

## Corporate Human Rights Benchmark 2018 Company Scoresheet



**Company Name** Compass Group  
**Industry** Agricultural Products (Supply Chain only)  
**Overall Score (\*)** 14.7 out of 100

Theme Score	Out of	For Theme
2.8	10	A. Governance and Policies
6.1	25	B. Embedding Respect and Human Rights Due Diligence
1.7	15	C. Remedies and Grievance Mechanisms
0.0	20	D. Performance: Company Human Rights Practices
2.9	20	E. Performance: Responses to Serious Allegations
1.2	10	F. Transparency

(\*) 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 2018 Methodology document. 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	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Company's Human Rights Policy Statement states that 'Human rights are basic rights to which everyone is entitled. They define minimum standards of behaviour that countries are expected to abide by to ensure the dignity of their citizens. Compass Group fully supports everyone's entitlement to human rights and respects the principles of the United Nations Global Compact'. [Human rights policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a> ] Score 2 • Not met: UNGPs • Not met: OECD
A.1.2	Commitment to respect the human rights of workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: ILO Core • Met: UNGC principles 3-6: The Statement of continuing support to the Global Compact is signed by a Board member and states the following: 'Compass Group PLC and its group companies ("Compass") has been a signatory to the United Nations Global Compact (UNGC) since June 2004. We remain fully committed to supporting and upholding its 10 Principles in the areas of human rights, labour, environment and anti-corruption'. [UNGC Communication on progress, 01/2018: <a href="http://unglobalcompact.org">unglobalcompact.org</a> ]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: All four ILO for AG suppliers: The Supply chain Integrity policy statement includes an explicit commitment to at least each core labour area. [Supply chain integrity policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: All four ILO Core: Although the Company is committed to the UNGC principles, no evidence found of a formal statement of policy committing explicitly to each core labour standard. [Code of business conduct, 01/2018: <a href="http://compass-group.com">compass-group.com</a> &amp; Human rights policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Met: Respect H&amp;S of workers: The Company commits to respect H&amp;S of its workers in the Workplace Health and Safety Policy Statement. [Health and safety policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Met: H&amp;S applies to AG suppliers: The Workplace Health and Safety Policy Statement expects 'similarly high standards from our suppliers and contractors'. [Health and safety policy statement, 01/2018: <a href="http://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 and natural resources (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Respect land ownership and resources</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Voluntary Guidelines on Tenure</li> <li>• Not met: IFC Performance Standards</li> <li>• Not met: FPIC for all</li> <li>• Not met: Zero tolerance for land grabs</li> <li>• Not met: Respecting the right to water</li> <li>• Not met: Expecting suppliers to respect these rights</li> </ul>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry - people's rights (AG)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Women's rights</li> <li>• Not met: Children's rights</li> <li>• Not met: Migrant worker's rights</li> <li>• Not met: Expects suppliers to respect these rights</li> </ul> Score 2 <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 engage with stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to stakeholder engagement</li> <li>• Not met: Regular stakeholder engagement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Commits to remedy</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with AG suppliers to remedy impacts</li> </ul>
A.1.6	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Zero tolerance attacks on HRs Defenders (HRDs)</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Expects AG suppliers to reflect company HRD commitments</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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: CEO or Board approves policy: The Group Chief Executive has signed the Human Rights Policy Statement. [Human rights policy statement, 01/2018: <a href="http://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: Board level responsibility for HRs: Human rights policy indicates that 'The Group Executive Board and extended Leadership Team are responsible for the execution of this Policy'. The Corporate Responsibility Committee of the Board assists the Board in fulfilling its corporate responsibility, including health, safety, and ethical business conduct among other topics. [Human rights policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a> &amp; Annual report, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Speeches/letters by Board members or CEO</li> </ul>
A.2.2	Board discussions	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Board/Committee review of salient HRs: 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'. The HR Director is part of the Corporate Responsibility Committee, which meets periodically and deals with sustainability-related issues: 'The Committee has a rolling agenda and receives reports from the Director of Health, safety and environment and other senior managers to ensure that progress is being made towards meeting the Group's specific corporate responsibility KPIs and in our ongoing corporate responsibility commitments. [Annual report, 2017: <a href="http://compass-group.com">compass-group.com</a> &amp; Human rights policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Examples or trends re HR discussion</li> <li>• Not met: Both examples and process</li> </ul>
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Incentives for at least one board member</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</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	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Senior responsibility fo HR (inc ILO): 'The Group Executive Board and extended Leadership Team are responsible for the execution of this [Human Rights] policy.. 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'. Functions of Global Leadership in this respect are described. The Company is committed to the 10 principles of the Global Compact. [Human rights policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a> &amp; Code of business conduct, 01/2018: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility</li> <li>• Not met: Day-to-day responsibility in supply chain</li> </ul>
B.1.2	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Senior manager incentives for human rights</li> <li>• Not met: At least one key AG HR risk, beyond employee H&amp;S</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Performance criteria made public</li> </ul>
B.1.3	Integration with enterprise risk management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: HR part of enterprise risk system</li> </ul> Score 2 <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) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Communicates its policy to all workers in own operations</li> </ul> Score 2 <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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Steps to communicate policy commitments to BRs: The Company indicates in the Corporate responsibility report that 100% 'contracted approved suppliers have signed the Compass Code of Business Conduct'. This code contains the requirements for suppliers in relation to human rights key issues including all ILO core labour standards. [Code of business conduct, 01/2018: <a href="http://compass-group.com">compass-group.com</a> &amp; Corporate responsibility report, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Not met: Including to AG suppliers</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: How HR commitments made binding/contractual: See above. [Code of business conduct, 01/2018: <a href="http://compass-group.com">compass-group.com</a> &amp; Corporate responsibility report, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Not met: Including on AG suppliers</li> </ul>
B.1.5	Training on Human Rights	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: Trains all workers on HR policy commitments</li> <li>• Met: Trains relevant managers including procurement: The Company indicates in the Corporate responsibility report that it is rolling out 'our e-learning programme for the Group's procurement teams. It is designed to raise awareness of the issues of slavery and human trafficking, as well as helping to identify and mitigate potential risks from our global supply chain. So far, our 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. Policies and requirements concerning suppliers include all ILO core. [Corporate responsibility report, 2017: <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: Both requirements under score 1 met</li> </ul>
B.1.6	Monitoring and corrective actions	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: Monitoring implementation of HR policy commitments: The Company indicates that 'We recognise that certain categories of procured products and services potentially carry a higher risk of child or slave labour being used in the supply chain. This is why we use the SEDEX data in addition to conducting independent audits, to verify labour standards and identify any poor practices within our supply base'. The Company is committed to comply with the 10 principles of the Global Compact. [Annual report, 2017: <a href="http://compass-group.com">compass-group.com</a> &amp; Supply chain integrity policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Met: Monitoring AG suppliers: See above.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Describes corrective action process: Although the Company indicates that 'any supplier breaches that are uncovered via audit or any other means will be fully investigated and, where possible, remedied', no further details found. [Annual report, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Not met: Example of corrective action</li> <li>• Not met: Discloses % of supply chain monitored</li> </ul>
B.1.7	Engaging business relationships	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: 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="http://compass-group.com">compass-group.com</a>]</li> <li>• Met: HR affects on-going supplier relationships: The Annual report indicates that 'any supplier breaches that are uncovered via audit or any other means will be fully investigated and, where possible, remedied. Repeat breaches of those that cannot be remedied will result in the immediate termination of the relevant supplier relationship'. [Annual report, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Both requirement under score 1 met</li> <li>• Not met: Working with suppliers to improve performance</li> </ul>
B.1.8	Approach to engagement with potentially	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</li> <li>• Not met: Frequency and triggers for engagement</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	affected stakeholders		<ul style="list-style-type: none"> <li>• Not met: Workers in SC engaged</li> <li>• Not met: Communities in the SC engaged</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Analysis of stakeholder views and company's actions on them</li> </ul>

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: In its Corporate Responsibility Report, the Company states: 'We have worked with strategy consultants to understand which of the commodities we buy, or countries we source from, are at the highest risk of incidents of modern slavery. Our priorities are the supply chains for salad and fruits, seafood (particularly prawns) and tea, coffee and cocoa. We are also focusing our attention on high-volume products such as staff uniforms and linens, and disposable items like paper cups and plastic cutlery. Another potential risk area we have identified is agency labour.' However, there no further information about the process to identify its human rights risks and impacts and the process seems to be focused only in modern slavery and human trafficking. [Corporate responsibility report, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Identifying risks in AG suppliers</li> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Salient risk assessment (and context): The Company indicates that 'in some of our business sectors and in certain geographic regions where we operate, the risk of human trafficking, slavery or child labour being used is higher'. 'In 2016-2017, our Group HR team commissioned a third party to conduct detailed due diligence assessment of adherence to Company policies for those countries viewed to be of a higher risk of slave labour and human trafficking. The review comprised seven countries and we found that there was a high level of compliance with our policies and procedures'. [Slavery &amp; Human Trafficking statement, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Not met: Public disclosure of salient risks: However the Company discloses that it assessed risk of slavery and human trafficking. [Slavery &amp; Human Trafficking statement, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	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: Action Plans to mitigate risks: Although the Company provides an example of taking action, no evidence found of a description of a global system in place. [Slavery &amp; Human Trafficking statement, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Met: Example of Actions decided: The following example is mentioned in the Human Trafficking statement: 'Our business in the UAE, Qatar and Saudi Arabia source the majority of labour from India, Nepal, Bangladesh and the Philippines. Strict betting procedures are in place for all overseas labour agencies and we only contract with those registered and approved by local government agencies. All labour agencies are required to adhere to our Code of Business Conduct and would be terminated for any breach. Additional checks and controls are in place from recruitment through to the commencement of employment to confirm that our standards and procedures are adhered to'. [Slavery &amp; Human Trafficking statement, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Including in AG supply chain: Although the Company provides an example of taking action, no evidence found of a description of a global system in place. [Slavery &amp; Human Trafficking statement, 2017: <a href="http://compass-group.com">compass-group.com</a>]</li> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	actions to respond to human rights risks and impacts		Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including AG suppliers Score 2 • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

### C. Remedies and Grievance Mechanisms (15% 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	1.5	The individual elements of the assessment are met or not as follows: Score 1 • 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="http://compass-group.com">compass-group.com</a> & Speak up website: <a href="http://compass-speakup.com">compass-speakup.com</a> ] Score 2 • Not met: Number grievances filed, addressed or resolved: In the Slavery and Human trafficking statement the Company indicates that it didn't receive any concerns relating to slavery and human trafficking via speak up in 2017. However, no further details found regarding other human rights issues. [Slavery & Human Trafficking statement, 2017: <a href="http://compass-group.com">compass-group.com</a> ] • Met: Channel is available in all appropriate languages: 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) [Code of business conduct, 01/2018: <a href="http://compass-group.com">compass-group.com</a> & Speak up website: <a href="http://compass-speakup.com">compass-speakup.com</a> ] • Met: Opens own system to AG supplier workers: The Supply chain policy indicates that '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'. [Supply chain integrity policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a> ]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Grievance mechanism for community Score 2 • Not met: Describes accessibility and local languages • Not met: Expects AG supplier to have community grievance systems • Not met: AG supplier communities use global system
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 • Not met: Engages users to create or assess system • Not met: Description of how they do this Score 2 • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: AG suppliers consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Response timescales • Not met: How complainants will be informed

Indicator Code	Indicator name	Score (out of 2)	Explanation
	publicly available and explained		Score 2 • Not met: Escalation to senior/independent level
C.5	Commitment to non-retaliation over complaints or concerns made	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Public statement prohibiting retaliation: The Code of business conduct indicates that 'Compass will not tolerate any reprisal for reporting a problem, raising a concern or assisting in an investigation. Anyone found to be involved in retaliation against any individual who has raised concerns in good faith will be subject to disciplinary action'. However, it is not clear whether other stakeholders can use the channel and are covered by the non-retaliation commitment. [Code of business conduct, 01/2018: <a href="http://compass-group.com">compass-group.com</a> & Speak up website: <a href="http://compass-speakup.com">compass-speakup.com</a> ] • 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'. [Code of business conduct, 01/2018: <a href="http://compass-group.com">compass-group.com</a> & Speak up website: <a href="http://compass-speakup.com">compass-speakup.com</a> ] Score 2 • Not met: Has not retaliated in practice • Not met: Expects AG suppliers to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

#### D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.1.b	Living wage (in the supply chain)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Living wage in supplier code or contracts: Although the Company indicates in its Slavery & Human Trafficking Statement that its 'Standards encompass the nine-point Ethical Trade Initiative (ETI) Base Code' which include the following practice: 'Living wages are paid in the country of supply/production'; there is no further information about Living wage in its Supplier Code: guidelines where the definition, how to calculate it, process to reviewed and negotiated it, etc [Supply chain integrity policy statement, 01/2018: <a href="http://compass-group.com">compass-group.com</a> ] • Not met: Improving living wage practices of suppliers Score 2 • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends in progress made
D.1.2	Aligning purchasing decisions with human rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Avoids business model pressure on HRs (purchasing practices) • Not met: Positive incentives to respect human rights (purchasing practices) Score 2 • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Identifies suppliers back to manufacturing sites (factories or fields) Score 2 • Not met: Discloses significant parts of SP and why

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	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 Company states in their Modern Slavery Statement that 'child labour shall not be used'. However, the indicator seeks for specific guidelines related to age verification and remediation programmes to complement the prohibition to use child labour. [Slavery &amp; Human Trafficking statement, 2017: <a href="http://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: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.b	Forced labour: Debt bondage and other unacceptable financial costs (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: Debt and fees rules in codes or contracts</li> <li>• Not met: How working with suppliers on debt &amp; fees</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.5.d	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</li> <li>• Not met: How working with suppliers on free movement</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Analysis of trends in progress made</li> </ul>
D.1.6.b	Freedom of association and collective bargaining (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: FoA &amp; CB rules in codes or contracts</li> <li>• Not met: How working with suppliers on FoA and CB</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in progress made</li> </ul>
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (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: Sets out clear Health and Safety requirements</li> <li>• Not met: Injury Rate disclosures</li> <li>• Not met: Lost days or near miss disclosures</li> <li>• Not met: Fatalities disclosure</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: How working with suppliers on H&amp;S</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.1.8.b	Land rights: Land acquisition (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: Rules on land &amp; owners in codes or contracts</li> <li>• Not met: How working with suppliers on land issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provides analysis of trends in the progress made</li> </ul>
D.1.9.b	Water and sanitation (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: Rules on water stewardship in codes or contracts</li> <li>• Not met: How working with suppliers on water stewardship issues</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</li> </ul>
D.1.10.b	Women's rights (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: Women's rights in codes or contracts</li> <li>• Not met: How working with suppliers on women's rights</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> <li>• Not met: Provide analysis of trends in progress made</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		No allegations meeting the CHRB severity thresholds were found, and so the score of 11.75 out of 80 points scored in themes A-D & F has been applied to produce a score of 2.94 out of 20 points for theme E.

## F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.24 out of 4	Out of a total of 42 indicators assessed under sections A-D of the benchmark, Compass Group made data public that met one or more elements of the methodology in 13 cases, leading to a disclosure score of 1.24 out of 4 points.
F.2	Recognised Reporting Initiatives	0 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> <li>• Not met: Company reports on GRI</li> <li>• Not met: Company reports on SASB</li> <li>• Not met: Company reports on UNGPRF</li> </ul>
F.3	Key, High Quality Disclosures	0 out of 4	Compass Group met 0 of the 8 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.2 : Board discussions</li> <li>• Not met: Score 2 for B.1.6 : Monitoring and corrective actions</li> <li>• Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers</li> <li>• Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s)</li> </ul> Discussing challenges openly <ul style="list-style-type: none"> <li>• Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts</li> <li>• Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned</li> </ul> Demonstrating a forward focus <ul style="list-style-type: none"> <li>• Not met: Score 2 for A.2.3 : Incentives and performance management</li> <li>• Not met: Score 2 for B.1.2 : Incentives and performance management</li> </ul>

### 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 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.