
COMPASS GROUP UK & IRELAND BUSINESS CONTINUITY MANAGEMENT POLICY STATEMENT

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1 CORPORATE OBJECTIVES

1.1 Compass Group UK & Ireland is the leading provider of contract catering and support services in the UK and Ireland. Our Corporate objectives are as follows:

Our vision

To be a world-class provider of contract foodservice and support services, renowned for our great people, our great service, and our great results.

Our mission

Everyone in Compass is committed to consistently delivering superior service in the most efficient way, for the shared benefit of our clients customers, shareholders and employees.

Our guiding principles

- Health, Safety and Environment first
- Delivering for clients and consumers
- Developing our people and valuing diversity
- Profitable growth
- Constant focus on performance and efficiency.

Purpose of BCM Policy

The Board of Directors of Compass UK & Ireland recognise that the changing nature of the environment in which we operate means that our ability to continue operation uninterrupted may not be entirely within our control; as demonstrated during the recent pandemic. We know from the experiences of others that the organisation could also be seriously affected by an unforeseen incident such as loss of IT services. The purpose of our Business Continuity Management Policy is for us to achieve our Corporate Objectives even if we experience an unforeseen Incident.

Our customers are entitled to expect that we do everything possible to ensure minimum disruption to our operations and the delivery of services upon which they rely. To this end, Compass has a Business Continuity Management (BCM) programme with a set of interlocking plans and arrangements (the Business Continuity Management System, or BCMS) to ensure that Compass has a tried, tested and best practice response to minimise the impact of significant disruptions.

This BCMS policy supports Compass by assuring that products and services are delivered with our best endeavours despite disruptive events, maintaining SLAs wherever possible. Our organisation's overall risk management strategy and appetite is set out by The Business Continuity Steering Group and the business, legal and regulatory drivers with respect to continuity of operations, are defined by that group.

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2 BUSINESS CONTINUITY MANAGEMENT OBJECTIVES

2.1 The BCM objectives are as follows:

- The preservation of life is our first priority, so as to ensure the safety and welfare of Compass employees and staff and of any visitors who are in Compass premises (or client site) at the time of an incident.
- To minimise the impact on Compass of any interruption to normal activities; to a level which is below the impact tolerance level stated in this policy.
- To contain any financial costs associated with interruptions or incidents to manageable levels.
- To protect the Compass reputation as a reliable and resilient supplier of contract catering and support services, and to ensure that business following any interruption is not adversely affected by reduced levels of activity during an interruption.

3 EMERGENCY RESPONSE AND OPERATIONS

3.1 Head Office and Central Functions

Our head office and central functions are supported by comprehensive business continuity plans. We have an Incident Management teams at each of our key locations at Birmingham, Chertsey, Dublin and Aberdeen. The Tactical plan provides a coordinated response and specifies the key personnel, resources, services and actions required for effective recovery from an incident which is controlled by the Incident Management Team. At an Operational level each department has its own section, which contains the specific detail and processes required for recovery. Priority is given to maintaining our critical support activities such as D&T, Payroll, Finance and HR.

3.2 Sectors

At a sector level each location will have a Tactical Plan which provides the response structure at a local level and is owned by Operations Director/Regional Manager for each site. The Operations Director/Regional Manager reports to the Managing Director of the Sector who has strategic responsibility for the plan. The plan identifies the circumstances in which the plan is invoked and will be integrated with the clients site Business Continuity Plan. The plan links into the Compass central support structures for:

3.2.1 Supply Chain

We have a full supply contingency plan in place for food and disposables. Should a nominated supplier be unable to supply the full order, our chefs onsite can contact our Foodbuy Support Line who have a comprehensive database of approved suppliers. Our Vendor Assurance teams undertake extensive quality control checks before a supplier can be added to our approved supplier list.

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3.2.2 Staff Shortages

Compass has its own internal resourcing agency, Constalation, which is able to provide swift cover as and when required.

3.2.3 IT Support (Data & Security)

Compass IT Support Services are on hand to provide technical support and advice through the IT support line. They will despatch engineers to resolve hardware problems and equipment failures such as till failure.

3.3 Unit Managers Emergency Manual

Each Unit Manager has an emergency manual which gives clear guidance on the emergency procedures and what to do in the case of a wide range of incidents. This manual is designed to work in conjunction with the Business Continuity Plan.

4 RISK MANAGEMENT

- 4.1** All of our business processes are regularly analysed for single points of failure, critical resources in terms of people, applications, infrastructure and suppliers. Threats and risks of each of these components are classified on our risk register. Once a risk has been logged it will be subject to continual review, mitigation and assessment to ensure that it remains under control.

5 SCOPE

- 5.1** In order to optimise the application of resources to the BCMS, the BCMS scope defines areas of the Compass Group that are subject to its measures and that benefit from its additional protection. These areas are set out in the following table:

5.2

Areas of Compass UK & Ireland falling within the scope of the BCMS	
Locations	All Compass Locations with the UK and Ireland
Head Offices	Birmingham (Parklands) Chertsey (Group) Dublin (Parkview) Aberdeen (ESS Support Services Offshore)

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Areas of Compass UK & Ireland falling within the scope of the BCMS	
Sectors	<p>Business and Industry Defence and Government Education Healthcare & Senior Living Offshore Sports, leisure and Hospitality FM Support Services</p>
Supply Chain	<p>Foodbuy Team Ensuring a resilient Supply Chain through its functions of: Foodbuy Support Line Category Development Sourcing Business Support Supply Chain Team Vendor Assurance</p>
Resources	<p>Telecommunications Information systems All data in use Office buildings Facilities People</p>
Disaster recovery	<p>We have a number of prevention and detection tools in place which are monitored by our security centre 24/7. All critical applications have Technology Continuity Plans and are regularly updated and tested at least annually. Any failures during testing is tracked by our compliance team until remediated.</p> <p>Sites also have both technical and / or non-technical continuity plans (dependent on site and requirements).</p>
Stakeholders	<p>Compass UK & Ireland Board, Sector MDs Shareholders Customers Staff and their families Suppliers</p>

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Areas of Compass UK & Ireland falling within the scope of the BCMS	
Incidents and Scenarios	<p>Any incident leading directly to the prolonged evacuation or unavailability of Compass facilities.</p> <p>Prolonged failure of the Compass internal and/or customer-facing IT network</p> <p>Absence due to illness, including pandemics such as COVID-19 and influenza, of significant numbers of Compass Staff</p> <p>Serious injuries or fatalities to an employee, customer or member of the public</p> <p>Food safety incidents affecting a number of customers</p> <p>Any incident which damages the environment including fire or flood</p> <p>Theft/robbery; risk of legal action e.g. closure notices; industrial/staff relations; dawn raids, sabotage</p> <p>Issues where clients/staff/public say they will involve the media to seek resolution</p> <p>Client/supplier issues e.g. risk of contract following an incident</p>
Timeline based on Business Impact Analysis	<p>The assessment of impact and planning of response and contingencies will be based upon elapsed time following the interruption of operational activities, constituting the 'timeline' based on the Business Impact Analysis.</p>

The requirements of this policy relate only to the areas of Compass UK & Ireland listed in the table above as being within the scope of the BCMS.

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6 Business Continuity Management Principles

6.1 The BCMS is based upon ISO22301:2012 Business Continuity Management System Requirements and includes the following components:

6.2

BCM Component	Practical Requirement(s)
Business Impact Analysis	Assessment and analysis of Compass's operational activities and services, and their relative criticality.
Risk Assessment	Assessment and analysis of the risk of occurrence of disruptions to Compass's activities and controls applied to reduce the risk to an acceptable level.
Invocation Arrangements	Documented, tried and tested procedures for invoking aspects of the BCMS arrangements to deal appropriately with incidents.
Disaster Recovery	Arrangements for the restoration of services or the provision of alternative enabling resources.
BC Planning	Documented plans at Administration Centre, Sector and unit levels, which set out key actions to be taken in response to a variety of scenarios and showing how activities will be restored.
Culture	An ongoing programme of training and awareness activities aimed at maximizing the awareness of BCM amongst all staff and stakeholders and securing collaborative 'buy-in' so as to ensure the continued and proactive operability and maintenance of the BCMS.
Testing	An ongoing programme of activities that test all aspects of the BCMS, thereby proving its adequacy and operability and providing assurance to the Compass UK & Ireland Board of Directors.

7 BUSINESS IMPACT ANALYSIS

7.1 The key objective of the BCMS is the limitation of impacts arising from a disruptive incident with an appropriate combination of proactive (avoidance) and reactive (response) measures. However, it is recognised that Compass must be prepared to accept a certain level of impact in the event of an interruption, not least so as to limit the level of expenditure on risk controls and resilience measures to that which is appropriate for the Compass risk appetite.

7.2 Compass will review the criteria for the assessment of impact. These criteria will include, but will not be limited to, impacts whose nature is:

- Financial
- Reputational
- Affects customer service/satisfaction.

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The table below defines the levels of impact that are used in making assessments.

Level		Impact
Very High	5	Impact that is likely to terminate Compass's existence
High	4	Impact that exceeds the Compass's risk tolerance, but from which it would expect to eventually recover
Medium	3	Major loss of business value
Low	2	Significant loss of business value
Very Low	1	Minor loss of business value

7.3 The Compass UK & Ireland policy is that any risk with a Very High impact must be mitigated and that very low impact levels are automatically accepted.

8 Maximum Acceptable Outage

8.1 Generally, the impact experienced following a disruptive incident will continue to increase with time, until the service is resumed. The priority and resource resilience given to each activity is established on an objective basis, so the Maximum Acceptable Outage (MAO) is a function of the rate of increase of impact in relation to the Minimum Business Continuity Objective for the activity.

8.2 For each activity, the MAO is the point on the timeline at or before which the activity must be resumed, so that the resulting impact will be within the MAO.

8.3 The Recovery Time Objective (RTO) for each activity may be a time period shorter than the MAO, and certainly not longer, allowing for the gradual recovery of activities and where the activity can, in any event, be recovered much more quickly.

8.4 Business Impact Analysis will be carried out using the Compass BIA template and the use of this template will reflect these principles.

8.5 Crisis Management Plan

This Strategic Plan provides a UK & Ireland Response to a high impact incident which has the potential to affect multiple sites across the business. Examples of such incidents include food contamination, industrial disputes, natural disasters, terrorism and sabotage.

The Crisis Management Team (CMT) is a small team so that it can operate effectively and quickly. The CMT will assess the severity of the incident and the wider implications. They will then agree a strategy and response and from a business continuity perspective, create a plan of action, mobilising the necessary resources. The UK and Ireland Executive will be kept up to date and provide strategic oversight of the crisis.

Each member of the Crisis Management Team will have a designated alternate and can be contacted using the AlertMedia crisis communication system.

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Name	Role	Alternate
Mark Armstrong	CMT Leader	Nick Bracken
Jodi Lea	Legal	Howard James
Keely Coates	Finance	Damien Barne
Finola Carey	HR	Susan Lee
Lucy Hunt	Communications	Melanie Downs
Nick Bracken	Resilience	David Crowe
Mike Moss	Foodbuy	Emily Ryan

9 RESPONSIBILITIES

- 9.1** The Managing Director is accountable to the Board of Directors to achieve our Corporate Objectives even if we experience an unforeseen Incident and to maintain Compass Group as a robust and resilient organisation.
- 9.2** The Crisis Management Team, determines the scope, provides resources, develops timeframes and defines responsibilities for the Business Continuity Management System.
- 9.3** The Head of Risk and Resilience, Nick Bracken is responsible for:
- Development and implementation of the BCMS
 - Business Continuity Training Plan
 - Business Continuity Exercising Plan
 - Build and maintain positive relationships with clients and their BC reps.
 - Provision of specialist expertise and experience to ensure the business meets its BC obligations.
 - Tactical support to units.
 - Audits to check standards; prepare units; investigate incidents
- 9.4** Operation Directors/Regional Managers are responsible for the tactical response structure and maintenance of the Sector Business Continuity Plans.
- 9.5** Head Office Function Directors/Managers are responsible for the tactical response structure and maintenance of the Head Office Business Continuity Plans.
- 9.6** The Head of HR is responsible for ensuring that the detailed BCMS requirements of individual roles are contained in their job descriptions.
- 9.7** Unit Managers are responsible for the operational response structure and maintenance of the Sector Business Continuity Plan.
- 9.8** Approvals of any and all material changes to the BCMS policy will be approved by the Chair of the Crisis Management Team.
- 9.9** The chair of the Crisis Management Team will report to the Board of Directors on a regular basis that, through appropriate testing of the BCMS and fulfilment of all

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maintenance actions in respect of plans and contingencies, that Compass business interruption risks are being appropriately and effectively managed.

10 Testing and Maintenance

10.1 The BCMS will be tested on a regular basis, including:

- Desktop rehearsal of Head Office Business Continuity plans at least every 12 months.
- Desktop rehearsal of Critical Functions Continuity and Disaster Recovery Plans at least every at least every 12 months
- An exercise of outsourced Disaster Recovery arrangements at least every 12 months.
- Post exercise reports will be submitted to the Head of Risk and Resilience and reviewed by the Crisis Management Team to identify any learning outcomes and business improvements.

10.2 A detailed testing plan will be subject to approval annually by The Crisis Management Team.

10.3 Changes in business strategy, legislation, and risk (either financial or operational) are notified to the Business Continuity Manager by the Incident Management Team Leaders and Sector Plan owners as and when they occur, and the business continuity arrangements – and the test programme – are updated to take account of these changes.

10.4 It is a requirement of the change control procedure that changes to business processes, assets and systems should be reflected in the business continuity arrangements. Specifically, changes to personnel, addresses or telephone numbers, locations, equipment, systems, facilities, contracts or key customers, must be incorporated into updated versions of the business continuity plans. The plan should be reviewed on a quarterly basis.

11 Training and Awareness

11.1 Compass Group recognises that the BCMS will be most effective when all employees/staff and stakeholders have an appropriate level of awareness of resilience, contingencies and response plans.

11.2 The Head of Risk and Resilience is responsible for developing and implementing a BCMS awareness and education programme.

11.3 All Unit Managers will be required to familiarise themselves with Unit Managers Emergency Manual and its processes.

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12 Document Owner and Approval

The Chair of the Business Continuity Steering Group is the owner of this document and is responsible for ensuring that this policy is reviewed in line with the requirements of the BCMS.

The current version of this document is available to all members of staff on the Compass Group Health and Safety Website.

This document is approved by the Chair of The Crisis Management Team on the issue date shown and is issued on a version controlled basis under his signature.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial Issue	Roger Downing	March 2015
2	Annual Review	Roger Downing	March 2016
3	Annual Review	Roger Downing	March 2017
4	Annual Review	Andy May	March 2018
5	Annual Review	Mark Armstrong	May 2019
6	Annual Review	Mark Armstrong	December 2020
7	Annual Review	Mark Armstrong	September 2021
8	Annual Review	Mark Armstrong	December 2022
9	Annual Review	Mark Armstrong	October 2023
10	Annual Review	Mark Armstrong	December 2024
11	Annual Review	Nick Bracken	December 2025