



## **SLAVERY & HUMAN TRAFFICKING STATEMENT**

Compass Group, UK and Ireland Limited (“**Compass**”) presents its annual statement under section 54 of the Modern Slavery Act 2015 for the year ended 30 September 2018. Since publishing our first Slavery and Human Trafficking Statement in 2016, we have continued to develop our understanding of the risks to our business of modern slavery and human trafficking, and the measures available to protect our business and our supply chains.

### **Introduction**

Trends towards globalisation mean that it is increasingly common for businesses to source their goods and services from different countries, making visibility in the supply chain more challenging.

Whilst globalisation has created advantages for businesses and individuals alike it has also provided opportunity for unscrupulous businesses to exploit vulnerable people by coercing them into becoming victims of human trafficking and slavery.

Those who profit from modern slavery and human trafficking go to great lengths to hide their criminal activities and it can be extremely difficult to identify such activity.

Although it is not possible to say with absolute certainty that such activity does not exist within our supply chain, Compass’s people are the key to our continued success and we will not tolerate any such behaviour within our supply chains or within our own business.

### **Our Business and Supply Chains**

Compass provides outsourced food and support services to millions of people around the UK every day. We operate in diverse industries including Business-to Business, Education, Defence, Offshore, Sports & Leisure, Healthcare and Residential Care.

Although our supply chains are complex we remain committed to eradicating slavery and human trafficking through a combination of risk assessment, collaborative programmes, policies and activities which help us identify, mitigate and manage the risk.

We recognise the importance of maintaining both visibility and transparency within our supply chain in order to continue to protect those who work within it from potential abuse and exploitation and to this end, we take great care in selecting our suppliers.

The size and scale of our organisation and its dedicated procurement resource provides us with a front-line defence against the risk of modern slavery and human trafficking within our supply chains. Training and awareness programmes support the recognition of the warning signs of these types of practices and what should be done for suspected wrongdoing.

### **Policies and Contractual Controls**

We are committed to ensuring that our employees are subject to fair working practices and are treated with respect. Within our business the rights of our employees are respected by the implementation of our [Human Rights Policy](#) and [Code of Ethics](#).



Both are aligned to the principles of the [United Nations Global Compact](#) and the International Labour Organization core conventions. Furthermore, we recognise the United Nations Guiding Principles on Business and Human Rights (UNGPs) as the basis for our approach to human rights in our direct operations and supply chains.

We expect our suppliers to treat their employees and contractors in the same way that we treat our own, and to this end, we ensure that our supply contracts specify a commitment to comply with our Human Rights Policy, our Code of Business Conduct and our Code of Ethics, details of which can be found in our annual and corporate responsibility reports for 2017 and on our holding company's website: [www.compass-group.com](http://www.compass-group.com).

Our procurement teams and their suppliers are required to comply with our Global Supply Chain Integrity Policy, a copy of which can be found at [www.compass-group.com](http://www.compass-group.com). This policy is underpinned by a robust set of standards which clearly define our responsible sourcing principles and the values we expect our suppliers to uphold.

Our standards encompass the nine-point Ethical Trade Initiative (ETI) Base Code whereby:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid in the country of supply/production
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed

### **Due Diligence and Risk Assessment**

To identify and tackle issues effectively we continuously work to increase visibility of the various tiers of our supply chains and embed the respect for human rights that is a key element of our Global Supply Chain Integrity strategy.

We conduct comprehensive risk assessments of the current and emerging vulnerabilities within our supply chains, supported by the expert risk analysis and rigorously researched quantitative political, human rights and environmental risk indices provided by an independent specialist in global risk analytics.

The outcomes of this risk assessment and horizon scanning activity enables us to prioritise our social compliance assessment and auditing schedule with confidence as we look to mitigate or eliminate the identified risks as appropriate.

In addition to this, our suppliers are subject to a rigorous on-boarding procedure which incorporates a risk-based assessment of their policies and practices.



We understand that our suppliers often have their own complex supply chains, which makes it difficult for us to directly monitor or control the working conditions of each individual entity within a supply chain.

We make it clear to our suppliers that they have a responsibility to ensure that their own supply chains remain free from abuse. We are committed to reducing supply chain complexity so that any vulnerabilities can be more easily identified and addressed through a comprehensive risk-based assessment.

To support this, Compass is a member of the Supplier Ethical Data Exchange 'SEDEX', a not for profit organisation dedicated to driving improvements in responsible and ethical business practices across global supply chains.

It enables sharing of ethical supply chain data which allows members to access information about their suppliers in four key areas – labour standards, health and safety, the environment and business ethics.

Across our Group global business, we have rolled out SEDEX to 50% (2017: 30%) of suppliers within those categories we consider to carry a higher risk. Following this successful pilot, we are engaging with our global procurement teams to further expand the application of SEDEX across the UK supplier base.

Any supplier breaches that are uncovered via audit or any other means will be fully investigated and, where possible, remedied. Repeat breaches or those that cannot be remedied will result in the immediate termination of the relevant supplier.

### **Effectiveness**

We take great care to assess the adherence and application of our policies, especially in the areas of our supply chain we have identified to be higher risk.

For example, in relation to the Company's offshore sector, we have retained a global labour supplier to supplement our own offshore workforce flexibly to meet our clients' requirements. This supplier meets our businesses' supply chain standards and has committed to act within the principles of our policies and procedures (including in respect of slavery, human trafficking and the Codes of Business Conduct and Ethics) and in accordance with applicable laws and regulations. Any breaches by the supplier entitles us to terminate its contract.

### **Awareness Raising and Training**

We have developed an e-learning programme for the Group's procurement teams which is designed to raise awareness of the issue of slavery and human trafficking and to help identify and mitigate potential risks from our supply chain. In 2016-2017, 60 Foodbuy UK personnel were trained with that number increasing by 10% the following fiscal year.

In addition to this, key members of Compass's procurement and HR teams are obliged to attend role-specific modern slavery and human rights training.

### **Access to Report Concerns**



Concerns about slavery and human trafficking may be raised by employees, suppliers and others through our existing Speak Up helpline at [www.compass-speakup.com](http://www.compass-speakup.com). During the last 12 months, there have been no reports to the Speak Up helpline regarding allegations of slavery or human trafficking.

Had there been any such reports, appropriate investigations and remedial action would have been undertaken, including the potential termination of the relevant supply contract if remediation proved to be unsuccessful.

## Reporting on our Progress

In this statement, we have set out the steps that we are taking to prevent modern slavery and human trafficking occurring in our business and supply chains. Our holding company is reporting the progress that the whole group is making each financial year through the following key performance indicators:

Key Performance Indicator	2016-17 Performance	2017-18 Performance	2017-18 Review
% of newly contracted suppliers who have signed the Compass Code of Business Conduct	100%		No change
Number of concerns relating to slavery and human trafficking reported by <b>employees</b> globally, via Speak Up	Nil		No change
Number of concerns relating to slavery and human trafficking reported by <b>suppliers</b> globally, via Speak Up	Nil		No change
Number of buyers in our Foodbuy procurement teams who have successfully completed our slavery and human trafficking e-learning	200		Improvement on 2016-17 performance - 50 additional buyers trained
% of contracted approved suppliers to our UK business who have shared information with us via the SEDEX ethical sourcing platform	30%		Improvement on 2016-17 performance to 50%

### Performance Key

- Progress made in the last 12 months
- Performance maintained versus prior year
- Performance fallen versus prior year

The Board has concluded that our policies, procedures and supply chain risk mapping activity provide reasonable, but not absolute assurance that the Company has reduced the risk that slavery and human trafficking could be found in our business or in our supply chains.

Chris Garside  
CEO Compass Group, UK and Ireland Limited

Approved by the Board of Compass Group, UK  
and Ireland Limited for release on 1 October 2018