



25.03.2019

**Eradicating Modern Slavery and Human Trafficking Policy  
Compass Group (Australia) PTY Ltd (ABN 41 000 683 125) (“Compass Group”) and its  
associated entities.**

As part of Compass Group PLC, our organisation provides outsourced food and support services to millions of people around the world every day. We operate in 50 countries across 5 sectors: Business & Industry, Education, Defence, Offshore & Remote, Leisure and Healthcare, more details of which can be found in our annual report at [www.compass-group.com](http://www.compass-group.com). As a result, our supply chains are global, extensive and complex.

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

Our complex and diverse supply chains are managed through our procurement functions comprising of specialist and skilled professionals who undertake the sourcing and management of our suppliers and ensure we do business with suppliers who share similar values, ethics and sustainable business practices - including those relating to human rights. The work of our procurement teams is supported by specific training and awareness programs designed to ensure we are aware, can recognise, and take action aligned to our policies, procedures and controls.

**Policies and Contractual Controls**

We are committed to ensuring our employees are subject to fair working practices and are treated with respect. We expect our suppliers to treat their employees and contractors in the same way, and to this end, we ensure that our supply contracts specify our commitments, policies and standards including our Code of Business Conduct and Code of Ethics. Our relevant policies can be found at <http://compass-group.com.au/being-responsible>.

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

**Due Diligence & Risk Assessment**

We continuously work to increase the visibility of the various tiers of our supply chains and embed the respect for human rights that is a key element of our Global Supply Chain Integrity strategy. We conduct comprehensive risk assessments across our supply chain in addition to a rigorous on-boarding procedure which incorporates a developed risk-based assessment of supplier policies and practices.



We acknowledge that suppliers often have their own complex supply chains and we make clear to our suppliers our expectations of their responsibility to adopt and ensure that their own supply chains remain free from abuse. We are committed to reducing supply chain complexity so that any vulnerabilities can be more easily identified and addressed through our sourcing processes, associated standards and risk assessment processes.

We commit to working with our suppliers to assess, identify and remedy any vulnerabilities in our respective supply chains. Any supplier breaches will be fully investigated and where repeat breaches or where satisfactory remedy cannot be achieved, will result in the immediate termination of the relevant supplier.

### **Awareness, Training & Communications**

Through Compass Group PLC, we have developed an e-learning program for our procurement teams which is designed to raise awareness and understanding of the issue of slavery and human trafficking and to support our teams to identify and mitigate potential risks from our supply chain. We complement these programs with additional training and education opportunities with specialist 3<sup>rd</sup> party organisations as part of our continuous improvement and capability development activities.

For our broader business, our employees and our suppliers - any concerns about our supply chain relating to our Code of Conduct, ethical trading practices, modern slavery and human trafficking may be raised through our Speak Up helpline at [www.compass-speakup.com](http://www.compass-speakup.com).

### **Further Information**

Further information relating to the Compass Group PLC statements relating to modern slavery and human trafficking can be found at [www.compass-group.com](http://www.compass-group.com).

Yours sincerely,

Shelley Roberts  
Managing Director  
Compass Group Australia

*On behalf of and approved by the Compass Group Australia Executive Leadership team on 21 March 2019*