COMPASS GROUP

GLOBAL SAFETY STANDARDS



April 2026

PURPOSE

At Compass, a culture of care, respect and safety is paramount in everything we do. We have a moral obligation to safeguard each other, our customers and the environment by aspiring to operate a safe, injury free and healthy workplace serving food that is always safe to eat and providing service with customer and community safety top of mind.

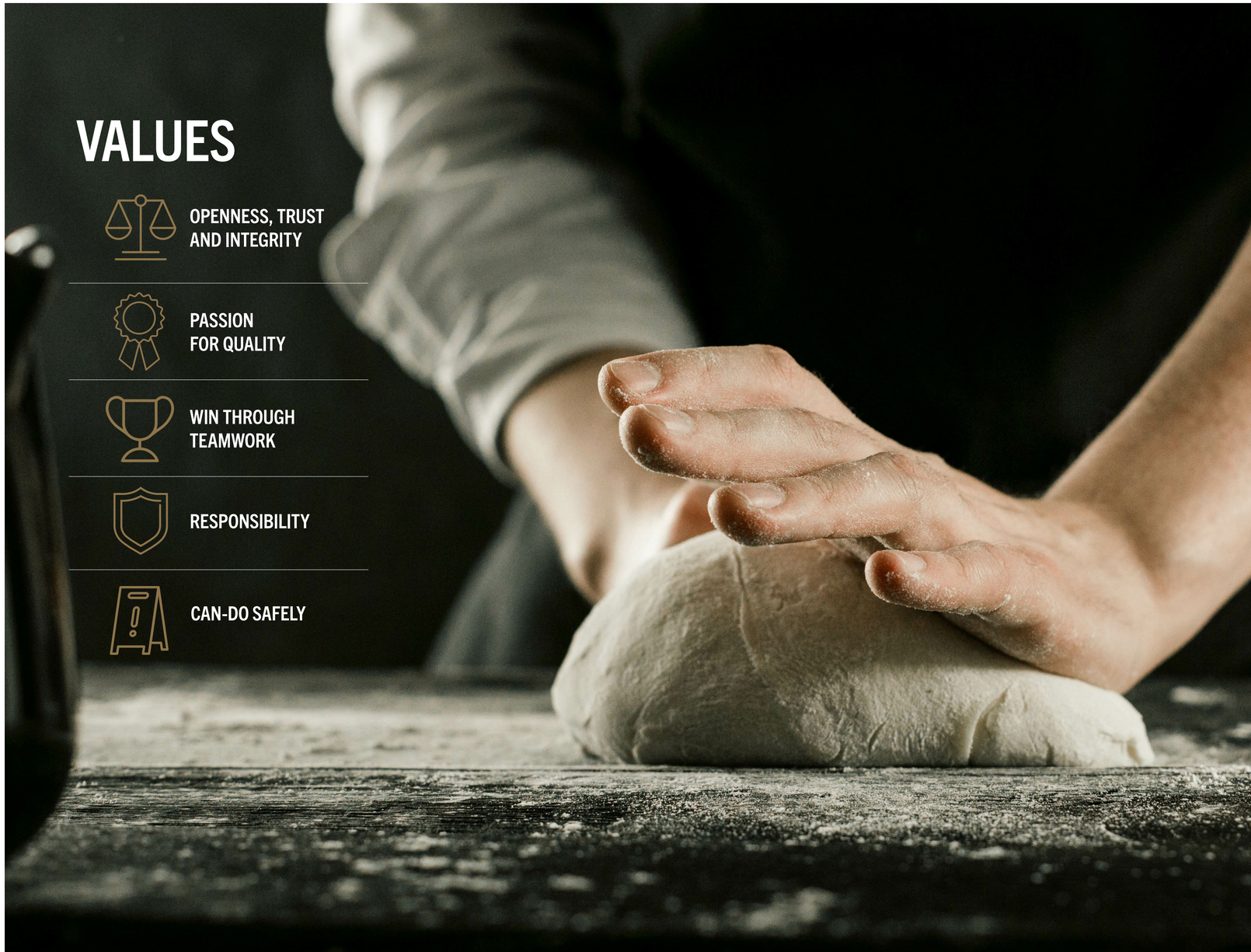
People are at the heart of who we are and the services we provide. Our safety culture emphasises the fundamental importance of prevention and intervention. Through awareness, information sharing and training, we empower our people to take individual and collective responsibility for their own safety and the safety of those around them.

Our core Values and Global Safety Standards guide the decisions, actions and behaviours of our people and serve as a foundation for the way we conduct business.

Compass is committed to upholding the highest standards of safety. It is the responsibility of all leaders to prioritise the health and safety of our colleagues/associates and customers by implementing the best safety practices to meet the diverse demands of our business.

The Global Safety Standards were developed to serve as the foundation for required minimum operational safety standards in all markets. While Regional and Country Safety Leaders are responsible for communicating and assuring minimum operational safety standards, safety is a shared responsibility—from leadership through to frontline employees. Operating under the following framework will best support a culture that places a high level of importance on safety beliefs, values and attitudes.

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COMPLIANCE WITH GLOBAL SAFETY STANDARDS

A freedom-within-a-framework approach should leverage the most stringent safety standards across Compass (Global and Regional), as well as applicable Country and Client requirements. You must ensure that you read, understand, and comply with these standards at all times. You must avoid any activity or behaviour that could lead to a breach of the standards set forth.

Compliance with the Global Safety Standards and any applicable local safety standards will be subject to periodic review and assurance by Group Internal Audit, in coordination with relevant regional and local stakeholders, to ensure effective implementation and ongoing compliance.

If you know of or suspect a breach of these standards, you may raise your concern with your manager, your local Human Resources Manager or Listen Up Champion, a member of your country, regional, or Group Legal team, or a member of Group Ethics & Integrity.

Anyone found to be in breach of the Global Safety Standards may be subject to disciplinary action, up to and including dismissal.

GROUP OPERATING MODEL: 3Cs OF SAFETY

Freedom within a framework

CLIENT

Client specific safety protocols critical to business needs should be considered and implemented so long as they are not in conflict with local regulations, nor create undue operational hardship.

COUNTRY

Recognising business climate, customs and culture differ from country to country, region to region; leadership in each locality adopts safety processes, policies and framework which properly reflect country regulatory requirements and increase risk awareness and preventative behaviours.

COMPASS

Our Global system for managing safety and health is aligned with our business culture, values and processes. The foundation of our framework is evidenced in our Global Safety Standards. Compass Global standards and policies should underpin Country and Client specific requirements.

SAFETY FUNDAMENTALS



- **Safety fundamentals are non-negotiable and represent a minimum common denominator for all countries**
  - Expected safe behaviours are defined for all colleagues/ associates. All colleagues/associates are held accountable for adhering to these safe behaviours
  - Adherence to the Global Safety Reporting Guidelines Policy
  - Only perform tasks that you have been trained in and authorised to conduct by your manager

- **Stop unsafe work:**
  - Assess the risk before undertaking any task
  - Stop your work or that of your colleagues/associates should you spot any risk which has not been identified and properly addressed
  - Correct use of PPE as per unit risk assessment (PPE standards reviewed and approved by country leadership team)
  - Facility and equipment conditions, including cleanliness, disrepair, and water sources in higher-risk areas, must be routinely assessed regardless of ownership, with clear leadership reporting to address risks that could contribute to unsafe services and negatively impact consumers.

- **While driving:**
  - Mandatory use of safety belts
  - Adhere to posted speed limits
  - Use of phone strictly through hands-free set
  - Fatal risks are clearly identified and control frameworks are in place and verified

LEADERSHIP

- Annual Country Leadership acknowledgment/sign off (documented) certifying understanding and adherence to global safety standard expectations
- Ensure Safety integration in the business through Safety senior leader directly reporting to Country Leadership Team (LT)
- Leadership Team (LT) Safety Walks are conducted at Units
- Safety assessments completed by units, Country Safety Team and second/third party auditors are reported to LT
- Safety Committees/Councils established in country (MD+LT+Regional Directors), during which review of serious incidents and safety performance take place on a regular basis (ideally monthly)
- There is an up-to-date and sufficiently comprehensive set of written Food and Workplace Safety policies and procedures that are leveraged across the business via training and self-certification audits/checklists
- Leadership campaigns focused on commitment to maturing safety culture
- Safety objectives incorporated into individual LT performance
- Safety Performance to be included in sector and country business reviews



COMMUNICATION & TRAINING

- There is formal management reporting around number and nature of incidents (F ood Safety and Workplace Injuries) at unit, sector and regional level. Safety related KPIs exist and are formally communicated within the business.
- Active colleague/associate safety engagement – examples of engagement may include colleague/associate led safety huddles, pre/post-shift safety briefings, peer to peer safety observations, etc.
- Protocol in place for sharing of lessons learned from incidents (food and workplace safety related) with prescribed corrective actions to prevent incident recurrence
- Safety ‘stand downs’ are undertaken in the event of a serious incident (including near-misses that had potential to be serious)
- Clear in-unit signage on HACCP controls should be prominently displayed, tailored as appropriate to the unit’s layout, equipment, and operational needs.
- Countries shall have a documented Safety Training Policy outlining mandatory training for all colleagues/associates, supported by training curricula or course outlines that cover key topics such as workplace safety, food safety, and allergen management.
- Countries shall document and oversee attendance and completion rate records centrally including face-to-face, online and site based training sessions for all required safety training courses.





SAFETY MANAGEMENT SYSTEMS & CONTROLS

- Safe work practices/processes have been documented and are available to all units.
- Documented Safety Management System(s) in place specific to Policies, Procedures and Processes.
- Employees follow written programs on employee hygiene practices and personal protective equipment.
- Safety Risk assessments are proactively conducted at regular intervals, supporting the identification of potential hazards and determining appropriate measures to mitigate or manage those risks.
- Digital Safety Management System(s) in place that supports safety inspections, incident management and data insights.
- Systems and alerts are in place and monitored to identify non-compliance and/or systemic safety issues found within the business.
- Safety Metrics are reviewed by country LT on a monthly basis and annual reduction limits are established.
- Internal (unit self-assessment + Safety Team) and External Audit program in place, with verification process to ensure corrective actions are completed.
- Compass HACCP fully in place (as per the local food safety management system and in accordance with the globally recognised HACCP principles). HACCP plans must be reviewed regularly and after any changes to the service model.
- Critical Control Points [CCPs] are identified within the local HACCP plan and employee training materials. Monitoring procedures are documented and are validated during on-site inspections.



SAFETY MANAGEMENT SYSTEMS & CONTROLS

- Minimum Mandatory Control Points [CPs]/CCPs: Temperature recording/monitoring around Receiving/Delivery, Storage, Defrosting, Cooking, Cooling, Reheating, Hot-Holding and Cold-Holding.
- CPs/CCPs must be managed, monitored, and recorded in alignment with the Group Minimum Requirements Matrix.
- Specific CPs/CCPs may vary based on locale but must be clearly defined within each Country Food Safety Management System [FSMS]. CCPs should be visibly identifiable in all relevant operational areas.
- Allergen Management control programs are developed in accordance with local regulatory standards and in compliance with the Global Allergen Management Plan. Countries must demonstrate a documented Allergen Management Program outlining allergen policy, checks, labelling, menu review, and communication protocols. Controls are validated through on-site inspections and include pre-service allergen checks, clear customer-facing allergen signage and/or product information cards and controls to prevent cross-contact during receiving, storage, handling, and use.
- Contracted Suppliers: Each country is required to adhere to the Global Supply Chain Integrity Standards and maintain documented evidence of compliance with risk assessment and supplier approval procedures.



CENTRAL PRODUCTION UNITS (CPUs)/COMMISSARIES

GLOBAL FOOD SAFETY NON-NEGOTIABLES

COMPASS GROUP

DEFINITION

Central Production Unit (CPU)/Commissary: A Compass Group operated, dedicated food production unit, exclusively producing items for off-site distribution to separate Compass units/client sites for final preparation, service, or sale.



PURPOSE AND SCOPE

This document highlights 18 core group-mandated food safety requirements for all in-scope global CPU/Commissary sites:

1. Regulatory approval
2. Site design and layout
3. Medical screening/personal hygiene and PPE
4. Food safety leadership
5. Food safety and quality management system
6. Waste management
7. Pest management
8. Maintenance program
9. Cleaning program
10. Labelling/traceability
11. Bespoke HACCP plan
12. Validation of shelf life and cooking instructions (as applicable)
13. Sampling program
14. Business continuity plan (BCP)
15. Incident management/product withdrawal process
16. Digital HACCP implementation
17. Food defence
18. Third party certification

Further details on each of these food safety requirements can be found on the following pages.

As a global document, we recognise variance with specific nomenclature is inevitable. The requirements reflected within should connect well with established local or regional regulatory standards. However, should you have any questions or require further guidance, please engage with your National/Regional/Global Safety leads for further discussion and interpretation.

It is important to note that these specific requirements do not replace any more stringent national, regional or global Compass requirements or corresponding legal requirements that either apply exclusively to CPU's/Commissaries or across all Compass operations within any given geography.

In line with our 3C's operating model, and alongside our **Global Safety Standards, Supply Chain Integrity Standards** and **Allergen Management Plan**, these requirements are intended to underpin Country and Client specific requirements:

Please see page 3 for more detail on our 3C's operating model.

GROUP OPERATING MODEL: 3Cs OF SAFETY
Freedom within a framework

CLIENT

COUNTRY

COMPASS

FOOD SAFETY REQUIREMENTS IN DETAIL

NON-NEGOTIABLE	DETAILS
1. Regulatory approval	All applicable regulatory approvals/licences to be in place prior to site mobilisation. (NB. In some jurisdictions, additional licencing may be required for CPUs/commissaries – for example an '853 licence' may be required within the European Union).
2. Site design and layout	The site shall be fit for purpose in terms of size, capacity and capability. The design, construction, layout, flow of processes and movement of personnel to be sufficient to minimise the risk of food contamination.
3. Medical screening/ personal hygiene and PPE	Corresponding site protocols to be in place to minimise the risk of food contamination from all personnel including contractors and visitors. Personnel access to site to be strictly controlled.
4. Food safety leadership	As a minimum, the site leader or a site leadership team member to have an in-depth knowledge of HACCP principles and be able to demonstrate competence, experience and training.
5. Food safety and quality management system	An effective, documented food safety and quality management system to be in place, maintained by a dedicated on-site individual or team.
6. Waste management	Waste disposal and removal to be carefully managed to prevent accumulation, risk of contamination and the attraction of pests.
7. Pest management	Internal and external areas to be maintained and monitored to prevent pest infestation. An effective, documented, preventative pest management program to be in place.
8. Maintenance program	An effective, documented site maintenance program to be in place to prevent food contamination and reduce the potential for equipment and vehicle breakdowns.
9. Cleaning program	All cleaning chemicals used to be suitable and appropriate for site operations. Effective, documented housekeeping and cleaning programs to be in place to ensure appropriate standards of hygiene are maintained through appropriate validation and verification and the risk of food contamination is minimised.
10. Labelling/traceability	Ingredients, semi-prepared and prepared items are clearly identified and traceable. Product identification records (including batch codes) to be maintained for ingredient and packaging receipt/usage, production and food product despatch.

NON-NEGOTIABLE	DETAILS
11. Bespoke HACCP plan	A documented, site-specific end-to-end HACCP plan (prepared in accordance with the Codex Alimentarius HACCP principles) to be in place that covers all applicable processes and food products. Sites to have designated HACCP team leaders who shall have received appropriate training.
12. Validation of shelf life and cooking instructions (as applicable)	Where applicable, food product shelf life and cooking/reheating instructions to be assigned (using an appropriate margin of safety) and reviewed in a systematic and scientific way, utilising appropriate internal or external expertise to ensure compliance with relevant microbiological, chemical and organoleptic criteria.
13. Sampling program	Sites to have implemented a documented, risk-based sampling and analysis program to verify that food, water and environmental samples meet applicable legal and safety requirements.
14. Business continuity plan (BCP)	A documented, site-specific BCP to be in place to manage the impact of a major disruption or disaster.
15. Incident management/ product withdrawal process	A documented, site-specific crisis management plan to be in place, to manage incidents that impact food safety, authenticity, legality or quality effectively, and enable the withdrawal and recall of food products as necessary. Annual risk-based withdrawal and upstream traceability challenge tests to be carried out at each site.
16. Digital HACCP implementation	As a minimum, sites to have implemented effective remote monitoring of fridge/ freezer temperatures, and to be working towards 100% digital HACCP checks with a reputable solution provider.
17. Food defence	A documented, site-wide food defence risk assessment to be in place.
18. Third party certification	As a minimum, sites to have either independent HACCP certification or site-specific ISO 22000 certification. Certification against a GFSI recognised standard is required for food manufacturing sites with elevated levels of industrial scale, automation, process complexity and stakeholder expectation.

GLOBAL SAFETY REPORTING GUIDELINES



PURPOSE AND SCOPE

This document provides a common definition of safety and regulatory incidents and establishes the minimum requirements for their accurate reporting once substantiated.

Please note this document focuses exclusively on Global Reporting Requirements (Group Safety).

Specific industry or client reporting on Health and Safety measurements may vary and our ability to report accurately on those elements should not be impacted in any way by the guidance outlined in this document.

While the definitions contained within are intended to drive conformity of reporting globally; we rely on the integrity of our Country Health and Safety professionals to evaluate each incident and the evidence provided for reporting determination.

It is the responsibility of the Country Safety team to fully understand global reporting expectations and to sign off on the safety data reported each period before it is uploaded Globally. This process will support data consistency and quality and will reduce the need for intra-year adjustments.



REPORTABLE INCIDENTS, REGULATORY ACTIONS AND SAFETY WALKS

Safety Walks completed each period

Personal safety incidents resulting in a workplace injury

Food safety incidents resulting in food poisoning, an allergic reaction or a preventable consumer-facing foreign body including any alleged to have caused dental damage or consumer injury.

Regulatory warnings or enforcement actions that could materially impact business continuity, lead to legal action, incur financial penalties/fines, or negatively impact brand reputation across all Compass Group operations globally

Fatality (non-employee) - Any confirmed or credible alleged fatality potentially linked to Compass Group operations — in either food or non-food services, and regardless of when the event occurred.

OTHER MATERIAL RISKS

This document does not attempt to define an exhaustive list of all potential material risks beyond those explicitly identified. However, Country and Regional Safety teams are expected to exercise professional judgment and escalate any material safety or regulatory risks—such as outbreaks of infectious disease or large-scale product recalls of manufactured products—to the Global Safety team for timely review and assessment.

SAFETY WALKS

Safety Walks provide Compass with a valuable opportunity to engage directly with front-line operations, observe safety practices in action, and demonstrate our ongoing commitment to a strong safety culture. It is required that Safety Walks be digitally documented and reported each period to the Regional Safety Team in a manner that is auditable and subject to review.



WORKPLACE SAFETY

All workplace safety incidents (and related metrics) relate to Compass Group employees only, including temporary workers and those workers whose wage is paid by Compass Group through an agency if their labour hours are included in MAP. Contractors should report incidents through their own company reporting systems.

The reporting of workplace safety incidents involves the following steps:

1. **Assess if the incident arises from a work related or a non-work-related activity**

- The term 'Work-Related' should be interpreted as:
  - Ability of Country Safety teams through investigation to substantiate that the injuries sustained are aligned with the work performed and in the scope of job duties
  - Substantiated injuries are those that occur during assigned working hours
  - Injuries (physical condition) sustained can reasonably be attributed to the nature of the injury description and work performed
  - Business commuting/travelling between two different work locations is included in this definition [private commuting/travelling from/to home or another destination other than the workplace is not included in this definition]

2. **For work related incidents, classify the incident according to the following categories below:**

- Fatality
- Lost Time Injury (LTI)
- Restricted Work Duty (RWD)
- Medical Treatment Case (MTC)

Accurate classification of workplace safety incidents is critical, as Compass Group globally tracks incident rates by category.

WORKPLACE SAFETY DEFINITIONS

Fatality: The Death of a company employee engaged in work-related activities, which resulted from an event or exposure in the work environment. Including any fatal accidents that occur as part of business travel (but excluding travel between home and the workplace).

Lost Time Injury (LTI): A work-related injury that requires a person to stay away from work more than 24 hours. The injury must be substantiated following appropriate investigation and Illnesses are not included. 24hrs are calculated from the time of the incident or from the time of the effective absence from work should the conditions of the person deteriorate during the days following the occurrence of the incident, if it's proven that such deterioration is directly linked to the incident itself

Restricted Work Duty (RWD): As a result of a work-related injury, a worker has to be assigned to another job or is unable to perform essential/routine job functions without modification per a medical certificate.

Medical Treatment Case (MTC): A work-related injury which is more severe than First Aid, requires more advanced treatment, yet results in no lost work time beyond the day of the injury (Needle Stick injuries through contaminated needle are to be classified as MTC).

Total Recordable Injury Frequency Rate (TRIFR) = Total number of Fatalities + LTIs + MTC + RWD / Number of MAP4 AND MAP5 employee hours worked (in millions).

Reporting Guidance:

Group Safety must be notified immediately of any fatality and within 24 hours of any catastrophic incident. Catastrophic incidents would include life-threatening injuries and/or severe burns. Routine or precautionary hospital visits that do not meet these criteria do not require Group Safety notification.

FOOD SAFETY

A food safety incident is defined as follows:

1. A substantiated case of food borne illness
2. A substantiated allergic reaction
3. A substantiated, foreign body that is discovered and reported by a guest (or consumer).

To determine whether a food safety incident should be classed as substantiated, please refer to the flowchart below:

Reporting Guidance:
It is the responsibility of all leaders to ensure timely reporting of health and safety matters across the entirety of operations. Group Safety should be notified of all Cat A incidents and all Food Safety incidents that have the potential to cause reputational harm (whether that be with the client or media). The incident does NOT need to be substantiated prior to reporting. Delay in reporting to determine root cause + negligence is not acceptable.

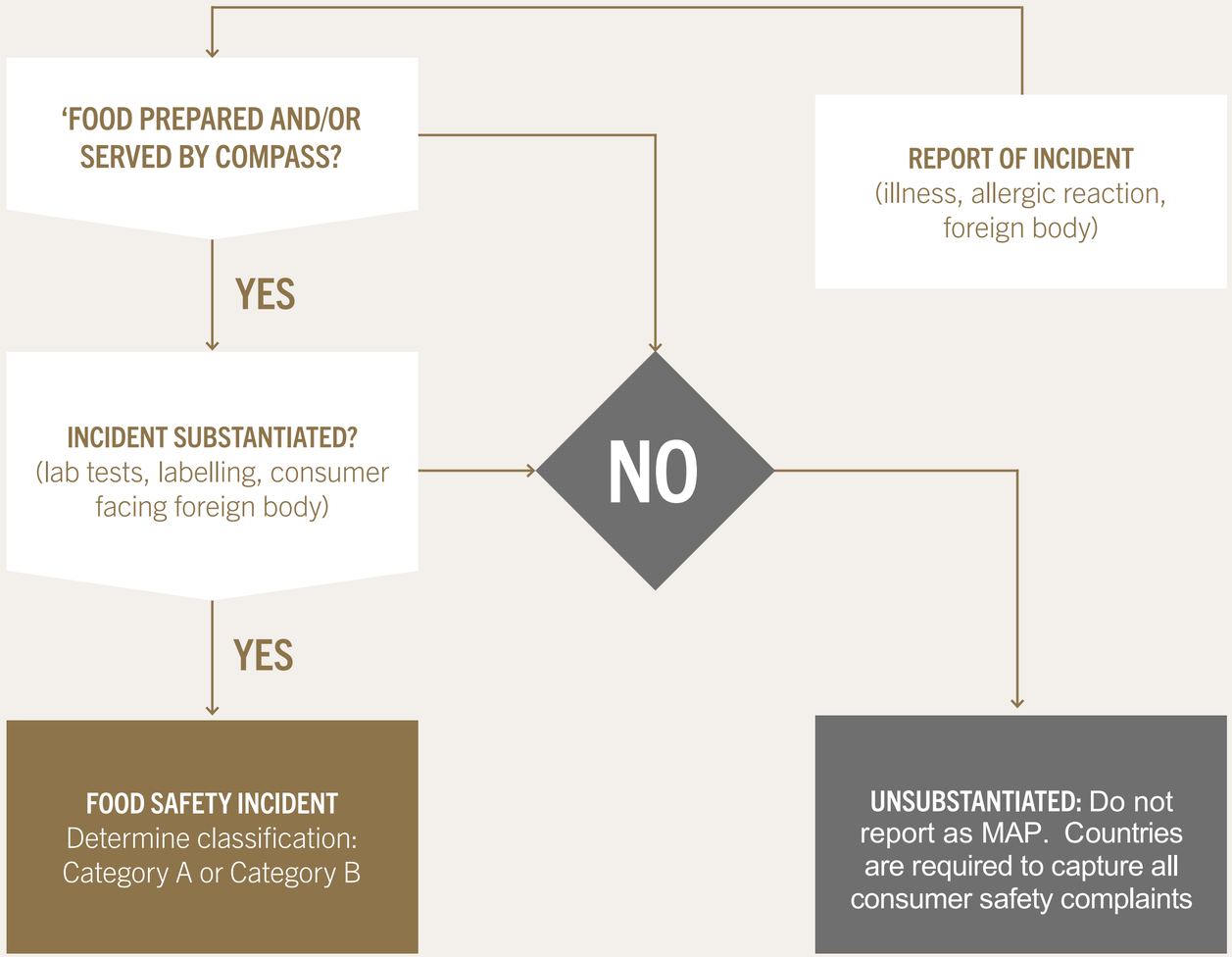
Food Safety Incident Rate (FSIR) is calculated as follows:

Material FSIR = Total number of Cat A (A1 + A2) / Total Food Cost (in GBP millions)

Total FSIR = Total number of Substantiated Food Safety Incidents ((A1+A2)x1.5)+ (B1+B2+B3) divided by total food cost (in GBP millions)

To support enhanced transparency and governance, all countries are required to capture and have capability to report the full volume of Food Safety Incidents, including both MAP and non-MAP incidents. This includes all Category A and Category B incidents, regardless of merit, outcome, or incident circumstances, to ensure full visibility of consumer complaint volume (excluding quality related complaints).

All Category A incidents must be reported in Origami in accordance with established requirements. For non-MAP incidents, countries are responsible for leveraging existing local systems or solutions to ensure complete capture and, where applicable, reporting to Regional and Group Safety on an as-needed basis. Countries must maintain an accurate and complete view of incidents reported.



Once substantiated, a Food Safety Incident (FSI) is classed as follows:

A. **Category A** = the number of food safety incidents resulting in a food borne illness or allergic reaction, of which:

- **Category A1** = the number of food safety incidents resulting in a food borne illness
- **Category A2** = the number of food safety incidents resulting in an allergic/intolerance reaction (not limited to regulatory identified allergens)

B. **Category B** = the number of food safety incidents caused by a foreign body found by a guest (or consumer) in food and products served by Compass Group, of which:

- **Category B1** = the number of food safety incidents caused by a foreign body of supplier origin, that are either:
  - specifically extrinsic* in nature and preventable at unit level
    or
  - unexpected intrinsic** bone in processed/ formed, meat/poultry/fish containing items that is alleged to have caused dental damage or consumer injury
- **Category B2** = the number of food safety incidents caused by a foreign body of unit origin or accountability (excluding suspected post-service contamination such as consumer hair or live insect when dining room pest control is not the responsibility of Compass)
- **Category B3** = the number of food safety incidents caused by a foreign body of unknown origin that are alleged to have caused dental damage or consumer injury

***Extrinsic foreign bodies** are derived from any other origin other than the plant or animal material used as ingredients. This includes human hair, insects, wood, glass, metal, stones or any other material that would make the item unacceptable from a food safety and hygiene (rather than a quality) perspective.

****Intrinsic foreign bodies** are derived from the ingredients, for example – fruit stones, vegetable leaves or egg shell.



Please note **for all food incidents:**

- A food safety incident must be substantiated following an appropriate investigation. Example: If the incident involves a foreign body, the foreign body must ideally be obtained and under the control of Compass for analysis. If the foreign body is not in our possession for analysis, a high-quality image must be provided instead. Failure to provide either means that the incident can't be substantiated.

Please note **for Category A incidents:**

- Commencing FY23, Category A incidents are now weighted 50% more heavily than reportable Category B incidents
- The number of incidents must be reported, not the number of people affected. Nevertheless, the number of people affected (actual or estimated) has to be included in the final report submitted to Group Safety leadership following the investigation of the incident
- Group Safety leadership must be notified within 24 hours of a potential Category A incident being identified, utilising the Origami platform.

Please note the following exclusions in the reporting of Category A incidents:

If after thorough investigation, a Cat-A food safety incident is deemed in its entirety to be the result of a substantiated failure in the supply chain, with all corresponding Compass vendor assurance, allergen management, hygiene and HACCP protocol compliance evidenced, then the incident shall be deemed for the purposes of reporting, as unsubstantiated.

Please note **for Category B incidents:**

- All consumer-facing foreign body incidents of supplier origin must be followed up and closed-out with the corresponding supplier

Supplier origin (or accountability) has to be considered substantiated when:

- The foreign body is identified as directly attributable to a supplier beyond reasonable doubt
- In all cases the foreign body would be reasonably expected to be absent from the purchased product

Please note the following exclusions in the reporting of Category B1 incidents:

- Pre-packed retail snack items and boxed meals produced in a non-Compass facility (e.g. bought-in, pre-packed sandwiches from a wholesaler/ manufacturer) are excluded from Category B1
- Extrinsic foreign bodies are excluded from Category B1 if they are 100% embedded (and therefore impossible to identify and remove at unit level) in a pre-prepared item/meal prepared in a non-Compass facility, unless dental damage or consumer injury is alleged.
- Intrinsic foreign bodies (e.g. a chicken or fish bone) are excluded from Category B1 (with the exception of unexpected bone in processed/formed meat/ poultry/fish containing items that is alleged to have caused dental damage or consumer injury)

- **Example 1:** A piece of metal wire within a sausage caused injury to a consumer. Although this was 100% embedded within a pre-prepared item from a non-Compass facility, it was alleged to have caused injury so is reportable as a Category B1 incident
- **Example 2:** A consumer finds an insect in fresh broccoli, as a component of a plated meal that was prepared at the unit. This is reportable as a Category B2 incident as this was found in an unprepared item that had subsequently underwent a process step at unit level (washing/treatment/inspection) designed to specifically reduce or remove this type of foreign body
- **Example 3:** A consumer finds a metal coin within a boxed meal sourced from a local restaurant. This is not reportable as a Category B1 incident as the meal was prepared in a non-Compass facility
- **Example 4:** A consumer finds a piece of red plastic that was 100% embedded within an individual pie that was produced in a Compass Central Production Unit (CPU). This is reportable as a Category B1 incident as the item was prepared in a Compass facility
- **Example 5:** A consumer finds a strand of human hair partly embedded in a sausage.This is reportable as a Category B1 incident as the item was not 100% embedded within the item and therefore was preventable at unit level
- **Example 6:** A consumer finds a piece of bone in a bowl of unit-prepared chicken soup that is alleged to have caused dental damage. This is not reportable as a Category B1 incident as it is not classed as 'unexpected' and is not within a food classed as a 'processed/formed meat/poultry/fish containing item'

Unit origin (or accountability) has to be considered substantiated when:

- The foreign body is identified as directly attributable beyond reasonable doubt to the unit environment and equipment **OR**
- The foreign body is identified as directly attributable beyond reasonable doubt to the processes, food preparation, handling and other behaviours of Compass Group employees working in the unit
- **Example 7:** A consumer finds an insect in salad. Upon investigation, it is found that the salad was delivered as a packaged salad mix, clearly labelled with the instruction to 'wash before use'. As a Compass employee should have identified the insect during the process of food preparation, this is reportable as a Category B2 incident
- **Example 8**: A consumer finds an unidentified, melted plastic object in a hot meal prepared by the unit. The incident is substantiated as the object has clearly undergone cooking as it has been distorted by heat, however the origin of the object cannot be confirmed. This is not reportable as a Category B3 incident as dental damage or consumer injury was not alleged

REGULATORY ACTIONS OR ENFORCEMENT ACTIONS

To ensure timely, transparent, and consistent reporting of significant regulatory warnings or enforcement actions that could materially impact business continuity, lead to legal action, incur financial penalties/ fines, or negatively impact brand reputation across all Compass Group operations globally (a **'Material Event'**).

DEFINITION

For the purposes of this reporting requirement, a material event includes, but is not limited to:

- Regulatory warnings, citations, or notices of violation that have the potential to cause substantial operational disruption or materially impact service delivery
- Enforcement actions imposed by local, regional, or national authorities which carry fines/penalties
- Legal or governmental actions arising from food safety, health, or environmental non-compliance
- Any incident with credible potential to cause significant reputational harm to Compass Group or its brands

REPORTING REQUIREMENT

- All regulatory warnings, citations, notices of violation, enforcement actions, and similar activities must be tracked and documented. Countries are responsible for applying their internal escalation criteria based on the nature of the incident.
- All **Material Events** must be escalated immediately to the Country MD and Country General Counsel, Regional MD and Regional General Counsel and Regional/Global health and safety leaders.
- **Material Event** reporting must include details of the regulatory body, nature of the issue, potential impact, and immediate mitigation actions taken. A follow-up report should outline corrective measures, timelines, and communication plans to internal and external stakeholders, where applicable

EXCLUSIONS:

Routine regulatory oversight involved in securing business, operating, and food service permits and licenses.



FATALITY

The purpose of this standard is to ensure immediate, transparent, and consistent reporting when made aware of any confirmed or credible alleged fatality that may be linked to Compass Group operations. Timely escalation enables appropriate leadership oversight, legal and compliance coordination, and compassionate engagement with affected individuals or stakeholders.

This requirement reinforces Compass Group's commitment to maintaining the highest standards of safety governance, accountability, and duty of care across all operations, ensuring that serious incidents are managed with urgency, integrity, and sensitivity.

DEFINITION

Any confirmed or credible alleged fatality potentially linked to Compass Group operations — in either food or non-food services, and regardless of when the event occurred.

REPORTING REQUIREMENT

Any confirmed or credible alleged fatality potentially linked to Compass Group operations must be immediately reported to the Country MD and Country General Counsel, Regional Safety Leader and Regional General Counsel, and Group Safety Leader in accordance with Compass Group's global escalation protocols.

This requirement applies to all Compass Group countries, businesses and sectors, encompassing food and non-food service operations, including subsidiaries, joint ventures, contractors, and managed sites.

It applies regardless of:

- When the event occurred (current or prior fiscal years),
- Where it occurred (on-site, off-site, or in transit), or
- Whether it involved employees, contractors, clients, visitors, or members of the public.

MOTOR VEHICLE COLLISION RATE

Please record the total number of Motor Vehicle Collisions involving direct employees that have a contract with the company. It does not relate to contractors who should report through their own company systems.

Motor Vehicle Collisions - Light (Light MVC) & Serious (Serious MVC):

- **Light MVC** - any MVC involving a olleague/associate sustaining minor injury (First Aid Case), or property damage in excess of $10,000
- **Serious MVC** – where the involved employee(s) sustains a Medical Treatment Case and/or a Restricted Work Duty injury; involved vehicle is towed from the scene or cannot be driven on its own power in a roadworthy state.

Motor Vehicle Collisions - Major (Major MVC) & Catastrophic (Catastrophic MVC):

- **Major MVC** - any MVC involving an employee sustaining a Lost Time Injury (LTI) or Days Away from Work
- **Catastrophic MVC** - any company employee or third-party fatality associated with an MVC

No. of driven Kilometres (millions):
Please record the total number of kilometres (millions) driven in motor vehicles by direct employees conducting company business. It does not relate to contractors who should report through their own company systems

Motor Vehicle Crash rate (per 1m kms):
Motor Vehicle Crash Rate (MVCR) = # of motor vehicle collisions (Light+Serious+Major+Catastrophic) / number of driven kilometres (millions)



Mergers, Acquisitions, and New Business Integration: Safety Requirements

All newly acquired businesses and new contracts must align with our Global Safety Standards as a fundamental condition of integration. Safety compliance is non-negotiable and must be prioritized from day one, with safety considerations fully integrated into the due diligence process.

Immediately upon acquisition or contract commencement, a comprehensive Safety Gap Analysis must be conducted to assess current practices against our Global Safety Standards. At the same time, the business must demonstrate full compliance with all applicable local regulatory and legal requirements; including, where appropriate, infrastructure.

Based on the findings of the Gap Analysis, a clear integration roadmap will be developed and implemented. This roadmap must define clear actions, responsibilities, and milestones required to achieve full alignment with our standards.

Notwithstanding the need to achieve regulatory compliance as soon as possible, all newly acquired and onboarded businesses are expected to achieve full compliance with our Global Safety Standards within a maximum of six (6) months. Leadership accountability is essential to ensure timely and effective integration. Progress must be actively monitored, with clear escalation of any barriers to achieving compliance.

COMPASS GROUP

GUIDANCE NOTES

LEADERSHIP

Leadership is defined as Country MD's/Sector CEO's and their immediate direct reports. Countries have the option to expand the definition of leadership more broadly as they see fit based on varying operational design.

DIGITAL SAFETY MANAGEMENT SYSTEM

A Digital Safety Management System is a software-driven framework designed to manage, monitor, and improve safety processes and compliance in a structured and automated way, replacing traditional paper-based systems by integrating technology to centralise monitoring, reporting, analytics, and decision-making while streamlining workflows, data collection, and safety performance insights.

SAFETY COMMITTEE / COUNCIL

A formal group responsible for overseeing, improving, and sustaining safety performance by identifying risks, strengthening controls, and promoting a strong safety culture.

MANDATORY TRAINING

Mandatory training consists of required training driven by regulatory, legal, safety, or company policy requirements. Mandatory training must be documented in a Safety Training Policy, completed within defined timeframes, is role-specific or enterprise-wide, and requires formal documentation and tracking. Mandatory training can be delivered to teams face-to-face, online or at site /unit level, but must be centrally documented. Records are only required for mandatory training. Records are not required for other training such as ongoing, operational coaching and reinforcement that occurs as part of normal business operations (such as shift/service huddles, on-the-job coaching, and real-time feedback).

SAFETY WALK

Safety Walks are a structured, proactive activity conducted by leaders and team members to engage with the workforce, promote open dialogue, recognise positive safety practices, and identify operational safety opportunities through documented observation and discussion. Countries are required to leverage a digital solution to formally record Safety Walk completion and associated actions.

RISK ASSESSMENT

A systematic evaluation of the unit’s infrastructure, equipment, and operational tasks to identify potential hazards. The assessment must document control measures and mitigation actions designed to reduce identified risks to a level that is as low as reasonably practicable.