



# Fighting Against Forced Labour and Child Labour in Supply Chains

2024 Annual Report

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Serve a  
**better future**

by enriching people, communities and the planet.

## OUR COMMITMENT

As a leader in food services, Compass Group Canada always strives to do what's right—for our people, our customers, our shareholders, the planet, and the communities that we serve.

In 2023, we launched our official purpose: *“At Compass Group Canada, we serve a better future by enriching people, communities, and the planet.”*

Our purpose is at the core of what we do and the key driver behind our strategic framework, which contains our promises, ambitions, goals, values, and commitments. Our purpose is underpinned by four key beliefs:

Our purpose is underpinned by four key beliefs:

- Everyone should be seen and nourished as a whole person
- Great service starts with understanding what people value most
- To positively impact a community, we must respect what makes it unique
- Positive change for our planet's future starts with making better choices today

To achieve our purpose, we are committed to maintaining strong governance and high ethical standards throughout our operations, to conducting business with integrity, to never compromising on safety, and to treating others with kindness and respect. This commitment extends to all of Compass Group Canada's operations, including those of Foodbuy—our procurement and supply chain solutions division.





At Compass Group Canada, we recognize that our success and future growth depends on everyone within our organization upholding our commitments. Whatever our role, how we act and behave can affect how we are viewed and impact the trust that our stakeholders have in us. That's why we're committed to ensuring all of our people understand the importance of our commitments and have the tools and training to act as champions of our purpose—including ensuring that they are acting responsibly when it comes to managing and mitigating the risks associated with forced labour and child labour in our supply chain.

Eradicating forced labour and child labour is a commitment that we at Compass Group Canada are passionate about. In this report, we are proud to share the progress that we have made over the past year. Working with our global Compass Group network, we will continue to build on these efforts in the years ahead.

**Saajid Khan**  
Chief Executive Officer  
*Compass Group Canada*  
31<sup>st</sup> May 2024

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## FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR IN SUPPLY CHAINS

This is Compass Group Canada's first Fighting Against Forced Labour and Child Labour in Supply Chains report, which has been prepared in accordance with the federal government of Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act.

While this is our first report, our commitment to identifying and mitigating the risks associated with forced labour and child labour is not new. We have regularly invested in strategies, tools, processes, and partnerships to identify and mitigate potential risks across our operations and supply chain—such as our work with the Supplier Ethical Data Exchange (Sedex) and our recently introduced Third Party Integrity Due Diligence (TPIDD) policy. We have been supported and guided in these endeavours by our ultimate parent company, Compass Group PLC, which is listed in the UK and is committed to complying with the Modern Slavery Act 2015 (UK).

### OUR FOCUS AREAS

Our focus areas related to identifying and mitigating the risks associated with forced labour and child labour in our supply chain are aligned with the key focus areas identified by our global Compass Group network. Our Canadian team works closely with our global counterparts on initiatives in order to maximize the effectiveness of our endeavours.

#### FOCUS AREAS

1. Reviewing and assessing our sourcing, contracting, and supplier selection processes and related technologies through our centralized and globally recognized procurement business, Foodbuy
2. Actively communicating our expectations to our suppliers and enforcing standards through our contracts
3. Conducting targeted audits through third parties and partnerships with industry expert organizations
4. Investing in targeted training for our teams, supported by the learnings from Compass Group's global, multi-disciplinary Human Rights Working Group
5. Providing our people with access to the independently operated helpline SpeakUp! to report any concerns relating to the use of forced labour and child labour
6. Investigating and addressing concerns that are identified at the very highest levels by our Canadian Leadership Team



## KEY HIGHLIGHTS—FY23

- Provided awareness training to all national Foodbuy Canada—CGC’s procurement and supply chain solutions organization—team members on the risks associated with forced labour and child labour in our supply chain; training was provided during the onboarding of new team members, on a refresh basis, and as required based on role
- Delivered targeted training to mid- and senior-level management across Compass Group Canada on identifying and mitigating the risks of forced labour and child labour
- Launched Compass Group’s Third Party Integrity Due Diligence Policy; launch included dedicated training sessions for procurement team members
- Participated actively in Compass Group’s global Human Rights Working Group—a group focused on sharing best practice insights, lessons learned, and case studies across the Compass Group network
- Implemented the requirement for formal and independent SMETA audits to be conducted by our strategic suppliers as part of our standard supplier contracts
- Provided financial support for select suppliers, including both SME and social enterprises, to undertake and complete the SEDEX self-assessment questionnaire alongside independent SMETA auditing

# Reporting requirements

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This is the first annual report prepared by Compass Group Canada Ltd. in accordance with the new Canadian federal Fighting Against Forced Labour and Child Labour in Supply Chains Act, which came into force on January 1, 2024. It sets out the steps Compass Group Canada has taken to prevent and reduce the risk that forced labour or child labour is used at any step of its supply chain during the prior fiscal year ended September 30, 2023. Compass Group Canada's Executive Leadership has approved this report.

This a joint report filed by Compass Group Canada Ltd. on behalf of itself and the following reporting entities: Canteen of Canada Limited, East Coast Catering Limited, Great West Catering Ltd., Town Square Food Services Ltd., Groupe Compass (Quebec) Ltee., Compass Canada Support Services Ltd., Chef's Hall Inc., and Crothall Services Canada Inc.





# Introduction to Compass Group Canada



## COMPASS GROUP CANADA

Compass Group Canada (CGC) is Canada's leading foodservice and support services provider with over 20,000 associates working in more than 2,200 locations throughout the country. We specialize in providing foodservices and support services, including facilities management and vending services. Compass Group Canada works across a number of core sectors, including leading sports and leisure venues, executive dining rooms and cafes, schools, universities, seniors' residences, and hospitals, in addition to remote camps and offshore oil rigs.

CGC and the reporting entities are companies incorporated in Canada. CGC's ultimate parent company is Compass Group PLC, which is listed in the UK and has operations throughout the world. Compass Group PLC shares our goal of eradicating modern slavery and has published its own Modern Slavery Statement pursuant to the provision of section 54 of Modern Slavery Act Statement 2023 (UK), found here: [here](https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/modern-slavery-act-statement-2023.pdf)\*

## FOODBUY CANADA

Foodbuy is the leading foodservice procurement and supply chain solutions organization (GPO) in North America and the sole sourcing partner for its parent company, Compass Group North America. Foodbuy Canada negotiates and manages purchasing contracts with over 400 supplier partners nationally.

Foodbuy Canada manages \$3.4B in purchasing volume from both Compass units and non-Compass members, who also participate in these purchasing programs.

\*<https://www.compass-group.com/content/dam/compass-group/corporate/Who-we-are/Policies/modern-slavery-act-statement-2023.pdf>





AS COMPASS CANADA, WE...

# Serve a better future

by enriching people, communities and the planet.

And we do this because we believe that...



Everyone should be seen and nourished as a whole person



To positively impact a community, we must respect what makes it unique



Great service starts with understanding what people value most



Positive change for our planet's future starts with better choices today



## COMPASS OPERATIONS

Our business is structured to reflect the six key sectors that we operate in. Within each sector, we operate a number of distinct brands; this has allowed us to showcase our understanding of the unique needs of our clients and to build long-lasting relationships built on trust.

- **Business & Industry:** We provide food services in workplaces across the country, ranging from corporate offices to manufacturing sites. Our food service teams energize thousands of employees while they enjoy the hospitality of our cafés, restaurants, and catering.  
*Brands: Eurest, ESFM, Gourmet Cuisine, Canteen*
- **Education:** We are the country's leading foodservice and environmental services provider in the public and private education sectors. We create campus dining experiences with care, focusing on the delivery of diverse, healthy, and delicious meals to help fuel students throughout their academic journeys.  
*Brands: Chartwells (K-12, Higher Education, Independent Schools)*
- **Healthcare:** We serve Canada's largest and most prominent hospitals and health systems by providing a full range of food and environmental services. We elevate the patient and guest experience to allow them to focus on what matters most—their health and wellbeing.  
*Brands: Compass One*
- **Senior Living:** We are Canada's only specialized senior living food and hospitality provider. We create dining and hospitality experiences that let residents of senior living facilities across the country to feel at home.  
*Brands: Marquise*
- **eSports & Leisure:** We have been innovating foodservices in the sports and leisure sector for over 60 years. We create exceptional culinary experiences and lasting memories for our guests across a range of venues, including sports arenas, convention centres, and entertainment venues. We also provide premium services related to corporate dining, retail, airport lounge and executive traveler hospitality, and more.  
*Brands: Levy Canada, Restaurants Associates*
- **Remote Services:** We have been transforming remote workplaces for over 40 years, including defence, offshore, and remote sites around the world. Our focus is on providing a home away from home atmosphere for the resident workers of our clients, supporting every aspect of their daily community life 24 hours a day, 365 days a year.  
*Brands: ESS, East Coast Catering*

## Foodbuy Canada Operations

Foodbuy Canada is Compass Group Canada's purchasing and supply chain solutions department. Foodbuy Canada also extends participation in its competitive purchasing contracts to non-Compass members, leveraging this enhanced purchasing volume for improved contract terms.

**\$3.4**

billion in managed spend in Canada

**400+**

contracted suppliers

**21,000**

member locations

**36,000+**

contracted SKUs

Our Canadian and North American operations do not work alone. Our Compass Group network has a strong footprint in the foodservice industry globally.

## Our Global Spread

Globally, we bring together the combined strength of a Group which operates in:

**40**

countries with more than



**500,000**

employees serving

**5.5**

billion meals



delivering the same superior standards of service globally, daily, personally.

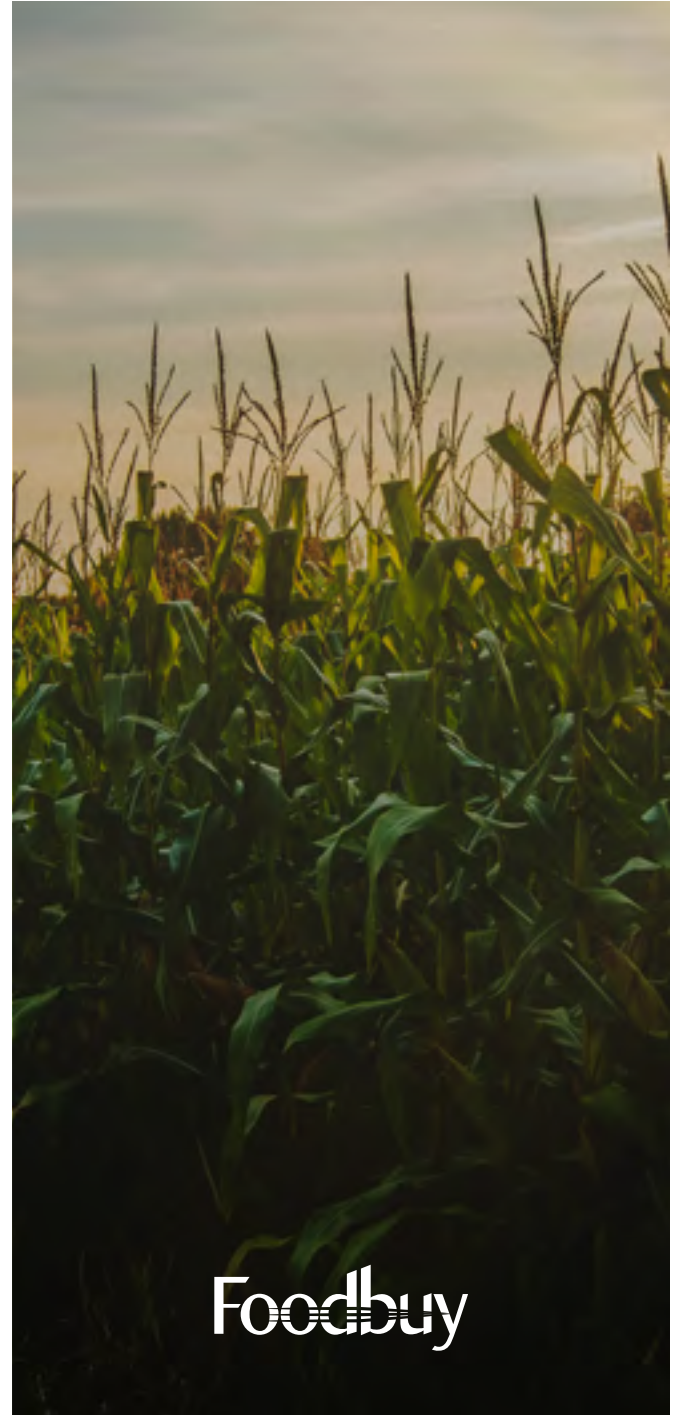


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## OUR SUPPLY CHAIN

Compass Group Canada's operations rely on an extensive and complex supply chain of distributors, suppliers, and subcontractors. To ensure best practice and procurement due diligence, Compass Group Canada operates a wholly owned and dedicated centralized procurement and supply chain business, Foodbuy Canada. Foodbuy Canada works with both broadline and direct store distributors and with approximately 400 suppliers in Canada.

Foodbuy Canada is responsible for sourcing, contracting, and providing the technology and capability to appropriately manage the supply of products and services used across Compass Group Canada's operations in addition to separate Foodbuy Canada members. This includes food and beverage products, cleaning supplies, small wares, furniture, vehicles, IT equipment, PPE, labour services, and services provided by subcontractors such as trades. We hold our suppliers to the same ethical standards and expectations as we do our direct operations.



†<https://foodbuy.com.au/>

# Our risk approach

This section of the report provides an overview of key facets of Compass Group Canada’s risk approach related to identifying and mitigating forced labour and child labour in our supply chain.

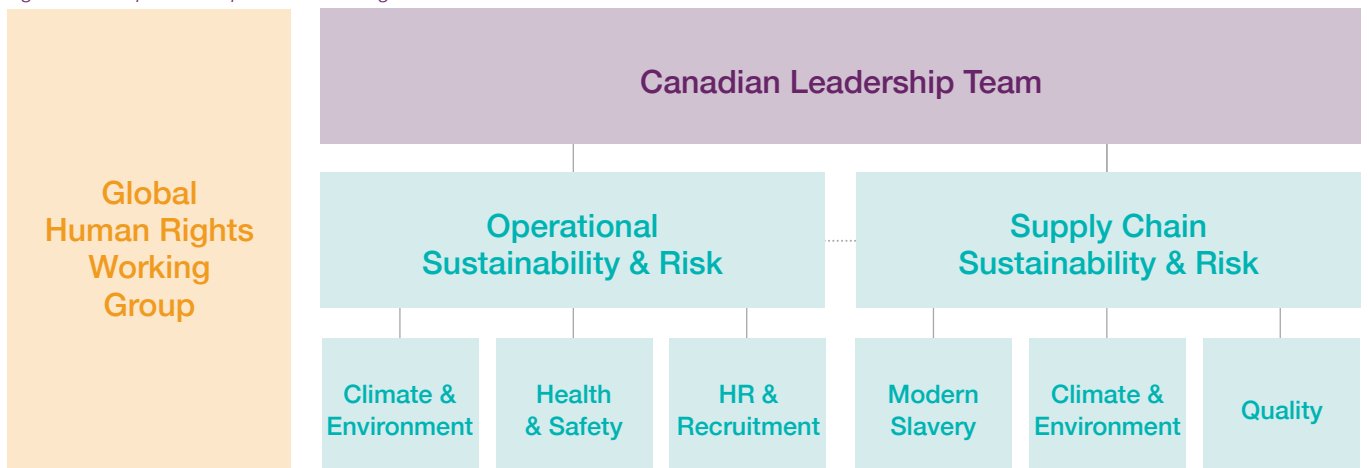


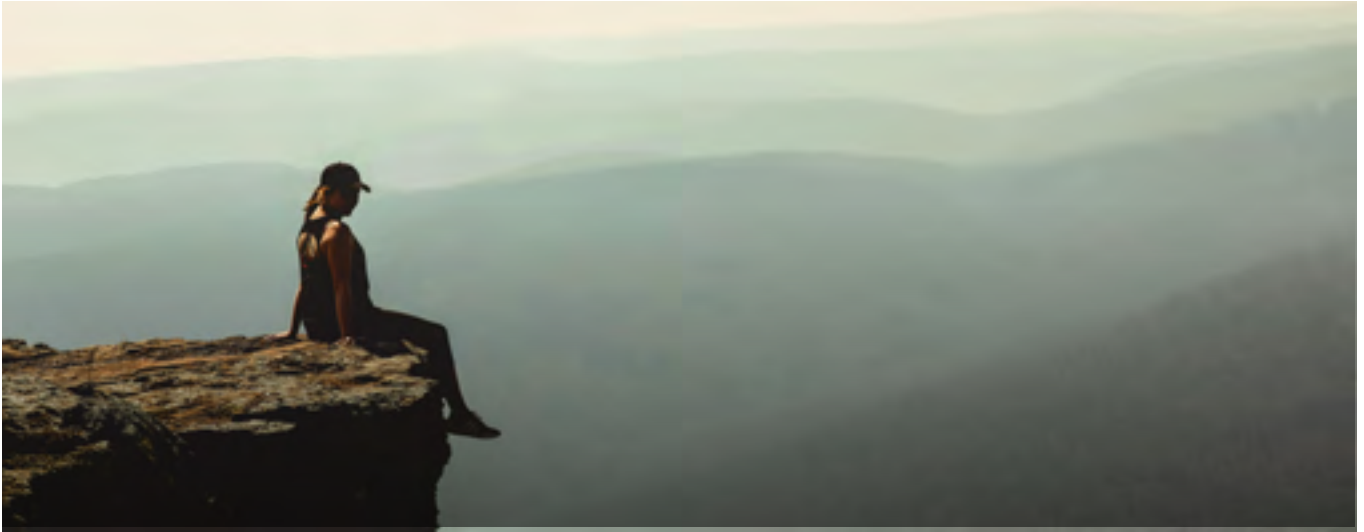
## OUR GOVERNANCE FRAMEWORK

As one of the largest catering and support services companies in Canada, we recognize and value both our responsibility and the positive role we can play in helping to eradicate forced labour and child labour. We are aware of the inherent risks that forced labour and child labour can pose and of the internal and external operating factors that can give rise to it. To help ensure risk factors are considered throughout our end-to-end operations, we have embedded ethical business process requirements into our policies and into our organizational structure.

The following figure outlines our governance framework with respect to identifying and mitigating the risks associated with forced labour and child labour in our supply chain.

Figure 1: Compass Group Canada’s risk governance framework





## OUR RISK-BASED APPROACH

Our operations revolve around the hospitality and support services industry, which is recognized by the International Labour Organization (ILO) as potentially posing a higher risk of forced labour and child labour compared with other industries. To identify and assess the risks related to forced labour and child labour within our operations and supply chain, we utilize an extensive risk-based approach that incorporates leading practice guidance, tools, and processes; data collection and assessment; audits; and knowledge sharing. Contributors to our approach include:

- The Ethical Trade Initiative's (ETI) Base Code for labour standards—a globally recognized code of good labour practices founded on conventions of the ILO
- International Labour Organization publications and research
- Sedex risk assessment tools and supplier self-assessment questionnaire
- SMETA audits and other third-party labour audits conducted at the facilities of our suppliers
- A mandatory and robust internal Supplier Risk Assessment conducted prior to onboarding a new supplier; this includes our new Third Party Integrity Due Diligence policy
- Regular supplier visits and performance reviews conducted by our procurement team in collaboration with health and safety, environment, and quality control teams
- Guidance, knowledge sharing, and lessons learned from our global Human Rights Working Group
- Outcomes of publicly available relevant investigations
- Information from our Speak Up! anonymous whistleblower program and escalation processes; this program is accessible to all Compass Group employees and suppliers globally



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## OUR POLICIES AND STANDARDS

The following policies provide minimum standards and guidance for all members of Compass Group Canada, Foodbuy Canada, and our partners with respect to identifying and mitigating the risks associated with forced labour and child labour:

### Global policies (Compass Group PLC)

- **Code of Business Conduct:** Refreshed and re-launched in June 2023, this code provides guidance for all our businesses.
- **Supplier Code of Conduct:** Launched in 2022, this code applies to all of Compass Group's supply chain partners globally; it sets out the ethical standards, principles, and behaviours expected from all of Compass Group's supply chain partners.
- **Human Rights Policy:** This policy states our commitment to the four core conventions of the ILO, and reinforces our global commitment to respect the human rights of all vulnerable groups.
- **Global Supply Chain Integrity Policy:** This policy is applicable to all of Compass Group's procurement activities globally; it sets out how Compass Group encourages compliance with the ETI Base Code.

### Compass Group Canada policies

- **Employee Code of Conduct:** Last updated in November 2023, this code outlines Compass Group Canada's policies and procedures as to appropriate behavioural standards for all employees.
- **Whistleblower Policy:** Last updated in May 2023, this policy supports our commitment to fostering a culture of ethical behaviour and good corporate governance by providing safe options for the reporting of improper conduct.
- **Recruitment Policy:** Last reviewed in December 2022, this policy outlines how Compass Group Canada manages recruitment, transfers, secondments, and other contract variations for new and existing employees.





## OUR EXTERNAL OPERATING FACTORS

As a leader in the foodservice industry, we source products from a large and diverse global supplier base. We recognize that risks associated with forced labour and child labour exist within our multitiered and global supply chain given the complexity, amount, and variety of products we source. We consider our direct and indirect supply chain to span a number of industries considered to have a heightened risk of forced labour and child labour, including farming, agriculture, food production, food processing, and distribution.

During the reporting period, and in line with Compass Group's global structured risk assessment framework, we focused our activities on the following higher risk supply chain categories:

- Horticulture and meat processing, involving both domestic and migrant seasonal workers
- Food products warehousing and distribution
- Engagement with small and medium-sized subcontractors and service providers, including domestic and international labour recruitment agencies

We understand the increased risks of forced labour and child labour within our indirect supply chain, particularly risks related to suppliers with international operations that are difficult to assess. We have identified the following higher risk product categories as having a significant presence in our supply chain:

- Coffee and cocoa

- Seafood
- Sugarcane, meat, nuts, corn and sunflower products, palm oil, sesame and beans, and rice
- Textiles and clothing
- Tobacco products
- Consumables

We use Sedex to support our assessment of inherent risks associated with the location and commodities of new suppliers. During the current reporting period, we implemented the requirement for new strategic suppliers to confirm their membership in Sedex and to commit to completing the Sedex self-assessment questionnaire in order to increase supply chain transparency and accountability. We also updated our standard supplier agreements to include the requirement for a formal and independent SMETA audit within the first year of trading with Foodbuy Canada.

Risks associated with forced labour and child labour are reviewed yearly by our global Human Rights Working Group, with input from Compass Group's ethics and integrity team.

In addition to using Sedex as an assessment tool, Foodbuy Canada's procurement team and Compass Group Canada's health and safety teams conduct risk assessments on all prospective suppliers. Our existing suppliers are also subject to regular performance reviews, which include conversations about working conditions, and audits where required.



## MANAGING OUR SUPPLY CHAIN RISKS

As part of our continued efforts to review our global and domestic supply chain risks, Compass Group Canada recently conducted a review of our standard processes and documentation for supplier contracts. As a result, our contracts now include detailed expectations and audit requirements related to the risks of forced labour and child labour. These expectations include formal supplier risk assessments (SRA) for both existing suppliers—during ongoing contractual periods—and new suppliers to ensure both groups meet Compass Group’s safety, quality, certainty of supply, and social and ethical standards. Each SRA is reviewed regularly to ensure that it remains fit-for-purpose and addresses and aligns with the key risks across Compass Group Canada’s supply chain. Our global Human Rights Working Group reviews these supply chain risks annually.

Compass Group PLC’s global Supplier Code of Conduct (SCOC) is an integral part of our approach to maintaining an effective third-party risk management framework. Our global SCOC was adjusted in 2022 to reinforce our focus on transparency, human rights, and labour standards. The SCOC represents an extension of our Code of Business Conduct and values, and sets out the

high ethical standards, principles and behaviours that we expect from our supply chain partners.

### The five focus areas of our global SCOC include

- ✓ Business integrity and ethical principles
- ✓ Human rights and labour standards
- ✓ Health and safety
- ✓ Sustainability
- ✓ SpeakUp!

The new global SCOC was issued to all key suppliers by direct and formal communication at the executive level and required acknowledgment of receipt and acceptance of terms. Additionally, the values, standards, and requirements within the SCOC were communicated to all members of our Foodbuy Canada team and supported by specific training. Elements of the SCOC were also embedded in all our standardized sourcing, tendering, and supply contract documentation



## MANAGING OUR SUPPLY CHAIN RISKS (cont)

To support recognition, understanding, and acknowledged compliance to the SCOC, alongside our broader values and expectations in positive action on risks related to forced labour and child labour, our Foodbuy Canada procurement and supply chain teams reinforce the code and its contents through our supplier Quarterly Business Review processes and during all new and renewal contracting activities.

SpeakUp! remains an important element of identifying and promptly addressing the risks of forced labour and child labour within our supply chain. Our suppliers and their workers have access to this confidential and independently operated multilingual whistleblower program. Information received through SpeakUp! is promptly addressed at the highest executive levels of the relevant jurisdiction.

During this reporting period, Compass Group PLC also introduced a new Third Party Integrity Due Diligence

Policy, which we have embraced within Compass Group Canada as it builds upon our existing risk assessment framework. This new policy sets out expectations, requirements, and minimum standards from our suppliers, which will provide a basis for assessment and continual review of the ethical compatibility between our organization and new and existing third parties, including those within Compass Group Canada's value and supply chain. It also identifies risks that would prevent a business engagement from proceeding or continuing, and provides guidance on identifying and determining the extent to which such risks are present.

The implementation of the TPIDD policy was supported by training for members of our procurement team so that they fully understand potential risks and the escalation steps required to address them. Moving forward, the TPIDD assessment and Sedex onboarding and review process will form the key components of Compass Group Canada's supplier risk assessment.



Figure 1: Compass Group Third Party Integrity Due Diligence Policy—Business integrity risks

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## SUPPLY CHAIN RISK MANAGEMENT OUR TWO-PRONGED APPROACH

### Proactive Collaboration

- Working with Sedex—leveraging information and results from Sedex self-assessments and audits
- Working with our suppliers—leveraging supplier-specific questionnaires, discussing product attributes, providing coaching to ensure supplier alignment with our goals

### Rapid Response

- Our procurement team conducts weekly meetings to discuss any red flags identified. This allows for rapid review, discussion, and determination of follow-up actions.



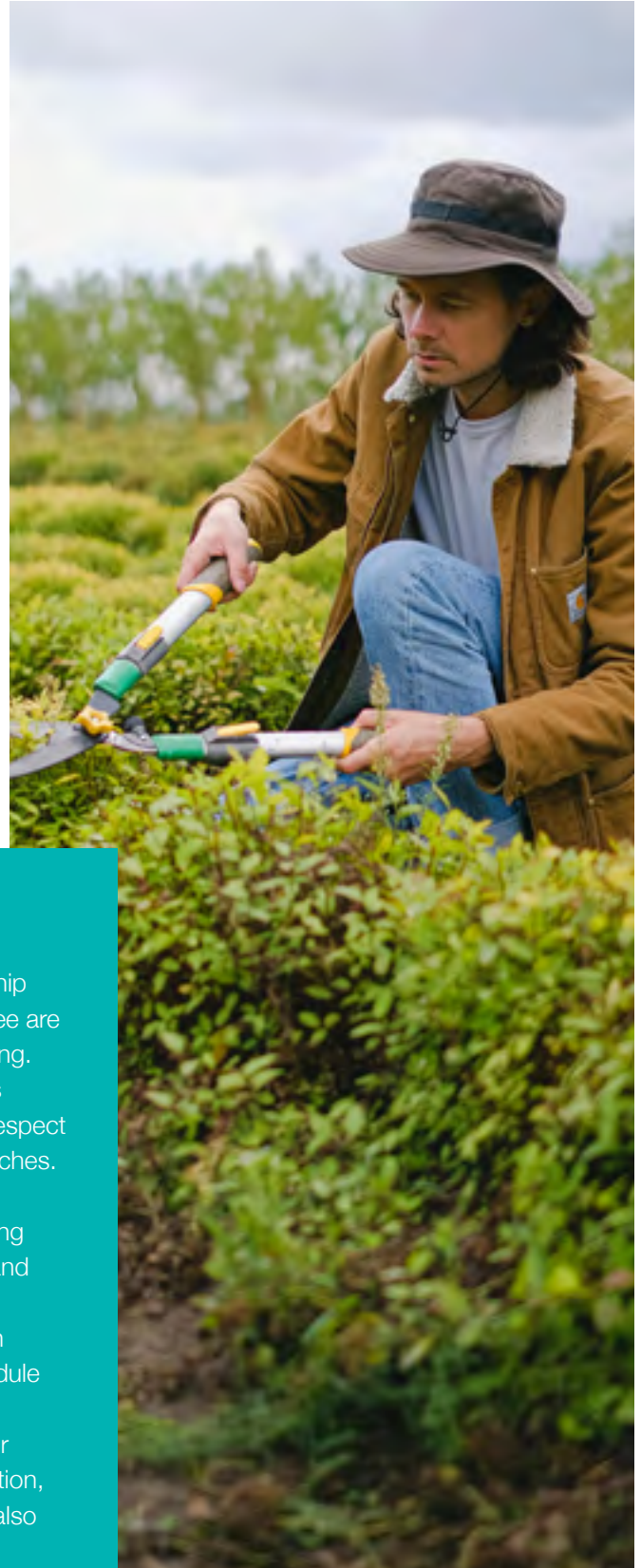
## OUR TRAINING APPROACH

Training and awareness are essential to identifying and mitigating the risks of forced labour and child labour in our supply chain. During the reporting period, we invested in further training for our procurement team, reaching 100% milestone for all Foodbuy Canada team members.

### Our training approach is two-fold:

1. Internal ethical procurement training focused on raising awareness and recognizing signs and indicators of forced labour and child labour, as well as the escalation processes and procedures in case a concern has been identified
2. External training delivered in collaboration with Sedex, aimed at providing relevant tools to enable our procurement team to effectively assess risks and gain increased visibility over the extended supply chain

Compass Group Canada participates in the Compass Group global Human Rights Working Group to support our commitment to identifying and mitigating the risks of forced labour and child labour in our supply chain.



## TRAINING OUR LEADERS

All Compass Group Canada team members in positions above unit management, including all Canadian Leadership Team Members and members of the Executive Committee are required to participate in annual ethics and integrity training. This training is mandated at a global level, which ensures everyone involved with Compass Group is aligned with respect to expectations, requirements, and management approaches.

During 2024, ethics and integrity training focused on Doing What's Right guided by our Code of Business Conduct and our Business Integrity Policy. Modules included business integrity, anti-bribery and corruption, data privacy, human rights, and Compass Group ethics and integrity. The module on human rights included a number of facets aimed at building awareness around forced labour and child labour risks and issues, including human rights, worker exploitation, worker harassment, and human trafficking. The module also addressed appropriate due diligence.



# Assessing the Effectiveness of our Actions

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## OUR OPERATIONS

Our approach to assessing the effectiveness of our actions to fight against the use of forced labour and child labour in our supply chain is consistent with the approach taken by Compass Group PLC globally. Our global Human Rights Working Group works tracks and assesses a number of indicators in order to identify key actions and adjustments to our approach.

### These indicators include:

- Number of human rights grievances reported by Compass Group's people via SpeakUp!
- Total number of incidents of substantiated human rights breaches and actions taken
- Significant actual and potentially adverse human rights issues in the supply chain and actions taken
- Proportion of high-risk suppliers reviewed compared to total high-risk spend
- Outstanding matters of audit non-compliance and relevant corrective actions

Members of Compass Group Canada collaborate closely with other members of Compass Group PLC's global Human Rights Working Group to enhance knowledge and information sharing across geographies in order to strengthen the impact of our efforts.



## OUR SUPPLY CHAIN

During the reporting period, no human rights or issues related to forced labour or child labour were raised through SpeakUp! in Canada. Given the complexity and multi-dimensionality of related risks, however, we do not take the absence of related SpeakUp! submissions as clear evidence of the lack of forced labour and child labour in our extended supply chain.

During FY23, there were no issues identified through our SpeakUp! related to forced labour or child labour that required investigation by Compass Group Canada.

To identify, assess, minimize, and manage associated risks, we also proactively engaged with Sedex and our

suppliers to continually increase the transparency and traceability of our overall supply chain.

The global Human Rights Working Group met quarterly throughout FY23 to assess our human rights efforts—including those focused on identifying and mitigating the risks associated with forced labour and child labour in our supply chain—and to discuss emerging risks, lessons learned, and current and future actions. Our Canadian representatives—including the Senior Director of Shared Services and People & Culture with Compass Group Canada and the Senior Manager of Responsible Sourcing at Foodbuy Canada—are particularly active in the working group and work diligently to apply global best practices to the Canadian context.

## OUR APPROACH TO POLICY ENFORCEMENT FORCED AND CHILD LABOUR

Compass Group Canada strictly prohibits the use of forced labour and child labour within our operations and supply chains—a fact that is entrenched in both our Compass Group Canada Supplier Code of Conduct and our global Modern Slavery Statement.

Every incident of possible noncompliance is investigated. Upon identification of any such practices, we take immediate remedial action. This includes engaging with the supplier to demand the cessation of unethical labour practices and to provide a directive that any practices must be corrected in compliance with our company's standards. If the supplier fails to make identified changes, we take steps up to and including the discontinuation our business relationship with the supplier in order to ensure we are not complicit in, or indirectly supporting, the use of forced or child labour. These actions reflect our unwavering commitment to uphold ethical labour standards throughout our supply chains.



## CONSULTATION PROCESS

All of Compass Group Canada's subsidiaries and controlled entities share common values and a strong commitment to responsible business practices, including efforts to eradicate the use of forced labour and child labour in our supply chains.

### To compile and finalize this report, we have engaged and consulted with:

- *The Canadian Leadership Team on behalf of Compass Group Canada's wholly-owned subsidiaries and the entities that it controls, including Foodbuy Canada*
- *Members of our recruitment, payroll, HR, and health and safety teams who are engaged in ensuring compliance with operating policies and procedures across Compass Group Canada's operations*
- *Members of our Foodbuy Canada procurement and supply chain teams responsible for supporting Compass Group Canada's procurement activities*
- *Members of Compass Group PLC's global Human Rights Working Group*

# Report Approval and Attestation

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In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

A handwritten signature in blue ink that reads "Saajid Khan".

**Saajid Khan**

Chief Executive Officer

31<sup>st</sup> May 2024

I have the authority to bind the reporting entities.



