



Compass Group's Code of Ethics

Acting responsibly in business
everyone
everyday
everywhere

Compass Group Code of Ethics & UN Global Compact

As a world leader in our field we have to set the very highest standards for the quality of the services we provide and the professional and ethical way we run our business. Our reputation and future success depend on it.

The behaviour and actions of *everyone* of us, *everyday*, *everywhere* in the world we operate can impact this. Every individual employee in Compass Group shares a responsibility to uphold these standards and to conduct our business in a professional, safe, ethical and responsible manner. This is without exception and without compromise.

To help every employee understand their role in protecting and building our reputation we have developed the Compass Group Code of Ethics. This Code sets out the clear standards of behaviour that we expect all of our people to demonstrate in dealing with colleagues and those outside the company such as customers, clients, suppliers, shareholders and other stakeholders. The Code has been developed with input from across the business, key stakeholders such as the Compass European Works Council (CEC) and in association with the Institute of Business Ethics. The principles set out in this Code are implicit in our values.

We have a range of resources available to help people understand how these principles work in practice, access to support if they are unsure of how they apply to specific situations, and channels to raise issues where they feel they are being breached.

The Code of Ethics underpins our social, ethical and environmental commitments and sends a powerful message to all our stakeholders of Compass Group's commitment to responsible business practice. To further underline this we are a signatory to the United Nations Global Compact, a UN initiative to encourage companies to commit to make human rights, labour standards, environmental responsibility and anti-corruption part of the business agenda whilst maintaining competitive advantage.

The 10 Principles of the UN Global Compact are integral to our own business principles and add new dimensions to responsible business practice by creating a platform, based on universally accepted principles, to encourage innovative new initiatives and partnerships within the communities we work in and with other organisations.

The Code of Ethics should not be seen as simply a set of words in a document; they are the principles that guide the way we should think, act and behave, and should be in evidence in our everyday working. They are vital in building and protecting our reputation and to ensuring that Compass continues to be a company that people feel proud to work for, and confident to buy from and invest in.

1. Relations with our employees

As a service company, our people are key to the success of our business. We respect and value the individuality and diversity that every employee brings to the business and seek to create a positive, open, working environment wherever we operate.

- We are committed to basing relations with our employees on respect for the dignity of the individual and fair treatment for all.
- We aim to recruit and promote employees on the basis of their suitability for the job, without discrimination.
- We aim to foster effective communication to enable all our employees to perform their work effectively. This will include encouraging and helping employees to develop relevant skills to progress their careers.
- We place the highest priority on the health and safety of our employees and the safety of the environment in which they work.
- We do not tolerate any form of discrimination or sexual, physical, mental or other harassment of any kind toward our employees, whether from our own staff or others.
- We operate fair and just remuneration policies.
- We require any employee with a potential conflict of interest to disclose it to their line manager.
- We operate in an environment of trust and as such we do not tolerate any fraudulent or dishonest behaviour by our employees either within the Group or in dealing with other stakeholders.

2. Relations with our clients and customers

We are passionate about delivering superior quality, service and choice to our clients and customers: our reputation and the loyalty of our clients and customers depend upon it.

- The quality and safety of the food and services we provide, and that of our products and processes, is paramount and must never be compromised.
- We aim to provide a high level of client and customer service at all times. All feedback on our service is recorded and given prompt consideration.
- All customer and client information is treated as confidential.
- We never deliberately give inadequate or misleading descriptions of our products or services.
- No employee may offer or receive – or influence others to offer or receive – any money or material gift that could be construed as a bribe.

3. Relations with our investors

The company's success in the marketplace is built upon the trust and confidence of those who invest in us, and we are dedicated to protecting their long-term interests.

- We aim to generate an attractive rate of return on a long-term basis, through the responsible use of assets entrusted to us.
- We are committed to a high standard of corporate governance and accountability.
- Our accounting statements will be true, timely, complete and material, and available in an easily understandable form.

4. Relations with our suppliers and subcontractors

We seek to establish mutually beneficial relationships with all our suppliers, and encourage them to match our high standards in respect of quality, food safety, working conditions, trading practices, health and safety and environmental protection.

- We treat our suppliers and subcontractors honestly and fairly.
- No employee may offer or receive – or influence others to offer or receive – any money or material gift that could be construed as a bribe or influence.
- We endeavour to ensure we are not exploited directly or indirectly by requests to make facilitation payments.
- All information concerning the company and its suppliers is to be treated as confidential.
- We do not work with companies that infringe the law or endanger Compass Group's reputation.

5. Relations with governments and the wider communities

Success in business is dependent on compliance with legal constraints, together with sensitivity to local customs and conventions governing business relationships. The communities in which we operate (and from which we draw our employees) are important to us.

- We are committed to making a positive contribution to the sustainable development of the communities in which we operate.
- We take into account the concerns of the wider community – including national and local interests – in all our operations. We use our expertise to contribute to the wellbeing of the community in a manner appropriate to our business objectives.
- We endeavour to ensure that we are not exploited for the purpose of money laundering, drug trafficking or tax evasion.
- We support the rights of human beings as set out in the UN Declaration of Human Rights. We consider carefully before doing business in countries that do not adhere to the UN Declaration.
- We do not make donations to political party funds or candidates.
- We respect the law, traditions and cultures of the countries in which we operate. When there is an apparent conflict between local custom and the principles and values set out in this Code, employees acting on our behalf must be guided by this Code.
- We are committed to doing our business in a way that's as environmentally friendly as possible. The Group's Environmental Policy and Guidelines include standards on waste reduction and recycling, and the conservation of water and energy.

6. Implementation and Compliance

We are committed to creating a working environment in which employees can and do behave in the right way.

We expect employees to raise with their line manager, or where they are uncomfortable doing so, with their next up line manager or through external report lines, any concerns they may have of serious wrongdoing or behaviour that is not in the letter or spirit of our values or our Group Code of Ethics.

Compliance with our Group Code of Ethics is a condition of continuing employment.

The Global Compact



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

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

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges
- Principle 8: Businesses should undertake initiatives to promote greater environmental responsibility
- Principle 9: Businesses should encourage the development and diffusion of environmentally friendly technologies

Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery