



Modern Slavery

Statement 2025



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





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 document contains forward-looking statements in relation to Compass Group Australia, including 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 leader in food and support services, we remain committed to doing what is right, for our people, customers, shareholders, the communities we serve, and the planet, at Compass Group Australia. Since launching our Purpose in 2023, to Serve a Better Future by enriching people, communities and the planet, we have continued to embed these principles into our strategy, with recent years reinforcing and advancing this commitment.

Our passionate approach to the eradication of modern slavery from all supply chains includes:

- The continual review and refresh of our sourcing, contracting and supplier selection processes and technologies through our centralised and globally recognised procurement business, Foodbuy.
- The active communication of our expectations to all our suppliers and enforcement through our contracts.
- Conducting specific audits through both our own people and through partnerships with industry expert organisations.
- Our investment in targeted training to all our teams, supported by the learnings from Compass Group's global, multi-disciplinary Human Rights Working Group.
- Providing our people with access to our independently operated helpline 'Speak and Listen Up' to report any concerns relating to modern slavery.
- Concerns identified are investigated and addressed at the very highest levels of our Australian Executive leadership.



At Compass Group Australia, we recognise and embrace our responsibility and opportunity to make an enduring and positive contribution to the health and wellbeing of our team members, customers, the communities we work in and the world we live in. We commit to using our influence as an industry leader to learn, share, action and promote activities that support the principles of eradicating modern slavery, this includes those contained in the Modern Slavery Act 2018 (Cth) and the UN Declaration on Human Rights.

This marks Compass Group Australia’s sixth 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 company, 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 continued use of our Third-Party Integrity Due Diligence Policy.

Six years into our journey to support the eradication of modern slavery, we are proud of our accomplishments and are happy to share our ongoing progress.

Joanne Taylor
 Managing Director
 Compass Group Australia
 27th of March 2026

Toby Edmunds
 Executive Director
 Foodbuy Australia
 27th of March 2026

Highlights from FY25

FOCUS AREAS	STATUS/PROGRESS
1. Reviewing sourcing, contracting, and supplier selection processes through Foodbuy.	Continued development of the Third-Party Integrity Due Diligence Process, assessing the majority of new and high-risk suppliers. Over 1,800 supplier profiles have been created and assessed since its launch in 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. This is now re-enforced with mandatory updates in our Supplier Quarterly Business Reviews.
3. Utilising industry expertise to conduct third-party audits.	Continued utilisation of Sedex and SMETA audits to assess the risk of modern slavery in our supply chain. In FY25, Compass Group Australia updated its Sedex Self Assessment Questionnaire and completed its first four Pillars SMETA audit. Modern slavery governance and Sedex have been integrated to the Quaterly Business reviews with key suppliers.
4. Investing in targeted training.	100% of the Foodbuy team completed modern slavery training. Company-wide training is ongoing through Compass Group PLC's global platform on Harassment and Bullying prevention alongside our Grievance process.
5. Providing access to Speak and Listen Up helpline.	Speak and Listen Up continues to be used as the confidential and anonymous (if preferred) channel to raise sensitive concerns. Compass Group Australia has a robust investigations and escalation process to deal with any issues raised through the helpline or otherwise.
6. Leadership accountability in addressing concerns.	The Australian Leadership Team representatives will investigate relevant matters, ensuring accountability at the highest levels. The Ethics and Integrity platform was launched to provide greater transparency into ongoing actions within the business, with the progress shared with the leadership team and wider Compass Group PLC.
7. Measuring and tracking our impact Status/Progress	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. Target for FY26 to achieve 100% on all suppliers in High Risk categories.
8. Cross country collaboration and governance.	Continued commitment, attendance and participation in the global Human Rights Working Group, sharing both best practice insights and case studies with our global Compass Group peers. Roll-out of the Ethics & Integrity platform, aimed at tracking and measuring success across all modern slavery and human rights initiatives.

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

The numbers shared currently exclude Applejack whilst the integration work is in progress.

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, McMahon's Point, NSW 2060) and its wholly owned or controlled subsidiaries have taken between 1st October 2024 to 30th September 2025 (**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 Compass Group Australia subsidiaries are Reporting Entities for the purposes of the Act.

28 Villages Pty Ltd ABN 71 629 047 721.

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 Events Stadia Venues Hospitality Services Pty Ltd ABN 82 674 764 688.

Compass Group Healthcare Hospitality Services Pty Ltd ABN 79 114 320 615.

Compass Group Relief Hospitality Services Pty Ltd ABN 59 121 922 898.

Compass Group Remote Hospitality Services Pty Ltd ABN 98 113 561 363.

Delta FM Australia Pty Ltd ABN 64 157 852 054.

Foodbuy Pty Ltd ABN 22 623 079 863.

HEC Hospitality Services Pty Ltd ABN 46 652 326 193.

Omega Security Services Pty Ltd ABN 46 114 100 962.

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

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



Our Structure & Operations

Compass Group Australia operates several businesses, 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, restaurants and aged care facilities. Compass Group Australia also has a small operational presence in Timor-Leste.

On 13 December 2024, Compass Group Australia completed the acquisition of a majority shareholding in Applejack Hospitality Services Pty Ltd and its wholly owned subsidiaries (Applejack), a premier Sydney based hospitality group. A description of the work that has been undertaken to date, aligning Applejack with Compass framework can be found in the Applejack case study later in this Statement.

On 20 November 2025, Compass Group Australia made a strategic investment in The Big Group Pty Ltd, a premier luxury hospitality and event management company. Due to the timing of the investment, being outside of the reporting year, The Big 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 2025 (UK), found [here](#).*

*<https://www.compass-group.com/content/dam/compass-group/corporate/oar-2025/website-updates/modern-slavery-statement-2025.pdf>



As Compass Group 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



To positively impact a community, we must respect what makes it unique



Great service starts with understanding what people value most



Positive change for our planet's future starts with better choices today



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.

Compass Group (Australia) Pty Ltd’s Modern Slavery Governance Framework





Our Operations



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:



Our Services



Canteens & Food Halls



Security Services



Retail & Vending solutions



Venues & Events



Fine Dining and Concierge



Corporate Catering



Patient & Resident Services



Facilities Management



Design & Construction



Cleaning & Accommodation Management



Health & Wellness



Airline Lounge Passenger Services



Logistics & Transport Services



Sports, Leisure & Hospitality

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



Business & Industry

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



Facilities Management

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



Education

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



Security

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



Energy, Resources & Defence

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



Purchasing

Partnering with our clients to deliver new sources of competitive advantage and innovation through market-leading procurement, supply chain operations, and insight.



Healthcare & Senior Living

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



Our Supply Chain

Compass Group Australia operates through an extensive and complex supply chain, working with a large number of suppliers and subcontractors. This supply chain spans across multiple tiers, including direct suppliers, growers, manufacturers, distributors and wholesalers. Each of these partners play a critical role in delivering the products and services Compass relies on to meet our client's needs.

To uphold best practices, and ensure procurement due diligence, the company manages its sourcing through [Foodbuy](https://foodbuy.com.au/), 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.

<https://foodbuy.com.au/>

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, through its reliance on contracted and temporary labour.

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: [ETI Base Code](#).*
- 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 the majority of 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.
- Internal audits aimed at identifying risks and opportunities for process improvements.
- Engagement with consultants and specialist subject matter experts to assess internal labour hire and payroll systems.
- Engagement with peers in other Compass countries to share best practices and learnings.
- Information and escalation from our Speak and Listen Up anonymous whistle-blower program available to all Compass Group PLC 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 operate across a wide range of industries, supporting clients in multiple sectors every day, and they remain central to our success. With a large and diverse workforce, and a strong commitment to delivering exceptional services safely, we continuously evaluate recruitment practices and working conditions within our own operations and at the client sites we manage. This includes regularly reviewing our human rights policies and frameworks to ensure we uphold the rights and wellbeing of workers, support First Nations peoples, and respect the communities in which we operate.

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:

- ✓ Established a dedicated Workforce Optimisation team to support interim labour risk governance, including defining rules, controls and procedures for Compass sites, in collaboration with Foodbuy.
- ✓ Enhanced the collaboration between the Workforce Optimisation and Foodbuy teams, to review and validate the list of Interim Labour agencies available to use within Compass Group Australia, ensuring that all of them are bound by a contract.
- ✓ Amended our standard Labour agency contracts to include new clauses, such as a right to audit, minimum age working requirement or rights to review invoices.
- ✓ Adopted a detailed Service Level Agreement, embedded in all agencies contracts, with standard Key Performance Indicators to adhere to.
- ✓ Conducted an Internal audit to review various risk areas, including youth employment, master data analysis and modern slavery controls.
- ✓ 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 broad and diverse supplier network, Compass Group Australia recognises the potential risks of modern slavery within our extensive domestic and global multi tiered supply chain. Due to the scale, complexity and diversity of the products and services we procure, we remain firmly committed to identifying, mitigating and addressing these risks.

Our direct and indirect supply chains extend across sectors such as textiles, agriculture, food production and distribution, and hospitality and facilities management, which are identified as industries that can carry an elevated risk of modern slavery.

During the reporting period, in alignment with our Supply Chain Risk Management Framework, 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.
- 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 Australia'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 Management 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, with 92% of suppliers on Sedex completing. To support businesses with limited resources, we have provided direct guidance, training and on-site support, ensuring fair participation without undue burden. This support has been extended and re-enforced for Small and Diverse businesses, ensuring that organisations with limited resources could meet Compass Group Australia's expectations.

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 FY25, this process was further enhanced through the introduction of modern slavery governance and Sedex completion in our standard Quarterly Business Reviews with key suppliers. In this forum, Self-Assessment questionnaires and audit completions are reviewed and discussed, ensuring closer collaboration across the Supply Chain.

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 standards, our Recruitment team undertakes comprehensive audits across multiple stages of the hiring process. Our recruitment practices, and approved Enterprise Agreements, are designed to identify and address potential risks related to onboarding and payroll. These risk assessment and remediation activities are guided by the following protocols:

- Dedicated internal Recruitment and Payroll team.
- Newly established Workforce Optimisation Team, ensuring compliance with approved Interim Labour agencies.
- 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 through utilising Compass Group Australia-specific casual labour pools.
- Weekly and Monthly spot checks on new hires to validate recruitment process adherence.
- Mandatory Casual Pool & Agency Prerequisite Courses for all candidates, shared with agencies.
- 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 Compass Group Australia KFA (Key Financial Audit) 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 quarterly 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, Workforce Australia, Creating Communities, BTAC, Kariyarra Aboriginal Corporation, Koolankga Group, Saltbush, Wiradjuri Condoblin Corporation, Cosmo Newberry Aboriginal 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 percent of Compass Group's Australia's workforce (5,607 team members) is employed under Enterprise Agreements, with the others employed through individual contracts or Industry Awards.

Agreements confer minimum pay and entitlements, and typically provide for consultation regarding significant operational changes. Compass Group Australia recognises the rights of team members to negotiate collectively, with or without the involvement of third parties.



Case Study | SMETA Audit

March 2025 Compass Group Australia conducted its very first 4 Pillar Sedex Members Ethical Trade Audit (SMETA) Audit. This audit covers a comprehensive, in-depth evaluation of a company's ethical, social and environmental performance. The four pillars reviewed in the audit included:

1

Labour Standards:

- Wages & hours
- Forced & Child Labour
- Freedom of Association
- Discrimination & Treatment

2

Health & Safety:

- Workplace Environment
- Medical Access
- Training

3

Environment:

- Management Systems
- Resource Management
- Waste & Emissions
- Permits

4

Business Ethics:

- Anti-Corruption
- Data Protection
- Transparency

The audit was conducted by an independent third party across 4 days, with interviews and document reviews both on two sites and in the Compass Group Australia Head Office. This included more than 30 interviews of both Compass Group Australia on site employees and above unit employees.

A SMETA audit does not result in a pass or fail outcome, rather it highlights areas of improvement and requests for clarifications for auditors to finalise their findings review. One of these findings queried our current risk management governance with Interim Labour companies and casual staff. We successfully demonstrated our established processes and guidelines to the auditors showcasing how we ensure that all staff receive the appropriate level of support and care throughout their engagement with Compass Group Australia. At the end of the audit, there were no outstanding non-compliances and all findings were successfully closed.

Policies, Codes and Standards

Compass Group Australia is committed to continually reviewing and strengthening its policies and practices to uphold the highest ethical standards and proactively address emerging risks across its global operations. As part of our ongoing improvement processes, we regularly share insights and best practices across our international network, helping to identify potential risks and enhance ethical standards within each country's supply chain.

Our human rights related policies and codes integrate elements of 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. These frameworks are important reference points for the commitments we set and for our expectations.

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) – 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) – applies to all of Compass Group PLC's supply chain partners globally. It extends the Code of Business Conduct principles to supply chain partners and sets out Compass Group PLC's high ethical standards, expectations and principles.
- Human Rights Policy (HRP - Compass Group PLC) – highlights the responsibility to respect human rights within Compass Group PLC's businesses and their supply chains.
- Third Party Integrity Due Diligence Policy (TPIDD - Compass Group PLC) – establishes minimum requirements to assess and monitor new and existing third parties within the scope of the policy.
- Responsible Sourcing Policy Statement (RSPS – Compass Group PLC) – Ensures responsible sourcing is central to Compass Businesses and their operations.
- Speak and Listen Up Policy (Compass Group PLC) – 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.
- Employee Code of Conduct (ECC - Compass Group Australia) – outlines Compass Group Australia's policy and procedure for appropriate behaviour standards for all employees.
- Recruitment Policy (RP - Compass Group Australia) – Outlines the management of recruitment, transfers, secondments and other contract variations for new and existing employees.
- Business Integrity Policy (BIP - Compass Group Australia) – sets out clear standards of behaviour that Compass Group Australia's expects all personnel to demonstrate and showcases Compass Group Australia's commitments to promoting a culture that upholds honesty, ethics and integrity.

Addressing Risks in our Supply Chain



Our due diligence framework continues to evolve, incorporating both new and existing tools to effectively assess and manage risks across our supply chain. Taking into account Compass Group Australia's scale, operational diversity, sectors of activity, and the specific needs of our suppliers and clients, we tailor our approach to address human rights risks, with a particular focus on higher risk categories.

This approach is reinforced through a combination of internal frameworks, and collaborations with Compass Group PLC's global network, including relationships with third-party industry leaders such as Sedex. The Global Supplier Code of Conduct, issued by Compass Group PLC, alongside the Supply Chain Risk Management framework, 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 continued to develop and enhance our 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 PLC countries in FY24, we have continued to grow the footprint of the Third-Party Integrity Due Diligence process, which has been instrumental in identifying potential risks. 767 supplier profiles, including labour agencies, subcontractors, consultants, distributors, retailers, and wholesalers, were created on the platform during the reporting period. At the end of FY25, 1,819 supplier profiles were available on the platform.



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 will continue to refine the tool and associated guidelines to ensure we implement a culture of continuous improvement on this process.

As part of our Ethics and Integrity Key Financial Controls (KFC) internal governance, we undertook a review of all our existing advisors, Consultants and Donation partners engagements as they can carry an added risk of fraud, corruption and human rights violations. All suppliers and partners reviewed had their profiles created on the Third-Party Integrity Due Diligence platform. This allowed us to identify any potential risks and remove any third party not used in the last 18x months from the time of the review, ensuring that if required again, they would be required to go through the extensive due diligence process as part of onboarding.

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 a requirement within our supplier agreements, particularly for those 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 Interim Labour Audit

With more than 15,000 employees working across 700+ sites, Compass Group Australia focuses heavily on continuous improvement and risk identification to ensure that HR & Payroll processes and underlying IT systems and controls are designed and operating effectively while covering key risks related to human rights and modern slavery.

As part of this focus, the Compass Group Australia Internal Audit team conducted an analysis over large datasets to identify potential control gaps and assess modern slavery risks. Whilst no major issues were identified, control improvements have been recommended to ensure appropriate monitoring of some of those risks.

These controls improvements were assigned to multiple functions within Compass Group Australia, including Human Resources, Procurement and Digital & Technology. Additional actions were introduced in relation to Youth Employment, where Compass Group Australia aligns with our Compass Group PLC Human Rights Policy and has set the minimum working age of 15, above the minimum working age in the majority of Australian states. Controls were implemented with Interim Labour Agencies, such as the right to audit and minimum working age added to contracts.

Other actions were taken to improve the risk identification of salary bondage, alongside shared addresses investigation.

The overall audit and resulting actions will carry on into FY26, with monthly tracking of the implemented actions and risks aligned with our Continuous Improvement focus.





Case Study Applejack Hospitality Integration

On 13 December 2024, Compass Group Australia acquired a majority shareholding in Applejack Hospitality Services Pty Limited, the owner of 11 restaurants, bars, pubs and cafés in Sydney.

This acquisition introduced a large variety of suppliers, some of which were not known to Compass Group Australia. As a key first step, the Compass Group Australia team worked with Applejack to build the full list of their supply chain, including legal entity name, country of incorporation, types of services and / or products provided and key contact details. 35 new supplier profiles, mainly small businesses within the Sydney region, were then created within our Third Party Integrity Due Diligence system to identify any major red flags and inherent risks in dealing with these new suppliers.

In addition, knowledge sharing sessions were commenced to align Applejack's ESG governance with Compass Group Australia's own framework, and the risk areas identified align with Compass Group Australia's own. This work will continue throughout the upcoming year and support will be provided by the broader Compass Group Australia team wherever risk areas have been identified.



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 100% trained milestone for all Foodbuy Australia team members. The training is also extended to all Compass Group Australia employees.

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 the event 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.

Training is also extended to all Compass Group Australia employees through our Compass College platform, across relevant topics such as Harassment and Bullying and the Compass Group Australia Grievance Process.

In FY25, 14,754 employees completed the Respectful Behaviours training module and 4,386 New Starters received training on our Speak and Listen Up grievance process as part of their induction.

In addition, 170 Unit Managers attended a dedicated workshop on Harassment and Bullying.

Our modern slavery framework continues to evolve aligned with our Human Rights Policy and our Supply Chain Risk Management Framework.

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 Australia'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 Australia executive levels of the relevant jurisdiction.



Our Supply Chain

Through our Speak and Listen Up Grievance process, Compass has a robust investigations and escalation process to deal with any issues raised through the helpline or otherwise.

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 risks associated with our Supply Chain, we are proactively engaging with Sedex and our suppliers to continually increase our overall supply chain transparency and traceability. This is reinforced through our Third Party Integrity Due Diligence platform, which allows to track any adverse media against our suppliers on a daily basis.

Through our FY25 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 identified issues have been addressed. This process has also formerly been integrated to our standard Quarterly Business Reviews with key suppliers.

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.
- Applejack Management / founders.

This statement was formally approved by Compass Group Australia's Leadership Team on 27th of March 2026 before being signed by Compass Group Australia's Managing Director and Executive Director – Foodbuy Australia.

