

# Modern Slavery

## Statement FY20







## Better Together Working in Partnership

Chartwells



Eurest

medirect

DeltaFM

RA

ESS

Support Services Worldwide

OMEGA  
SECURITY SERVICES

Foodbuy



# Our commitment



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

We place these commitments at the heart of everything we do. We proudly share our expectation that our people and our supply base must also embrace the same high ethical standards.

Since publishing our policy, *Eradicating Modern Slavery in our Supply Chains* in March 2019, we have continued to invest in the capability, processes and partnerships required to implement best practices in the detection, investigation and mitigation of risks in our operations and supply chain. We do so, knowing we have the support of our parent company, Compass Group PLC which is listed in the UK and is committed to complying with the *Modern Slavery Act 2015* (UK).

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

1. the continual review and refresh of our sourcing, contracting and supplier selection processes and technologies through our centralised and globally recognised procurement business, Foodbuy Pty Ltd;
2. the active communication of our expectations to all our suppliers and enforcement through our contracts;
3. conducting specific audits through both our own people, and through partnerships with industry expert organisations;
4. our investment in targeted training to all our teams, supported by the learnings from Compass Group's global, multi-disciplinary Human Rights Working Group;
5. providing our people with access to our independently operated helpline "SpeakUp" to report any concerns relating to modern slavery; and
6. investigating and addressing concerns that are identified at the very highest levels of our Australian Executive leadership.

As market leaders in our industry, we are completely aligned with the intentions behind and are committed to complying with the *Modern Slavery Act 2018* (Cth) and will continue to both invest and take action, with the ultimate goal of eradicating modern slavery worldwide.

**Shelley Roberts**  
Managing Director  
Compass Group (Australia) Pty Ltd  
10 March 2021

**Andrew Brightmore**  
Executive Director  
Foodbuy Pty Ltd



# 1. Introduction

This statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth). It describes the steps Compass Group (Australia) Pty Ltd (ABN 41 000 683 125 of 35-51 Mitchell Street, McMahon's Point, NSW 2060) (CGA) and its wholly owned or controlled subsidiaries have taken to increase awareness, promote greater transparency and assess and address any risks of modern slavery in their supply chains during the year 1 October 2019 to 30 September 2020 (**Reporting Period**).

CGA and the following wholly owned subsidiaries of CGA are considered reporting entities under the Act:

1. Compass Group B&I Hospitality Services Pty Ltd (ABN 82 089 388 143);
2. Compass Group Defence Hospitality Services Pty Ltd (ABN 80 089 388 134);
3. Compass Group Healthcare Hospitality Services Pty Ltd (ABN 79 114 320 615);
4. Compass Group Remote Hospitality Services Pty Ltd (ABN 98 113 561 363); and
5. Delta Facilities Management Pty Ltd (ABN 98 075 305 010)

**(Reporting Entities).**

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

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





## OUR STRUCTURE AND OPERATIONS

In Australia, Compass Group operates a number of brands including ESS, Medirest, Eurest, Chartwells, Delta FM and Restaurant Associates. We provide a broad range of food and beverage catering and facilities management services including employee and student dining and food halls, retail and vending solutions, corporate and events catering, fine dining and concierge services, client site maintenance, cleaning and accommodation management, patient and resident meals, security and facilities management and supply chain design and management services. Our operations are extensive across Australia including both onshore and offshore facilities and reflect our diverse client base encompassing schools and universities, tourism, hotel and cultural institutions, major venues, the energy, resources and Defence sectors, hospitals and aged care facilities and business & industry.

CGA and its wholly owned subsidiaries are ultimately owned by Compass Group PLC listed in the UK which has operations throughout the world. Compass Group PLC shares the goal of eradicating modern slavery and has published its own Modern Slavery Statement pursuant to the provision of section 54 of *Modern Slavery Act 2015* (UK) which can be found at [https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/CGPLC\\_modern\\_slavery\\_act\\_statement\\_2020\\_FINAL.pdf](https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/CGPLC_modern_slavery_act_statement_2020_FINAL.pdf)





## OUR SUPPLY CHAIN

Compass Group invests in its supply chain through a wholly owned, dedicated and centralised procurement and supply chain business, Foodbuy Pty Ltd. Foodbuy is responsible for the management of Compass Group's supplier relationships and activities including sourcing, contracting and the provision of technologies and capability to appropriately manage both the national and international supply chain for Compass, as well as a number of other Foodbuy clients. This supply chain consists of more than 2,500 supplier relationships to source more than \$671m+ of hospitality related products and services annually including food, beverages, retail, consumables, labour, cleaning products, safety equipment, food preparation equipment, smallwares and professional services.

Compass Group requires our supply chain to reflect and represent our commitment to ethical sourcing, the highest standards in human rights, safety and risk management and our proud commitment to Australian based growers, manufacturers and suppliers as well as Aboriginal and Torres Strait Islander and Small and Medium Enterprise supply partnerships. Alongside our majority domestically sourced supply base, a proportion of our products are sourced from international suppliers. We also recognise that Australian suppliers may rely on complex supply chains that extend internationally. Our policies, processes and practices reflect that our commitment to the eradication of modern slavery extends across both these domestic and international relationships. From local agriculture to overseas manufacture and ingredient harvesting, we recognise our opportunity and responsibility to be an influence of positive change across all communities.

## 2. Modern slavery risk areas

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Compass Group acknowledges that modern slavery can occur anywhere in the world. In the Reporting Period, we continued to invest in setting and adopting standards at both a domestic as well as a global level from Compass Group PLC to support the investigation and identification of any potential for our operations or supply chain to cause, contribute to or be directly linked to modern slavery.

We rely on a number of sources to identify risk across our operations and supply chain, including in-house capability and technology and expert external partnerships. The results of the risk assessments we conduct as well as those conducted by Compass Group PLC are a crucial dataset. These are detailed further in section 3 and include:

- The mandatory risk-based assessments (**SRA**) undertaken by our trained and qualified Foodbuy procurement practitioners, for all new and prospective suppliers which are reviewed at Executive level prior to supplier selection and on-boarding;
- The SRA audit process whereby existing suppliers are subject to desktop and site audit reviews based on specific risk-based segmentation with additional activities at the discretion of our Foodbuy procurement team as required to undertake specific investigations or in response to supply market changes;
- Face to face supplier site visits conducted by members of our senior leadership team alongside Compass Group's Health, Safety, Environment and Quality team and Foodbuy personnel;
- Targeted questionnaires issued from time to time to our existing suppliers;
- The adoption of the Sedex technology solution by Compass Group PLC in the Reporting Period and the subsequent adoption in Australia in December 2020;
- The Human Rights Risk Impact Assessment that is being lead by Compass Group PLC with the assistance of external human rights specialists; and
- The risk assessments conducted by Compass Group PLC to assess vulnerabilities in higher risk segments of the global supply chain and also for compliance with local employment law in high risk counties (Asia and the Middle East).





We also monitor and take into account the outcomes of any investigations that are made publicly available, through the media, lobby groups or NGOs as well as publicly available human rights indices and our partnerships with market experts such as Sedex.

In the Reporting Period, Compass Group PLC identified the highest risk products within Compass Group's supply chain globally as:

- Seafood;
- Hot beverages;
- Fresh produce;
- Garments and disposables; and
- Agency labour.

At a local Australian level, Compass Group identified specific heightened risk in the following areas:

- Anywhere that migrant workers may be utilised in our operations or supply chain due to the increased risk that this group may be the subject of exploitation due to their visa conditions, language and cultural barriers and a lack of knowledge about workers' rights in Australia. We believe we effectively manage this risk in our own operations where we engage migrant workers, through our investment in an inhouse and centralised people management team with appropriate and dedicated talent and training in this area, our robust employment processes including our employee contracting, onboarding and ongoing training processes but recognise this as a potential risk in the Australian supply chain, particularly in domestic agriculture (particularly farm labour and associated recruitment);
- In imported consumables manufactured in developing countries including textiles in workwear and packaging; and
- In overseas harvested commodities (e.g. coffee beans).

These risk areas will continue as a focus for Compass Group in FY21.



### 3. Actions we have taken to assess and address risk

Our modern slavery investment and focus strategy for the Reporting Period was founded on three core pillars:

1. Setting and communicating our expectations;
2. Making sure we are asking the right questions; and
3. Providing a channel for stakeholders to identify potential issues and concerns as a precursor to effective and efficient remediation.

#### SETTING AND COMMUNICATING OUR EXPECTATIONS

Compass Group publicly published its policy, *Eradicating Modern Slavery* in our Supply Chains (**Policy**) on the Compass Group website within 30 days of the *Modern Slavery Act 2018* (Cth) coming into force. This was a signal to the market of our pre-existing and continued firm commitment to comply with the spirit and intent of the legislation. We provided a copy of our Policy to all of our suppliers at an executive level and specifically invited those with annual revenue in excess of AU\$100m to share their Modern Slavery commitment with us. The responses were reviewed by members of the Foodbuy Executive leadership team.

Our values are communicated to potential new suppliers as early as the “Request for Information” stage. At the point of entering into a contract with us, our suppliers are required to formally commit to complying with:

1. Our Global Supply Chain Integrity Policy
2. Our Code of Ethics
3. Our Human Rights Policy

Our *Global Supply Chain Integrity Policy* defines our responsible sourcing principles and the values we expect our suppliers to hold. The *Global Supply Chain Integrity Policy* adopts the *Ethical Trading Initiative Base Code*, which itself, is based on the conventions of the International Labour Organisation.

Our *Code of Ethics* sets out the standards of behaviour that we expect all of our people and suppliers to demonstrate in their dealings with colleagues, customers, clients, suppliers, shareholders and other stakeholders. The *Code of Ethics* was developed with input from across Compass Group globally, the Compass European Works Council and in association with the Institute of Business Ethics in the UK. The principles set out in this Code are implicit in our values and include the following commitments:

#### HUMAN RIGHTS

##### Principle 1:

*Businesses should support and respect the protection of internationally proclaimed human rights within their sphere of influence*

##### Principle 2:

*Businesses should ensure that their own operations are not complicit in human rights abuses*

##### Principle 3:

*Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining*

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## LABOUR

### Principle 4:

*Businesses should uphold the elimination of all forms of forced and compulsory labour*

### Principle 5:

*Businesses should uphold the effective abolition of child labour*

### Principle 6:

*Businesses should eliminate discrimination in respect of employment and occupation*

We published our *Human Rights Policy* in June 2020 in support of our belief that as one of the largest private employers globally, Compass can make a tangible positive impact on the development and enhancement of human rights globally. The *Human Rights Policy* helps define the minimum standards of behaviour which all Compass employees and business partners are expected to uphold.

Additionally, our standard supplier contract requires our suppliers to comply with all relevant laws, including the *Modern Slavery Act 2018* (Cth), Divisions 270 and 271 of the *Criminal Code 1995* (Cth) and any other analogous anti-Modern Slavery laws or regulations in force in Australia. We require our suppliers to share information with us, have policies and procedures in place to ensure compliance with modern slavery laws, notify us of actual or potential modern slavery breaches and keep complete, accurate and up to date records to trace the supply chain of goods and services provided to us.

We expect the same high standards of our own people. In the Reporting Period:

1. We have updated and rolled out mandatory annual training to our Foodbuy supply chain team and other key staff on human rights and modern slavery. This builds on the content already delivered to staff on our *Code of Ethics*. The training was delivered electronically via our e-learning platform.
2. Our inhouse legal teams developed and conducted additional informal sessions to create further awareness and understanding of the modern slavery laws and in support of our commitments, activities and values across our organisation.
3. We ensured that we have processes in place to ensure that all team members hold working rights in Australia and comply with visa conditions where relevant.
4. We continued to support the right of our employees to join and actively participate in unions.
5. We continued to adopt and invest in our global suite of supply chain standards from Compass Group PLC, led by the Vendor Quality Assurance (**VQA**) which provides detailed policy, procedure, process and decision-making criteria relating to the sourcing, selection and management of our suppliers.
6. We continued to formally communicate our ethical supply chain standards, commitments and expectations to all prospective and existing suppliers through our sourcing, contracting and market engagement activities and through our standardised "Request for Information", "Request for Proposal" and "Request for Quotation" technology platforms; and
7. We continued to communicate and enforce our standards, expectations and commitments through specific Supply Chain engagements, conference events and through targeted updates and questionnaires issued from time to time to our existing suppliers.





## DUE DILIGENCE – ASKING THE RIGHT QUESTIONS

As part of a global business, we have been able to benefit from the knowledge and experience gained by our parent Compass Group PLC in the actions it has taken to comply with the *Modern Slavery Act 2015* (UK). Compass Group PLC is conducting a Human Rights Risk Impact Assessment across Compass Group with the assistance of external human rights specialists to collect data, identify risk and implement mitigation strategies relating to any modern slavery risks. Compass Group PLC conducts risk assessments of vulnerabilities in higher risk segments of the global supply chain and also conducts internal and independent audits for compliance with local employment law in high risk countries (Asia and the Middle East). In various countries, including Australia, Compass Group utilises its partnership with leading industry experts such as Sedex including the adoption of their supplier risk assessment platform and professional independent auditing and certification capabilities to support and inform our risk identification and response activities. The Sedex technology solution was adopted by Compass Group PLC in the Reporting Period and subsequently adopted in Australia in December 2020.

At a local Australian level, we refreshed our “RFI”, “RFQ”, supplier selection criteria and on-boarding process, procedures and technologies to include additional and specific modern slavery risk-based assessment of supplier policies and practices which must be completed

to a satisfactory level. This is a core step in our supplier audit program, under which existing suppliers are subject to onsite audits at a regular frequency (determined by our *Global Supply Chain Integrity Standards*), our standardised risk-based segmentation structure as well as ad hoc face to face supplier site visits conducted by members of our senior leadership and Foodbuy team alongside review of specific written questionnaire responses. As part of our *Global Supply Chain Integrity Standards*, we also utilise external professional third-party organisations with independent supply chain auditing expertise such as HACCP Australia and Sedex (via Compass Group PLC) to undertake and support structured audits and event response reviews. As part of our annual risk management process, in FY21 we will further review and refresh our next 12 month audit program with our 3rd party professional organisations and based on our considered supplier risk segmentation structure.

Further reflecting our commitment to market leadership in professional supply chain management, our Foodbuy organisation has created and recruited for a specific new role during the Reporting Period and in November 2020, completed the recruitment of an experienced “Supply Chain Sustainability Manager” to provide focussed leadership in this area and to further refine our multi-year strategy, plans and activities.



## PROVIDING A CHANNEL TO IDENTIFY ANY POTENTIAL ISSUES AND CONCERNS AS A PRECURSOR TO EFFECTIVE AND EFFICIENT REMEDIATION

Aligned to our values and our employee *Code of Conduct*, we remain committed to providing specific channels and solutions for all our people to be able to easily, confidently and confidentially raise any concerns around compliance with our broader values, standards, expectations and code of conduct. We encourage our team to raise any concerns through our “Speak Up” solution alongside other communication pathways.

The “Speak Up” platform is an independently operated service which is available 24 hours a day via phone or online at [www.compass-speakup.com](http://www.compass-speakup.com). Calls are taken by independent specialists who don’t work for Compass Group and reports can be made anonymously. The service is managed by Compass Group’s national “People” team, with ultimate accountability sitting with our Executive Director – People & Safety. Overall reporting of information gathered through this channel forms a core and regular component of our governance and reporting structures.

As part of our FY21 supply chain strategies, our Foodbuy team are investigating the potential to make the “SpeakUp” platform available across our supply chain to allow the employees of our suppliers to also raise concern, where suppliers may not have their own platform in place.

In recognising any employee reluctance to use the “SpeakUp” solution, Compass Group also has a robust *Whistleblower Policy* which has been designed to provide protection to disclosers, ensure reports are dealt with appropriately, and protect disclosers from victimisation and retaliation.

Compass Group’s policy is that any legitimate concern raised about a breach of our ethical standards and values through “SpeakUp” or otherwise must be discussed, investigated, managed and resolved at the highest levels of the Compass Group Australia Leadership including our Managing Director and where relevant, our suppliers, Government and unions. Concerns are dealt with on a case-by-case basis and where required may involve use of the provisions dealing with modern slavery obligations, our *Code of Ethics* and/or the dispute resolution mechanisms in our contracts with our suppliers.



## 4. How we assess the effectiveness of our actions

To further support our existing compliance measures and our continued commitments in this area, the following key performance indicators were used to assess Compass' performance globally in human rights:

1. number of human rights grievances reported by Compass Group's people via Speak Up;
2. total number of incidents of substantiated human rights breaches and actions taken; and
3. significant actual and potential adverse human rights impact in the supply chain and actions taken.

Our global *Human Rights Policy* will be reviewed annually by the Corporate Responsibility Committee of the Board of Compass Group UK. Each review will be informed by our prior year performance in the above metrics.

Locally, we also have set a suite of reporting requirements and metrics to review the efficacy our processes including monthly reporting of our risk assessments and issue receipt volume / response performance metrics. We also operate a weekly leadership governance process to evaluate and conduct root cause analysis of all supply chain key risk events.

Compass Group in Australia also actively contributes to Compass Group's Human Rights Working Group – a multi-jurisdictional, multi-disciplinary group tasked with overseeing Compass Group's human rights strategy that is led by Compass Group PLC. Meetings are monthly and include functional representatives from Compass' Sustainability, Procurement, Legal, Audit, Ethics and Compliance and our People teams. Compass Group is required to report regularly to the Working Group on its actions on modern slavery. Compass Group key Australian executives attend these meetings regularly including our Executive Director, Foodbuy and our General Counsel.

We will continue to monitor the effectiveness of our actions as we develop our approach.



## 5. Our consultation process

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*In compiling and finalising this statement, we have engaged closely with members of our Foodbuy business, our Australian Leadership Team on behalf of CGA's wholly owned subsidiaries and the entities that it controls and Compass Group's Human Rights Working Group. The Statement was approved by CGA's board and Australian Leadership Team before being signed by CGA's Managing Director and our Executive Director, Supply Chain.*





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Working in Partnership

