

Company Name Compass Group
Industry Agricultural Products (Supply Chain only)
Overall Score (*) 18.0 out of 100

Theme Score	Out of	For Theme
4.3	10	A. Governance and Policies
6.5	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
3.6	20	E. Performance: Responses to Serious Allegations
1.9	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 2019 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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> 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: compass-group.com] Met: UNGC principles 1 & 2: The Company indicates that 'Compass remains fully committed to supporting the United Nations Global Compact and upholding its ten principles which are reflected in our Corporate Responsibility commitments, policies and practices'. [CompassGroup UN Global Compact, 04/19: s3-us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD
A.1.2	Commitment to respect the human rights of workers	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"> Not met: ILO Core: The company states that "We recognise the United Nations Guiding Principles on Business and Human Rights (UNGPs) as the basis for our approach to human rights in our direct operations and supply chains". However, no evidence found of a commitment to the ILO Declaration on fundamental standards and rights at work. No further evidence found in the CR Update 2018. [Corporate

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			<p>Responsibility Report 2018, 01/2019: compass-group.com & CR Update 2018, 03/19: compass-group.co.uk</p> <ul style="list-style-type: none"> 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: https://s3-us-west-2.amazonaws.com/ungc-production/attachments/cop_2018/451121/original/Compass_Group_PLC_UNGC_COP_2018_FINAL.pdf?1515081104#..\.Downloads\Link checker 2019.xlsm#Sheet2!G53] Met: Explicitly list All four ILO for AG suppliers: The Supply chain Integrity policy statement says: ' We embrace the Ethical Trading Initiative (ETI) Base Code principles, and reflect these within our Code of Business Conduct and Supplier Code. The Base Code principles are: Employment is freely chosen; Freedom of association and the right to collective bargaining is respected; Working conditions are safe and hygienic; Child labour shall not be used; Living wages are paid; Working hours are not excessive; No discrimination is practised; Regular employment is provided; No harsh or inhumane treatment is allowed'. [Supply chain integrity policy statement, 01/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Explicit commitment to All four ILO Core: No evidence found of a formal statement of policy committing explicitly to each core labour standard. [Code of business conduct, 01/2018: compass-group.com & Human rights policy statement, 01/2018: compass-group.com] Met: Respect H&S of workers: The Company commits to respect H&S of its workers in the Workplace Health and Safety Policy Statement. [Health and safety policy statement, 01/2018: compass-group.com] Met: H&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: compass-group.com]
A.1.3.AG.a	Commitment to respect human rights particularly relevant to the industry - land and natural resources (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Respect land ownership and natural resources Not met: Respecting the right to water Not met: Expecting suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: Voluntary Guidelines on Tenure Rights Not met: IFC Performance Standards Not met: FPIC for all Not met: Zero tolerance for land grabs Not met: Respecting the right to water Not met: Expecting suppliers to respect these rights
A.1.3.AG.b	Commitment to respect human rights particularly relevant to the industry – people’s rights (AG)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Women's rights Not met: Children's rights Not met: Migrant worker's rights Not met: Expects suppliers to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> Not met: CEDAW/Women's Empowerment Principles Not met: Child Rights Convention/Business Principles Not met: Convention on migrant workers Not met: Expecting suppliers to respect these rights
A.1.4	Commitment to engage with stakeholders	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"> Met: Regular stakeholder engagement: The Company reports that 'we conduct regular employee surveys and in 2018 we conducted over 1,000 hours of face to face conversations and 200 hours of focus groups with a broad sample of our employees'. [Campden BRI to support industry authenticity network, 11/07/19: foodnavigator.com & CompassGroup UN Global Compact, 04/19: s3-us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Commits to engage stakeholders in design Not met: Regular stakeholder design engagement

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A.1.5	Commitment to remedy	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"> • Not met: Commits to remedy: Although the Company reports in relation to its grievance mechanism, no formal statement found containing a commitment to remedy any adverse impact that it has caused or contributed to. [CompassGroup UN Global Compact, 04/19: s3-us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with AG suppliers to remedy impacts: The Company indicates that 'we work closely with suppliers and require all contracted suppliers to adhere to our CBC. If a supplier violates the CBC, the relevant senior personnel are informed and we conduct an investigation. Following this we make an assessment including on the severity of the violation. As a first step, we will work with the supplier through a remedial plan of action to improve the ongoing situation'. However, this seems to refer to the context of corrective action plans for non-compliances. Not clear whether the Company is committed to remedy through either the business relationship's own mechanism or through collaborating with those business relationships on the development of third party non-judicial remedies.
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects AG suppliers to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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"> • Met: CEO or Board approves policy: The Group Chief Executive has signed the Human Rights Policy Statement. [Human rights policy statement, 01/2018: compass-group.com] • 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: compass-group.com & Annual report, 2017: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • 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: compass-group.com & Human rights policy statement, 01/2018: compass-group.com] • Met: Examples or trends re HR discussion: The company's Corporate Responsibility Committee report indicates that the 'supply chain Integrity Policy statement was revised in 2018 and is supported by the Group's global Supply Chain Integrity Standards [...] The Committee is pleased with the progress that has been made to support compliance with our global standards and will continue to champion responsible behaviour over the coming years'. It also indicates that 'the Committee will continue to closely monitor safety performance across the Group and provide support for ongoing initiatives that will improve existing practices'. [Annual Report 2018, 20/10/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both examples and process

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A.2.3	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Incentives for at least one board member: The CEO (Supervisory Board member) has a bonus for Health and Safety performance including lost time incident frequency rate and food safety incident rate. [Annual Report 2018, 20/10/2018: compass-group.com] • Not met: At least one key AG HR risk, beyond employee H&S: As indicated above, the CEO has a bonus related to health and safety improvement. However, it is not clear whether it includes the health and safety of local communities or workers in the supply chain. [Annual Report 2018, 20/10/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

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	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: As indicated in A.1.2 the company is committed to support and uphold the UN Global Compact's ten principles. • Met: Senior responsibility for HR: '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. [Human rights policy statement, 01/2018: compass-group.com & Code of business conduct, 01/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for AG in supply chain
B.1.2	Incentives and performance management	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"> • Not met: Senior manager incentives for human rights • Not met: At least one key AG HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	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"> • Not met: HR risks is integrated as part of enterprise risk system <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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"> • Met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations: The Company indicates that 'when employees sign their contract of employment and during annual performance reviews, they confirm acceptance of the CBC and confirm their continued adherence to it'. However, the CBC (Code of Business Conduct) only contains the company's Human Rights Policy for its suppliers. [Code of business conduct, 01/2018: compass-group.com & CompassGroup UN Global Compact, 04/19: s3-us-west-2.amazonaws.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
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"> • Met: Commits to all 4 ILO core conventions for suppliers: See indicator A.1.2 • Not met: Communicating policy down the whole AG supply chain: As indicated below, 100% contracted approves suppliers have signed the code. However, no evidence found of the Company communicating the code down the supply chain, to indirect suppliers (or requiring suppliers to do so). • Not met: Requiring AG suppliers to communicate policy down the chain: The Company indicates in the Corporate responsibility report 2017 that 100% 'contracted approved suppliers have signed the Compass Code of Business

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			<p>Conduct'. In 2018 report it states that 'we require all suppliers and their supply chain to meet our supply chain human rights standards, including the nine-point Ethical Trading Initiative (ETI) base code contained within the Compass Group Code of Business Conduct'. The company's human rights policy is found in the Code of Business Conduct. However, no evidence found of requiring suppliers to communicate the code down the supply chain (to their own suppliers). [CR Update 2018, 03/19: compass-group.co.uk & Corporate responsibility report, 2017: compass-group.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: See above. [Corporate responsibility report, 2017: compass-group.com & Corporate responsibility report, 2017: compass-group.com] • Not met: Including on AG suppliers
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"> • Met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Met: Trains relevant AG 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. No more recent evidence found in latest reports. [Corporate responsibility report, 2017: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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"> • Met: Scores at least 1 on A.1.2 • Not 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. However, no evidence found in relation to monitoring its own operations on compliance with labour standards. Latest document checked. No additional details found. [Annual report, 2017: compass-group.com & Supply Chain Integrity Policy 2018, 06/2018: compass-group.com] • Met: Monitoring AG suppliers: 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. [Supply Chain Integrity Policy 2018, 06/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Score of 2 on A.1.2 • 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: compass-group.com] • Not met: Example of corrective action • Not met: Discloses % of AG supply chain monitored
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"> • Met: HR affects AG 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: compass-group.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: HR affects on-going AG 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: compass-group.com] Score 2 <ul style="list-style-type: none"> • Met: Both requirement under score 1 met • Not met: Working with AG suppliers to improve performance
B.1.8	Approach to engagement with potentially affected stakeholders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Stakeholder process or systems • Not met: Frequency and triggers for engagement • Not met: Workers in AG SC engaged • Not met: Communities in the AG SC engaged Score 2 <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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"> • Not met: Identifying risks in own operations: The company indicates that 'we continue to develop our understanding of the risks to our business of modern slavery and human trafficking, and the measures available to protect our business and our supply chains'. However, no description found of the process to identify human risks and impacts. [CR Update 2018, 03/19: compass-group.co.uk] • Not met: Identifying risks in AG suppliers: As indicated above, identification also refers to suppliers. However, no description found of the process to identify human risks and impacts. [CR Update 2018, 03/19: compass-group.co.uk] Score 2 <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
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"> • 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 & Human Trafficking statement, 2017] • Not met: Public disclosure of salient risks: Current document checked, however, no public disclosure was found. [Slavery and Human Trafficking Statement, 01/10/2018: compass-group.com & CR Update 2018, 03/19: compass-group.co.uk] Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Action Plans to mitigate risks: Although the Company indicates that it conducts 'comprehensive risk assessments of our supply chains' and that it is a member of SEDEX. No details found of a global system to take action to prevent, mitigate or remediate its salient issues. [Slavery and Human Trafficking Statement, 01/10/2018: compass-group.com & Annual Report 2018, 20/10/2018: compass-group.com] • Not met: Including in AG supply chain • Met: Example of Actions decided: The following example is mentioned in the Human Trafficking statement: 'Our businesses in the UAE, Qatar and Saudi Arabia source the majority of labour from India, Nepal, Bangladesh and the Philippines. Strict vetting 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 commencement of employment to confirm that our standards and procedures are adhered to'. The Company also indicates that has

Indicator Code	Indicator name	Score (out of 2)	Explanation
			established an e-learning programme for procurement teams to help identify and mitigate potential risks from supply chain. It describes how it is being rolled out. [Slavery and Human Trafficking Statement, 01/10/2018: compass-group.com & Annual Report 2018, 20/10/2018: compass-group.com] Score 2 • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness 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: compass-group.com & Speak up website: compass-speakup.com] 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 and 2018. However, no further details found regarding other human rights issues. [Slavery and Human Trafficking Statement, 01/10/2018: compass-group.com] • 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: compass-group.com & Speak up website: compass-speakup.com] • 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 2018, 06/2018: compass-group.com]
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: It is not clear that the mechanism is open to external individual or the community in general. [SpeakUP Poster 2016, 2016: altogethergreat.com] 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	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Engages users to create or assess system

Indicator Code	Indicator name	Score (out of 2)	Explanation
	design and performance of the channel(s)/mechanism(s)		<ul style="list-style-type: none"> • Not met: Description of how they do this Score 2 <ul style="list-style-type: none"> • 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 publicly available and explained	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Response timescales • Not met: How complainants will be informed Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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: compass-group.com & Speak up website: compass-speakup.com] • 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: compass-group.com & Speak up website: compass-speakup.com] Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • 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, including how it defines living wage. [Supply Chain Integrity Policy 2018, 06/2018: compass-group.com & Slavery and Human Trafficking Statement, 01/10/2018: compass-group.com] • Not met: Improving living wage practices of suppliers Score 2 <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Avoids business model pressure on HRs (purchasing practices): The Company indicates that 'where possible, we source food and ingredients from growers and producers local to our units, purchase from organic producers and participate in fair trade initiatives. We place great emphasis on sustainable sourcing. (...) Compass constantly strives to find the right balance between building long-term supply relationships based on the compatibility of values and behaviour, as well as quality and price'. However, it is not clear the practices it adopts to avoid price and short notice requirements or other business requirements undermining human rights'. [Code of business conduct, 01/2018: compass-group.com] • Not met: Positive incentives to respect human rights (purchasing practices): Also, 'in addition to sharing our requirements we will focus on areas where human rights risks may exist within our supply chain. To achieve this, we are using SEDEX (Supplier Ethical Data Exchange) to gain better visibility of our supply chain and undertake a risk assessment which will inform a programme of visits and assessments. We will use the results from these to collaborate and engage with our suppliers to effect improvements'. No description found of a specific positive incentive put into place via its purchasing practices to encourage its business relationships to act with respect for human rights. [Supply chain integrity policy statement, 01/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
D.1.3	Mapping and disclosing the supply chain	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifies suppliers back to manufacturing sites (factories or fields) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Discloses significant parts of SP and why
D.1.4.b	Prohibition on child labour: Age verification and corrective actions (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Child Labour rules in codes or contracts: The Company states in their Modern Slavery Statement that 'child labour shall not be used'. In addition, the Company is a member of SEDEX and goes under SMETA (Sedex Members Ethical Trade Audit), which includes age verification. No details found, however, on remediation guidelines or requirements for suppliers in case child labour is found. No further information found in the CR Update 2018. [Slavery and Human Trafficking Statement, 01/10/2018: compass-group.com & CR Update 2018, 03/19: compass-group.co.uk] • Not met: How working with suppliers on child labour: No evidence found of how the company works together with suppliers to eliminate child labour and to improve working conditions of young workers where relevant. [CR Update 2018, 03/19: compass-group.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made
D.1.5.b	Prohibition on forced labour: Debt bondage and other unacceptable financial costs (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Debt and fees rules in codes or contracts: In its Supply Chain Integrity Statement, the Company indicates that 'employment is freely chosen'. However, no evidence found of debt bondage requirements, including refraining from imposing any financial burdens on workers by withholding wages or expenses including recruitment fees and related recruitment costs, in its contractual arrangements with its suppliers or supplier code of conduct. Neither any evidence found about how the company works with suppliers to eliminate imposing any financial burden on workers. No further information found in the Code of Conduct. [Supply Chain Integrity Policy 2018, 06/2018: compass-group.com & Code of business conduct, 01/2018: compass-group.com] • Not met: How working with suppliers on debt & fees: See above. [Supply Chain Integrity Policy 2018, 06/2018: compass-group.com & Code of business conduct, 01/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.d	Prohibition on forced labour: Restrictions on workers (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Free movement rules in codes or contracts: In its Supply Chain Integrity Statement, the company indicates that “employment is freely chosen”. However, no evidence found of requirements on workers’ freedom of movement, including refraining from restricting workers’ movement through the retention of passports or other personal identification or travel documents or bank payment cards or similar arrangements for accessing wages or other measures to physically restrict movement, in its contractual arrangements with its suppliers or supplier code of conduct. Neither was any description of No further evidence found int the Supply Chain Integrity Policy. [Code of business conduct, 01/2018: compass-group.com & Supply Chain Integrity Policy 2018, 06/2018: compass-group.com] • Not met: How working with suppliers on free movement: No evidence found in relation to how the company works with suppliers to eliminate detention of worker’s documents or other actions to physically restrict movement. [Code of business conduct, 01/2018: compass-group.com & Supply Chain Integrity Policy 2018, 06/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.6.b	Freedom of association and collective bargaining (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: FoA & CB rules in codes or contracts: In the Supply chain integrity statement, it is stated that 'the Base Code principles are: employment is freely chosen; freedom of association and the right to collective bargaining is respected; (...)'. However, no evidence found in code for suppliers some specification to it, including the prohibition of intimidation, harassment, retaliation and violence against union members and union representatives. [Code of business conduct, 01/2018: compass-group.com & Supply Chain Integrity Policy 2018, 06/2018: compass-group.com] • Not met: How working with suppliers on FoA and CB: No evidence found of a description of how the company works with suppliers to improve their practices in relation to freedom of association and collective bargaining. [Code of business conduct, 01/2018: compass-group.com & Supply Chain Integrity Policy 2018, 06/2018: compass-group.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury rates (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Sets out clear Health and Safety requirements • Not met: Injury Rate disclosures • Not met: Lost days or near miss disclosures • Not met: Fatalities disclosure <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How working with suppliers on H&S • Not met: Provides analysis of trends demonstrating progress
D.1.8.b	Land rights: Land acquisition (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on land & owners in codes or contracts • Not met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.9.b	Water and sanitation (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Rules on water stewardship in codes or contracts • Not met: How working with suppliers on water stewardship issues <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (in the supply chain)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Women's rights in codes or contracts • Not met: How working with suppliers on women's rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met • Not met: Provides analysis of trends demonstrating progress

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 threshold were found, and so the score of 14.40 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.60 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	1.43 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 15 cases, leading to a disclosure score of 1.43 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"> • Not met: Company reports on GRI • Not met: Company reports on SASB • Not met: Company reports on UNGPRF
F.3	Key, High Quality Disclosures	0.5 out of 4	Compass Group met 1 of the 8 thresholds listed below and therefore gets 0.5 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management

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 2019 Key Findings report and technical annex 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.