



Fighting Against Forced Labour and Child Labour in Supply Chains

2024 Annual Report

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Executive Summary



Serve a better future

by enriching people, communities and the planet.

OUR COMMITMENT

As a leader in food services, Compass Group Canada always strives to do what's right—for our people, our customers, our shareholders, the planet, and the communities that we serve.

In 2023, we launched our official purpose: *"At Compass Group Canada, we serve a better future by enriching people, communities, and the planet."*

Our purpose is at the core of what we do and the key driver behind our strategic framework, which contains our promises, ambitions, goals, values, and commitments.

Our purpose is underpinned by four key beliefs:

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

To achieve our purpose, we are committed to maintaining strong governance and high ethical standards throughout our operations, to conducting business with integrity, to never compromising on safety, and to treating others with kindness and respect. This commitment extends to all of Compass Group Canada's operations, including those of Foodbuy—our procurement and supply chain solutions division.



At Compass Group Canada, we recognize that our success and future growth depends on everyone within our organization upholding our commitments. Whatever our role, how we act and behave can affect how we are viewed and impact the trust that our stakeholders have in us. That's why we're committed to ensuring all of our people understand the importance of our commitments and have the tools and training to act as champions of our purpose—including ensuring that they are acting responsibly when it comes to managing and mitigating the risks associated with forced labour and child labour in our supply chain.

Compass Group Canada is committed to eradicating forced labour and child labour. In this report, we are proud to share the progress that we have made over the past year. Working with our global Compass Group network, we will continue to build on these efforts in the years ahead.

Saajid Khan

Chief Executive Officer
Compass Group Canada
31st May 2024

FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

This is Compass Group Canada’s 2nd Fighting Against Forced Labour and Child Labour in Supply Chains report, which has been prepared in accordance with the federal government of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act

Compass Group Canada is commitment to identifying and mitigating the risks associated with forced labour and child labour. We regularly invest in strategies, tools, processes, and partnerships to identify and mitigate potential risks across our operations and supply chain—such as our work with the Supplier Ethical Data Exchange (Sedex) and our recently introduced Third Party Integrity Due Diligence (TPIDD) policy. We have been supported and guided in these endeavours by our ultimate parent company, Compass Group PLC, which is listed in the UK and is committed to complying with the Modern Slavery Act 2015 (UK).

OUR FOCUS AREAS

Our focus areas related to identifying and mitigating the risks associated with forced labour and child labour in our supply chain are aligned with the key focus areas identified by our global Compass Group network. Our Canadian team works closely with our global counterparts on initiatives in order to maximize the effectiveness of our endeavours.

FOCUS AREAS
1. Reviewing and assessing our sourcing, contracting, and supplier selection processes and related technologies through our centralized and globally recognized procurement business, Foodbuy
2. Actively communicating our expectations to our suppliers and enforcing standards through our contracts
3. Conducting targeted audits through our partnership with SEDEX
4. Investing in targeted training for our teams, supported by the learnings from Compass Group’s global, multidisciplinary Human Rights Working Group
5. Providing our people with access to the independently operated helpline SpeakUp! to report any concerns including those relating to the use of forced labour and child labour
6. Investigating and addressing concerns that are identified at the very highest levels by our Canadian Leadership Team



KEY HIGHLIGHTS—FY24

- Delivered targeted training to mid and senior level management across Compass Group Canada on Ethics & Integrity including conflicts of interest as outlined in our Company's Code of Business Conduct.
- Participated actively in Compass Group's global Human Rights Working Group, which provides a global forum for best practice sharing, coordination and awareness raising on human rights issues, including modern slavery.
- Implemented the requirement for formal and independent SMETA audits to be conducted by our strategic suppliers as part of our standard supplier contracts.

Reporting requirements

Compass Group Canada Ltd. prepared this report in accordance with the Canadian federal Fighting Against Forced Labour and Child Labour in Supply Chains Act, which came into force on January 1, 2024. It sets out the steps Compass Group Canada has taken to prevent and reduce the risk that forced labour or child labour is used at any step of its supply chain during the prior fiscal year ended September 30, 2024. Compass Group Canada's Executive Leadership has approved this report.

This a joint report filed by Compass Group Canada Ltd. on behalf of itself and the following reporting entities: Compass Group Canada Operations Ltd., Canteen of Canada Limited, East Coast Catering Limited, Groupe Compass (Quebec) Ltee., Compass Canada Support Services Ltd., Chef's Hall Inc., and Crothall Services Canada Inc.



Introduction to Compass Group Canada



COMPASS GROUP CANADA

Compass Group Canada (CGC) is Canada's leading foodservice and support services provider with over 24,000 associates working in more than 2,400 locations throughout the country. We specialize in providing foodservices and support services, including facilities management and vending services. Compass Group Canada works across a number of core sectors, including leading sports and leisure venues, executive dining rooms and cafes, schools, universities, seniors' residences, and hospitals, in addition to remote camps and offshore oil rigs.

CGC and the reporting entities are companies incorporated in Canada. CGC's ultimate parent company is Compass Group PLC, which is listed in the UK and has operations throughout the world. Compass Group PLC aligns with our commitment of eradicating modern slavery and has published its own Modern Slavery Statement pursuant to the provision of section 54 of Modern Slavery Act Statement 2024 (UK), found [here](https://www.compass-group.co.uk/media/dydaeuw/modern-slavery-statement-2024.pdf)*

*<https://www.compass-group.co.uk/media/dydaeuw/modern-slavery-statement-2024.pdf>

FOODBUY CANADA

Foodbuy is the leading foodservice procurement and supply chain solutions organization (GPO) in North America and the sole sourcing partner for its parent company, Compass Group North America. Foodbuy Canada negotiates and manages purchasing contracts with over 400 supplier partners nationally.

Foodbuy Canada manages \$4.2B in purchasing volume from both Compass units and non-Compass members, who also participate in these purchasing programs.



AS COMPASS CANADA, WE...

Serve a better future

by enriching people, communities and the planet.

And we do this because we believe that...



Everyone should be seen and
nourished as a whole person



Great service starts with
understanding what people
value most



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



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



COMPASS OPERATIONS

Our business is structured to reflect the six key sectors that we operate in. Within each sector, we operate a number of distinct brands; this has allowed us to showcase our understanding of the unique needs of our clients and to build long-lasting relationships built on trust.

- **Business & Industry:** We provide food services in workplaces across the country, ranging from corporate offices to manufacturing sites to premium catering. Our food service teams energize thousands of employees while they enjoy the hospitality of our cafés, restaurants, and catering.

Brands: Eures, ESFM, Gourmet Cuisine, Canteen, Food Dudes

- **Education:** We are the country's leading foodservice and environmental services provider in the public and private education sectors. We create campus dining experiences with care, focusing on the delivery of diverse, healthy, and delicious meals to help fuel students throughout their academic journeys.

Brands: Chartwells (K-12, Higher Education, Independent Schools)

- **Healthcare:** We serve Canada's largest and most prominent hospitals and health systems by providing a full range of food and environmental services. We elevate the patient and guest experience to allow them to focus on what matters most—their health and wellbeing.

Brands: Compass One

- **Senior Living:** We are Canada's only specialized senior living food and hospitality provider. We create dining and hospitality experiences that let residents of senior living facilities across the country to feel at home.

Brands: Marquise

- **Sports & Leisure:** We have been innovating foodservices in the sports and leisure sector for over 60 years. We create exceptional culinary experiences and lasting memories for our guests across a range of venues, including sports arenas, convention centres, and entertainment venues. We also provide premium services related to corporate dining, retail, airport lounge and executive traveler hospitality, and more.

Brands: Levy Canada, Restaurants Associates

- **Remote Services:** We have been transforming remote workplaces for over 40 years, including defence, offshore, and remote sites around the world. Our focus is on providing a home away from home atmosphere for the resident workers of our clients, supporting every aspect of their daily community life 24 hours a day, 365 days a year.

Brands: ESS, East Coast Catering

Foodbuy Canada Operations

Foodbuy Canada is Compass Group Canada's purchasing and supply chain solutions department. Foodbuy Canada also extends participation in its competitive purchasing contracts to non-Compass members, leveraging this enhanced purchasing volume for improved contract terms.

\$4.2

billion in managed
spend in Canada

400+

contracted
suppliers

33,000

member
locations

Our Canadian and North American operations do not work alone. Our Compass Group network has a strong footprint in the foodservice industry globally.

Our Global Spread



c.30

Number of countries in which
we operate



580,000+

Number of people we engage
and employ globally



5.5 bn

Number of meals served globally
per year

OUR SUPPLY CHAIN

Compass Group Canada's operations rely on an extensive and complex supply chain of distributors, suppliers, and subcontractors. To ensure best practice and procurement due diligence, Compass Group Canada operates a wholly owned and dedicated centralized procurement and supply chain business, Foodbuy Canada. Foodbuy Canada works with both broadline and direct store distributors and with over 400 suppliers in Canada.

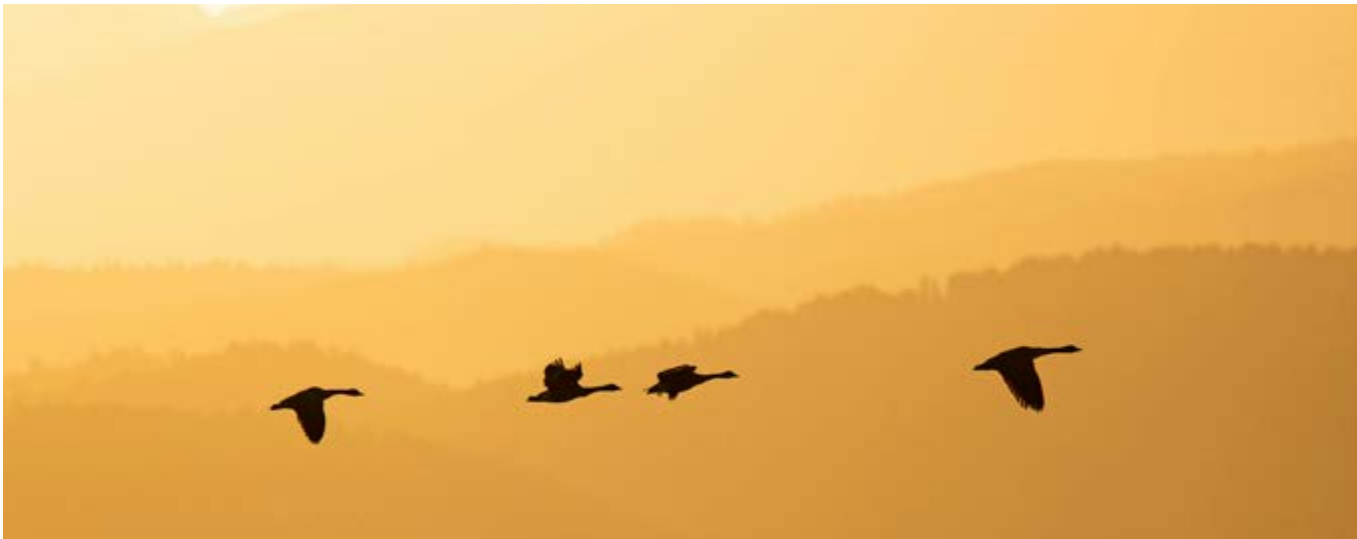
Foodbuy Canada is responsible for sourcing, contracting, and providing the technology and capability to appropriately manage the supply of products and services used across Compass Group Canada's operations in addition to separate Foodbuy Canada members. This includes food and beverage products, cleaning supplies, small wares, furniture, vehicles, IT equipment, PPE, labour services, and services provided by subcontractors such as trades. We hold our suppliers to the same ethical standards and expectations as we do our direct operations.



[†]<https://foodbuy.com.au/>

Our risk approach

This section of the report provides an overview of key facets of Compass Group Canada’s risk approach related to identifying and mitigating forced labour and child labour in our supply chain.



OUR GOVERNANCE FRAMEWORK

As one of the largest catering and support services companies in Canada, we recognize and value both our responsibility and the positive role we can play in helping to eradicate forced labour and child labour. We are aware of the inherent risks that forced labour and child labour can pose and of the internal and external operating factors that can give rise to it. To help ensure risk factors are considered throughout our end-to-end operations, we have embedded ethical business process requirements into our policies and into our organizational structure.

The following figure outlines our governance framework with respect to identifying and mitigating the risks associated with forced labour and child labour in our supply chain.

Figure 1: Compass Group Canada’s risk governance framework





OUR RISK-BASED APPROACH

The hospitality and support services sector has been highlighted by the ILO and other organisations as one where there may be heightened risks of forced labour, particularly due to its reliance on outsourced services, subcontracted labour, and complex labour supply chains. While our directly employed workforce is protected under Canadian labour law, we recognise that risks may exist in the extended labour and goods supply chains that support our operations. To identify and assess the risks related to forced labour and child labour within our operations and supply chain, we utilize an extensive risk-based approach that incorporates leading practice guidance, tools, and processes; data collection and assessment; audits; and knowledge sharing. Contributors to our approach include:

- Sedex risk assessment tools and supplier self-assessment questionnaire
- SMETA audits and other third-party labour audits conducted at the facilities of our suppliers
- Regular performance reviews conducted by our Risk Management team
- Guidance, knowledge sharing, and lessons learned from our global Human Rights Working Group
- Outcomes of publicly available relevant investigations
- Information from our Speak and Listen Up anonymous program which provides guidance for employees, suppliers and partners to raise concerns. It emphasizes that all reports will be reviewed by Group Ethics and Integrity, an independent team overseeing the Speak Up program. It reassures all stakeholders that their voices will be heard, and their concerns taken seriously.

OUR POLICIES AND STANDARDS

The following policies provide minimum standards and guidance for all members of Compass Group Canada, Foodbuy Canada, and our partners with respect to identifying and mitigating the risks associated with forced labour and child labour:

Global policies (Compass Group PLC)

- **Code of Business Conduct:** Code of Business Conduct: The Code of Business Conduct (CBC) offers a comprehensive framework that outlines Compass' commitment to upholding ethical business practices. It emphasizes safety, integrity and respect as core principles that must guide employees' behaviour in all situations. The CBC mandates compliance with applicable laws, and where it is more stringent than local regulations, its principles must be followed. An important theme of the CBC is its zero-tolerance stance on forced labour and modern slavery, ensuring that all business operations, including those of partners, align with the highest ethical standards. The CBC also addresses, amongst other things, equality and inclusion, reaffirming the Company's commitment to fairness and non-discrimination.
- **Supplier Code of Conduct:** This code applies to all of Compass Group's supply chain partners globally. It outlines our 5 key focus areas of engagement with our suppliers; Business integrity and ethical principles, Human rights and labour standards, Health and safety, Sustainability & Speak Up, We're Listening. The SCOC must be reviewed and accepted by all new suppliers invited to the vendor certification process.
- **Human Rights Policy:** The Human Rights Policy affirms Compass' commitment to respecting the human rights of workers across its businesses' operations and supply chains. The policy underscores the importance of fair treatment, inclusion and non-discrimination and is aligned with international human rights standards, including key conventions from the International Labour Organization (ILO). It outlines performance indicators to monitor compliance, such as the number of substantiated human rights breaches and training completion rates, ensuring that Compass actively works toward eliminating modern slavery and promoting a fair work environment.
- **Supply Chain Integrity Policy:** This policy is applicable to Compass Group's procurement activities globally and includes a focus on Responsible Sourcing, Deforestation Risks, Human Rights, Quality and Health & Wellness.
- **Responsible Sourcing Policy Statement (RSPS):** Ensures responsible sourcing is central to Compass' businesses and their operations. The RSPS highlights Compass' commitment to ethical and sustainable practices across its businesses' supply chains. It focuses on reducing environmental impact, eliminating deforestation, promoting animal welfare and respecting human rights. The policy addresses risks related to forced labour, modern slavery and labour exploitation. Suppliers are expected to uphold high ethical standards, adopt sustainable practices, and ensure transparency and traceability in their operations. Compass expects suppliers to disclose supply chain data, comply with applicable policies, and use the Speak Up platform to report concerns. Non-compliance may lead to termination of agreements.

Compass Group Canada policies

- **Employee Code of Conduct:** Last updated in November 2023, this code outlines Compass Group Canada's policies and procedures as to appropriate behavioural standards for all employees.
- **Whistleblower Policy:** Last updated in May 2023, this policy supports our commitment to fostering a culture of ethical behaviour and good corporate governance by providing safe options for the reporting of improper conduct.
- **Recruitment Policy:** Last reviewed in December 2022, this policy outlines how Compass Group Canada manages recruitment, transfers, secondments, and other contract variations for new and existing employees.



OUR EXTERNAL OPERATING FACTORS

As a leader in the foodservice industry, we source products from a large and diverse global supplier base. We recognize that risks associated with forced labour and child labour may exist within our multitiered and global supply chain given the complexity, amount, and variety of products we source. We consider our direct and indirect supply chain to span a number of industries considered to have a heightened risk of forced labour and child labour, including farming, agriculture, food production, food processing, and distribution.

To minimize risk, Foodbuy rarely sources direct from farmers and leverages partnerships with distributor's and/or wholesalers.

We understand the potential increased risks of forced labour and child labour within our indirect supply chain, particularly risks related to suppliers with international operations that are difficult to assess. We have identified the following higher risk categories as having a significant presence in our supply chain:

- Apparel / Uniforms
- Cocoa/Chocolate
- Coffee & Tea
- Fruit & Vegetables
- Rice
- Seafood
- Labour Agencies

We partner with Sedex to support our assessment of inherent risks associated with the location and commodities of our suppliers. During the current reporting period, we continued to re-engage with our key supplier partners to complete the Sedex self-assessment questionnaire. This ongoing effort will continue to increase our supply chain transparency and accountability.

Human rights risks, including those associated with forced labour and child labour are regularly discussed by our global Human Rights Working Group, Supply Chain Risk Management Steering Group, with input from Compass Group's ethics and integrity team, amongst others.

In addition to using Sedex as an assessment tool, Foodbuy Canada's Procurement & Compass Group Canada's Risk Management teams conduct assessments on prospective suppliers. Our contracted food suppliers are subject to annual review, which includes verification of registration and good standing with provincial/local worker's compensation board/commission of the territory it operates in within USA & Canada



MANAGING OUR SUPPLY CHAIN RISKS

As part of our continued efforts to review our global and domestic supply chain risks, Compass Group Canada reinforces our global Supplier Code of Conduct within our Supplier Agreement. Updated in June 2024, the Supplier Agreement requires that our supplier partners review and act accordingly to all applicable principles of the SCOC.

Compass' Global Supplier Code of Conduct (SCOC) is an integral part of our approach to maintaining an effective third-party risk management framework as it sets out the principles, expectations, and behaviours we require our supply chain partners to adhere to. This Code promotes Compass' high ethical standards and principles in our supply chain and sets out our supplier sustainability and responsibility aspirations, including human rights and labour standards.

To support recognition, understanding, and acknowledged compliance to the SCOC, alongside our broader values and expectations in positive action on risks including forced labour and child labour, our Foodbuy Canada procurement and supply chain teams reinforce the code and its contents during all new and renewal contracting activities.

SpeakUp! remains an important element of identifying and promptly addressing the risks of forced labour and child labour within our supply chain. Our suppliers and their workers have access to this confidential and independently operated multilingual whistleblower program. Information received through SpeakUp! is promptly addressed at the highest executive levels of the relevant jurisdiction.

The five focus areas of our global SCOC include

- ✓ Business integrity and ethical principles
- ✓ Human rights and labour standards
- ✓ Health and safety
- ✓ Sustainability
- ✓ SpeakUp!

Our principle: We are committed to the positive development and enhancement of human rights globally which includes working towards eradicating modern slavery and human trafficking. We are opposed to any and all forms of human rights violations or abuse.¹

WHAT ARE OUR EXPECTATIONS OF 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
- Treat all employees and workers humanely and ensure that all work is freely chosen
- Ensure they do not use or benefit from any child, forced, bonded or compulsory labour
- Ensure that all of their employees and workers meet the relevant legal minimum age of employment and have in place systems to prevent child labour and exploitation
- Firmly oppose any form of human trafficking and immediately act on any suspected risks or activities in their supply chain
- Immediately act on and investigate any suspected human rights issues in their business and within their supply chain

¹ Compass respects the rights enshrined within the United Nations Universal Declaration of Human Rights, the Ethical Trading Initiative (ETI) Base Code, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact 10 principles.



SUPPLY CHAIN RISK MANAGEMENT OUR TWO-PRONGED APPROACH

Proactive Collaboration

- Continue to engage with suppliers to initiate Sedex onboarding and to complete self-assessment questionnaires and audits

Rapid Response

- Collaborate with Sedex on red flag audit results. This allows for rapid review, discussion, and determination of follow-up actions.

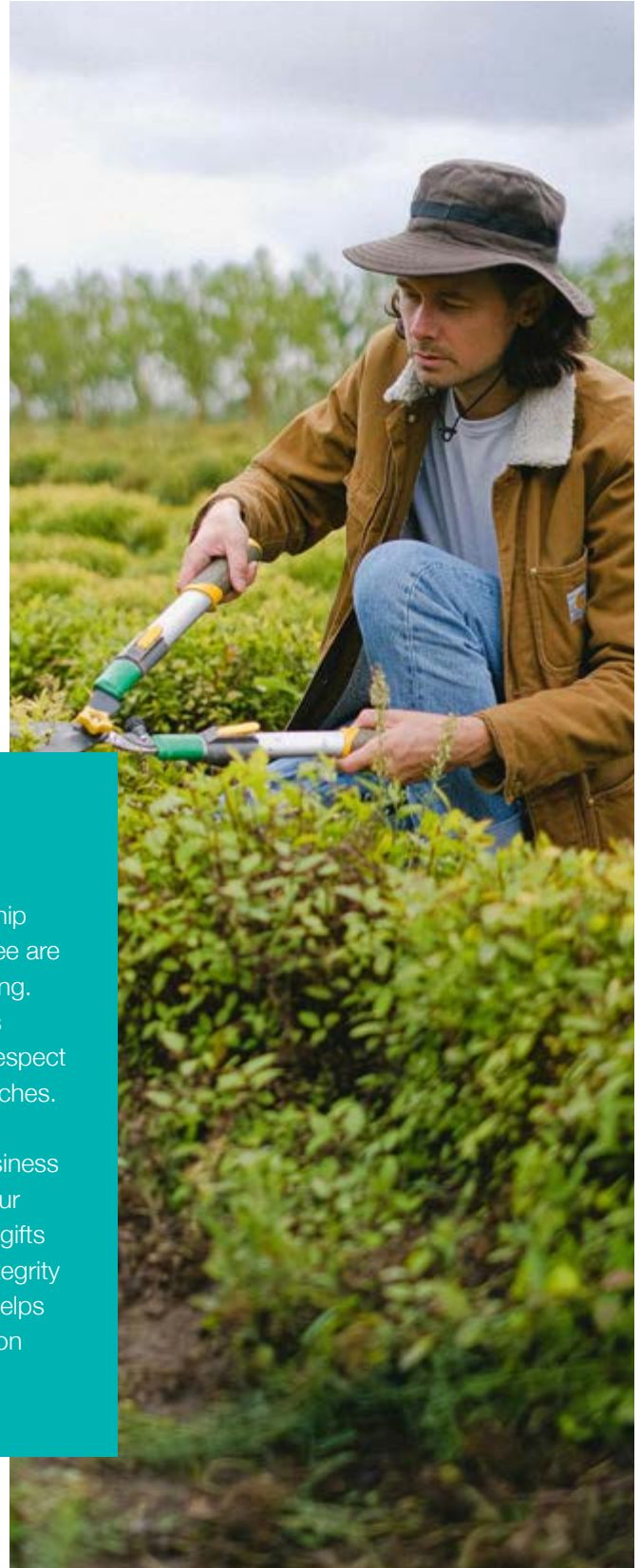


OUR TRAINING APPROACH

Training and awareness are essential to identifying and mitigating the risks of forced labour and child labour in our supply chain.

Internal ethical procurement training focused on raising awareness and recognizing signs and indicators of forced labour and child labour, as well as the escalation processes and procedures in case a concern has been identified

Compass Group Canada participates in the Compass Group global Human Rights Working Group to support our commitment to identifying and mitigating the risks of forced labour and child labour in our supply chain.



TRAINING OUR LEADERS

All Compass Group Canada team members in positions above unit management, including all Canadian Leadership Team Members and members of the Executive Committee are required to participate in annual ethics and integrity training. This training is mandated at a global level, which ensures everyone involved with Compass Group is aligned with respect to expectations, requirements, and management approaches.

During 2024, ethics and integrity training focused on Business Integrity guided by our Code of Business Conduct and our Business Integrity Policy. Modules included the topics of gifts and hospitality and conflicts of interest. Our Business Integrity Policy sets the standard for responsible leadership and helps us model ethical behavior, fraud awareness and prevention efforts.

Assessing the Effectiveness of our Actions



OUR OPERATIONS

We are committed to conducting ongoing risk based human rights due diligence throughout our business and supply chain, and work with third party specialists by risk, priority, geography and issue. We recognise the importance of due diligence in helping provide insight and visibility into the areas of heightened risk our business and Compass business partners face. Employees with direct involvement in areas of human rights risk also receive training on aspects specific to their roles.

The following key performance indicators will be used to assess Compass' performance in human rights:

- Workplace safety measures, such as Total Recordable Injury Frequency Rate (TRIFR)
- Total number of incidents of substantiated human rights breaches and action taken
- Number of human rights concerns related to Compass reported via our Speak Up resources
- Significant actual and potential adverse human rights impacts in the supply chain and actions taken
- Modern Slavery and Human Right straining

Members of Compass Group Canada collaborate closely with other members of Compass Group PLC's global Human Rights Working Group to enhance knowledge and information sharing across geographies in order to strengthen the impact of our efforts.



OUR SUPPLY CHAIN

During the reporting period, no human rights or issues related to forced labour or child labour were raised through SpeakUp! in Canada. Given the complexity and multi-dimensionality of related risks, however, we do not take the absence of related SpeakUp! submissions as clear evidence of the lack of forced labour and child labour in our extended supply chain.

During FY24, there were no issues identified through our SpeakUp! related to forced labour or child labour that required investigation by Compass Group Canada.

To identify, assess, minimize, and manage associated risks, we also proactively engaged with Sedex and our

suppliers to continually increase the transparency and traceability of our overall supply chain.

The global Human Rights Working Group met regularly throughout FY24 to discuss and assess our human rights efforts—including those focused on identifying and mitigating the risks associated with forced labour and child labour in our supply chain—and to discuss emerging risks, lessons learned, and current and future actions. Our Canadian representatives are particularly active in the working group and work diligently to apply global best practices to the Canadian context.

OUR APPROACH TO POLICY ENFORCEMENT FORCED AND CHILD LABOUR

Compass Group Canada strictly prohibits the use of forced labour and child labour within our operations and supply chains—a fact that is entrenched in our Compass Group Canada Supplier Code of Conduct and our global Modern Slavery Statement and Human Rights Policy.

Every incident of possible noncompliance is investigated. Upon identification of any such practices, we take immediate remedial action. This includes engaging with the supplier to demand the cessation of unethical labour practices and to provide a directive that any practices must be corrected in compliance with our company's standards. If the supplier fails to make identified changes, we take steps up to and including the discontinuation of our business relationship with the supplier in order to ensure we are not complicit in, or indirectly supporting, the use of forced or child labour. These actions reflect our unwavering commitment to uphold ethical labour standards throughout our supply chains.



CONSULTATION PROCESS

All of Compass Group Canada's subsidiaries and controlled entities share common values and a strong commitment to responsible business practices, including efforts to eradicate the use of forced labour and child labour in our supply chains.

To compile and finalize this report, we have engaged and consulted with:

- *The Canadian Leadership Team on behalf of Compass Group Canada's wholly-owned subsidiaries and the entities that it controls, including Foodbuy Canada*
- *Members of our recruitment, payroll, HR, and health and safety teams who are engaged in ensuring compliance with operating policies and procedures across Compass Group Canada's operations*
- *Members of our Foodbuy Canada procurement and supply chain teams responsible for supporting Compass Group Canada's procurement activities*
- *Members of Compass Group PLC's global Human Rights Working Group*

Report Approval and Attestation



In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the June 1, 2024 - May 31, 2025 reporting year.

A handwritten signature in black ink, appearing to read 'Saajid Khan', written in a cursive style.

Saajid Khan

Chief Executive Officer

31st May 2025

I have the authority to bind the reporting entities.

