

**Company Name** Compass Group  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score** 25.6 out of 100

Theme Score	Out of	For Theme
3.4	10	A. Governance and Policies
7.2	25	B. Embedding Respect and Human Rights Due Diligence
8.5	20	C. Remedies and Grievance Mechanisms
1.5	25	D. Performance: Company Human Rights Practices
5.0	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### A. Governance and Policies (10% of Total)

#### A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: General HRs commitment: The Company indicates that 'we are committed to supporting the dignity, wellbeing and human rights of all our employees, the communities in which we operate, and those affected by our operations'. Also, 'we believe that everyone is entitled to basic rights and freedoms, whoever they are, and wherever they live'. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Commitment to the UNGPs: The Company indicates that 'We are fully committed to the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights'. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>Met: Commitment to the OECD Guidelines for Multinational Enterprises: See above [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Company has a commitment to the ILO Core: The Company indicates that 'We are fully committed to (...) the core conventions of the International Labour Organization ("ILO") and Ethical Trading Initiative'. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>Met: Company has an explicit commitment to All four ILO Core: The Company states that 'Compass is specifically committed to the four core conventions of the ILO of: the freedom of association, the right to collective bargaining, the elimination of forced or compulsory labour, the abolition of child labour, the elimination of discrimination in respect of employment and occupation'. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Company expect suppliers to commit to ILO Core: See below. [Supply Chain Integrity Policy, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: Company explicitly list All four ILO for suppliers: The Supply chain Integrity policy statement says: 'We embrace the Ethical Trading Initiative (ETI) Base Code principles, and reflect these within our Code of Business Conduct and Supplier Code. The Base Code principles are: Employment is freely chosen; Freedom of association and the right to collective bargaining is respected; Working conditions are safe and hygienic; Child labour shall not be used; Living wages are paid; Working hours are not excessive; No discrimination is practised; Regular employment is provided; No harsh or inhumane treatment is allowed'. [Supply Chain Integrity Policy, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Company states in its Human Rights Policy: 'This includes a commitment to providing a safe workplace in all our operations where our employees, consultants and contractors working in any of our sites can be assured of a safe and healthy workplace that looks after their physical and mental wellbeing'. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week: The Code of Conduct reads: 'As a minimum we will act within the Base Code of the Ethical Trading Initiative which is an internationally recognised code of labour practice, the key elements of which are: [...] Working hours are not excessive'. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. The Company has provided an additional source to this indicator, however, no material evidence was found. Moreover, commitments are expected to be placed in Company policy documents. [Code of business conduct, 01/2018: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expect suppliers to commit to H&amp;S of their workers: The Company indicates in its Workplace Health and Safety Policy: 'Specifically, we will: Seek to prevent injury to any employee, consumer and contractor–Stop unsafe work and conduct a risk assessment before undertaking any task, including as soon as practical in taking on any new contract–Investigate and conduct a root cause analysis of all serious incidents and near misses Ensure that every employee is properly trained to safely perform at work. We will also expect similarly high standards from our suppliers and contractors.' On the other hand, the Company indicates in its Supply Chain Integrity Policy: 'As a minimum, our procurement activity will comply with the relevant food safety and personal health and safety standards, codes of practice, Company regulations and standards in the countries in which we operate and will reflect our ongoing commitment to sustainable food procurement and corporate responsibility (CR)'. [Workplace health and safety Policy, 11/2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Supply Chain Integrity Policy, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: The Supplier Code of Conduct indicates its expectation for its suppliers: 'comply, at a minimum, with all applicable laws and regulations regarding human rights and modern slavery including but not limited to working hours and days worked, minimum wages, overtime, breaks and rest time, sick leave and annual holidays as well as other mandatory benefits, ensuring that appropriate records are kept'. However, it is not clear the Company expects suppliers to respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supply Chain Integrity Policy, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Respect land ownership and natural resources as set out in VGGT</li> <li>• Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards: It states: 'Our "Zero Harm" ambition includes a commitment to respecting the ownership and use of land and natural resources as part of our broader sustainability strategy.[...] We recognise legitimate tenure rights as a human right'. However, CHRB is looking for a statement of commitment to recognise and respect legitimate tenure rights related to the ownership and use of land as set out in the relevant part(s) of the Voluntary Guidelines on Responsible</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	peoples' rights (AG)		<p>Governance of Tenure or of the IFC Performance Standards. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration: The 2021 Annual Report indicates: 'In addition to buying locally, our businesses proactively conduct business with small, medium and minority owned enterprises. Through partnerships, our Australian business champions indigenous suppliers. Our US business partners with organisations that promote opportunities for black, indigenous and people of colour farmers. And our Canadian business supports women owned businesses. These initiatives help to ensure that procurement spend is targeted where it can make the greatest difference to communities'. In the context of Australia, the 2021 Sustainability Report notes: 'The business exceeded its target of placing 1,050 new Aboriginal and Torres Strait Islander jobseekers into employment for its Commonwealth Indigenous Employment Parity Initiative Project, achieving 1,879 placements'. As for Canada: 'ESS has invested over \$1.2m(CDN) in subcontracting opportunities with Indigenous businesses in 2021. 1,068 ESS associates completed the Indigenous Awareness Training course in 2021'. However, no commitment found to respecting indigenous peoples' rights or references the relevant part(s) of the ILO Convention on Indigenous and Tribal Peoples No.169 or of the UN Declaration on the Rights of Indigenous Peoples. Also, commitments are expected to be placed in formal policy documents and reports do not meet CHRB standards.</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Respecting the right to water: The Company indicates that 'we recognise the right to safe water for anyone affected either directly or indirectly by our operations'. However, 'recognise' is not considered a formal commitment following CHRB wording criteria. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Company's policy commits to obtain FPIC</li> <li>• Not Met: Expecting suppliers to make these commitments</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Women's rights: The Company states in its Human Rights Policy: 'we adopt a broad scope of respecting human rights including: zero tolerance towards discrimination and inappropriate behaviour – in particular towards vulnerable groups, such as minority groups, indigenous communities, migrant workers, children and women [...]'. However, no commitment statement to respect Women's rights was found, as evidence seems to focus in discrimination. It also states: 'We believe that everyone is entitled to basic rights and freedoms, whoever they are, and wherever they live'. The Company has also provided a source, in its feedback to CHRB, where it indicates that 'Compass Group USA [was] Named a 2021 Best Employer for Women by Forbes'. It has also referenced its 2021 Annual Report, which contains figures on women representation in management. However, no explicit commitment to respecting the rights of women found. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Compass Group USA Named a 2021 Best (web), N/A: <a href="https://compass-usa.com">compass-usa.com</a>]</li> <li>• Not Met: Children's rights</li> <li>• Not Met: Migrant worker's rights</li> <li>• Not Met: Expects suppliers to respect at least one of these rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: CEDAW/Women's Empowerment Principles</li> <li>• Not Met: Child Rights Convention/Business Principles</li> <li>• Not Met: Convention on migrant workers</li> <li>• Not Met: Expecting suppliers to respect these rights</li> </ul>
A.1.4	Commitment to remedy	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: The Company commits to remedy: The Human Rights Policy states that 'Compass Group is committed to acting with integrity as a responsible business in all our operations globally. This commitment extends to providing access to or cooperating with the remediation of any breaches of human rights we identify we have or may have caused or contributed to in our operations. We aim to achieve this through our Speak Up resources, enabling effective remedy whilst not preventing access to other forms of remedy if justified.' [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Company expect suppliers to make this commitment: The Supplier Code of Conduct indicates: 'From time-to-time we may ask you to openly share necessary information or participate in an audit or review (as required) relating to your business dealings with Compass, recognising the importance of helping to</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>ensure the principles and commitments in this Code are being followed. Compass acknowledges that deficiencies in processes may arise and that it could take time to implement a corrective plan to improve and remedy the situation. In the event of unsatisfactory progress being made or non-compliance with the Code, Compass may refuse to work with or take steps to terminate an agreement with any supplier'. However, it is not clear the Company expects suppliers to commit to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to'. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Collaborating with other remedy initiatives</li> <li>• Met: Work with suppliers to remedy impact: The Company indicates that 'As part of this process we are committed to working with our Business Partners or those adversely impacted in a similar way. Where potential or actual breaches of human rights are identified directly to our activities with Compass' business partners, we will support our business partners in the remediation of those impacts through their own grievance or Speak Up processes, or support collaboration to provide for non-judicial remediation through third parties'. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Zero tolerance attacks on HRs Defenders (HRDs)</li> <li>• Not Met: Company expect suppliers to make this commitment</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Work with HRD to create safe and enabling environment</li> </ul>

### A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Company indicates in its Human Rights Policy that 'This Policy will be reviewed annually by the Corporate Responsibility Committee of the Board. Each review will be informed by our prior year performance'. Also, as stated in its 2021 Modern Slavery Statement, 'The Compass Group PLC Board is responsible for ensuring that Compass meets its human rights responsibilities, including those regarding modern slavery. Further oversight and guidance are provided by the Corporate Responsibility Committee (CR Committee), the Global Head of Sustainability, the Group Chief People Officer, the Group Chief Commercial Officer, the Group Head of Ethics &amp; Integrity, the Global Human Rights Working Group and the Regional Governance Committees.' [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Describe HR expertise of Board member</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Speeches/letters by Board members or CEO: In its 2022 Annual General Meeting, the CEO, Dominic Blakemore, was asked the following question: ‘what steps is Compass Group taking to increase and systematise rigorous human rights due diligence in its commodity and labour supply chains?’. His answer follows: ‘I also just want to stress how committed we are to eradicating any human rights abuses that may be apparent in our supply chain, or indirectly within those of our suppliers. We take these matters very, very seriously. In terms of specific actions, we have a supplier code of conduct which has precise requirements in this area, and we conduct regular supplier audits as well, which gives us confidence of compliance with that code of conduct. We've recently appointed a senior manager from our HR function, dedicated to the human rights agenda, who will be managing any areas of risk, which you'll see disclosed in our Modern Slavery Act statement which will be published later this week. We have a SpeakUp hotline which is available to all of our employees, which we have extended to our suppliers and their employees should they have concerns about their treatment. Finally, we are committed to using specialist advisers as appropriate to consult with and audit where necessary should matters be raised to our attention. I think the CCLA have an approach which they advocate as ‘find it’, ‘fix it’, ‘prevent it’, and we very much subscribe to that point of view, and we are very open to any communication to us of any matters that we need to investigate or address’. Also, Dominic Blakemore, Chief Executive Officer of the Compass Group is among the ‘top executives of WBCSD member companies who endorsed the Call to Action in this second edition of the CEO Guide are’. The CEO has also written an ‘Statement of Continuing Support’ to the UN Global Compact. The CEO is also a Board member. [2022 AGM Questions, 2022: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Human rights agenda gains traction as top business executives use their voices to call for action, 28/10/2020: <a href="https://wbcsd.org">wbcsd.org</a>]</li> </ul>
A.2.2	Board responsibility	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board/Committee review HRs strategy: The Human rights policy states that ‘Our Group HR Director will ensure that any reports of human rights abuses are appropriately investigated immediately and reported to the Audit Committee of the Group Board in a timely manner’. Also, ‘the objective of the CR Committee is to assist the Board and the Company in fulfilling its corporate responsibility in line with the Company’s strategy, policies and practices. The CR Committee receives reports from the Global Safety and Sustainability Director, (...) Group Head of Ethics and Compliance, Group Chief People Officer and other senior managers to ensure that progress is being made towards meeting the Group’s specific CR KPIs and our ongoing CR commitments’. Finally, ‘the health and safety and food safety performance is considered by the CR Committee at each meeting against agreed KPIs’. [Annual Report 2019, 2020: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: Examples/trends re HR discussion in the last reporting period: The company's Corporate Responsibility Committee Report 2021 reads: 'This year, the work of the Committee continued to focus on overseeing the health and safety initiatives developed by management to keep the Group’s people, clients and consumers safe. [...] The Committee also looked at a range of matters that are important to investors and other stakeholders. This included environment, social and governance (ESG) matters [...]. I am pleased to report that, as a Group, we have made good progress in the following areas: [...] increasing the number of health and mental wellbeing and other support mechanisms available for employees; further strengthening health and safety protocols to ensure that as the Group’s employees, clients and consumers return to work they feel safe and confident; the Group Lost Time Incident Frequency Rate and Food Safety Incident Rate limits that we set at the beginning of the year' In addition, in its Annual Report 2021, the Company indicates: ' The Group’s sustainability strategy remained high on the Board’s agenda. The following items were identified as areas of future focus with respect to the sustainability strategy: [...], responsible sourcing [...]' [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets both requirements under score 1: See above.</li> <li>• Not Met: How affected stakeholders/HR experts informed discussions: The 2021 MSA indicates: ‘The scale, influence, and international reach of the Group’s operations means that we are in a position to make a real difference. Building on a solid base, over the past year we have made further positive progress, including: working with the Slave-Free Alliance to map our human rights activity and draft a strategic plan to drive progress within the Group’s businesses and particularly in</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>key higher-risk areas'. It also indicates that 'Members of the HRWG [Global Human Rights Working Group] received presentations from industry experts including the Slave-Free Alliance and SEDEX'. However, although the Company indicates that it works with Slave-Free Alliance and that it the HRWG received presentations from the Alliance, it is not clear how experiences of the Slave-Free Alliance [or any other affected stakeholders or external human rights experts] informed Board level discussions on human rights strategy or policy or management. The 2021 Sustainability Report indicates: 'Our Designated Non-executive director (NED) for workforce engagement, Ireena Vittal, hosted six virtual roundtables in the year with employees from across the businesses. These roundtables, together with the outcomes from other engagement activities, provide excellent insight to wider employee sentiment and gave our people an opportunity to speak directly to a member of the Board of directors, ensuring the employee voice is heard in the Boardroom. The main themes observed at the roundtables, which were reported to the Corporate Responsibility Committee and the Board, were: continued pride in our response to the pandemic; our ability to build confidence and provide clarity for our people and clients; concerns about wellbeing and potential increased levels of anxiety as the crisis extended, with proactive sharing of ideas, interventions and support given to employees; the positive impact technology had as an enabler for the businesses, alongside a desire to get back to meeting people in person and rebuilding personal connections'. However, it is not clear how Board discussion on human rights were influenced by the NED workforce engagement as topics don't seem cover labour(human rights issues (besides wellbeing/anxiety due to the covid pandemic crisis). [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>]</p>
A.2.3	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:  Score 1  <ul style="list-style-type: none"> <li>Met: Incentives for at least one board member: The Company indicates: 'For Dominic Blakemore [...], the annual bonus plan for the financial year to September 2021 was based on the following Group level performance measures: operating margin, absolute revenue, cash conversion and health, safety and environmental measures (HSE) (based on the Lost Time Incident Frequency Rate and Food Safety Incident Rate)'. Dominic Blakemore is the Group CEO and he is a Board member. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>Not Met: At least one key HR risk, beyond employee H&amp;S: Although the Company has a performance management scheme linked to health and safety, it is not clear it includes health and safety of local communities or workers in the supply chain. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> Score 2  <ul style="list-style-type: none"> <li>Met: Performance criteria made public: It also indicates: 'HSE measures remain unchanged, however for 2020-2021 they equate to 10% of the plan, emphasising our commitment to our health'. Lost Time Incident Frequency Rate weighs 5% of Dominic Blakemore's bonus plan. [Annual Report 2019, 2020: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>Not Met: Review of other board performance criteria</li> </ul> </p>
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:  Score 1  <ul style="list-style-type: none"> <li>Not Met: Board process to review business model and strategy: Regarding its Corporate Responsibility Committee, it indicates: 'An important aspect of the Committee's work involves the oversight of how the Company engages with and understands the interests of its key stakeholder groups. This provides the Committee with greater insight into stakeholder views, which helps to inform Board debate and decision making. This year, the work of the Committee continued to focus on overseeing the health and safety initiatives developed by management to keep the Group's people, clients and consumers safe. This was supported by a structured employee engagement strategy to ensure that employees received the appropriate levels of advice, guidance and support, in relation to both safety and mental health. The Committee received regular updates on the measures being implemented to enable it to assess the effectiveness of actions taken by management. The Committee also looked at a range of matters that are important to investors and other stakeholders. This included environment, social and governance (ESG) matters, which have continued to gain momentum during 2021 as a driver of the Group's purpose. A significant proportion of the Company's investors are signatories to the internationally recognised Principles for Responsible Investment and increasingly, Compass' clients, consumers and employees want to work for and with companies with a strong focus on sustainability and other social purposes'. However, it is not clear whether and how this oversight role can lead to discuss and review its business</li> </ul> </p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>model and strategy for inherent risks to human rights at board level or a board committee. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describe frequency and triggers for reviewing</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions decided</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See A.1.2.a</li> <li>• Met: Senior responsibility for HR implementation and decision making: The Company states that 'The Group Chief Commercial Officer, who reports directly to the Group Chief Executive Officer, acts as the global functional lead for the Group with respect to our Human Rights Policy and has reporting responsibility for human rights on behalf of our operations and supply chain'. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How it assigns Day-to-day responsibility: The Company indicates: 'The Global Human Rights Working Group (HRWG) has been operational since February 2020. The cross functional group comprises internal audit, purchasing, HR and legal representatives from 14 countries, which represent higher-risk areas in relation to human rights as well as our larger markets. A core objective of the HRWG is to promote awareness of human rights risks, including salient modern slavery risks. In 2021, we expanded the HRWG further with the addition of representatives from the Latin America region. Activities of the HRWG during the last year have focused on issues related to the ETI Base Code.' [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: Day-to-day resources and expertise allocation in own ops: See above, the Company has people (working group) whose tasks include human rights management in 14 countries from different departments (applying perspective to human rights). In addition, the Company indicates that it's 'working with the Slave-Free Alliance to map our human rights activity and draft a strategic plan to drive progress within the Group's businesses and particularly in key higher-risk areas'. It also indicates it trains workers on Human Rights and it has a Speak Up line. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Resources and expertise allocation in the supply chain</li> </ul>
B.1.2	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Senior manager incentives for human rights: The Company indicates: 'For Dominic Blakemore [...], the annual bonus plan for the financial year to September 2021 was based on the following Group level performance measures: operating margin, absolute revenue, cash conversion and health, safety and environmental measures (HSE) (based on the Lost Time Incident Frequency Rate and Food Safety Incident Rate)'. Dominic Blakemore is the Group CEO (named executive officer). [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: At least one key HR risk, beyond employee H&amp;S: Although the Company has a performance management scheme linked to health and safety, it is not clear it includes health and safety of local communities or workers in the supply chain. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria made public: It also indicates: 'HSE measures remain unchanged, however for 2020-2021 they equate to 10% of the plan, emphasising our commitment to our health'. Lost Time Incident Frequency Rate weighs 5% of Dominic Blakemore bonus plan. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Review of other senior management performance</li> </ul>
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR risks is integrated as part of enterprise risk system: The Annual Report 2021 indicates that 'Risks and the corresponding controls and mitigations are reviewed by country and regional leadership teams on an ongoing basis. Risk updates form an integral part of periodic management reviews and are also reviewed regularly by the Regional/Group Governance Committees and the Executive Committee. A critical component of the risk review process is the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>dynamic identification of developing and emerging risks at a country, regional and Group level. This bottom up and top down approach provides a comprehensive assessment of the key risks facing the Group. The findings of the risk reviews, including the principal risks and any developing trends, are reported to and considered by the Board twice a year. [...] Ensuring high standards of business ethics with regards to human rights and social equality has always been important to Compass. The ethical behaviour of large businesses is increasingly important to investors, other stakeholders and society. In recognition of this, we have reaffirmed our focus on ensuring high standards of business ethics, and have reclassified our risks to address this as a principal risk in its own right'. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Provides an example: The Company summarizes its main risks in its Annual Report 2021, including: 'Social and Ethical Standards: [Description] We rely on our people to deliver great service to our clients and consumers, so we recognise that their welfare is the foundation of our culture and business. We remain vigilant in upholding high standards of business ethics with regard to human rights and social equality. [Mitigation] To enhance our ability to counter the risks to our businesses and supply chains represented by modern slavery, we have focused on the areas where our human rights strategy can have the greatest impact. This has been done through our Human Rights Working Group, the engagement of external specialist advisors, our Modern Slavery eLearning tools and ongoing work to strengthen and improve our human rights due diligence as part of our supplier evaluation and labour agency reviews.' [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Audit Ctte or independent risk assessment</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Score of 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Communicates its policy to all workers in own operations: The Company indicates in its MSA 2021: 'Our people are our first line of defence in identifying any signs of modern slavery. We have sought to improve their awareness of the issue and provide training and guidance in helping to recognise the signs of modern slavery. For example, at a UK&amp;I Foodbuy team meeting for more than 200 colleagues, a training session was presented on modern slavery and human trafficking to help drive awareness. Through our e-learning training platform, the Modern Slavery and Human Rights module has been assigned for completion to certain senior leaders, managers and colleagues at Group level and to employees in 16 countries involved in supply chain and procurement activities, as well as members of the HRWG and the Chairman of the CR Committee. At the time of reporting, 551 employees have completed the training; 92% of the target group. We are committed to extending the scope of the target population this year to continue to raise awareness'. The 2021 Annual Report also notes that it engages and employs 480,000 people in 45 countries around the world. In its feedback to CHRB, it indicates that its Human Rights policy is available to any worker via the website. It has also provided information on training on Modern Slavery. However, it is not clear whether Company's commitments on human rights are communicated to all employees globally in local languages (alternatively the Company could achieve this subindicator if all employees are trained in the Company's human rights commitments). [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communication of policy commitments to stakeholder</li> <li>• Not Met: How policy commitments are made accessible to audience</li> </ul>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a</li> <li>• Met: Requires suppliers to communicate policy requirements: The Sustainability Report 2021 indicates: '[...] new suppliers are expected to sign our Code of Business conduct, or to confirm their own code meets our standards [...].' The company's human rights policy is found in the Code of Business Conduct. The Supplier Code of Conduct states: 'We expect you to promote the principles and commitments set out in this Code to your relevant stakeholders and encourage responsible business practices in your own supply chains'. [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: The Company states in its Supply Chain Integrity Policy: 'Our aim is to establish mutually beneficial relationships with our suppliers. To help achieve this and to ensure our suppliers</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>are clear on our requirements we use our Supplier Code. Agreement with this Code forms part of our purchasing terms and conditions for supply.' The Sustainability Report 2021: '[...] new suppliers are expected to sign our Code of Business conduct, or to confirm their own code meets our standards [...]'. The company's human rights policy is found in the Code of Business Conduct. [Supply Chain Integrity Policy, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Company requires suppliers to cascade down to their suppliers</li> </ul>
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: How workers are trained on HR policy commitments: The Company indicates in its MSA 2021: 'Our people are our first line of defence in identifying any signs of modern slavery. We have sought to improve their awareness of the issue and provide training and guidance in helping to recognise the signs of modern slavery. For example, at a UK&amp;I Foodbuy team meeting for more than 200 colleagues, a training session was presented on modern slavery and human trafficking to help drive awareness. Through our e-learning training platform, the Modern Slavery and Human Rights module has been assigned for completion to certain senior leaders, managers and colleagues at Group level and to employees in 16 countries involved in supply chain and procurement activities, as well as members of the HRWG and the Chairman of the CR Committee. At the time of reporting, 551 employees have completed the training; 92% of the target group. We are committed to extending the scope of the target population this year to continue to raise awareness'. The 2021 Annual Report also notes that it engages and employs 480,000 people in 45 countries around the world. However, it is not clear if training in human rights policy commitments is conducted to employees generally (beyond relevant specific functions that engages on human rights topics). Current evidence seems to focus in specific parts and for employees related to procurement and supply chain activities. The Company has provided, in its feedback to CHRB, comments on training, however, the given evidence could not be found in the public domain. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: Trains relevant managers including procurement: The Company indicates in its MSA 2019: 'Our e-learning programme for the Group's procurement teams was developed in house. It is designed to raise awareness of the issues of slavery and human trafficking and to help identify and mitigate potential risks from our global supply chain'. So far, the Foodbuy procurement teams in the UK and North America (accounting for 70% of global procurement spend) have completed the programme. The annual report also states that will extend the e-learning program to its top 20 countries by 2020.' In addition, see description above, including through the e-learning platform, modern slavery &amp; human rights module has been assigned for completion to employees at different level involved in procurement activities. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Trains suppliers to meet company's HR commitment: The Company indicates, in its feedback to CHBR, that it has a Global Supplier Code of Conduct which sets out expectations for suppliers. It has the Company's human rights provisions. However, it is not clear suppliers are trained on the Code and how. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Disclose % trained</li> </ul>
B.1.6	Monitoring and corrective actions	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Scores at least 1 on A.1.2.a: See A.1.2.a</li> <li>• Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: The Company indicates in its Annual Report 2021: 'We also apply the Supplier Ethical Data Exchange (SEDEX) tool to assess, track and share information on supply chain social compliance and human rights, and are currently rolling out SEDEX across several of our largest countries'. The 2021 MSA notes: 'Our approach to due diligence combines research, risk assessments, alignment with and implementation of industry standards and best practice, utilising cross functional working groups, stakeholder engagement and applications of relevant policies. In June 2021, we established a partnership with the Slave-Free Alliance (an anti-slavery social enterprise)'. As for its supply chain monitoring: 'This year, we rolled out SEDEX across more countries to improve visibility of the Group's supply chains</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>and to undertake risk assessments. [...] Within our United Kingdom &amp; Ireland (UK&amp;I) business, SEDEX has been used to identify sourcing countries with the highest human rights risk in order that these geographies can be prioritised. Our UK&amp;I business is also accessing supplier self-assessment and audit reports on SEDEX and was able to review SEDEX Members Ethical Trade Audits (SMETA) from over 60 suppliers [...]. Using a risk-based approach, audit nonconformances were followed up to ensure the remediation of actions identified. SEDEX is being rolled out in our Australian business, which enables it to monitor suppliers using the system. In Sweden, SEDEX is being used to analyse country of origin data for produce in our supply chain, with plans to gather new information regarding suppliers' production sites and the measures they take to minimise risks related to human rights. Our North American business is currently investigating platforms (including SEDEX) that align with and will enable the business to confirm that the ETI base code is being met in its supply chain'. However, it is not clear how the Company monitors Human Rights compliance within its own operations. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Proportion of supply chain monitored: The 2021 MSA indicates: 'By October 2021, 43% of priority category suppliers in Australia were being tracked via the system, which is equivalent to 75% of priority category spend in Compass Group Australia'. However, it is not clear the total proportion of its supply chain that is monitored. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Describe how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Score of 2 on A.1.2.a: See indicator A.1.2.a</li> <li>• Not Met: Describes corrective action process: The Company indicates: 'Where third party audit reveal issues, we require our suppliers to remedy them. Failure to address material issues will lead to termination of the relationship.' The 2021 MSA provides examples of actions taken when potential Human Rights risks were identified. However, no description found of its corrective action process. [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Disclose findings and number of corrective action: The 2021 MSA provides examples of actions taken when potential Human Rights risks were identified. However, it is not clear the findings of its monitoring process and the number of corrective action process as a result of the monitoring. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>
B.1.7	Engaging and terminating business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HR affects selection of suppliers: The Code of conduct indicates that if the person's role involves 'selecting or working with suppliers you should ensure that, from the point of search and selection, through to supply and payment, your relationship is conducted in accordance with the guiding principles of responsible ethical trading. As a minimum we will act within the Base Code of the Ethical Trading Initiative', and explains which are the key elements, including human rights. [Code of business conduct, 01/2018: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: The Company states in its Sustainability Report 2021: 'Where third party audit reveal issues, we require our suppliers to remedy them. Failure to address material issues will lead to termination of the relationship.' The Supplier Code of Conduct indicates: 'Compass acknowledges that deficiencies in processes may arise and that it could take time to implement a corrective plan to improve and remedy the situation. In the event of unsatisfactory progress being made or non-compliance with the Code, Compass may refuse to work with or take steps to terminate an agreement with any supplier'. [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe positive incentives offered to respect human rights</li> <li>• Not Met: Working with suppliers to meet HR requirements: The Company, in its 2019 MSA, describes the programme of independent audits that it carries out. 'Such audits will continue throughout our business into the next financial year to highlight areas for improvement, inform our process and serve to strengthen our relationships with suppliers'. The 2021 MSA provides has various examples of actions taken to tackle potential Human Rights risks. However, no evidence found of proactive engagement work carried out with suppliers to improve their human rights performance. [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.8	Approach to engagement with affected stakeholders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company indicates: 'We have a wide range of stakeholders that include clients, consumers, colleagues, suppliers and shareholders, the communities in which we operate and the global environment which we all share. The success of our strategy is reliant on the support and commitment of all our stakeholders.' It then lists different stakeholders, including 'our people', 'our communities', 'our suppliers' and 'NGOs', disclosing how it engages with each of them and their areas of focus. However, it is not clear how it has identified affected stakeholders with whom to engage in particular human rights issues during last two years. [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Discloses stakeholders that HRs may be affected</li> <li>• Not Met: Provides two examples of engagement with stakeholders: The Company indicates: 'These [materiality assessments] help us understand the issues that matter most to us and our stakeholders; [...] In 2021, we reviewed our materiality matrix. In addition to feedback from our ongoing dialogue with internal and external stakeholders, including clients, suppliers, associations and community groups, we used a business analytics tool to review corporate reports of our stakeholders, mandatory and voluntary regulations in the countries in which we operate, news and social media. Together, this allowed us to identify and monitor the environmental, social and governance (ESG) external issues that are most important to our stakeholders and our business'. Moreover, 'Our Designated Non-executive director (NED) for workforce engagement, Ireena Vittal, hosted six virtual roundtables in the year with employees from across the businesses. These roundtables, together with the outcomes from other engagement activities, provide excellent insight to wider employee sentiment and gave our people an opportunity to speak directly to a member of the Board of directors, ensuring the employee voice is heard in the Boardroom. The main themes observed at the roundtables, which were reported to the Corporate Responsibility Committee and the Board, were: continued pride in our response to the pandemic; our ability to build confidence and provide clarity for our people and clients; concerns about wellbeing and potential increased levels of anxiety as the crisis extended, with proactive sharing of ideas, interventions and support given to employees; the positive impact technology had as an enabler for the businesses, alongside a desire to get back to meeting people in person and rebuilding personal connections'. Although the Company discloses two instances of engagement with different groups of stakeholders, in order to meet this indicator, the Company is expected to provide two examples of its engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years. Although employees are affected stakeholders (2nd example), no further evidence found of affected stakeholder engagement involving human rights impacts. [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HR issues: The Company indicates that 'We respect feedback from all our stakeholder groups and take their views into consideration in our decision-making processes'. A materiality matrix is provided. However, no evidence found of a summary analysis of the input/views given by the stakeholders on human rights issues, and how the Company took these into account. No further evidence found in latest report. [Sustainability Report 2019, 2020: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Describe how views influenced company's HR approach: The Company presents example of how the Board had regard for the interests of its stakeholders in its decision making processes during the year in three topics: Climate change and environmental sustainability, COVID-19, Dividend and Online AGM. However, no example related to human rights approach was found. [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Identifying risks in own operations: The Company indicates that 'during the year, we initiated a Human Rights Risk Assessment across the Group. To help us with the assessment, we engaged the help of independent external human rights specialists who are working in conjunction with the Human Rights Working Group to complete the review'. The process of the human rights impact assessment involves identifying 'risk through collection of internal and external data and engagement of global colleagues through the Human Rights Working Group and within countries', among other steps. [Sustainability Report 2019, 2020: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: Identifying risks through relevant business relationships: The Company states that 'we conduct comprehensive risk assessments of the current and emerging vulnerabilities within the higher risk segments of our supply chain. This is underpinned by expert risk analysis and rigorously researched quantitative political, human rights and environmental risk indices provided by an independent specialist in human rights. The outcomes of these risk assessments and horizon scanning activities help us to identify our priorities as we look to mitigate or eliminate identified risks. We are also developing a Group blueprint to evolve and develop our approach to purchasing and in order to ensure we have stronger policies, standards and controls'. [Sustainability Report 2019, 2020: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above, the Company indicates, in its Sustainability Report 2019, that 'we engaged the help of independent external human rights specialists who are working in conjunction with the Human Rights Working Group to complete the review'. Moreover, in its Human Rights Policy, the Company indicates that 'We are committed to conducting ongoing human rights due diligence throughout our business and supply chain, and work with third party specialists by geography and issue'. The 2021 MSA indicates: 'We understand the fundamental importance of due diligence and robust risk management to identify, prevent and mitigate incidences of modern slavery in the Group's supply chain and operations. Our approach to due diligence combines research, risk assessments, alignment with and implementation of industry standards and best practice, utilising cross functional working groups, stakeholder engagement and applications of relevant policies. In June 2021, we established a partnership with the Slave-Free Alliance (an anti-slavery social enterprise), which is acting as our 'critical friend' to help us to improve our due diligence processes and to address salient human rights risks. [...] Our Australian business conducted an online impact assessment workshop in January 2021, which included [...] and conducting a human rights impact assessment. Risks were discussed at length and suggestions for improvements included: strengthening human rights due diligence processes as part of supplier risk assessments; developing additional supplier contractual and onboarding requirements and monitoring; enhancing controls over one-time vendors and suppliers (especially smaller project vendors and interim labour). Subsequently, in Australia, SEDEX is being used to track and monitor high-risk tier one suppliers whilst medium-risk and high-risk tier two suppliers will begin to be monitored next using the system. By October 2021, 43% of priority category suppliers in Australia were being tracked via the system, which is equivalent to 75% of priority category spend in Compass Group Australia. [...] During the year, our North American business engaged with key suppliers in high-risk categories to better understand each supplier's policies and procedures related to Compass' CBC, with a focus on human rights'. However, it is not further description found of its global system it has in place to identify its human rights risks and impacts on a regular basis across its activities involving consultation with affected stakeholders. [Sustainability Report 2019, 2020: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Triggered by new circumstances</li> <li>• Not Met: Describes risks identified</li> </ul>
B.2.2	Assessing human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describe process for assessment of HR risks and discloses salient HR issues: The Company indicates in its Sustainability Report 2021: 'In June 2021, we began a partnership with the Slave-Free Alliance, an anti-slavery social enterprise, which is acting as our 'critical friend' in improving our due diligence processes and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>addressing salient human rights risks. We are working with them to map our human rights activity and draft a Strategic Plan to drive action – particularly in key higher risk areas. In 2021, we rolled out SEDEX (Supplier Ethical Data Exchange) across more countries to improve visibility of our supply chains and to undertake risk assessments. The results of these risk assessments will be used to collaborate with our suppliers to effect improvements in managing supply chain risks.'</p> <p>However, no further information describing the process of human rights risk assessment, in order to evaluate salient risks and impacts, was found. [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: How process applies to supply chain: The 2021 MSA indicates: 'Within our United Kingdom &amp; Ireland (UK&amp;I) business, SEDEX has been used to identify sourcing countries with the highest human rights risk in order that these geographies can be prioritised. Our UK&amp;I business is also accessing supplier self-assessment and audit reports on SEDEX and was able to review SEDEX Members Ethical Trade Audits (SMETA) from over 60 suppliers in higher-risk categories, generated from a prioritisation assessment exercise. [...]. In Sweden, SEDEX is being used to analyse country of origin data for produce in our supply chain, with plans to gather new information regarding suppliers' production sites and the measures they take to minimise risks related to human rights. Our North American business is currently investigating platforms (including SEDEX) that align with and will enable the business to confirm that the ETI base code is being met in its supply chain'. It also indicates 'Our Australian business conducted an online impact assessment workshop in January 2021, which included members of its procurement team being trained on modern slavery and conducting a human rights impact assessment. Risks were discussed at length and suggestions for improvements included: strengthening human rights due diligence processes as part of supplier risk assessments; developing additional supplier contractual and onboarding requirements and monitoring; enhancing controls over one-time vendors and suppliers (especially smaller project vendors and interim labour). Subsequently, in Australia, SEDEX is being used to track and monitor high-risk tier one suppliers whilst medium-risk and high-risk tier two suppliers will begin to be monitored next using the system. By October 2021, 43% of priority category suppliers in Australia were being tracked via the system, which is equivalent to 75% of priority category spend in Compass Group Australia'. Although evidence found includes compliance monitoring, it seems integrated within a process that informs broader risk assessments that includes country specific considerations for different supply chains, use of different platforms and expertise. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Public disclosure of the results of HR assessment: The Company indicates in its MSA 2021: 'Compass' country-led due diligence processes identified several potential modern slavery and human rights risks that could be present within our businesses' operations and supply chains.' Then it discloses information about some cases, for example: Labour Agencies in the UK, Agency Labour in China, among others. However, no list of salient human rights risk was found. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: How it involved affected stakeholders in the assessment</li> </ul>
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Action Plans to mitigate risks [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Description of how global system applies to supply chain [Modern Slavery and Human Trafficking Statement 2019, 16/12/19: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: Example of actions decided on at least 1 salient HR issues: In a Case Study: Migrant Labour recruitment in the Middle East, the Company reports about actions taken to stop practices of modern slavery against migrant workers: '- since adopting a 'no cost' recruitment model for all recruitment (irrespective of source country), steps are being taken to provide for greater and earlier clarity in communication to prospective candidates by the recruitment agencies of what constitutes 'recruitment fees' that are reimbursed as part of the free recruitment policy, and evidence required to support the same. - the first tier recruitment agency contracts are now enhanced, including with KPIs and a requirement for the new provisions to be mirrored in the engagement contracts with second tier agencies. Measures are being taken to provide sufficient training and auditing of the second tier (sub)agencies that are subcontractors to the contracted source country recruitment agencies. - given the pandemic-related travel challenges of HR staff from UAE and Qatar attending recruitment days in person, a prior HR</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>employee (who had moved back to Nepal) has been recruited by our Middle East business to support their on-the-ground presence in Nepal. Similar structures are being implemented in India. - employment offers are now provided to candidates in their source country language.' [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involve stakeholders in decisions about actions</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: System for tracking or monitor if actions taken are effective: In its 2021 MSA, it explains: 'Our businesses in the Middle East are alert to the risks inherent in cross-border migrant labour recruitment and are implementing an enhanced and ongoing ethics and compliance programme across all recruitment channels. [...] In light of the changing circumstances due to the pandemic, for example new requirements around quarantine, during 2021 our UAE and Qatar businesses took the opportunity to review their recruitment standard operating procedures. Their review set out to ensure local processes and colleague experience met our own high standards of conducting business with honesty, integrity and respect, the standards of all applicable source and destination country laws, and against the 11 ILO forced labour indicators. There were good standards of compliance overall and the businesses generally complied with the 11 ILO forced labour indicators. Where exceptions were identified, actions were taken quickly to remedy them, and the businesses continue to strengthen their practices overall. The Company then discloses examples of actions taken. However, it is not clear how the Company has a system to monitor if actions taken to prevent/mitigate human rights risks and impacts are effective beyond this issue. Current evidence seems to refer to an isolated review action in a specific context and topic. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Lessons learnt from checking system effectiveness</li> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Involve stakeholders in evaluation of actions taken</li> </ul>
B.2.5	Communicating on human rights impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provides two examples of comms with stakeholders: Although the Company indicates in its feedback to CHRB that it has a grievance channel and it communicates it to its workers, no examples found demonstrating how it communicates with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. The Company is expected to provide two of such examples.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The code of business conduct states that 'Speak Up is a Group-wide facility in Compass for our people to confidentially raise their concerns over actions and behaviour that they feel may be improper, unsafe, unethical or even illegal; issues that they feel they cannot raise with their Line Manager or through normal procedures. Employees can do this via a confidential telephone helpline and web-site, which is run by an independent specialist provider and is available 7 days a week, 24 hours a day. [Code of business conduct, 01/2018: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Speak up website, N/A: <a href="https://app.convercent.com">app.convercent.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Channel is available in all appropriate languages and workers aware: The Code of business conduct indicates that 'In many countries, the Speak up helpline has been set-up in more than one language'. The Speak up website is available in 32 languages (plus English). In addition, the Company indicates in its MSA 2021: 'Our Speak Up, We're Listening programme was relaunched and rebranded globally from 1 October 2021 with a coordinated roll out and engagement campaign across all 45 countries'. [Code of business conduct, 01/2018: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Describe how workers in the supply chain have access to grievance mechanism: The Company states in its Supply Chain Integrity Policy: 'Our commitment to upholding integrity includes having a process to address where this may not be happening either in our own operations or our supply chain. 'Speak Up' is a group-wide programme for Compass employees and suppliers to confidentially raise their concerns over actions or behaviour that they feel may be improper, unsafe, unethical or illegal' In addition, it indicates in its MSA 2021: ' As part of the roll out of the new supplier code, we will promote awareness within the supplier community of our Speak Up, We're Listening programme to encourage suppliers to raise any concerns directly via their Compass business partner (if applicable) or via our accessible, independently managed and confidential reporting helpline and/or online platform'. [Supply Chain Integrity Policy, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: Expect Suppliers to convey expectation to their own suppliers: The Supplier Code of Conduct indicates: 'We expect you to promote the principles and commitments set out in this Code to your relevant stakeholders and encourage responsible business practices in your own supply chains'. The Supplier Code of Conduct has information on the Speak Up mechanism. [SpeakUp and Listen Policy, 11/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism for community: The Company indicates in its Human Rights Policy: 'We are committed to holding ourselves accountable and there are multiple channels available to employees and third parties to raise concerns and report potential breaches. We aim to promote and foster a culture of integrity and engagement where everyone feels confident raising their voice. We promote our Speak Up programme including our confidential reporting helpline, online web-portal and other Speak Up resources, to provide the support and governance to ensure we sustain and strengthen this culture. The helpline is operated by an independent third party and is available internally and externally to ensure that all employees, Business Partners and any other stakeholders can raise their concerns in confidence and anonymously, when they feel something isn't right.' [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [SpeakUp and Listen Policy, 11/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes accessibility and local languages and stakeholder awareness: As indicated above, the channel is online available and seems to be open to anyone affected (and the process asks the complainant about relationship with the company including whether complainant is an employee). In addition, the Company indicates in its MSA 2021: 'Speak Up, We're Listening is Compass' confidential reporting programme that is available in all 45 countries where we operate, in applicable local languages. [...] Further initiatives are planned for 2022 to continue raising awareness of our programme and reinforce our commitments to listening and following up when our people, partners, communities or interested parties raise their voice.' However, this is a work in progress, and it is not clear whether external stakeholders are being made aware of the mechanism. In its feedback to CHRB, the Company provides additional sources, however, no evidence found on how it ensures that affected external stakeholders at its own operations are made aware of it. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [SpeakUp and Listen Policy, 11/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Communities access mechanism direct or through suppliers: The Company indicates in its Human Rights Policy: 'We are committed to holding ourselves accountable and there are multiple channels available to employees and third parties to raise concerns and report potential breaches. We aim to promote and foster a culture of integrity and engagement where everyone feels confident raising their voice. We promote our Speak Up programme including our confidential reporting helpline, online web-portal and other Speak Up resources, to provide the support and governance to ensure we sustain and strengthen this culture. The helpline is operated by an independent third party and is available internally and externally to ensure that all employees, Business Partners and any other stakeholders can raise their concerns in confidence and anonymously, when they feel something isn't right.' The Supplier Code of Conduct indicates: 'As a supplier to Compass, you and your employees, workers and contractors have access to Speak Up, We're Listening; Compass' confidential and independently operated multilingual whistleblowing programme'. However, it is not clear that external individuals and communities also have access to it or to the Company's grievance mechanisms, in order to raise Complaints or concerns about human</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			rights issues at the Company's suppliers. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a> ] & [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a> ] <ul style="list-style-type: none"> <li>• Not Met: Expect supplier to convey expectation to their own suppliers</li> </ul>
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Engages users to create or assess system</li> <li>• Not Met: Examples (at least two) of how they do this</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Engages with potential or actual users on the improvement of the mechanism: The Speak and Listen Up Policy states 'You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed via the Group Ethics &amp; Integrity portal using the ask a question facility'. However, although the Company indicates it has a channel open to suggestions on its Speak and Listen Up Policy, it is not clear how it actively engages with potential or actual users (or individuals or organisations acting on their behalf) in a process of interaction and dialogue between a Company and its stakeholders. The Company has provided additional comments for this indicator, however, its comments could not be found in the public domain. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]  <ul style="list-style-type: none"> <li>• Not Met: Provides user engagement example (at least two) on improvement</li> </ul> </li> </ul>
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Response timescales and how complainants will be informed: The Speak and Listen Up Policy indicates: 'Just as it is an expectation that any concerns be promptly reported, Compass also strives to assess and resolve all concerns in a timely manner. Any delays will be communicated to the appropriately involved parties. For those who feel comfortable, routinely following up on your concern will help to avoid any delays. [...] If appropriate, your report will be allocated for investigation. Investigations will be conducted respectfully, impartially and fairly, including affording these principles, rights and applicable privileges to the people mentioned in your report. From time to time, we may engage an external independent third party to lead or support an internal investigation or review of circumstances'. Finally, 'If you have provided contact details and/or are contactable anonymously through the Speak Up platform or helpline two-way messaging facilities, you will receive an acknowledgment that your report has been received and will be updated if your case is allocated for investigation or follow-up.' However, no further description found of the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant. The Company has provided additional comments for this indicator, however, its content could not be found in the public domain. [SpeakUp and Listen Policy, 11/2021: <a href="https://compass-group.com">compass-group.com</a>]  <ul style="list-style-type: none"> <li>• Not Met: Describe support (technical, financial, etc) available for equal access by complainants</li> </ul> </li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Escalation to senior/independent level</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation: The Company states in its Human Rights Policy: 'We operate a strict policy of non-retaliation and actively encourage all our stakeholders to use the helpline or other Speak Up resources (including those who raise concerns about human rights issues and can find themselves in a difficult position when raising their voice or in exercising their rights to freedom of expression, association, peaceful assembly and protest). Compass is committed to reviewing, following up and investigating concerns, as appropriate, and ensuring those who raise concerns in good faith do not suffer any form of retaliation including threat, intimidation or other detrimental treatment.' [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]  <ul style="list-style-type: none"> <li>• Met: Practical measures to prevent retaliation: Reports in speak up can be made 'via a confidential telephone helpline and web-site, which is run by an independent specialist provider'. Also, as noted above, 'anyone found to be involved in retaliation against any individual who has raised concerns in good faith will be subject to disciplinary action'. The Modern Slavery statement indicates that 'Our Speak Up, We're Listening programme was relaunched and rebranded globally from 1 October 2021 with a coordinated roll out and engagement campaign across all 45 countries'. The Speak and Listen Up Policy also indicates: 'Reports may be submitted using our Speak Up resources in way you feel most comfortable with, including whether you wish to provide your personal identification details or</li> </ul> </li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>remain anonymous. [...] Your identity will not be disclosed without your consent to anyone beyond those dealing with and investigating the concerns or those included on a strict need-to-know basis to receive and act upon the findings or remedial actions, unless this is necessary and proportionate in the context of looking into the matter, undertaking an investigation and/or seeking legal advice [...] We follow up with everyone who raises a concern using the Speak Up platform or helpline to check whether they believe they have suffered any form of retaliation'. [Code of business conduct, 01/2018: <a href="https://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Company indicate it will not retaliate against workers/stakeholders: The Speak and Listen Up Policy indicates: 'Compass strictly prohibits and does not tolerate retaliation or detrimental conduct in response to you raising a concern or being able to raise a concern'. However, no further evidence found indicating that it will not retaliate against workers and stakeholders through: legal action against persons or organisations who have brought or tried to bring a case against it involving credible allegation of adverse human rights impacts, or against the lawyers representing them as well as the through firing or engaging in economic forms of retaliation against any workers or their representatives who have brought or tried to bring a case against it involving an allegation of human rights abuse and engaging in violent acts or threats to the livelihoods, careers or reputation of claimants or their lawyers. [SpeakUp and Listen Policy, 11/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: The Supplier Code of Conduct indicates its expectations to suppliers: 'provide the appropriate information, training, and tools necessary to help employees and workers comply and ensure there is a mechanism to allow them to raise concerns safely and without fear of retaliation'. It also notes: 'We expect you to promote the principles and commitments set out in this Code to your relevant stakeholders and encourage responsible business practices in your own supply chains'. However, it is not clear this prohibition of retaliation also covers individual stakeholders and communities at supplier level, as it is not clear the mechanism is open to them. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Complainants not asked to waive rights: The Speak and Listen up Policy indicates: 'Compass strives to resolve all matters internally but nothing in this policy should be interpreted to prohibit you from reporting, at any time, suspected unlawful conduct to any relevant governmental authority, regulator or other external party'. [SpeakUp and Listen Policy, 11/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Company does not require confidentiality provisions: The Company has provided an additional source to this indicator, however, no material evidence was found.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Will work with state based non judicial mechanisms: The Code of Business Conduct notes: 'You may come into contact with government officials or representatives from public regulatory bodies during the course of your work for Compass. If you are asked to provide them with any information in connection with an enquiry or investigation, you have a duty to make sure that you are truthful and accurate, and that Compass' legitimate interests are protected. Always contact your local legal team before responding to any request for information from an unexpected agency. You should make sure that any information or files relevant to the investigation are preserved and not destroyed. This includes making sure any electronic systems for record disposal are temporarily suspended to ensure that relevant records are kept. Compass employees are expected to co-operate fully with the investigation. You must not obstruct the collection of information by properly authorised officials or retaliate against anyone who co-operates with the investigation'. However, although the Company indicates procedures to be followed when contacted by government officials or representatives from public regulatory bodies on ongoing investigations, the indicator focuses on the process by which it cooperates with state-based non-judicial grievance mechanism on complaints brought against it specifically. The Company has provided an additional source to this indicator, however, no material evidence was found. [Code of business conduct, 01/2018: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.7	Remedying adverse impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how remedy has been provided: The Company discloses information about a Case Study: Migrant Labour recruitment in the Middle East: 'Our businesses in the Middle East are alert to the risks inherent in cross-border migrant labour recruitment and are implementing an enhanced and ongoing ethics and compliance programme across all recruitment channels. [...] Where exceptions were identified, actions were taken quickly to remedy them, [...] : - new arrivals who are required to quarantine are provided with a monetary stipend while they are under COVID quarantine in UAE prior to starting work. - from 1 April 2021 in UAE and Qatar as applicable, for those colleagues who were not provided food as part of their accommodation, their food allowances were enhanced while also providing cash allowance advances to new recruits to purchase food on immediate arrival to their destination country. - through oversight by operational management, it was discovered that a minority of unit staff had not been paid in July 2021, and this was remedied the following month. There was no evidence that this was an institutional common practice.- two members of staff did not hold their own passports as these were with the client for security pass processing and were immediately returned.- the cost of Emirates identification cards (previously paid for by the employee) is now also covered by the business. [...] [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Changes to systems, processes and practices to stop similar impact: Following the Case Study: Migrant Labour recruitment in the Middle East, the Company reports about actions taken to stop modern slavery practices: '- since adopting a 'no cost' recruitment model for all recruitment (irrespective of source country), steps are being taken to provide for greater and earlier clarity in communication to prospective candidates by the recruitment agencies of what constitutes 'recruitment fees' that are reimbursed as part of the free recruitment policy, and evidence required to support the same. - the first tier recruitment agency contracts are now enhanced, including with KPIs and a requirement for the new provisions to be mirrored in the engagement contracts with second tier agencies. Measures are being taken to provide sufficient training and auditing of the second tier (sub)agencies that are subcontractors to the contracted source country recruitment agencies. - given the pandemic-related travel challenges of HR staff from UAE and Qatar attending recruitment days in person, a prior HR employee (who had moved back to Nepal) has been recruited by our Middle East business to support their on-the-ground presence in Nepal. Similar structures are being implemented in India. - employment offers are now provided to candidates in their source country language.' [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Describe approach to monitoring implementation of agreed remedy: The 2021 Annual Report indicates: 'Each concern is assessed, followed up and investigated (if appropriate) by an assigned case manager, with regular reports to the Corporate Responsibility Committee and the Regional Governance Committees'. One of the main duties of the Corporate Responsibility Committee is 'receiving updates on non-financial related reports from the whistleblowing helpline, Speak Up, We're Listening'. Also: 'The Committee noted the probity displayed by the businesses in dealing with concerns raised and, in particular, monitored trends in reporting occurring throughout the year, including those related to COVID-19 related Speak Ups, to ensure that any issues identified were remediated appropriately'. The Speak Up Policy discloses the key steps that will occur when someone voices their concerns under the policy. However, it is not clear the Company's approach to monitoring implementation of the agreed remedy. The Company has provided an additional source to this indicator, however, no material evidence was found. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>] &amp; [SpeakUp and Listen Policy, 11/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: Approach to learning from incident to prevent future impacts: It states in its Human Rights Policy: 'We have an embedded continuous improvement process designed to investigate, remediate and prevent reoccurrence of issues. This model forms part of our overall Group Ethics and Integrity programme, where we operate a continuous learning and improvement cycle. It includes the identification of root causes and corrective and preventative actions including the development of integrity insights and lessons learned. Our Audit and Corporate Responsibility Committees of the Board provide oversight and monitor the effectiveness of our Speak Up programme'. [Human Rights Policy, 09/2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Number grievances filed, addressed or resolved and outcome achieved: The Company report in its MSA 2021: 'In the 12 months to September 2021 there were no Speak Up reports received through the helpline or via the online platform that were categorised as concerns raised around the issue of modern slavery and human trafficking. However, through Speak Up, we received some reports related to human rights topics including alleged discrimination and working practices. These reports were followed up and/or investigated in an appropriate and timely manner with our standard processes being followed.' The 2021 Sustainability Report notes the 'Total number of cases reported by employees globally, via Speak Up' in 2021 was '3,195'. However, no further information with respect the number of human rights concerns addressed or resolved, including own workers, and external stakeholders was found. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Sustainability Report 2021, 01/0222: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: How lessons from mechanism improve management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Evaluation of the channel/mechanism and changes made as result: The 2021 Annual Report indicates that one of the main duties of the Corporate Responsibility Committee is 'receiving updates on non-financial related reports from the whistleblowing helpline, Speak Up, We're Listening'. The Report also notes 'The Group's Speak Up, We're Listening programme has recently been relaunched [...]. To improve the management of reporting parties and development of the information received, the Committee noted the efforts being made for reporting to be more engaging and accessible for frontline employees via a simplified online intake process and use of a QR code. This is expected to improve the quality of the reports received, with more specific information provided, enabling a swifter and better analysis of potential issues and optimising investigation and case closure processes. The Committee noted the probity displayed by the businesses in dealing with concerns raised and, in particular, monitored trends in reporting occurring throughout the year, including those related to COVID-19 related Speak Ups, to ensure that any issues identified were remediated appropriately'. Although the Company indicates a recent improvement in the grievance mechanism, it is not clear the process it has in place to review the effectiveness of the grievance mechanism that lead to these changes. The Company has provided an additional source to this indicator, however, no material evidence was found. [2021 Annual Report, 2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

#### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company states in its Supply Chain Integrity Policy: 'We embrace the Ethical Trading Initiative (ETI) Base Code principles, and reflect these within our Code of Business Conduct and Supplier Code. The Base Code principles are: [...], Living wages are paid[...]'. The Supplier Code of Conduct indicates suppliers should: 'comply, at a minimum, with all applicable laws and regulations regarding human rights and modern slavery including but not limited to working hours and days worked, minimum wages, overtime, [...] as well as other mandatory benefits, ensuring that appropriate records are kept'. However, it is not clear it has a timebound target for requiring its suppliers to pay all workers a living wage or that the company includes requirements to pay workers a living wage in its contractual arrangements with its suppliers or its supplier code of conduct. A living wage should cover basic needs and provide some discretionary for employees and his/her family and or depends. [Supply Chain Integrity Policy, 2021: <a href="https://compass-group.com">compass-group.com</a>] &amp; [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Improving living wage practices of suppliers: The Company indicates, in the context of Compass USA, that it has an agreement to CIW in which it commits to ensure: 'Compass Group North America and the Coalition of Immokalee Workers (CIW) are proud to announce a partnership that will improve the working conditions of agricultural workers who harvest fresh tomatoes grown in Florida. [...] As part of the agreement, Compass Group will pay an additional 1.5 cents per pound for all the tomatoes they purchase annually, with one cent per pound being passed from the supplier directly to the harvesters. The agreed upon 'Code of Conduct' is designed to improve working conditions and give harvesters opportunity to advance beyond the field. In part, the agreement will ensure: Workers will receive an immediate raise based on the penny-per-pound, with the ultimate goal of a guaranteed minimum fair wage'. Compass is also a participant buyer of the Fair Food Program (US). [CIW_Agreement (web), 25/09/2009: <a href="http://ciw-online.org">ciw-online.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by payment below living wage</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Avoids business model pressure on HRs (purchasing practices)</li> <li>• Not Met: Practices adopted to pay suppliers in line with agreed timeframes: The Company indicates: 'We recognise the importance of maintaining both visibility and transparency within our supply chain to protect those that work within it from potential abuse and exploitation. We embrace the Ethical Trading Initiative (ETI) Base Code principles, and reflect these within our Code of Business Conduct and Supplier Code'. However, no description found of the practices it adopts to pay suppliers in line with agreed timeframe and for the amount agreed in the payment terms. [Supply Chain Integrity Policy, 2021: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: Review own operations to mitigate negative impact</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Examples of how it assessed, addressed and change purchasing practices</li> </ul>
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The SC Integrity Policy: 'The recently refreshed Global SCI Standards now include additional requirements aimed at making our global supply chain more resilient to food fraud by introducing a requirement for greater visibility of the end-to-end supply chain through risk-based supplier mapping.' The 2021 MSA indicates: 'As a Group, while we are working hard to identify and mitigate potential risks across our operations and supply chains, we recognise that there is still more to do. [...] This year, we rolled out SEDEX across more countries to improve visibility of the Group's supply chains and to undertake risk assessments. [...] Using a risk-based approach, audit nonconformances were followed up to ensure the remediation of actions identified. SEDEX is being rolled out in our Australian business, which enables it to monitor suppliers using the system. In Sweden, SEDEX is being used to analyse country of origin data for produce in our supply chain, with plans to gather new information regarding suppliers' production sites and the measures they take to minimise risks related to human rights. Our North American business is currently investigating platforms (including SEDEX) that align with and will enable the business to confirm that the ETI base code is being met in its supply chain. [...] the first tier recruitment agency contracts are now enhanced, including with KPIs and a requirement for the new provisions to be mirrored in the engagement contracts with second tier agencies'. However, no evidence found that it identifies its suppliers, including direct and indirect suppliers (names and locations of sources at farm level), and describes how it goes about this'. [Supply Chain Integrity Policy, 2021: <a href="http://compass-group.com">compass-group.com</a>] &amp; [2021 MSA Statement, 2021: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses names and locations of significant parts of SP and why</li> <li>• Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Child Labour rules in codes or contracts: The Supplier Code of Conduct indicates suppliers should: 'ensure you do not use or benefit from any child, forced, bonded or compulsory labour'. Also: 'ensure that all employees and workers meet the relevant legal minimum age of employment and have in place systems to prevent child labour and exploitation'. However, although the Company has child labour and age verification provisions, no evidence found that it requires suppliers to have remediation programmes. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: How working with suppliers on child labour</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of number affected by child labour in supply chain</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (in the supply chain)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Debt and fees rules in codes or contracts: The Supplier Code of Conduct indicates supplier should: 'ensure you do not use or benefit from any child, forced, bonded or compulsory labour; [...] ensure that recruitment is carried out ethically and responsibly'. However, although the Company suppliers should ensure responsible recruitment, it is not clear it prohibits suppliers and any third-party recruitment intermediaries from imposing financial burdens on job seekers and workers by collecting recruitment fees or related costs. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Met: How working with suppliers on debt &amp; fees: Regarding migrant labour recruitment in the Middle East, the 2021 MSA notes: 'There were good standards of compliance overall and the businesses generally complied with the 11 ILO forced labour indicators. Where exceptions were identified, actions were taken quickly to remedy them, and the businesses continue to strengthen their practices overall: [...] the first tier recruitment agency contracts are now enhanced, including with KPIs and a requirement for the new provisions to be mirrored in the engagement contracts with second tier agencies. Measures are being taken to provide sufficient training and auditing of the second tier (sub)agencies that are subcontractors to the contracted source country recruitment agencies'. [2021 MSA Statement, 2021: <a href="https://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by payment of recruitment fees</li> <li>• Not Met: Analysis of trends in progress made</li> </ul>
D.1.5.d	Prohibition of forced labour: Wage practices (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Suppliers to pay workers in full and on time in codes or contracts: The Supplier Code of Conduct indicates suppliers should: 'ensure that all work is based on a legally recognised employment relationship and that employees receive clear written information about their employment terms and benefits which comply, at a minimum, with applicable employment laws and regulations'. Also: 'comply, at a minimum, with all applicable laws and regulations regarding human rights and modern slavery including but not limited to [...] minimum wages, [...] as well as other mandatory benefits, ensuring that appropriate records are kept'. However, no further evidence found that it requires the suppliers to pay workers in full and on time, in its contractual arrangements with suppliers or supplier code of conduct. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: How working with supply chain to pay workers regularly and on time</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by failure to pay directly</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.5.f	Prohibition of forced labour: Restrictions on workers (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not Met: Free movement rules in codes or contracts: The Supplier Code of Conduct indicates suppliers should: 'treat all employees and workers humanely and ensure that all work is freely chosen'. However, no evidence found that it prohibits suppliers from retaining workers' personal documents or restricting workers' freedom of movement or requiring workers to use company provided accommodation in its contractual arrangements or within its supplier code. [Supplier Code of Conduct, 08/2022: <a href="https://compass-group.com">compass-group.com</a>]</li> <li>• Not Met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by retaining docs or restricting movement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: FoA &amp; CB rules in codes or contracts: The Supplier Code of Conduct indicates suppliers should: 'recognise and respect employees and workers rights to organise freely and bargain collectively'. Also, 'do not subject employees and workers to or tolerate any form of unfair or unlawful harassment, discrimination or degrading treatment, whether physical, verbal, sexual, or any harmful acts including violence'. However, no provision found of prohibiting intimidation, harassment, retaliation and violence specifically against trade union members and trade union representatives. [Supplier Code of Conduct, 08/2022: <a href="#">compass-group.com</a>]</li> <li>• Not Met: How working with suppliers on FoA and CB</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease rates (in the supply chain)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Sets out clear Health and Safety requirements: Regarding health and safety expectations, the Supplier Code of Conduct indicates suppliers should: 'comply, at a minimum, with all applicable laws and regulations, and adhere to relevant industry standards on workplace health and safety rules and procedures that apply to you and/or your Compass engagement. Report any concerns or issues that may occur in a timely manner to your Compass business contact. [...] employees and workers health and safety to be a priority throughout all aspects of our suppliers' activities, including implementing and maintaining relevant policies, standards, procedures and systems [...] provide employees and workers with a safe and healthy working environment, and, where provided, safe and secure housing conditions [...] promote and encourage a workplace culture of health and safety; implementing, where relevant, policies and practices including risk assessments and management and recording of incidents and accidents [...] ensure that any unsafe work is stopped immediately, and only starts again once the hazard has been removed or the issue resolved [...] ensure that all employees and workers receive adequate and relevant health and safety training and have the necessary tools and equipment to perform their roles safely and in a compliant manner [...]'. [Supplier Code of Conduct, 08/2022: <a href="#">compass-group.com</a>]</li> <li>• Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period</li> <li>• Not Met: Fatalities rate for lasting reporting period</li> <li>• Not Met: Occupation disease rate for last reporting period</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: How working with suppliers on H&amp;S</li> <li>• Not Met: Assessment of the number affected by H&amp;S issues in the SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress: Although the Company provides an analysis of trends demonstrating its progress, it is not clear the graphics make reference to its supply chain. [Safety culture, N/A: <a href="#">compass-group.com</a>]</li> </ul>
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Rules on land &amp; owners in codes or contracts: The Company indicates in its MSA 2021 that it will launch 'new Global Supplier Code of Conduct in 2022'. However, the new Code was not found yet. No evidence found in its contractual arrangements with its suppliers or supplier code of conduct of rules related to land rights. [2021 MSA Statement, 2021: <a href="#">compass-group.com</a>] &amp; [Supply Chain Integrity Policy, 2021: <a href="#">compass-group.com</a>]</li> <li>• Not Met: How working with suppliers on land issues</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Includes resettlement requirements that the supplier provides financial compensation</li> <li>• Not Met: Assessment of the number affected by land rights issues in its SP</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Rules on water stewardship in codes or contracts: No evidence found in its contractual arrangements with its suppliers or supplier code of conduct of rules related to water stewardship.</li> <li>• Not Met: How working with suppliers on water stewardship issues</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by lack of access to water and sanitation</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Women's rights in codes or contracts: No evidence found in its contractual arrangements with its suppliers or supplier code of conduct of rules related to women's rights.</li> <li>• Not Met: How working with suppliers on women's rights</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Assessment on the number affected by discrimination or unsafe working conditions</li> <li>• Not Met: Provides analysis of trends demonstrating progress</li> </ul>

### E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Health &amp; Safety</li> <li>• Headline: COVID-19. Compass employees, working at Tenet Healthcare, protest over alleged systematic safety issues, low wages and understaffing</li> <li>• Story: On May 10, 2021, media sources reported that the National Union of Healthcare Workers (NUHW) has led a protest at Tenet Healthcare's annual shareholders meeting at Fountain Valley Regional Hospital, to expose alleged systematic safety issues affecting patients and staff.</li> </ul> <p>The NUHW reported that workers, who work under, a subcontract with Compass Group, protested over staff shortages, poor pay, and unsafe working conditions despite high profits in 2020 estimated at USD 399 million, triple rise in stock price and top Executives' rewards with six-figure bonuses. The union also highlighted an inspection by the California Department of Public Health that found "systemic infection control violations, infection control violations — including placing an adult COVID patient in a paediatric unit — that put both caregivers and patients at increased risk for contracting COVID-19."</p> <p>The protesters included more than 150 NUHW members from three Tenet hospitals, including respiratory therapists, housekeepers, nursing assistants, medical technicians, and kitchen staff. Many of the employees work for Compass Group, a staffing firm subcontracted by Tenet Healthcare that the protesters said pays less than Tenet and charges more for health insurance, leaving many workers without coverage during a pandemic.</p> <p>[Health Leaders, 10/05/2021, "Tenet workers protest at shareholders' annual meeting": <a href="https://www.healthleadersmedia.com">healthleadersmedia.com</a>] [NUHW, 07/05/2021, "Tenet workers protest as corporation celebrates big pandemic profits": <a href="https://nuhw.org">nuhw.org</a>]</p>
E(1).1	The company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Public response: In response to the allegation, Tenet Healthcare stated: "“This matter is not about us. It’s about a negotiation strictly between the NUHW and the Compass Group, which is a vendor that provides a range of food, laundry and other support services to hospitals,” the system said in its statement. “At all times, our main concern is the safety of our staff, the integrity of our facilities and the best possible outcomes for our patients, and we remain hopeful that the NUHW and Compass will reach a positive outcome at the conclusion of their respective negotiations".</li> </ul> <p>A spokesperson for Compass told Becker's Hospital Review "Our hard-working team members are at the heart of what we do, and their determination to provide best-in-class care and service is inspiring. We take pride in paying competitive wages and providing affordable benefits. We are pleased our new agreement has been ratified and look forward to continuing to work productively with the NUHW." This statement was given after the company and the NUHW reached an agreement over new contracts, it does not address the allegations regarding health and safety issues at all.</p> <p>The company provided feedback for this indicator mentioning a document called "CBA Agreement". However, the document sent by Compass Group is not a public</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>response to the allegation and it not directed at the public. [Health Leaders, 10/05/2021, "Tenet workers protest at shareholders' annual meeting": <a href="https://healthleadersmedia.com">healthleadersmedia.com</a>] [Becker's Hospital review, 22/12/2021, "Workers at 3 Tenet hospitals in California approve contracts with double-digit pay raises": <a href="https://beckershospitalreview.com">beckershospitalreview.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: See above. Although the Collective Bargaining Agreement between the company and the union addresses the issues, this does not qualify as a public response under this indicator, as it is not addressed to the public as such.</li> </ul>
E(1).2	The company has investigated and taken appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Engaged with stakeholders: The company engaged with the union in talks over new contracts including agreements to necessary changes regarding COVID-19 related practices. This indicates that the stakeholders concerns to the underlying causes of the insufficient health and safety measures have been addressed. [Collective Bargaining Agreement with Compass Group USA at Fountain Valley Regional Hospital Los Alamitos Medical Center Lakewood Regional Medical Center August 21, 2021 – April 30 2024: <a href="https://nuhw.org">nuhw.org</a>]</li> <li>• Met: Identified cause: The company does not explicitly present investigative results on the underlying causes of the events concerned. However, from the outcome of the negotiation it can be assumed that the measures agreed upon address the root causes of the issue.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Identified and implemented improvements: Considering the agreement that the company has made with NUHW, it is stated that the Employer will make all reasonable efforts to make available required Personal Protective Equipment (PPE) for use by employees. The Employer will adhere to guidelines promulgated by relevant local, state and federal authorities. The Employer will also make all reasonable efforts to adhere to social distancing, screening, and masking guidelines promulgated by relevant local, state, and federal authorities [Collective Bargaining Agreement with Compass Group USA at Fountain Valley Regional Hospital Los Alamitos Medical Center Lakewood Regional Medical Center August 21, 2021 – April 30 2024: <a href="https://nuhw.org">nuhw.org</a>]</li> <li>• Met: Stakeholder input to steps taken: Considering that the agreement was made with NUHW, the views of affected stakeholders or their legitimate representatives have influenced the actions the company has taken to prevent similar human rights impacts in future. [Collective Bargaining Agreement with Compass Group USA at Fountain Valley Regional Hospital Los Alamitos Medical Center Lakewood Regional Medical Center August 21, 2021 – April 30 2024: <a href="https://nuhw.org">nuhw.org</a>]</li> </ul>
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy: The company has taken steps to prevent a repetition of the alleged events. However, the company has not provided remedy for the past violations.</li> </ul> <p>Furthermore, the company provided feedback for this indicator mentioning a document called "CBA Agreement". However, considering the "APPENDIX C – COVID-19 PANDEMIC", none of the remedies that the company has pointed out are there. So, the datapoints can not be considered a MET.</p> <ul style="list-style-type: none"> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: The company has taken steps to prevent a repetition of the alleged events. However, the company has not provided remedy for the past violations.</li> </ul> <p>Furthermore, the company provided feedback for this indicator mentioning a document called "CBA Agreement". However, considering the "APPENDIX C – COVID-19 PANDEMIC", none of the remedies that the company has pointed out are there. So, the datapoints can not be considered a MET.</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy delivered: The company has taken steps to prevent a repetition of the alleged events. However, the company has not provided remedy for the past violations.</li> </ul> <p>Furthermore, the company provided feedback for this indicator mentioning a document called "CBA Agreement". However, considering the "APPENDIX C –</p>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			COVID-19 PANDEMIC", none of the remedies that the company has pointed out are there. So, the datapoints can not be considered a MET. • Not Met: Independent remedy process used

## Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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