery risk assessment governance at all levels of the organisation.



## 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 three macro-indicators which are regularly tracked by the Modern Slavery Control Group:

1. number of human rights grievances reported by Compass Group's people via *Speak Up!* program;
2. total number of incidents of substantiated human rights breaches and actions taken; and
3. significant actual and potential adverse human rights impact in the supply chain and actions taken.

Compass Group Australia closely collaborates with Compass Group PLC's Global Human Rights Working Group to enhance knowledge and information sharing across geographies.

### OUR SUPPLY CHAIN

In the Reporting Period, no human rights-related issues have been raised through *Speak Up!* in Australia. However, understanding and acknowledging the complexity and multi-dimensionality of modern slavery, we do not take the absence of *Speak 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 2022 focus programs, Supply Partners representing 58% of our annual purchasing in high risk spend categories are now registered and formal Sedex members, allowing our Supply Chain Sustainability and Risk team with access to pre-existing independent audit reports as an additional source of information into our risk and compliance reviews.

The Modern Slavery Control Group, which includes the Executive Director of Foodbuy Australia, meets quarterly to assess progress against the four-year plan and discuss emerging risks and lessons learned.

## 5. Consultation Process

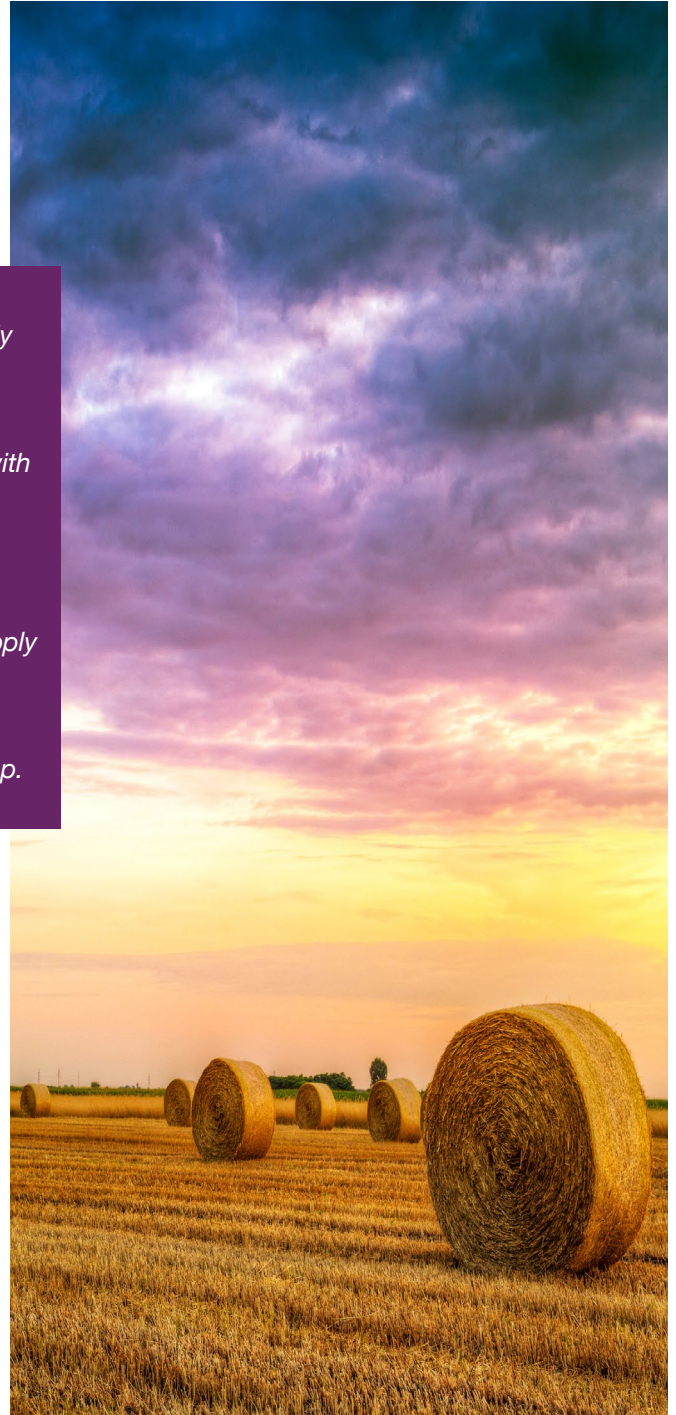
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All of CGA's subsidiaries and controlled entities share the common values and commitment to responsible business practice, including the efforts to eradicate modern slavery.

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

- *the Australian Leadership Team on behalf of CGA's wholly owned subsidiaries and the entities that it controls;*
- *members of our recruitment, payroll, HR, and health and safety teams who are engaged in ensuring compliance with our operating policies and procedures across Compass Group Australia's operations;*
- *Compass Group Australia's legal team;*
- *members of our Foodbuy Australia procurement and supply chain organisations responsible for supporting Compass Group Australia's procurement; and*
- *the Compass Group Global Human Rights Working Group.*

This statement was formally approved by CGA's Australian Leadership Team on 13th of March 2023 before being signed by CGA's Managing Director and Executive Director – Foodbuy Australia.



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communities  
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planet thrive

